

MINISTRY OF NATURAL RESOURCE
AND ECOLOGY OF THE RUSSIAN FEDERATION

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Facsimile
Chair of the AWG-KP
Mr. John Ashe

Cc: Mr. Yvo de Boer
UNFCCC Executive Secretary
Bonn, Germany
Fax: (49-228) 815-1999

Dear Mr. Ash,
Russian Federation sends the proposal to incorporate carbon sequestration in forest management activities in the context of the issues discussed by the AWG-KP (clarification of the negotiating text contained in document FCCC/KP/AWG/2009/L.15).
At the same time wish to draw particular attention that the Russian proposal to allow national commitments to reduce anthropogenic emissions of greenhouse gases by 2020 (by 15-25% from 1990 levels) under a new climate agreement specifically provided for the proper account the potential of Russian forests. Proposals were sent to the UNFCCC secretariat on Jan. 29, 2010 in accordance with the decisions KS-15/SS-5.

Sincerely,

Alexander Frolov

Chief Hydromet

Appendix: a (4 pages)

Proposals for clarification of the negotiating text of the Ad Hoc Working Group on further commitments for Parties included in Annex I (AWG-KP), 10th session

Land use, land use change and forestry (LULUCF)

The Russian Federation submits its proposals to clarify the negotiating text contained in document FCCC/KP/AWG/2009/L.15 (p. 16-28).

Accounting for carbon sequestration in forest management activities under Article 3.4 KP.

The Russian Federation supports the proposal to establish a basic level of absorption (emission) and an approach to accounting under Article 3.4 of the current difference between the absorption to the baseline (so-called «net-net» approach) (paragraph 11, option 2). This approach eliminates the natural component of absorption in the forest ecosystems and objectively assess the result of human impacts on the carbon balance in managed forests. It will provide a fair and scientifically grounded account of absorption of greenhouse gases in managed forests in contrast to the «gross-net» approach with fixed constraints applied during the first commitment period of the KP. «Net-net» approach will promote sustainable forest management, capacity measures to increase carbon sequestration in forests, maintain and increase carbon stocks in different pools of forest ecosystems, as well as optimization of forest management in countries in Annex I.

The Russian Federation supports the establishment of a baseline value of the absorption (emission) from the activities of forest management in 1990. This approach will provide the necessary degree of transparency in procedures for establishing a basic level and will maintain records in the LULUCF sector is comparable with other sectors in which emissions during the commitment period are correlated with the magnitude of 1990.

According to the Russian Federation, the proposal to apply additional restrictions on the fixed set-off of real absorption (emission) as a result of forest management in the net-net approach (paragraph 11 ter), concern the following aspects:

- lack of scientific justification, as a natural component of absorption is excluded when using the «net-net» approach;
- negative consequences for the countries in the planning of forest management in terms of lack of stimulation for measures to stabilize and enhance carbon stocks in managed forests;
- contrary to the UN Framework Convention on Climate Change and the Kyoto Protocol on the need for full accounting of emissions and sinks of anthropogenic greenhouse gas.

Given the foregoing, the Russian Federation considers unacceptable imposition of artificial restrictions on the fixed offset anthropogenic absorption in managed forests.

Given the considerable interannual variability of changes in carbon stocks in managed forests (see the background report of the Russian Federation submitted to the secretariat of the UNFCCC on 30 October 2009), and also increased due to increased climate change risk of large-scale fires and other natural disturbances, Russian Federation stresses the need to harmonize approaches to eliminate greenhouse gas emissions from natural origin reporting. The approach should be balanced and also exclude the subsequent sequestration of carbon in the recovery of ecosystems. Recognizing the possible negative consequences associated with excessive complexity of reporting and difficulties in substantiating the causes of violations in the forests, the Russian Federation considers it appropriate to co-application of the following proposals:

- "Neutral zone" between the established baseline of the absorption (emission) and zero carbon balance (paragraph 11 bis). This approach will prevent unreasonable discharge and subsequent residue units of the Party's assigned amount, if managed forest ecosystems are not the actual source of emissions of carbon dioxide.

- The concept of "force majeure", as contained in paragraphs 19-21. In considering the proposals take into account the complexity of the Russian Federation that emerged during the negotiation process with the concurrence of the threshold of emission of force majeure, which is expressed as a percentage of base-year emissions. So to be able to compare the importance of natural disturbances in countries with different forest cover Russian Federation proposes to use a range of threshold values (from 1 to 5 per cent) of the total carbon stock of biomass in managed forests. Correlation with a reservoir of carbon phytomass justified lowest uncertainty of his estimates, as well as most vulnerable to damage by fire. Furthermore, taking into account the

probability of significant emissions from natural disturbances in the sum for all years of the reporting period, but failed to reach the threshold of emissions in each year, the Russian Federation considers it expedient to use the total amount of emissions for all years of the commitment period. Thus, the Russian Federation suggested the following wording of paragraph 19 bis:

Each Party is required for the purposes of applying the definition of force majeure to choose a single minimum value for the total annual greenhouse gas emissions by sources and removals by sinks during the commitment period, ranging from Y 1 to 5 percent of the stock of phytomass carbon in managed forests of the total national emissions in the base was. Selecting Party will be fixed during the commitment period. Each Party is obliged to explain why and how this value was selected.

The Russian Federation supports the ability to adequately assess changes in the reservoir of carbon in timber products (known as harvested wood products) (Option 2, Article 21 ter - 21 novies) in future reporting. Replacing the currently used a simplified approach, involving the instantaneous carbon dioxide emissions from the total volume of harvested timber on evidence-based method that takes into account the storage of carbon in the products of the woodworking industry, would provide more reliable information on annual emissions and carbon sequestration in forest management activities on the territory of the Parties to Annex I. In considering the proposals the Russian Federation was also aware of the flexibility requirements for future reporting, including the voluntary choice of the valuation method, depending on the availability of necessary data.

According to the Russian Federation, the preservation of the current simplified approach for the immediate release of CO₂ when logging (Option 1) is possible only if the exclusion of emissions from the volume of timber exported from the reporting by Parties.

Considering the significant uncertainty of baseline data and existing methods for estimating emissions and absorption in plowed fields, pastures and grasslands, the Russian Federation considers it necessary to maintain the voluntary nature of reporting under Article 3.4 MP for the management cropland, grasslands, and revegetation (Section 6), and also supports the inclusion in the list of the management of wetlands.

Given the inadequate attention in the options for estimating emissions and absorption of greenhouse gases through the integration of land, as well as the difficulties associated with the need to reorganize their inventory systems for Annex I Parties for the collection of baseline data for the LULUCF sector, the Russian Federation considers it inappropriate to continue the negotiation process this option.