

Submission by Tuvalu

Submission by Tuvalu with respect to Consideration of further commitments for Annex I Parties under the Kyoto Protocol: Land use, land-use change and forestry (AWG-KP)

Tuvalu has pleasure in offering its views with respect to forest management reference level inscribed in the Annex of document FCCC/KP/AWG/2010/L.8/Add.2. As stated previously¹, Tuvalu does not believe that reference levels represent a transparent, complete, consistent, comparable, accurate and scientifically valid means of accounting for forest management. The means by which Annex I Parties have selected reference levels as indicated in Annex I of FCCC/KP/AWG/2010/L.8/Add.2 are based on a wide level of assumptions, as indicated in the footnote to Annex I.

Despite the technical assessment process established under paragraph 5, Tuvalu is of the view that the breadth of accounting methodologies that can be interpreted from paragraph 4 of FCCC/KP/AWG/2010/L.8/Add.2 and its respective footnote 1, will lead to inconsistent methodologies and inconsistent conclusions. The lack of clarity in defining precisely what a reference level is and how it should be applied, means that Parties are about to select their own methodology and set of assumptions. Without a consistent approach, (for instance, whether reference levels are to be based on BAU or forward projects) it makes comparisons extremely difficult.

It is highly doubtful that the review process that has been established will lead to any meaningful conclusions as review experts will not be able to properly interrogate the data and assumptions made by Parties in the development of their reference levels. Tuvalu believes that it is highly regrettable that the 12 months review process will delay conclusions and decisions relating to the second commitment period of the Kyoto Protocol. This makes it extremely difficult to avoid a gap between the first and second commitment periods of the Kyoto Protocol.

Furthermore, Tuvalu is fully aware of the fact that the concept of reference levels is now incorporated within the REDD+ agenda. The cross-over of concepts appears to be leading to further slippage in the environmental integrity in the climate regime. It would appear that certain Annex I and Non Annex I Parties are endeavouring to advance their particular interests within the Kyoto Protocol and/or REDD+ agendas based on creating 'flexible' rules with respect to reference levels.

Tuvalu is of the view that a single net-net accounting methodology, applied by all Annex I Parties, will provide a preferable accounting framework for forest management.

Despite these concerns, Tuvalu stands ready to make a constructive input into ongoing negotiations.

¹ As stated by Tuvalu at the Forest management accounting pre-session workshop on 30 July 2010 see: <http://unfccc.int/files/meetings/ad_hoc_working_groups/kp/application/pdf/tuvalu_lulucfwskp13.pdf>