

SUBMISSION BY LITHUANIA AND THE EUROPEAN COMMISSION ON BEHALF OF THE EUROPEAN UNION AND ITS MEMBER STATES

This submission is supported by Albania, Bosnia and Herzegovina, Iceland, the Former Yugoslav Republic of Macedonia, Montenegro and Serbia.

Vilnius, 12 September 2013

**Subject: Land use, land-use change and forestry under Article 3, paragraphs 3 and 4 of the Kyoto Protocol and under the clean development mechanism (SBSTA)
Views on issues relating to modalities and procedures for applying the concept of additionality**

At its 37th session, the SBSTA invited Parties to submit views on issues relating to modalities and procedures for applying the concept of additionality. The EU welcomes the opportunity to submit its views on this topic.

The EU notes that additionality, in the context of the Kyoto Protocol, is only required in the context of Articles 6 and 12 of the Kyoto Protocol, and the concept is not required in relation to Annex I Parties. Despite this, the EU believes that the concept of additionality is adequately considered in land use, land use change and forestry (LULUCF) accounting rules for developed and developing countries, with existing rules¹ applicable up to 2020 in the Kyoto framework.

In EU's view, there is no need for new or additional modalities and procedures for applying this concept to LULUCF activities neither in Annex I Parties, nor under the CDM, for the second commitment period of the Kyoto Protocol.

LULUCF is a crucial part of the calculation of QELROs, and Parties did their best efforts to agree LULUCF rules before targets to avoid uncertainties in these calculations. The EU is of the view that opening discussions on possible amendment to the agreed rules for LULUCF accounting in the second commitment period could jeopardize the ratification processes of Annex I Parties, and could, consequently, delay the ratification processes to the Kyoto Protocol.

The EU therefore requests the closure of the work programme to develop and recommend modalities and procedures for applying the concept of additionality, as this is not an issue that requires further consideration in this SBSTA agenda item, and will create serious problems for Annex I Parties in their ratification of the second commitment period. Any new concepts for accounting related to the land use sector in the context of the post-2020 agreement should be considered in the ADP discussions or incorporated into the work programme on more comprehensive accounting framework for LULUCF.

¹ Decisions 2/CMP.7, 3/CMP.1, 5/CMP.1 and 6/CMP.1