



Feedback to the ‘Revised negotiating LCA text’ FCCC/AWGLCA/2009/INF.1, Section C ‘Policy approaches and positive incentives on issues relating to reducing emissions from deforestation and forest degradation in developing countries; and the role of conservation, sustainable management of forests and enhancement of forest carbon stocks in developing countries’, by Wetlands International with regard to addressing peat swamp forests in REDD, dd. 5 August 2009.

Objective and scope of this policy brief

This policy brief reflects whether incentives to reduce the greenhouse gas emissions caused by *peatland degradation* are appropriately addressed in the ‘Revised negotiating LCA text’, FCCC/AWGLCA/ 2009/INF.1, dd. 22 June 2009. Please find in this policy brief our comments and recommendations.

Magnitude of peatland emissions and importance of addressing these under REDD

Tropical peatswamps contain on average ~3,000 tC ha⁻¹ against ~250tC ha⁻¹ in forests on mineral soil. Degradation of peatsoils from deforestation, drainage, burning, or land-use change leads to significant greenhouse gas emissions in developing countries, in the magnitude of 600 Mt/CO₂/yr from drainage, and another 400-1000 MtCO₂/yr from peat forest fires. Logged and drained peat soils continue to release carbon dioxide emissions for decades; *degradation continues until soils are being restored or completely depleted of peat*. Both the magnitude of the emissions and the relatively cost effective potential for restoration provide arguments in favour of protecting and rehabilitating peatsoils with REDD. The new REDD mechanism provides a good opportunity to address most of these causes. On the contrary, excluding soil carbon (organic soil carbon as distinguished in the IPCC 2006 guidelines) from REDD will lead to credits for forest areas (on drained peat soils) that in fact are vigorous net carbon emitters and will boost the perverse practice that peatlands are drained to enhance the growth of trees.

Textural guide:

Paragraph 106.3 (a) *Stabilization of forest cover, and thereby forest carbon stocks.*

Forest carbon stocks should be clearly defined, and include all 5 carbon pools as distinguished by the IPCC 2006 guidelines, including soil organic carbon. By limiting REDD to only above ground biomass as the text proposes, REDD ignores peat swamp forests. This could lead to credits for forest areas (on drained peat soils) that in fact are vigorous net carbon emitters and will boost the perverse practice that peatlands are drained to enhance the growth of trees. It also would make undrained areas extra attractive for the establishment of plantations (such as palm oil and pulp wood). Depending on the baseline chosen, it could also ignore peat swamp

forests that have been deforested and drained in the past, but still contain substantial carbon stocks.

Wetlands International calls for the following text amendment:

- Stabilization of all forest carbon pools as distinguished by the IPCC 2006 guidelines, including soil organic carbon, and thereby forest carbon stocks.

Paragraph 106.3 (b) *Conservation and maintenance of forest carbon stocks due to sustainable management of forests.*

Wetlands International calls for the following amendment:

- Define forest and forest carbon stocks and incorporate all 5 carbon pools, including soil organic carbon (below ground carbon stocks) following the IPCC 2006 guidelines.

Paragraph 106.3 (d) *Reduction in forest degradation*

Wetlands International calls for the following amendment:

- It should be defined what reducing forest degradation means for the different forest carbon pools. Emissions as a result of peatland degradation continue for decades unless the degraded soils are being rehabilitated. Therefore **peatland restoration** should be defined as an activity under REDD to reduce forest degradation; *or*
- Peatland restoration should be added (e.g. in 106.3 (f) or 106.4 (e)) as a separate objective which qualifies for receiving positive incentives under REDD-plus mechanism

Paragraph 115

Wetlands International considers a **National Registry Schedule** crucial as this provides a transparent system of which emissions are most significant and need incentives under REDD or other NAMAs on national levels. This monitoring schedule should be based **on the use of the most recent IPCC guidelines** (and methodologies) for GHG inventories, incorporating **all 5 carbon pools, including organic soil carbon**.

Wetlands International furthermore considers it crucial that also emissions and removals **from ecosystems other than forests** with substantial carbon stocks (such as non-forested peatlands and other wetlands) are being monitored and registered in National Registry Schedules as to provide insight in the significance of incentives under other NAMA's (possibly similar system to REDD) to address these .

Paragraph 119

Wetlands International calls for the following text to be included in this paragraph:

Developing country Parties shall develop robust national monitoring systems to measure emissions by sources and removals by sinks in the land use, land-use change and forestry sector and shall take into account relevant methodological guidance provided by the Meeting

of the Parties to this Agreement, on the basis of the advice received from the Subsidiary Body for Scientific and Technological Advice (SBSTA) **including the use of the most recent IPCC guidelines (and methodologies) for GHG inventories***, including above and below ground carbon stocks. * agree also with x.12

Paragraph X.7 (a)

Concern with regards to UNFCCC definition of forest

Wetlands International is concerned that the definition of forest as defined in 16/CMP.1 excludes yet deforested and drained wetlands that are currently causing huge carbon dioxide emissions. These areas still have substantial carbon stocks (below ground), but no crown cover. It therefore depends which carbon pools will be incorporated in the UNFCCC definition of forest and what is considered '*temporarily unstocked*'. In the very long term every deforested and drained peat forest in the boreal, temperate and (sub) tropical zones will become forest with canopy cover.

Additional proposed paragraphs by Wetlands International under Section C:

Addressing non-forested wetlands under REDD or other NAMAs

Unforested peatlands, like the high altitude peatlands of the Himalayas, the Tibetan Plateau or the Paramos of the Andes or the treeless peatlands in (sub)arctic, boreal, temperate and tropical areas will (initially) likely not be incorporated in a REDD scheme. A large part of these peatlands is situated in developed countries with an emission target. For these peatlands, as well as for other ecosystems with substantial carbon stocks, the scope of REDD should be expanded or they should be addressed with another NAMA mechanism.

Text proposal:

Although REDD initially aims to reduce emissions from deforestation and forest degradation, the REDD-plus framework or another NAMA shall have as its **(ultimate) goal the comprehensive accounting of all sources and sinks from land use, with incentives for including additional land use categories commensurate with increased capacity, technologies, and methodologies.**

Under 3. [Measurement, reporting and verification of actions] [Measurement and Monitoring System]:

Express the need for support for enhancing MRV capabilities in developing countries

In many countries the knowledge of both above and below ground carbon stocks and their losses is very limited. There is a need to support developing countries on enhancing MRV in assessing their carbon stocks to enable REDD. This is for the huge below ground carbon stocks not more complicated than for above ground forest carbon stocks.



**Feedback to Document ‘Other proposed amendments to the Kyoto Protocol’,
by Wetlands International, d.d. 5 August 2009.**

Wetland degradation in developed countries leads to significant greenhouse gas emissions, in the magnitude of 900 Mt/CO₂/yr. This makes wetland degradation and wetland restoration important LULUCF activities to address under KP. This policy brief reflects whether incentives to reduce greenhouse gas emissions from *wetland degradation* are appropriately addressed in the ‘Proposed amendments to the Kyoto Protocol’ d.d. 1 July 2009. Please find below our comments and recommendations.

FCCC/KP/AWG/2009/10/Add.2/1 July 2009

It is proposed under Option 1 (page 4) to add *wetland management* under *article 3.4*, meaning that countries *may choose* to account for the accountable anthropogenic greenhouse gas emissions by sources and removals by sinks resulting from wetland management.

Although with this option emissions from wetlands are no longer entirely overlooked, this formulation

- A. still allows countries to ignore these significant emissions as the accounting remains voluntary, not obligatory;
- B. keeps open the option for draining pristine peatlands for forestry, especially in the boreal zone (the largest biome on earth with the largest concentration of peatlands), where drainage may initially lead to an increase in biomass and litter carbon stock. As the biomass and litter stocks tend towards equilibrium but the peat carbon losses continue, the initial gains in carbon stocks are annihilated and change into net carbon losses on the long run. Such draining of pristine peatlands for short-term carbon gains (but long-term carbon losses) would also conflict with the aims of the Biodiversity Convention and the Ramsar Convention.

Wetlands International proposes the following amendments:

- Nationally appropriate mitigation actions and commitments by developed countries should:
- Include all substantial greenhouse gas emissions and removals in national accounting from wetland degradation and wetland restoration *in a mandatory net-net accounting approach* with preferably 1990 as a base year, provided this is technically feasible and reliable.
 - As including LULUCF emissions and removals in accounting implies lower costs of reducing emissions, we demand high, ambitious reduction targets in line with the IPCC recommendations to keep temperature rise within the 2 degree Celsius limit.
 - The term “wetland restoration” should be chosen in favour of “wetland management”.

FCCC/KP/AWG/2009/10/Add.3/1July 2009:

The following definition under Article 3.4 is proposed under Option A, (i), page 14:
[“Wetland] [“Peatland] management” is a system of practices for stewardship and use of [wetlands] [peatlands] that have an effect on [greenhouse gas emissions and removals] [carbon stock changes], including drainage of [wetlands] [peatlands] and restoration of drained [wetlands] [peatlands];]

Comments and recommendations Wetlands International:

- This definition *does* appropriately cover both emissions and removals from wetlands. However, the incentive for countries to select this activity voluntarily *is limited* as countries are likely to select this activity only when net credits can be earned. Therefore *wetland degradation* should be defined as *a mandatory accounting activity*. With emissions from wetland degradation being mandatorily accounted, it will be sufficient to define restoration as a voluntarily activity.
- In addition, as explained above, the term “wetland restoration” should be chosen in favour of “wetland management”.