

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

**Subject: EU LULUCF consultation**

Brussels, 18<sup>th</sup> June 2015

Dear Commissioner Arias Cañete,

The European Commission has consulted stakeholders about the role the EU's land and forests should play in its 2030 Climate and Energy Framework. With this letter, the undersigned organisations are registering their views and state that Option 1 (LULUCF pillar), is their preferred option since it is the only one that could uphold the environmental and social integrity of the EU's target. They call on the EU to have a clear position ahead of Paris on the need for two distinct global goals, one for LULUCF and another for other emissions, including non CO<sub>2</sub> emissions from agriculture.

At the European Summit in October 2014, Heads of State agreed that, by 2030, the EU will domestically reduce its emissions by at least 40 per cent compared to 1990. In the run up to the United Nations climate summit in Paris, the EU should continue to show leadership to tackle climate change by upholding the environmental integrity of the 'at least 40 per cent' target. We believe that unless the following points are addressed, the EU is at risk not only of backsliding on its ambition and harming its credibility in this crucial year for climate, but it could entail damaging impacts on biodiversity and local communities. We call on the EU to consider the following points:

- Currently, the EU's forests and land are a net sink, which means that they absorb more carbon than they emit. Including this sector, known as Land Use, Land Use Change and Forestry (LULUCF), in the EU's 2030 climate target of 'at least 40 per cent' weakens this target by between **3-7 percentage points** depending on accounting rules used, which means the EU reduction target could be as low as [33 to 37 per cent](#). It is paramount that the EU does not include LULUCF in the existing instruments and develops a separate 'LULUCF pillar' as outlined in Option 1, with no fungibility with the other pillars. A separate target should be set for this pillar together with strong environmental safeguards that would incentivise good land use management, among others, incentivise ecosystems restoration, forest conservation, agro-ecology and re-wetting peatlands.
- The majority of emissions in the agriculture sector are 'non- CO<sub>2</sub>' emissions (methane and nitrous oxide) and are currently falling under the EU's Effort Sharing Decision (ESD). To ensure these emissions from agriculture are dealt with appropriately, we believe they should remain in a strengthened ESD
- Not only does LULUCF need to be in its own pillar, the carbon accounting rules for forest management urgently need correction to address the rise of bioenergy use in the EU. It is now widely recognised that bioenergy is not carbon neutral and can in some instances emit more GHG per unit of energy produced than fossil fuels. Currently, forest management is accounted for against a projected reference level. There is little transparency in how these projections are set, meaning Member States can set these projections to minimise accounting for emissions from forest management - while maximising removals, and emissions from bioenergy are

'hidden'. LULUCF would have more environmental integrity if forest management was accounted for against a base period rather than according to reference levels, since this properly accounts for what the EU is doing to its forest sink. In addition, as energy policies are the driver of increased bioenergy use, policy incentives need to be corrected in the energy sector, so that only the use of low carbon bioenergy sources is supported.

2015 is a year for climate ambition and the EU should take pains not to scupper the fragile path to a global agreement to maintain global warming to within 1.5 degrees, especially given the COP presidency in an EU Member State. The EU should increase its ambition by stating that two distinct goals are needed for the LULUCF and industrial emissions sectors. This would incentivise increased land mitigation through ecosystems restoration and forest protection, and avoid LULUCF diluting ambition in energy and industry. It would also avoid risks of over-relying on land-based mitigation that would increase competition for land which could have serious adverse impacts on human rights, food security and biodiversity. The LULUCF pillar must not be weakened through adopting the current rules, such as artificial accounting gains in forest management. New and more environmentally robust rules should be developed for this sector.

Furthermore, we urge you to promote this position internationally as the only way to ensure equitable, ambitious and unambiguous reductions in the industrial sectors as well as incentivising the mitigation potential of the land sector by incentivising the protection and restoration of ecosystems.

Yours Sincerely,



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