Submission on Forest Management under the Kyoto Protocol

27 November 2009

Parties were invited by the Co-facilitators of the LULUCF contact group of the Ad-hoc Working Group on Further Commitments for Annex I Parties under the Kyoto Protocol AWG-KP 9 in Barcelona to submit data and information on forest management, without presuming particular accounting rules, by November 27, 2009. Switzerland is pleased to provide its data as follows.

Switzerland's preferred option for the second CP for forest management accounting is grossnet with a discount factor for the reasons given in previous submissions. However, we are
open to consider other approaches that would maintain the environmental integrity and
incentives that are the fundamental purpose of LULUCF contributing to mitigating climate
change. Switzerland supports accounting approaches that provide an incentive for the increase
and maintenance of existing carbon stocks, for sustainable forest management, and for the
cascaded use of wood products, as well as disincentives for unsustainable management. In
general the package of incentives and disincentives has to promote forest-related activities
that provide real benefits for the climate. Therefore, Switzerland believes that all LULUCF
accounting rules should be designed to a package in such a way that they do not penalize
countries that have increased their forest stock before and after 1990 and plan to intensify the
utilization of wood in the future, given this is all done on a sustainable basis.

Regarding reference intervals for the second CP, Switzerland is ready to consider various options including the period 2001-2005 as well as a forward looking reference level in combination with the use of historical data. In Table 1 below, for columns B and F Switzerland has used the period 2001-2005 as reference interval. This particular 5-year period was chosen because for the purposes of comparison it is compatible in length with the 1st CP, as well as in time, since being close to the 1st CP data are fixed and available and thus distortions caused by comparison with a more distant period can be avoided. Further, we believe that all Annex I parties have complete, good quality data for this relatively recent period.

As mentioned above, the choice of the period 2001-2005 does not exclude the consideration of other reference intervals and how they are applied (for example including possible quantitative limitations and discount factors). If the period **1990-2012** were chosen, 1990 forest conditions could be taken into account while also incorporating changes that have occurred since then. Accounting for this extended period could resolve the issue many parties have expressed with 1990 being arbitrary and introducing arte-facts into the accounting due to 1990 forest conditions being uniquely distinct from those of a multi-year period. Including the first commitment period in the reference interval would mean that all available data would be used, as close to the 2nd CP as possible, thus minimizing arte-facts from interannual variability and the arbitrary choice of a particular base year. If 1990-2012 were Switzerland's reference interval, Column B (reference level) would be – 2.19 MtC0₂e/yr, Column F (forecast) would be 2.67 MtC0₂e/yr, and Column H (Option B) 2.67 MtC0₂e/yr.

Land-based accounting

Switzerland favors land-based accounting for the third and subsequent CP. Therefore, the 2nd CP should serve as a transition period for the fundamental change to land-based accounting in

the 3rd CP, but not for fundamental changes in accounting approaches with respect to the 1st CP. This is why we support mandatory accounting of forestland, cropland and grazingland management under Article 3.4 for the 2nd CP. If Parties account for these additional activities they will be a step closer to land-based accounting.

Table 1: Data on forest management of Swiss Forests (negative sign denotes carbon sink)

	A	В	С	D	Е	F	G	Н	I
Party	1990	Proposed	Forecast	Forecast for	Forecast	Forecast	Forecast	Forecast	Comments
	emissions/	Reference	for 1 st	2013-2020	based on	based on	based on 1st	under	Reference
	removals	level &	CP^2	$(MtC0_2e/yr)$	1990	reference	CP	Option B	Period
	$(MtC0_2e/yr)$	Reference	$(MtC0_2e/yr)$		$(MtC0_2e/yr)$	level	$(MtC0_2e/yr)$	$(MtC0_2e/yr)$	
		interval (if			(E = D - A)	$(MtC0_2e/yr)$	(G = D - C)		
		any)				(F = D - B)			
		$(MtC0_2e/yr)$							
Switzerland	- 3.49	- 1.11	- 0.41	0.48	3.97	1.59	0.89	1.54	2001-2005