

1. In your view, which of the multiple objectives of agriculture, forestry and other land use will gain most in relative importance by 2030?

1,000 character(s) maximum (997)

The long-term stability of carbon pools for carbon storage, biodiversity protection and ecosystem preservation is key. Forest biomass and soil organic carbon are vital carbon stocks and should be maintained and enhanced.

Emissions from land use represent a quarter of all human emissions. Those related to agriculture are particularly important. It is thus vital that the land use sector also plays its part. Mitigation measures are particularly needed in the agricultural sector, cost effective and feasible options do exist. This requires a shift of policy focus from agricultural production to food consumption, including measures to limit food waste, reduce animal protein consumption etc. The increasing and competing multiple requirements for land services need to be addressed on the demand side. Growing bioenergy use particularly drives decreases in forests carbon stocks and sinks. Food production is vital but its emissions will likely rise unless constrained by sustainability policies.

2. How can the contribution of agriculture, forestry and other land use to the production of renewable energy and raw materials be optimised, while fully exploiting the mitigation potential in these sectors?

1,000 character(s) maximum (946)

The demand-side of various land-based services must be addressed, including reduction of meat and dairy consumption. While land provides multiple services and resources for most human activity, limits must be respected for continued benefits.

Peatlands should be conserved and when degraded restored. Conversion of grasslands should be penalised.

In forestry, the aim should be long term stability of carbon pools. Optimal use of forests must recognise their material resource limits and prioritise more efficient, long lived material use rather than energy. Compared to the 1990 base year/period the sink level should be increased by 40% by 2030

Sustainable bioenergy has a role in EU's transition to a 100% renewable energy system. However, to avoid serious negative consequences for carbon emissions, biodiversity and land conflicts, the EU should introduce a cap on the use of biomass for energy and set sustainability standards for imported and domestic biomass.

3. How can the new framework ensure a fair and equitable distribution among Member States of action for mitigation in agriculture, forestry and other land use and reflect biophysical, geographical, and socio-economic variability and differences among Member States?

1,000 character(s) maximum (562)

Countries should account for what the atmosphere sees in terms of anthropogenic emissions and removals, from all sectors. The accounting rules should not allow countries to pick and choose activities or otherwise hide real emissions, as the forest management rules currently do. Excluding sectors must never be an option.

We are in favour of legally binding EU-wide target for the LULUCF sector combined with 10 year compliance period sector to provide flexibility for the Member States accompanied with ambitious policy measures to drive down emissions.

4. What are the most promising and cost-effective greenhouse gas reduction measures related to agriculture, forestry and other land use? Are there any technologies that would deserve special attention in research and technology development?

1,000 character(s) maximum (987)

Maintaining carbon stocks and addressing demand from other sectors are key. Ensuring that all emissions are accounted in an accurate manner will facilitate addressing them.

In agriculture sustainable food production measures such as waste reduction, better fertilizer use and limiting livestock sector will bring mitigation benefits. Measures could include removing subsidies, giving direct incentives or penalties, or indirect ones such as diet shifts.

Reform of bioenergy policies could reduce real emissions significantly. Currently, indirect land use change and carbon debt are not taken into account. Forest management accounting rules hide emissions and emissions from large amounts of imported biomass are not accounted for anywhere.

There are significant, low cost emission savings to be achieved through soil conservation and restoration, notably of peatland and grassland. Conserving natural forests and restoring degraded ones would both save emissions and increase sequestration.

5. What are the main obstacles and barriers to the implementation of emission reduction measures in agriculture, forestry and other land use?

1,000 character(s) maximum (823)

The EU's land-sector does not have a mid- or a long-term strategy for decarbonisation. The EC should urgently develop a 2050 roadmap for agriculture, forestry and other land-use that takes into account the EU's 2050 objectives as well as the IPCC's 2°C compliant carbon budgets.

EU agriculture policy, predominantly the CAP, does not incentivise mitigation and often supports actions that can increase emissions.

Similarly, incentives for bioenergy have not helped cut emissions. As energy policies are the driver of increased bioenergy use, policy incentives need to be corrected in the energy sector.

Forest management accounting rules are perverse and measured against a business as usual projection in which many states include emissions from harvesting for bioenergy, thereby ensuring that they are not accounted for.

6. On the basis of experience with the present set of rules on accounting, targets and flexibility, how could the present rules be improved, and which aspects could be maintained and which should be rejected in future?

1,000 character(s) maximum (995)

Countries should comprehensively account for all anthropogenic emissions and removals from a historical base year or period. All sectors do so except for LULUCF where the Kyoto rules allow countries to pick and choose which activities to account for - except for deforestation, afforestation and reforestation and, from 2012, forest management. Decision 529/2013/EU improves on the international rules by making accounting for cropland and grazing land mandatory after 2020, with net-net from accounting from a 1990 base year.

We would keep the EU rules for cropland and grazing land management and make accounting for the other non-forest LULUCF activities mandatory from 2020, especially wetland drainage and rewetting. Forest management rules should change so that countries account net-net from a base year or period, after 2020. Accounting should preferably be land-based rather than activity-based, in line with the Convention and ensuring comprehensive coverage of emissions and removals.

7. How could an element of flexibility in terms of using credits from LULUCF activities in the 2030 climate policy framework be introduced in a way that fully ensures the environmental integrity of the system?

1,000 character(s) maximum (997)

Use of LULUCF credits in other sectors would destroy any environmental integrity of the system. (We provide answers on flexibility in our answer to question n. 3).

As LULUCFs a net sink and was not included in the 2020 package, the EU's 2030 target would be significantly reduced if LULUCF credits were fungible with other sectors. Inclusion of LULUCF would lead to lower reduction commitment in the other sectors. Furthermore the current accounting rules for forest management allow emissions to be ignored.

LULUCF sector should be covered by a separate reduction target with comprehensive accounting of all GHG emissions and removals from land use and forestry activities/delete [from land.activities], including full accounting for emissions from bioenergy. It should be ensured that accounting rules are clear, honest and transparent, allowing real emission reductions, avoiding "hidden emissions".

Environmental integrity needs to be defined beyond integrity of emission savings.

8. What could be the main advantages and disadvantages of the three policy options outlined above, and which option(s) should be further developed or modified?

1,000 character(s) maximum (990)

Option 1 (LULUCF pillar with a reduction target) This option has the most potential for maintaining environmental integrity and ensuring reductions occur in all sectors. It reflects best the particularities of the LULUCF sector (non-permanence, high natural annual variability, etc).

Option 2. The two emission sources have very different characteristics and there is no advantage to merging them. This option would effectively result in undermining the mitigation potential in agriculture sector.

Option 3. This is the least desirable option because it opens the door for forest sinks being used to offset emissions in other ESD sectors. This option would therefore likely undermine other sectors efforts. Furthermore the current accounting rules for forest management do not reflect real emissions and removals.

9. Which is your preferred option? Why?

Option 1 — LULUCF pillar (x)

Option 2 — land use sector pillar

Option 3 — effort sharing

A combination of options

No preference

Please, provide an explanation for your choice in Question 9

1,000 character(s) maximum (490)

Forestry activities in LULUCF constitute a net sink and are poorly accounted for. For us it is of utmost importance that the forest sink is not used to offset emissions in other sectors.

We consider that countries should account fully for all emissions and removals. Therefore we find it important that emissions and removals on LULUCF sector are addressed, and we consider this best done by creating a separate LULUCF pillar with target of its own and rules particularly suitable for this sector.

Non-CO2 emissions from agriculture should be kept within the ESD. In order to ensure that emission reductions occur in all sectors, management of cropland, grazing land and wetland, as well as drainage and rewetting could be covered under a the ESD or under a separate target in the LULUCF pillar.

Let us conclude with what we consider the most important: forest sink must not be used to offset emissions in other sectors.