

Commissioner Miguel Arias Cañete
Commissioner for Climate Action & Energy
European Commission
B-1049 Brussels, Belgium

Brussels, 20 May 2016

Subject: EU LULUCF proposal has repercussions beyond the EU

Dear Commissioner Arias Cañete,

We understand that the European Commission is currently working on a proposal on land use, land use change and forestry (LULUCF). The decision the EU takes has **repercussions beyond the EU**.

Since the Paris Agreement commits all its signatories to *balancing anthropogenic emissions and removals*, countries around the world will need to decide how to integrate land, including wetlands and forests into their nationally determined contributions. How this is done matters, especially as the Paris Agreement requires this *balance* to be achieved *on the basis of equity and in the context of sustainable development and efforts to eradicate poverty*. The EU therefore has a **unique opportunity to set a positive precedent** for how to reduce emissions and increase removals of carbon dioxide from the atmosphere.

The undersigned organisations call on the Commission to make a LULUCF proposal that recognises the role that forests, land and wetlands play in mitigating climate change in a way that does not lower any **ambition** to reduce emissions and recognises the **multiple benefits** that these ecosystems provide in feeding people, purifying air and water and providing a home to biodiversity and indigenous peoples. To achieve this, we urge the Commission to propose a separate long-term target for land and forests, as part of its own pillar in the EU's Climate and Energy Framework, and therefore separate to the Effort Sharing Decision.

Ambition

The Paris Agreement sets a new and more ambitious target to limit global average temperature rise to well below 2 degrees above pre-industrial levels, and aiming for 1.5 degrees. This welcome commitment will require a global effort to reduce greenhouse gas emissions more and faster. The EU's historical responsibility and current high level of indirect emissions (i.e. emissions in third countries driven by our consumption) means the EU must show a high level of ambition in all sectors.

Setting a separate target for soils and forests would enable the EU to develop appropriate incentives to increase removals of atmospheric CO₂, without delaying emissions' reductions in other sectors.

CO₂ storage and sequestration in soil and forests should not be used to displace or reduce mitigation in other sectors, including industrial agriculture. Sequestration of carbon in forests cannot compensate for continued emissions. Fossil fuel emissions are effectively permanent, whereas carbon sequestration in forests and soils is temporary by comparison¹. Emission removals from forests should therefore be considered additional and separate to industrial emissions reductions.

Being ambitious also means improving accounting rules which currently do not reflect emissions from forests and land. If the EU's forest carbon sink is declining due to an increase in harvesting of wood, this must be accurately reflected in LULUCF accounts.

This is particularly important if forest carbon stocks are declining due to an increased harvesting of wood for energy generation. The EU should introduce four safeguards for bioenergy use: i) a cap to limit the use of biomass for energy production to levels that can be supplied sustainably; ii) an efficient and optimal use of biomass resources, in line with the principle of cascading use; iii) verifiable greenhouse gas savings and correct carbon accounting for biomass; iv) a comprehensive binding sustainability criteria to prevent negative social and environmental impacts.

Ecosystem integrity and food security

Ensuring the integrity of natural ecosystems is critical for maintaining life on earth. Healthy ecosystems protect biodiversity, purify the air and provide clean water, while forests, wetlands, peatlands and mangroves contribute to adaptation by providing buffer zones that protect local communities. Any LULUCF policy should recognise these multiple roles of land and forests. Again the EU could set a positive precedent.

The responsible management of land, including forest land and wetlands, is also crucial for ensuring food security and the right to food, and are fundamental to the well-being of indigenous peoples and local communities. This should be safeguarded, provided it is done through agro-ecological practices that emit low levels of greenhouse gases and have a greater carbon capture and storage capacity than conventional agriculture.² Setting a separate target for this sector would help ensure tenure security for forest peoples and food security of the poorest by protecting land from large scale bioenergy plantations that are assumed in many climate mitigation pathways.³ The FAO estimates that there are more than 500 million family farms in the world and are responsible for at least 56% of agricultural production⁴.

The special role that land, including forests and wetlands play in the livelihood strategies of a large part of the world's population would be recognised if they were placed in a separate pillar with its own target, distinct from other sectors.

¹ <http://www.nature.com/nclimate/journal/v3/n9/full/nclimate2006.html>

² <http://www.fao.org/3/a-i4327e.pdf>;

<http://www.unep.org/dewa/Assessments/Ecosystems/IAASTD/tabid/105853/Defa>

³ <http://www.fern.org/sites/fern.org/files/Final.pdf>

⁴ <http://www.fao.org/docrep/019/mj760e/mj760e.pdf>

We urge you to take these considerations into account in the Commission's forthcoming proposal, in line with Article 208 of the Lisbon Treaty on Policy Coherence for Sustainable Development, and welcome a meeting to discuss these issues in more detail.

Yours sincerely,



Laura Sullivan,
Europe Regional Director,
ActionAid International
On behalf of the following organisations:

Act Alliance EU
Oxfam EU
Greenpeace
Forest Peoples Programme
Friends of the Earth International
Friends of the Earth Europe
Wetlands International
China Environmental Paper Network
Client Earth
Finance and Trade Watch Austria
Bread for the world
IFOAM Organics International
Finnish Nature Conservation Association
Ara
Ateneo School of Government
LDC Watch
Transport & Environment
Carbon Market Watch
Centro México de Derecho Ambiental
Rainforest Foundation Norway
Forests of the World
Fern
Pivot Point
Nepal Federation of Indigenous Nationalities
Tebtebba
Climate Justice Programme
Denkhaus Bremen
Centro de Planificación y Estudios Sociales, Ecuador
Change Partnership