

## **LULUCF: the ‘No Loopholes’ Environmental Integrity Package for Ministers**

From the Ecosystems Climate Alliance: [www.ecosystemsclimate.org](http://www.ecosystemsclimate.org)

### **Closing LULUCF loopholes**

The Forestry and Land Use sector (LULUCF) is responsible for at least 30% of global emissions and has huge emission reduction potential. Loopholes in coverage across land and forests of developed countries currently undermine emissions reduction and the integrity of targets. Ministers, here are your options on the table to contribute to ambitious emissions reductions with LULUCF.

### **More comprehensive accounting**

Our key demand is that all significant sinks and sources of emissions are mandatorily accounted for in the land use sector. This should include at least ‘forest management’ and ‘wetland drainage and rewetting’. Each accounts for about half a billion tons of emissions in developed countries each year. You should also agree on a SBSTA work program to assist parties to move as soon as possible to full land-based accounting.

→ Wetland drainage and rewetting allows great emissions reductions with relatively little effort.

### **Forest Management – close the loophole**

Day to day logging activities and conversion of natural forests to plantations (all called forest management) are currently voluntary for accounting, leading to a failure to account for many emissions. Only land use change involving forests is currently mandatory for accounting (Article 3.3). Four new options are proposed by which to account for forest management. The key principle in determining which option to choose must be that it compares emissions to an historical baseline and incentivizes reductions below this level, given that in the Kyoto Protocol we are attempting to reduce emissions from 1990 levels.

There is only one option on the table that has no loopholes, has environmental integrity and is consistent with accounting in other sectors – Option 3 (*net-net accounting relative to the first commitment period*). So, this shouldn’t take long to decide. Projected reference levels should be refused. They just inflate emissions in the baseline and therefore only reduce emissions on paper, not in the atmosphere. Choosing projected reference levels would make the LULUCF sector outrageous compared to other sectors; becoming the notorious rotten apple in the KP basket.

**Close the bioenergy loophole:** bioenergy emissions should be accounted for in LULUCF and / or the energy sector, as burning wood and other biomass is emissive. Currently bioenergy is rarely accounted for anywhere, because emissions from forests and croplands are not usually accounted for.

### **Other matters relevant to accounting for forest management**

**Natural disturbance definition:** This relates to wildfire, insect and disease infestations and extreme weather events. Ensure the definition is restricted to non-anthropogenic events that are extreme and infrequent.

**Harvested wood products:** This is about trying to claim credits for wood even when it moves beyond the boundaries of forest management into other sectors, and would further skew accounts to overstate removals. Retain the rule that requires instant oxidation for all harvested wood products.

**Forest definitions:** The current definition of ‘forest’ adopted for use in LULUCF fails to differentiate between natural forests and plantations. It contributes to failure to account for emissions. The best way to solve this is to adopt the subsidiary forest categories of the FAO and to activate the decision that SBSTA explore a biome-based definition of forest (Decision 11/CP.7 Land use, land-use change and forestry).

**‘Flexible land use’:** This proposal would undermine the existing rules under Article 3.3 for deforestation, afforestation and reforestation so as to evade accounting for substantial emissions and must be rejected.

**Imposing a cap on credits / debits:** A cap is an attempt to limit the worst excesses of A1 loopholes on emissions, but it doesn’t solve the problem and it limits incentives for real emissions reduction.

A cap on debits is an outrageous proposition as it would limit a party’s obligation to account for emissions.