

SUBMISSION BY DENMARK AND THE EUROPEAN COMMISSION ON BEHALF OF THE EUROPEAN UNION AND ITS MEMBER STATES

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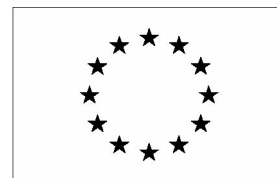
Copenhagen, 5 March 2012

Subject: Submission on methodological guidance for activities relating to reducing emissions from deforestation and forest degradation and the role of conservation, sustainable management of forests and enhancement of forest carbon stocks in developing countries (SBSTA)

Introduction

This submission sets out the EU views on the issues identified in:

- The COP 17 decision on safeguards and reference levels:
 - Timing of the first and the frequency of subsequent presentation of the summary of information on safeguards (paragraph 5)
 - Further guidance to ensure transparency, consistency, comprehensiveness and effectiveness when informing on safeguards (paragraph 6)
 - Technical assessment of the proposed forest reference emission levels and/or forest reference levels (paragraph 15)
- The SBSTA 35 conclusions
 - Guidance on national forest monitoring systems (paragraph 4)
 - Guidance on modalities for measuring, reporting and verifying (paragraph 4)
 - LULUCF activities (paragraph 5)
 - Drivers of deforestation and forest degradation (paragraph 5)
 - Issues to be addressed when developing and implementing national strategies and action plans (paragraph 5)



Guidance on systems for providing information on how safeguards are addressed and respected

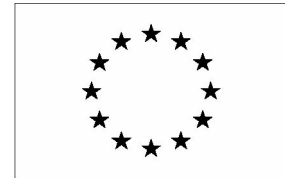
Timing of the first and the frequency of subsequent presentation of the summary of information

The summary of the information on how all safeguards are being addressed and respected throughout the design and implementation of each phase undertaken by the country should be included both in the National Communications and in the biennial update reports in addition to the guidance provided in Annex III to decision -/CP.17 (Outcome of the work of AWG-LCA) and in decision 17/CP.8. According to paragraph 41 of decision 2/CP.17 developing country Parties should submit their first biennial update report by December 2014 and subsequently every two years. Least developed country Parties and small island developing States may submit biennial update reports at their discretion.

Further guidance to ensure transparency, consistency, comprehensiveness and effectiveness when informing on safeguards

Most safeguards and reporting requirements are already covered by international conventions. Further UNFCCC guidance should build upon these requirements and should be updated as appropriate. To operationalize the provision of information on how the safeguards are addressed and respected throughout the design and implementation of each phase undertaken by the country, developing countries should develop and apply national indicators, quantified where possible, for the different safeguards. International processes and existing monitoring schemes for biodiversity could provide useful lessons and experiences. A core set of information requirements, common for all countries, should be agreed to ensure transparency, consistency, comprehensiveness and effectiveness. The summary of information to be provided in National Communications and biennial update reports should include:

| <i>Safeguards as contained in paragraph 2 of Appendix I to decision 1/CP.16</i> | <i>Information requirements</i> |
|--|--|
| (a) That actions complement or are consistent with the objectives of national forest programmes and relevant international conventions and agreements; | Description on how REDD+ actions contribute to achieving objectives of national forest programmes and relevant international agreements and processes; |
| (b) Transparent and effective national forest governance structures, taking into account national legislation and sovereignty; | Description of policy, legal, institutional and regulatory frameworks, including on law enforcement and recourse mechanisms; |



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|---|---|
| <p>(c) Respect for the knowledge and rights of indigenous peoples and members of local communities, by taking into account relevant international obligations, national circumstances and laws, and noting that the United Nations General Assembly has adopted the United Nations Declaration on the Rights of Indigenous Peoples;</p> | <p>Identification of different right holders and their rights; identification of relevant international obligations, national circumstances and laws taken into account; and description how those rights are respected;</p> |
| <p>(d) The full and effective participation of relevant stakeholders, in particular indigenous peoples and local communities, in the actions referred to in paragraphs 70 and 72 of this decision;</p> | <p>Description of participatory process for the design and implementation of a national REDD+ strategy or action plan and how this process was applied, including a description of the process for stakeholder identification, consultation and engagement and of systems to disseminate and receive information;</p> |
| <p>(e) That actions are consistent with the conservation of natural forests and biological diversity, ensuring that the actions referred to in paragraph 70 of this decision are not used for the conversion of natural forests, but are instead used to incentivize the protection and conservation of natural forests and their ecosystem services, and to enhance other social and environmental benefits;</p> | <p>Identification of the positive and negative impacts of REDD+ actions, the national REDD+ strategy or action plan on biodiversity, ecosystem services and conservation of natural forests taking into account the national biodiversity strategy and action plan under the CBD; and identification and monitoring of natural forests;</p> |
| <p>(f) Actions to address the risks of reversals;</p> | <p>Description of the potential risks, actions to address them and liabilities;</p> |
| <p>(g) Actions to reduce displacement of emissions;</p> | <p>Description of the actions and identification of significant sources, and the collection of data on the displacement of emissions.</p> |

The EU notes in this regard that the Collaborative Partnership on Forests has carried out helpful work in the past on ways to reduce the forest-related reporting burden on countries through streamlining reporting requests across international agreements and processes, increasing data comparability and compatibility, and facilitating the accessibility and flows of existing information¹. The SBSTA should consider how the outcomes of the CPF work could be used in relation to REDD+ reporting requirements.

¹ <http://www.fao.org/forestry/cpf/mar/en/>.



Technical assessment of proposed forest reference emission levels and/or forest reference levels

The objectives of the technical assessment by a team of independent experts are to assess whether Parties have provided transparent, complete, consistent with guidance agreed by the COP, and accurate information on the data, methodologies and procedures used in the construction of forest reference emission levels and/or forest reference levels and to provide, as appropriate, technical recommendations for ensuring consistency with the guidance agreed by the Conference of the Parties.

The technical assessments should be carried out by an independent team of experts under the auspices of the UNFCCC in consultation with the Party and should result in a summary report. The team of technical experts should assess whether the information on reference levels has been provided in accordance with the guidelines for submission of information on reference levels as contained in the annex to decision 17/CP.17 and whether the information is consistent with each country's greenhouse gas inventories. The summary reports should be made publicly available on the UNFCCC REDD web platform.

Following the technical assessments, proposed forest reference emission levels and/or forest reference levels should be forwarded to the COP for further consideration and possible adoption.

The EU has proposed draft decision text on this matter in Appendix I of its earlier submission contained in FCCC/SBSTA/2011/MISC.7.

Guidance on national forest monitoring system

The combination of Decision 15/CP.4, Decision 16/CP.1 and IPCC inventory guidelines and methodological guidance provides essential elements to guide the development of national forest monitoring systems. National forest monitoring systems should build upon existing systems and need to be capable of providing estimates of anthropogenic forest-related greenhouse gas emissions by sources and removals by sinks through the monitoring of forest carbon stocks and forest area changes and enable the monitoring of natural forests.

National forest monitoring systems should provide unbiased estimates that are transparent, documented, consistent over time, complete, comparable, assessed for uncertainties, subject to quality control and assurance and suitable for review. The systems should be efficient in the use of resources and so it may be efficient to combine the national forest monitoring system with the system to provide information on how safeguards are addressed and respected.



Guidance on modalities for measuring, reporting and verifying, as referred to in appendix II to decision 1/CP.16

Decision 1/CP.16 requests SBSTA to develop modalities for MRV of performance of anthropogenic forest-related emissions by sources and removals by sinks, forest carbon stocks, and forest carbon stock and forest area changes resulting from the implementation of REDD+ activities, consistent with MRV modalities for nationally appropriate mitigation actions by developing countries (NAMAs). These modalities should be further developed under SBSTA with a view to adopt a decision on modalities for MRV of performance of anthropogenic forest-related emissions by sources and removals by sinks, forest carbon stocks, and forest carbon stock and forest area changes resulting from the implementation of REDD+ activities.

Although the IPCC's guidance provides default values for undisturbed forest, additional work may be necessary to estimate changes in forest carbon stocks, including sample-based ground observations, in a cost-effective manner:

- where deforestation is taking place on forests that have already been subject to human activity,
- where default values are not appropriate to particular ecosystem types (including wetlands and organic soils),
- where countries wish to depart from default values and use higher tier methods.

The IPCC 2006 Guidelines contain useful additional scientific information and should be available for use in applying the currently agreed Guidelines. The IPCC Task Force in National Greenhouse Gas Inventories should be invited to prepare supplementary documentation to consolidate and facilitate the use of existing guidance and guidelines for REDD+ including existing guidance and guidelines on the use of remote sensing to collect more reliable and comparable information.

The emissions and removals from REDD+ activities should be reported in National Communications and biennial update reports. In paragraph 7 of Annex III to decision xx/CP.17 (outcome of the work of AWG-LCA) non-Annex I Parties are encouraged to include tables included in Annex 3A.2 to the IPCC GPG in their biennial update reports.

The results of REDD+ actions and activities regarding changes to forest-related GHG emissions and removals as reported in National Communications and biennial update reports should be independently analysed. Annex IV to decision xx/CP.17 (outcome of the work of AWG-LCA) provides a basis for this.

The EU has proposed draft decision text on this matter in Appendix II of its earlier submission contained in FCCC/SBSTA/2011/MISC.7.



The EU believes that SBSTA could usefully consider simplified reporting requirements that could be used, in earlier phases, in combination with conservative estimates of emission reductions before results-based actions are subject to full monitoring, reporting and verification (e.g., using tier 1 approaches and default carbon density values in combination with land conversion matrices, excluding certain carbon pools and non-CO₂ greenhouse gas, addressing a subset of subnational jurisdictions, activities or biomes).

LULUCF activities

Given the importance of rural development, food security, mitigation and adaptation in the agricultural sector and of agricultural expansion as a driver of deforestation, the implications of REDD+ implementation should be considered from a broad perspective.

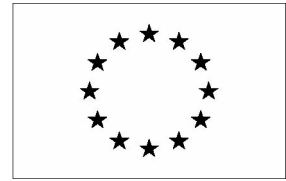
LULUCF activities that are not included in REDD+ could be addressed as a NAMA and/or in the context of adaptation strategies. These options could be assessed as part of a SBSTA work programme on agriculture.

Drivers of deforestation and forest degradation

In paragraph 68 of decision 1/CP.16 all Parties are encouraged to address drivers of deforestation and forest degradation. Addressing the drivers is necessary for reaching the collective aim to slow, halt and sustainably reverse forest cover and carbon loss.

Causes of deforestation and forest degradation operate at various levels, from the local level to domestic and global markets. However, deforestation and forest degradation are to a large extent driven by national circumstances, including insufficient law enforcement and institutional capacities (notably as regards governance and tenure). For this reason, drivers of deforestation and forest degradation should best be identified and prioritized at national level in a transparent and participatory manner.

At the same time, ways to reduce the pressure on forests should be identified and addressed in consumer countries. The EU is committed to develop specific initiatives to address the impact of the EU consumption and production patterns on natural resources. In recent years it has already put policies in place to address its responsibility as a consumer towards illegal logging in third countries. The EU Action Plan on Forest Law Enforcement, Governance and Trade (FLEGT), Voluntary Partnership Agreements with timber trade partners and the EU Timber Regulation provide a number of measures to prevent illegal timber products to access markets, to improve the supply of legal timber and to promote the demand for responsible wood products. The development of policies to control the impacts of the overall demand for products which may drive deforestation and degradation must be seen as an integral and key component of international efforts to reduce deforestation and forest degradation.



Issues to be addressed when developing and implementing national strategies and action plans

Addressing drivers of deforestation and degradation, land tenure issues, forest governance issues, gender considerations and safeguards (the issues mentioned in paragraph 72 of decision 1/CP.16) are crucial for any national strategy or action plan to be effective in the long run. For example, securing use and tenure provide more certainty for long term investments, it prevents land grabbing and enables a fair allocation of benefits and liabilities. It is in itself a key motivation for many stakeholders to engage into REDD+ activities.

REDD+ actions and activities will only be successful if protecting forests is in the interest of local and national stakeholders. The full and effective participation of all stakeholders, including indigenous peoples and local communities is therefore required to ensure a fair and efficient implementation of REDD+ actions and activities.