



Policy Brief to AWG-KP15 with regard to LULUCF

By Wetlands International on the need for mandatory accounting for 3.4 LULUCF activities + wetland management, d.d. 22 November 2010

The current 3.4 voluntary activities of cropland management, grazing land management and revegetation are rarely selected as an accounting activity, while the emissions, and mitigation potential are both significant in many situations. Many countries have elected not to account for emissions and removals from forest management. Finally, there is currently no category that allows for the accounting of emissions and reductions from wetland management.

Not accounting for these emissions not only means that these emissions are 'hidden', but also means that there is no incentive to reduce them, which means missing interesting, feasible and often 'low hanging fruit' mitigation opportunities, which would help Annex I countries to achieve more ambitious emissions reductions targets.

Wetlands International supports an ambitious work programme that leads to comprehensive accounting. For the second commitment period we support the adoption of the following LULUCF accounting proposal in Cancun:

- Accounting for emissions/removals from forest management be made mandatory;
- All existing 3.4 activities to be made mandatory, using a hotspot approach to address progressive resolution of data quality issues (see below);
- A new accounting activity should be added for 'wetland management' (which would include all lands that have been drained or rewetted and are not accounted for under any other 3.4 activity)
- A SBSTA work programme to support and facilitate all countries in meeting these more onerous reporting requirements and estimating their emissions from land uses activities under Article 3.4 in the most accurate and practicable way given the available resources.
- Establish a work programme for joint efforts to support countries that lack capacity to meet these more onerous reporting and data quality requirements
- Apply the conservativeness principle (already applied in 16/CMP.1, paragraph 21): as long as sufficient accuracy is not achieved, reduction estimates should be at the low side, by assuming low-side-of-the-range emissions in the baseline and high-side-of-the-range emissions in the commitment period.
- Monitoring of greenhouse gas emissions needs to be carried out in accordance with methodological guidance developed by the SBSTA including the use of the 2006 IPCC guidelines, or any subsequently revised IPCC Guidelines once approved by the IPCC.

Wetlands International believes a more comprehensive accounting programme is feasible. Capacity, methodologies and guidance for reporting and accounting for the most significant pools of emissions are either already available or within reach. Strong incentives towards more comprehensive accounting will enable further investments to address issues in relation to any outstanding methodologies or capacity-building (as we see for REDD+ readiness).

Parties should concentrate their MRV efforts on identifying those areas of land with the most significant sources of emissions – hotspots - and estimating these activities in the most accurate and practicable way *given available resources*. Only the most significant sources need be estimated with Tier 2 or 3 methods. Tier 1 is sufficient (and already available) for the remaining areas of land.

In this way, Parties can overcome any problems of comprehensive data availability and accuracy since accounting for an activity does not mean estimating everything, everywhere with tier 2/3 methods. This approach is feasible because most emissions take place on concentrated areas of land as a result of a limited subset of activities.

The programme to introduce more comprehensive accounting has already started with the SBSTA conclusion to improve reporting guidelines on annual inventories (FCCC/SBSTA/2010/L.12) including how to address the need for and ways to clarify methodological issues related to reporting on harvested wood products, wetlands and nitrous oxide emissions from soils and also more guidance on Tier 3 approaches.

In order to have improved guidance available for wetlands before the start of the second commitment period, it should be ensured that SBSTA requests the IPCC to start a process to revise the existing guidelines which is to be finished in time before the start of the second commitment period.

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