

LULUCF

What is LULUCF?

What are the problems with LULUCF?

What are the potential impacts on REDD?

Land use, land-use change and forestry (LULUCF) governs the accounting by Annex I Parties of emissions and sequestration from land (Articles 3.3, 3.4 and 3.7 of the Kyoto Protocol). LULUCF rules, definitions and guidelines are currently being renegotiated for the second Commitment Period.

Existing LULUCF rules allow forest managers to hide emissions from their forestry (logging) activities. Neither do these developed countries have to account comprehensively for all the activities in the land sector.

Annex 1 Parties are able to hide some large emissions and overstate removals of greenhouse gases, resulting in a skewed picture. The voluntary nature of accounting is being exploited by Annex I Parties to obtain credits without accounting for debits.

‘Pick and Choose’ Accounting for LULUCF

- It is mandatory to account for afforestation, reforestation, and deforestation only.
- It is voluntary to account for forest management (logging), grazing land management, cropland management, and revegetation.
- There is no comprehensive accounting across the land, in particular there is no accounting for emissions from peatlands and wetlands (a huge source of emissions). We want a new category called ‘wetland management’, and eventual land-based accounting.

More Cheating on Emissions Proposed

For the second commitment period, Annex I Parties are trying to change the rules to avoid accounting for increased emissions from forestry. Annex I Parties are proposing an ***emissions loophole that allows them to increase their forest management emissions and not even account for it. The result of their proposal will be that approximately 400 Mt CO₂e per year*** will disappear from the books, falsely exaggerating the actual emission reductions of these countries.

Under current and proposed rules, ***LULUCF is being used to falsely exaggerate emission reductions.***

Concern about LULUCF has been expressed this week by COMIFAC (Central African Forest Commission member states). They do not accept the gap between the requirements on REDD+ for developing countries and LULUCF, including that:

- A developed country is allowed to replace an existing forest by a plantation, while REDD safeguards guidelines do not allow the developing countries to do so
- A developed country would choose not to account for forest emissions, while developing countries are encouraged to do so

- A developed country would decide on its own the reference level against which it will get credits, whilst developing countries will have to explain their choices, and make public their models

They said 2 important things that ENGOs have also been campaigning on:

- targets for developed countries will be fraudulent because of hidden LULUCF emissions under current proposals, and
- developed countries should take up their responsibility to reduce emissions in LULUCF relative to their historical emissions

LULUCF could and should be a source of real mitigation action, as is proposed for REDD. Two new goals should be adopted for LULUCF:

- *reduce emissions – eg from deforestation, forest degradation, wetlands; and*
- *protect carbon stores – eg protect natural forests*

Other LULUCF Problems

LULUCF has many more inbuilt problems, right down to the level of definitions. As a result, emissions from industrial scale forestry operations are hidden.

Optional accounting of conversion of natural forests to plantations

This highly emissive activity is not accounted for by Parties which choose not to account for forest management (logging). Furthermore, the definition of a “forest” makes no distinction is between “natural forests” and “plantation forests”. The conversion of natural forests to plantations is not classed as “deforestation”. Thus, there is no obligation to account for it. If this definition is used in REDD it will undermine the plantation conversion safeguard.

No accounting of forest degradation

There is no obligation to report or account for forest degradation. Only the extreme state of deforestation is identified for accounting purposes. This failure to account fully for emissions due to forest degradation leads to the false impression that climate impacts due to forest management practices are neutral. The ecological sustainability of these practices is widely questioned. The definition of a forest sets the bar for deforestation so low that in many biomes ecosystem collapse will have occurred long before the threshold is reached. This definition cannot be used to address degradation.

No safeguard around indigenous rights and interests

The KP LULUCF provisions do not contain any obligation to respect indigenous rights and interests, nor to obtain free prior and informed consent for activities on IP lands.

No biodiversity safeguard

The KP LULUCF provisions do not contain any obligation to protect biodiversity.

Take home message: Bad LULUCF Rules endanger the potential to get a good REDD. It is the responsibility of Annex 1 Parties to accept improved LULUCF rules and to aim to reduce emissions and protect reservoirs of carbon on their land.