



18 February 2015

Subject: Inclusion of LULUCF in the EU 2030 climate target undermines its environmental integrity

Dear Minister,

Climate Action Network Europe - on behalf of 130 European NGOs - calls upon you to address the following issues when finalising the European Union's Intended Nationally Determined Contribution (INDC) to the UNFCCC in preparation of the Paris Climate Summit.

The Land Use, Land Use Change and Forestry (LULUCF) sector in the EU as a whole is a net sink. However, the forest management activities that make up almost all of the sink, are accounted in most of the EU's member states against a business as usual projection. As a consequence, emissions from forest management are mostly not accounted - while removals are. This is vastly unreliable in terms of accounting for the real effect upon the atmosphere, and therefore inclusion of LULUCF in the EU 2030 "at least 40% domestic" climate target would effectively undermine its environmental integrity. It is essential that the EU's INDC includes a commitment to address the emissions of the LULUCF sector, but without compromising the emission mitigation commitment made for the ETS or non-ETS sectors. Emissions and removals from LULUCF sector must be treated separately and on top of the EU's at least 40% domestic target.

At the COP20 in Lima countries agreed upon a number of information requirements to enable an assessment of individual and aggregate adequacy and fairness of the INDCs in the context of the UNFCCC's ultimate objective, its principles and the agreed 2°C warming threshold. To enable this, and to encourage other countries to present clear, transparent and quantifiable INDCs, it is vital that the EU's INDC is of a high standard and provides quantifiable information also about the LULUCF sector. Rules that govern countries' commitments in the new international agreement must not be weakened from those of the Kyoto Protocol, the EU's INDC commitment must therefore be presented as an economy-wide carbon budget for the period of 2021-2025. This is in line with the proposal under discussion to include five year commitment periods in the new international agreement.

The European Council decision of a domestic target of at least 40% reduction implies that the 40% reduction has to take place on the EU's territory. This excludes the use of international carbon units, both international offsets as well as allowances from emission trading schemes outside of Europe. However, the EU has a responsibility to also support mitigation action abroad and therefore the INDC should clarify how the EU will fulfil its commitment for support by international measures that could include both international trading and provision of financial support.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Wendel Trio', is written over a horizontal line.

Wendel Trio
Director. Climate Action Network Europe