

Input by observer organisation Wetlands International to:

the Ad Hoc Working Group on Long-term Cooperative Action under the Convention (AWG/LCA) with regard to the fulfillment of the Bali Action Plan and the components of the agreed outcome to be adopted at COP15

Wetlands International submits the following comments and proposals upon the **Assembly Document FCCC/AWGLCA/2008/16/Rev.1 as per the invitation for submissions in FCCC/SBSTA/2008/L.23:**

II. A SHARED VISION FOR LONG-TERM COOPERATIVE ACTION

23 b. On the scope of a shared vision, a shared vision should:

- Include all substantial greenhouse gas emissions and removals in national accounting, including LULUCF emissions.
- Incentives to reduce emissions and create some removals in developing countries by restoring degraded, drained peatlands that without restoration would cause ongoing emissions due to the loss of organic soils.
- 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.
- Integrate wetlands conservation and restoration into climate adaptation strategies for increasing the world's resilience to the impacts of climate change.

III. ENHANCED ACTION ON MITIGATION OF CLIMATE CHANGE

A. Measurable, reportable and verifiable nationally appropriate mitigation commitments or actions, including quantified emission limitation and reduction objectives, by all developed country Parties, while ensuring the comparability of efforts among them, taking into account differences in their national circumstances.

39. Nationally appropriate mitigation actions and commitments by developed countries should:

- Be comprehensive and ambitious; ensure coverage of anthropogenic greenhouse gas emissions and removals from all major sources and sinks of GHGs, including emissions and removals from LULUCF including wetlands in a land-based net-net accounting approach with 1990 as a base year, provided using this base year is technically feasible and reliable.

B. Nationally appropriate mitigation actions by developing country Parties in the context of sustainable development, supported and enabled by technology, financing and capacity-building, in a measurable, reportable and verifiable manner.

51. For nationally appropriate mitigation actions by developing countries:

- Identify peatlands as high carbon density areas with substantive and cost-efficient emission reduction opportunities and provide incentives for projects that end or prevent the predictable emissions from peatland loss (restoring drained areas, preventing and stopping peat fires) for mitigation ambitions in developing countries to be supported by developed countries.

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

61. On general principles relating to policy approaches and positive incentives.

n) *(already in Assembly document)*

Include projects that end or prevent emissions from peatland loss (drained areas) and also areas deforested since 1990 with still substantial carbon stocks*

* This may imply the UNFCCC definitions of forests should be broadened to 'forest lands' and include deforested and unforested forest lands including their soils; currently it will exclude the most degraded and emitting peatlands. Regularly cleared areas, repeatedly burned areas and areas with severely decreased soil levels resulting in lengthy periods of inundation will never comply with 10-30% tree cover or 2-5 metres tree height as per the UNFCCC definition of forests, while they were 'forests' once, still have substantial carbon stocks and are now a substantial source of emissions.

- REDD activities should make a positive contribution to biodiversity outcomes:
 - By explicitly taking care of the biodiversity impacts of the various approaches in the development of rules and modalities
 - By excluding under REDD the conversion of natural forests lands including soils to commercial forests or to plantations
 - By encouraging retention of carbon in natural forest lands including their organic soils rather than in harvested wood products and by protecting and restoring natural forest lands including their organic soils in preference to plantation establishment.

63. On how to measure, monitor and verify:

- To determine carbon stocks, emissions and emission reductions for forests and organic soils in particular (peatlands), the most recent and complete IPCC guidelines should be recommended (National Greenhouse Gas Inventories Volume 4, 2006)*, and non-Annex I countries should, if needed, be supported with resources and capacity to follow these.

NB: 63. c) The above proposal replaces this section in which input from Wetlands International has been mixed with comments by HIS, GW and CAN which has led to in incorrect proposal.

IV ENHANCED ACTION ON TECHNOLOGY DEVELOPMENT AND TRANSFER TO SUPPORT ACTION ON MITIGATION AND ADAPTATION

112. On adaptation planning and implementation

g) *(already in Assembly document)*

A thorough investigation of the role of wetland management and restoration in climate adaptation is needed

113. On streamlining and scaling up financial support and technological support

a) *(already in Assembly document)*

Need for streamlining and scaling up financial and technological support for wetlands conservation and restoration in climate adaptation