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SUBMISSION BY SWEDEN ON BEHALF OF THE EUROPEAN COMMUNITY AND ITS MEMBER STATES

This submission is supported by Croatia, the Former Yugoslav Republic of Macedonia, Serbia and Turkey

Stockholm, 27 July 2009

Subject: Other issues arising from the implementation of the work programme of the Ad Hoc Working Group on Further Commitments for Annex I Parties under the Kyoto Protocol - Land use, land-use change and forestry.

The EU submits the following in response to the request in paragraph 8 of the conclusions on consideration of further commitments for Annex 1 parties under the Kyoto Protocol reached at the eighth session of the AWG-KP, held in Bonn 1-12 of June 2009¹. This request encouraged Parties to share, before its informal meeting on 10–14 August 2009, views on the possible need for information and data to facilitate Parties' understanding of the implications of the options for the treatment of LULUCF discussed and considered at its eighth session. The EU believes these data are necessary to consider the implications of accounting approaches for QELROs and the relationship to current rules for LULUCF.

As a complement to its views, contained in the submissions by the EU prior to the meetings in Bangkok (AWG-KP 5.1)², Bonn (AWG-KP 5.2), Accra (AWG-KP 6.1)³, Poznan (AWG-KP 6.2)⁴, Bonn (AWG-KP 7) and Bonn (AWG-KP 8⁵), and in response to the non-paper⁶ produced at the eighth session of the AWG-KP, the EU wishes to provide further input regarding the data needed to quantify the options for accounting rules for LULUCF presented in its 27 April 2009 submission⁷.

¹ <http://unfccc.int/resource/docs/2009/awg8/eng/l10.pdf>

² <http://unfccc.int/resource/docs/2008/awg5/eng/misc01.pdf>

³ http://unfccc.int/files/kyoto_protocol/application/pdf/lulucf_eu.pdf

⁴ http://unfccc.int/files/kyoto_protocol/application/pdf/france_on_behalf_of_the_european_community_and_its_member_states.pdf

⁵ <http://unfccc.int/resource/docs/2009/awg8/eng/misc11.pdf>

⁶ http://unfccc.int/files/kyoto_protocol/application/pdf/revised_non-paper_consolidated_100609_1000.pdf

⁷ <http://unfccc.int/resource/docs/2009/awg8/eng/misc11.pdf>

The EU believes there is a strong link between accounting for forest management and accounting for harvested wood products, treatment of natural disturbances, legacy effects of age-class structure and voluntary vs. mandatory accounting of forest management, and that all these items have to be considered when discussing accounting rules for forest management in a future climate regime. The EU appreciates the progress that has been made regarding accounting for harvested wood products and treatment of natural disturbances, and believes it is possible to make further progress on these issues during the informal session in August and the ninth session in October (AWG-KP 9).

The table presented in Annex 1 lists the data needs, availability and related considerations to operationalise the accounting options developed in the EU's 27 April 2009 submission. The table also proposes next steps for submitting data.

To analyse accounting options for forest management and other activities will require countries to provide data set on net GHG emissions for the period 1990–2007/2008 for the related activities. The EU is of the view that LULUCF data reported to the UNFCCC and supplementary data reported for the purposes of the Kyoto Protocol should be used as the main basis for such datasets. These data could be complemented by additional data in support of appropriate representations of the respective activities.

Some options for accounting for forest management, such as an alternative bar level⁸ and bar with symmetrical band, require additional data to be provided that are not covered by the UNFCCC reporting data. This is also the case for data needs related to the development of options for the treatment of 'Force majeure' and accounting for harvested wood products.

The EU believes that an informal data collection process encompassing all the data needs should be set up at the Inter-sessional informal consultations under UNFCCC to be held in Bonn 10-14 August. The EU proposes that Parties submit the relevant set of data at the appropriate time, allowing the data to be compiled in time for the AWG-KP9 to be held 28 September to 9 October in Bangkok. The EU believes that Parties should submit data using a common format such as outlined in the Annex 1 in this submission.

Parties are also invited to provide information on the impacts of accounting approaches on emission reduction targets. EU is aware of that specific characteristics of these approaches may need to be elaborated further before COP15.

⁸ Parties where national circumstances, for example, the legacy effects of age structure, lead to a declining sink even in the presence of sustainable forest management, could propose an alternative level of removals or emissions for the bar. This proposal should be supported by transparent and verifiable data including, for example, net removals from forest management during the most recent period, age-class distribution, projected net removals from forest management in the commitment period consistent with reporting method used, relevant methodological information underpinning the projections, and further information enabling an informed assessment of the level proposed.

Annex 1

Accounting rules for Forest Management			
Options	Sub-options	Data needs, availability and considerations	Next steps
For all FM accounting options		1) Net GHG emissions/removals from UNFCCC Forest land remaining forest land for the period 1990-2007/2008. 2) Historic data to complement UNFCCC data, if needed. 3) Additional data including projections, if needed.	1) Countries to provide 1990-2007/2008 UNFCCC data ⁹ by 1/09/2009. 2) Countries to provide additional historic data in support of an appropriate representation of the activity by 1/09/2009. 3) Countries to provide data and related considerations in support of an appropriate representation of the activity including relevant information as described in footnote 8 by 1/09/2009.
For all FM accounting options (in case of merging 3,3 and 3,4)		Net GHG emissions/removals from UNFCCC forest converted to all other land uses and from UNFCCC all other land uses converted to forest for the period 1990-2007/2008. These data could be complemented by additional data in support of appropriate representation.	Countries to provide data by 1/09/2009.
GN with cap		Same data needs as mentioned for all FM accounting options	Discuss methods to set a cap.
GN with discounting factor		Same data needs as mentioned for all FM accounting options	Discuss methods to set a discount factor.
Net/net		Same data needs as mentioned for all FM accounting options	Discuss base year/base period

⁹ Data reported to the UNFCCC and supplementary data reported for the purposes of the Kyoto Protocol.

Options	Sub-options	Data needs, availability and considerations	Next steps
Bar/band	Bar with historical reference level	Same data needs as mentioned for all FM accounting options	Discuss base year/base period
	Bar with adjusted historical reference level	Same data needs as mentioned for all FM accounting options	Discuss at the informal consultations 10-14 August in Bonn criteria, including age class effect, to support and validate adjustment applied to the historical level for the purpose of setting the bar.
	Bar with projected reference level	Same data needs as mentioned for all FM accounting options	Discuss at the informal consultations 10-14 August in Bonn criteria to support and validate the use of projections for the purpose of setting the bar.
	Bar with symmetrical band	Same data needs as mentioned for all FM accounting options, as well as information on inter-annual variability and uncertainties.	Discuss at the informal consultations 10-14 August in Bonn criteria to establish the width of the band. Discuss the use of the band.
	Bar with asymmetrical band	Same data needs as mentioned for all FM accounting options	Discuss the use of the band.

Cropland management / Grazing land management / Revegetation			
Options	Sub-options	Data needs, availability and considerations	Next steps
Net/net		No additional need for specific data	Discuss base year/base period

Natural disturbances			
Options	Sub-options	Data needs, availability and considerations	Next steps
Force majeure' applied to forestry activities	Eligibility of events	Data on 'Force majeure' events occurred during the period 1990 – 2007/2008, including nature of the event; magnitude of the event expressed as a % of total 1990 emissions; area damaged; expected recovery (duration; removal profile); volume of timber impacted, lost, salvaged; area having undergone deforestation following up the 'Force majeure' event. When available, Parties may be invited to provide elements related to expected trends of future Force majeure events.	Countries to provide views on what constitutes 'Force majeure' events (restricted to forest land) as well as data related to 'Force majeure' events occurred during the period 1990 – 2007/2008 by 1/09/2009.

HWP			
Options	Sub-options	Data needs, availability and considerations	Next steps
Domestic production based approaches	Excluding exports (Domestically produced and consumed HWP - SCAD)	Net emissions from HWP pool changes excluding exported HWP for the period 1990-2007/2008 according to export country (including emissions from the pre 1990 pool).	Countries to provide overview of data sources, which covers data on e.g. consumption, production, trade, assumptions for domestic market, level of HWP exports according to import country (for parties intending to account for exports), and list of HWP categories considered. Data should be based on FAO forest product statistics where available.
	Including exports (Domestically produced HWP - Production approach)	Net emissions from HWP pool changes including exported HWP for the period 1990-2007/2008 according to import country (including emissions from the pre 1990 pool).	

Wetland management

Options	Sub-options	Data needs, availability and considerations	Next steps
For all Wetland management accounting options		Net GHG emissions from UNFCCC wetland remaining wetlands and land use changes affecting wetlands in the period 1990-2007	Countries to provide data by 1/09/2009.