

**Japan's view on the need for information and data to facilitate Parties'
understanding of the implications of the options for the treatment of
LULUCF**

Japan welcomes the opportunity to present its views on the need for information and data to facilitate Parties' understanding of the implications of the options for the treatment of LULUCF (FCCC/KP/AWG/2009/L.10) and submits them as follows. For further understanding of the submission, please refer to Japan's view on the treatment of LULUCF as of February, 2009 (FCCC/KP/AWG/2009/MISC.5, pp.42-47) and Japan's views on the Annex of the conclusion of the AWG-KP7: Options and proposals on how to address definitions, modalities, rules and guidelines for the treatment of land use, land use change and forestry (LULUCF) (FCCC/KP/AWG/MISC.11, pp.50-54).

This submission only addresses the forestry related issue, and the views on other issues are to be elaborated during the course of discussions.

It should be noted that, depending on the outcomes on other issues or the course of discussions, the following views may need to be revised or modified.

1. General view

As has expressed on various occasions, Japan has advocated that the gross-net accounting with strict activity-based approach should be adopted for afforestation, reforestation and deforestation under Article 3.3 and forest management under Article 3.4 of the Kyoto Protocol,

- 1)in order to provide incentives for sustainable forest management regardless of the stage of forest maturity;
- 2)in order to keep consistency and continuity with the current rules; and
- 3)in order to deal with issue of "human-induced".

Japan also provided its view on so-called "Bar Approach" on condition that it should not be prejudged as Japan's preference to that approach. Our view is reflected in the Chair text (FCCC/KP/AWG/2009/10/Add.3, p.19, footnote 6), which is "[They could also be set] ... with due consideration to national circumstances, such as: (a)Legacy effects of age structure[, in particular those which would lead to declining [or increasing] removals or [net emissions] even] in the presence of sustainable forest management; (b)Degree of forest management measures implemented; (c)Continuity of national forest policies and measures in line with the accounting rules and methodologies to identify forests under forest management, especially for Parties which elected forest management in the first commitment period."

In terms of HWP, the main objective of introducing the accounting of HWP should be to provide

incentives for the promotion of effective use of HWP in order to maximize their climate change mitigation functions. In line with this objective we have proposed the following rules,

- 1) Only HWP originated from forests accounted for under the Kyoto Protocol should be accounted for;
- 2) Short-lived HWP should not be included in the accounting;
- 3) Exported HWP should not be included in the accounting; and
- 4) HWP in SWDS should not be accounted for.

In line with these views above and full consideration of previous discussions on various options, Japan provides the view on the need for information and data to facilitate Parties' understanding of the implications of the options for the treatment of LULUCF and to promote discussion on this issue.

2. Proposal on information and data

(1) Basic data related to forest management and forestry

Basic data related to forest management and forestry is the prerequisite for understanding each country's conditions for exploring each option and helps us understand more deeply the implications of each option.

These data are:

- a) "forest area" (with plantation forest area and the proportion of domestic species in plantation forests) (from 1970 to 2005 (around every 5 years))
- b) "proportion of forest area to the total land area" (from 1970 to 2005 (around every 5 years))
- c) "stocks in forest" (from 1970 to 2005 (around every 5 years))
- d) "population density" (from 1970 to 2005 (around every 5 years))

a) "forest area" is fundamental data to understand forest management. The proportion of plantation forests is important as plantation forests and natural forests often require different forest management practices. The proportion of domestic species in plantation forests is useful in understanding the proper care to biodiversity in forest management.

b) "proportion of forest area to the total land area" and c) "stocks in forest" are for understanding how each country has managed its forests for the past several decades.

d) "population density" is an important factor to understand the development pressure on forests.

Most of these data a) – d) should be available from FRA (Global Forest Resources Assessment 2005), which is well authorized publication and allows comparability of data.

(2) Data representing the history of removals of LULUCF sectors under the Convention and the Kyoto Protocol

- a) "The trend of GHG removals from forest under the Convention since 1990"
- b) "The trend of GHG removals from forest under Article 3.3 and forest management under Article 3.4 since 2005" (latter: only for the countries selecting forest management and without cap)

These data are easily available since each county has provided them to the secretariat of the UNFCCC, and useful for assessing various accounting options. The data b) should be submitted if possible since the difference from the data a) should be clearly articulated.

(3) Other information and data for assessing accounting options

a) “Age-class structure” and “Age of representative species when their average growth volume becomes maximum”

Accounting rules should be those which provide incentives to sustainable forest management on every stage of forest maturity.

Maturity of forest can be estimated by using both “age-class structure” and “age of representative species when their average growth volume becomes maximum”. The availability of data and the type of forest should be considered taking account of each country’s conditions. In particular, as the data availability of “age of representative species when their average growth volume becomes maximum” might be a problem for some countries, the similar data can be used instead.

These data are also useful in considering “Legacy effects of age structure, in particular those which lead to declining removals even in the presence of sustainable forest management”, which should be considered in setting the level of Bar.

b) “Intensity of forest management practices implemented”

Each country promoting sustainable forest management has implemented different management practices depending on their natural, social, and historical conditions and constraints. The accounting rules should not hamper each country’s sustainable forest management, whose evaluation can be done by using the information related to “intensity of forest management practices implemented”. It should contain information on the contents and degree of forest management practices such as thinning, and the outline of regulation for forest conservation and protection (contents of regulation and the area subject to regulation, etc.)

This information is also useful in considering “Degree of forest management measures implemented”, which should be considered in setting the level of Bar.

c) “The necessity of continuity of current rules and its reasons”

Since nurturing forest takes long time, forest and forestry policies require long-term perspectives. Thus, in particular, for those countries which select forest management during the first commitment period and have promoted their forest and forestry policies under the rules of forest management, it is highly likely that the continuity of rules is important.

On the other hand, it is quite conceivable that the necessity of continuity is different among countries depending on whether it selects forest management or not during the first commitment period, or even among countries who select forest management, the necessity may vary depending on what kind of forest policies it has.

Therefore, each country should provide information on its necessity of continuity of rules on forest management, and information on its reasons.

This information is also useful in considering “Continuity of national forest policies and measures in line with the accounting rules and methodologies to identify forests under the forest management, especially for Parties which elected forest management in the first commitment period”, which should be considered in setting the level of Bar.

d)“The way of identifying areas subject to forest management under Article 3.4 of the Kyoto Protocol” (only for the countries selecting forest management)

The way of identifying areas subject to forest management is likely to be different among countries. From the perspective of the continuity of rules as well, it is important to clearly articulate the difference of identification methods.

This information is also useful in considering “Continuity of national forest policies and measures in line with the accounting rules and methodologies to identify forests under the forest management, especially for Parties which elected forest management in the first commitment period”, which should be considered in setting the level of Bar.

(4)Information and data for accounting options on HWP

(a) “Forest products data such as those regarding production, export and import”, as well as “Other information and data necessary to estimate domestic stock and lifetime of products in end-use such as building and furniture”

These information and data can be used as the basis to compare estimated emissions and removals on each of the proposed options including the one proposed by Japan and help us understand implications of the options.

“Forest products data and information” such as those regarding production, export and import provide the basis for estimation of HWP accounting. Such data are available from FAO.

“Information and data on domestic products in end-use such as building and furniture” are expected to provide more accurate estimation of emissions when used in addition to FAO data than those derived from FAO data only.