

**Environmental Monitoring Group submission on the
Proposals for a UNFCCC Agriculture Work Program**

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COP 17 requested Parties and observers to submit their views on agriculture by March 5 for consideration by the UNFCCC Subsidiary Body for Scientific and Technical Advice (SBSTA). This submission reflects the views of the Environmental Monitoring Group, a South African NGO with observer status with the UNFCCC.

The links between mitigation and adaptation in agriculture are increasingly plain to see, and concepts and approaches that seek to enhance the synergies between the two are an obvious way forward to address the global climate crisis and its impact on human well-being. However, if solutions are proposed and agreed upon that undermine the position and sovereignty of small-scale agricultural producers in developing countries; they may have potentially dire impacts on the future livelihoods of these populations, and their ability to husband natural resources in sustainable ways.

The United Nations Convention to Combat Desertification recognises the importance of bottom up approaches to promoting sustainable land management, and creates the legal framework for farmers to engage in a democratic manner in determining their own future. The UNCCD also recognises the complexity of the problems and possible alternative solutions, and advances multi-disciplinary approaches that will mobilise and focus the most appropriate scientific knowledge.

The launch of an Agriculture Work Program under the SBSTA is not necessary or appropriate. The Nairobi Work Program on Impacts, Vulnerability and Adaptation to Climate Change and the Work Program on Loss and Damage are adequate and appropriate ways in which the issue of agriculture can be addressed, within a process that has been designed to include the participation of affected groups. The NWP is designed to enable it to convene workshops and to consider technical papers, reports and submissions specifically on agriculture adaptation and vulnerability. To date the NWP has emphasized cross-sectoral approaches to adaptation, with agriculture included as one of the main sectors.

At COP 17 the Africa Group called for progress under the Work Program for Loss and Damage to “expedite work to understand, reduce and compensate loss and damage associated with the adverse effects of climate change, including impacts on agriculture.” The Work Program on Loss and Damage could address sudden extreme events caused by climate change, as well as the slow rise in temperatures and unpredictable climate that are already devastating small land holdings and their yields. An agriculture mitigation-oriented work program would be a major distraction from these urgent tasks given the large number of existing negotiating tracks within the UNFCCC process.

The decision of COP 17 that agricultural issues should be discussed by the SBSTA within the context of “sectoral approaches” to control, reduce or prevent greenhouse gas emissions (UNFCCC Article 4, para 1 (c)2) is inappropriate because it will enable countries that are major emitters of agricultural

greenhouse gasses as well as major overall emitters to offset their emissions through agricultural emission reductions and sequestration in developing countries. While suiting the needs of the developed world to off-set their emissions in the south, a work program of this nature might well have severe negative impacts on development, food security, rural livelihoods and agriculture adaptation.

It is common knowledge that offsets are traded on poorly regulated carbon markets. These markets are unstable and failed to deliver the envisaged investments and benefits to developing countries. The withdrawal of some countries from binding emissions targets under the Kyoto Protocol have further contributed to the volatility of carbon markets, resulting in little benefit to the poor. However, carbon markets have created wealth in the north amongst traders and speculators.

With its emphasis on mitigation, an agriculture work program within SBSTA's scope of work under article 4.1.(c) will probably become a vehicle for developing and legitimising agricultural carbon methodologies. Financing the trade of soil carbon offsets in unreliable and volatile carbon market under the guise of "climate smart agriculture", and promoting the notion that this sort of mitigation will also advance successful adaptation is misleading and will expose small-scale producers to risk and the disillusionment of false hopes of viable alternative income streams. The carbon footprint of small-scale producers in developing countries is negligible compared to large agro-industrial operations, while their vulnerability to climate-induced risk is much greater.

Offsets increase the risk of climate change by delaying direct investment in mitigation of the highest emitters, shifting the burden of mitigation onto the poor, and engaging them in unnecessary carbon accounting activities. Scarce global financial resources should be used to meet critical adaptation needs prioritized by the poor and vulnerable, and not to fund the high costs of ensuring compliance of land users and regulation of carbon markets.