

SustainUS, on behalf of the International Youth Delegation **April 24th, 2009**

*International Youth Delegations views on the Annex (FCCC/KP/AWG/2009/L.3):
'options and proposals on how to address definitions, modalities, rules and guidelines for the treatment of land use, land use change and forestry.'*

This paper presents the position of the International Youth Delegation (IYD) relating to LU-LUCF. It is based on our recent submissions to the UNFCCC. It is the view of the IYD that any negotiating text must address and incorporate each of the elements laid out in this position paper in its proposed policy approaches.

The International Youth Delegation (IYD) is a growing coalition of young people from around the world that are united around a common and shared vision for a bold, just, and long-term global climate treaty that safeguards the survival of all countries and peoples. Comprised of young people working on climate issues from over 50 countries and six continents, the IYD included over 500 members at COP 14 in Poznań. IYD members prepared several interventions and other statements in Poznań, and are looking forward to participating in the various UNFCCC meetings throughout the year in preparation for COP 15 in Copenhagen.

Parties in Poznań this past December repeatedly stressed the need to address deforestation in a post-2012 climate agreement. The science is clear that 20% of world greenhouse gas emissions come from deforestation. Moreover, it is clear that we cannot have a healthy planet without the world's forests. It is therefore absolutely essential that a comprehensive and inclusive international effort be devoted to ensuring that forest ecosystems are maintained as they house both wildlife and people, provide livelihoods for millions of global citizens, and significantly regulate atmospheric carbon. The International Youth Delegation has authored a guiding set of principles for the LULUCF framework, and we request that you consider these principles when forming the negotiating text for this vital area of climate policy.

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.

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, monoculture 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 as deforestation in the LULUCF framework post-2012. To clarify this distinction, we suggest that separate definitions for ‘forest’ and ‘plantation’ be created which recognize differences in resilience, biodiversity, and the provision of ecosystem services.

Also during the first period, many areas of ecosystem degradation and their associated emissions were unaccounted for. Additional definitions must be included and strengthened to cover areas where emissions and stocks can now be more confidently measured, as in the cases of peatland degradation, restoration and protection; wetland degradation, restoration and protection; soil conservation; and cropland management, for example in the case of tree plantations. These areas represent significant emissions and removals, which are ‘felt’ 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, be defined as any loss in the carbon carrying capacity, or harm to the biodiversity and/or resilience of a forest ecosystem. A reduction in the ability of a forest to sequester and safely store carbon, whether from direct human intervention in the functioning 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.

Even 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 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 remains 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 overall national emissions total. 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 under the current LULUCF framework to discriminate between sectors in the accounting process has the effect of increasing rather than decreasing, 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 ensure that the measurement of emissions and removals in these sectors are 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 accurately measurable, reportable and verifiable, and ultimately, are reduced.

3. LULUCF accounting rules 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, 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 University 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 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 points outlined in this submission are of great importance and their consideration and inclusion in the negotiating text are essential to improving LULUCF.

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