

SustainUS, on behalf of the International Youth Delegation

February 15, 2009

Response to AWG-KP requests for submissions on:

Definitions, modalities, rules and guidelines for the treatment of land use, land-use change and forestry (LULUCF) in the second commitment period.

The International Youth Delegation has authored a guiding set of principles for the LULUCF framework that will be put in place in the second commitment period. We request that you take these principles, and the policy solutions they imply, into consideration when forming the framework for this vital area of climate policy.

1. On first principles, the set of definitions used in LULUCF emissions accounting and reporting must be based on solid science, and must take a whole-of-ecosystem approach. Their use should not create perverse outcomes, as it has during the first commitment period.

The definitions of land use, land use change and forestry used during the first commitment period have created perverse policy outcomes. With increased capacity to accurately measure and account for carbon fluxes and stocks in land use situations, and building on the knowledge gained during the first commitment period, the definitions can be improved for the second commitment period.

The definitions set needs to be specific and targeted, such that ecosystem changes are not ignored as under the current system. LULUCF activities often have grave impacts on biodiversity, water and ecosystem services that go unacknowledged within the current framework; this problem can be addressed by defining natural and anthropological land uses separately.

Case study: plantations and forests

During the first commitment period, monocultural tree crops in young plantations are included in the broad definition of 'forests', despite the fact that they store less carbon, less securely and less permanently than natural forests at their full carbon carrying capacity; have negative impacts on biodiversity and water provision; and represent a conversion from natural, resilient ecosystems to agricultural land management. Carbon stocks and flows are being inadequately accounted for, and emissions inadequately reduced, as a result of this definition. Any conversion from natural forest to plantation needs to be recognized in the LULUCF framework post-2012. We suggest that separate definitions for 'forest' and 'plantation', recognizing differences in ecosystem services, resilience, biodiversity, and the capacity of an area of land to maintain itself, are included to make this distinction clear.

Also during the first period, many areas of ecosystem degradation and their associated emissions are unaccounted for. Other definitions must be included and strengthened to cover areas where emissions and stocks can now be more confidently measured, as in peatland degradation, restoration and protection; wetland degradation and restoration; and cropland management, for example in the case of tree plantations. These areas represent significant emissions and removals that are ‘seen’ by the atmosphere, but not by the reporting requirements laid out during the first commitment period. It is vital to include these in the requirements for LULUCF accounting in order to have an accurate record of emissions, and to reduce them accordingly.

On similar grounds, we suggest that ‘forest degradation’, an event that must be included in both LULUCF provisions and any REDD scheme, must be defined as any loss in the carbon carrying capacity, or harm to the biodiversity and resilience, of a forest ecosystem. A reduction in the ability of a forest to absorb and safely store carbon, whether from direct human intervention in the workings of that forest or from anthropogenic damage to the biodiversity therein, must be recognized fully within the LULUCF framework. Again, a whole-of-ecosystem approach in setting the definitions now will create policy benefits in every Party in which these definitions are applied.

We agree with The Wilderness Society, the Ecosystems Climate Alliance and others that, even under a move to full carbon accounting, as proposed in the current Option 4, would not be adequately accurate if still underpinned by a faulty set of definitions. We therefore request that the creation of accurate, science-based definitions for LULUCF activities, ecosystems and practices be among the top priorities of the AWG-KP during these negotiations.

2. LULUCF accounting rules must contribute towards good policy outcomes wherever they are used, and must not be a mechanism for Parties to offset their emissions from any sector.

Currently, nations are not obliged to include emissions from forest management and many other sectors covered by Article 3.4 of the Kyoto Protocol. Emissions and removals from many land use, land use change and forestry activities can be included or excluded to create a more favorable emissions profile for Parties, and to meet emissions reduction targets. There is no international imperative or incentive to reduce emissions from LULUCF activities while this is the case.

For example, emissions from the Managed Native Forest sector in Australia are not measured, and they are consequently not included in that Party’s reports or accounts. However, when standing natural forests are logged, the plantations that are often established in their place can be credited with removals of atmospheric carbon, and are often ‘netted’ with emissions from other sectors to produce a lower total of national emissions. The carbon they absorb will simply never match the original stocks of carbon that were lost in the logging process, and so can not even be used to offset emissions from the forestry sector, let alone other areas of emissions. This creates vast inaccuracies in national accounts, and perverse incentives to convert natural, self-sustaining forest

ecosystems to agricultural land under tree crops. This ability to choose between sectors to account for under the current LULUCF framework increases, rather than decreases, the overall net emissions from a Party.

We therefore suggest that emissions from forest management and other Article 3.4 activities, especially those relating to the conversion of land from natural to agricultural systems, be made a mandatory part of a Party's accounting and reporting. This must be accompanied by capacity-building activities to make the measurements of emissions and removals in these sectors as accurate and consistent across all relevant Parties as possible.

Coupled with an improvement in the set of definitions underpinning the LULUCF framework, as outlined in point 1, these approaches would ensure that Parties' emissions are made more adequately measurable, reportable and verifiable.

3. LULUCF accounting rules must contribute towards good policy outcomes wherever they are used, and must take into account pre-existing stocks of carbon in any assessment of land-use change.

As outlined under point 2, forest management and other terrestrial LULUCF sources and sinks are not compulsory inclusions in Parties' accounting systems. As a result, there is no imperative for Parties to account for or report the standing stocks of carbon contained in the ecosystems present before land use change or forestry activities take place.

A broad policy problem arises here: the vast stocks of carbon that were once safely stored in these areas are being released into the atmosphere without being accounted for whenever those forests are logged or these ecosystems are degraded.

Recent research from the Australian National University¹ has demonstrated that forests in that nation store on average three, and up to ten, times the carbon that is attributed to them by the relevant 2006 IPCC estimates for temperate forests. This is just one example of an area in which stocks of carbon are being inadequately measured, and as a result inadequately valued, by Parties to the Kyoto Protocol. As a result of the flows-only approach, national policies continue to be based on inaccurate or incomplete information.

We therefore suggest that a useful approach in the medium term – as urgently as possible, given that ancient terrestrial carbon stocks are often practically irreplaceable – would be to account for and report present stocks of carbon in standing forests and other ecosystems, and to protect them accordingly. This would be in addition to traditional accounting of carbon flows between stores like terrestrial ecosystems, the atmosphere, and so on.

When combined with science-based ecosystem definitions and mandatory accounting for more LULUCF activities, this stock-change basis for accounting would ensure that

¹ Mackey, B. et al, (2008) *Green Carbon: The role of natural forests in carbon storage. Part 1. A green carbon account of Australia's south-eastern Eucalypt forests, and policy implications*. Australian National University Press, Canberra, , retrieved from http://epress.anu.edu.au/green_carbon_citation.html.

standing stocks of carbon are adequately protected and managed, and that emissions from these vital sectors can be reduced as a key element in any policy response to climate change.

The International Youth Delegation is a growing group of young people from around the world, formed in Poznań by the more than 500 youth observers of the United Nations Climate Change Conference 2008, and including their national youth organizations. Made up of young people working on climate issues from an increasing number of countries – over 50 represented in Poznań – the IYD aims to act in the interests of the global youth in all its advocacy work. To this end, IYD members undertake many activities, including the research and writing of submissions to the UNFCCC process to stimulate action in many areas of climate policy in the lead-up to, during, and after the Copenhagen Climate Conference.

Other organizations that endorse this submission include the Australian Youth Climate Coalition, the Canadian Youth Delegation, SustainUS, and the United Kingdom Youth Climate Coalition.

This submission was authored by members of the Forests & Land Use Working Group of the IYD, drawn from these organizations and others around the world. It has been submitted on their behalf by SustainUS, an accredited observer organization within the UNFCCC process.

To contact the Forests & Land Use Working Group of the IYD, please email youthforests@googlegroups.com.