

## **The Climate-Land-Ambition-Rights Alliance (CLARA)**

### **Submission to the APA on guidance for emissions and removals from land use in Agenda item 3**

**September, 2016**

*Countries have been invited to submit their views to the Secretariat on item 3 on the Agenda, specifically the features of the NDCs, clarity, transparency and understanding of the NDCs and Accounting principles.*

#### **Introduction:**

The objective of the Paris Agreement is to strengthen the global response to climate change by keeping a global temperature rise this century well below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius. Delivering this level of ambition requires immediate and dramatic emissions cuts in all sectors.

The land sector has significant mitigation potential, both from reducing emissions and from increasing sequestration, but only if the special characteristics of land and the limits to land-based mitigation are acknowledged. The land sector is central to ensuring livelihood security, food sovereignty, and maintaining ecosystem integrity. Increased competition for land can put human rights and ecosystems at risk if international standards and obligations on human rights, the rights of indigenous peoples and local communities, and environmental obligations are not respected.

Reducing emissions and enhancing removals are significant components in 77% of countries' INDC mitigation contributions. Therefore, guidelines on accounting for Parties' NDCs must be transparent and comprehensive for the land-use sector. In light of a mitigation goal that requires emissions to go to zero, the land sector must shift from net emissions, to net removals (removing more CO<sub>2</sub> than is emitted). Transparent reporting and accounting rules can play a role in facilitating this shift. Yet this must be done in a way that ensures land types with the highest climate resilience and biodiversity benefits are prioritized.

Thus, we propose that the following guidelines and principles should be applied when reporting and accounting for agriculture, forestry and other land use:

#### **Features of NDCs**

All aspects of contributions should be included in a country's NDC. This means not just mitigation measures, but also adaptation and financing actions. Developed countries should include information on the level and timing of intended support to mitigation and adaptation measures. Developing countries should include the conditional action and ambition that can be unlocked if getting more support from

the international community. In keeping with the Lima decision, NDCs should be differentiated for countries with low emissions overall, such as LDCs.

### **Clarity and Transparency of NDCs**

Any risks to the principles in the Paris Agreement, including the preamble, should be recognized, and countries must outline their planned response to ensure that these principles are protected and enhanced. These principles include such crucial aspects as human rights, the rights of indigenous peoples and local communities, food security, sustainable consumption and the protection of biodiversity and ecosystem integrity during implementation of NDCs.

Reporting of mitigation action in the land sector must be fully transparent. Country commitments and reporting should be broken out by sector, and the land sector should include both reducing emissions (such as from slowing and halting deforestation and forest degradation) and increased removals (from ecosystem restoration or other activities) reported and accounted separately.

It is important that that gross emissions and gross removals in the land sector are reported and accounted separately - continued deforestation must not be hidden by afforestation or ecosystem restoration elsewhere in the country. Furthermore, non-CO<sub>2</sub> emissions from agriculture must not be hidden by soil carbon sequestration.

### **Accounting**

While recognizing that NDCs will be different and that countries have varying levels of capacity and responsibility, accounting principles should ensure that mitigation outcomes are at least comparable both between countries and through the years within the country. Related to land, accounting rules must provide clarity on both emissions (for example, from land use change) and removals (from carbon stocks, afforestation or ecosystem restoration). Because of non-permanence, reversibility and the risk of leakage, removals should be accounted for separately from emissions reductions. Building on reporting requirements under the Convention, major sources (key categories) of land emissions must be included. (With exception for LDCs, and using differentiation in accounting tiers).

Bioenergy must not be assumed to be carbon neutral - accounting guidance should ensure that bioenergy emissions are fully accounted for either in the harvest or combustion of biomass, and that any bioenergy produced from the dedicated use of land is additional to existing carbon stocks on that land.

### **The use of international markets**

With regards to carbon markets, we note that avoided emissions and removals from the land sector do not compensate ongoing emissions from fossil fuels, due to lack of permanence, measurement uncertainties and risk of reversals. Land sector emissions and removals should hence be excluded from carbon markets and dealt with in Article 6.8.

The following organizations subscribe this submission:

- Asociacion, Ambiente y Sociedad (AAS), Colombia
- Bread for the World
- Carbon Market Watch
- Center for International Environmental Law
- Climate Justice Program
- Derecho, Ambiente y Sociedad (DAR), Peru
- Forests of the World
- IFOAM – Organics International
- LDC (Least Developed Countries) Watch International
- Naturvernforbundet - Friends of the Earth Norway
- Pro Natura (FoE Switzerland)
- Rainforest Foundation Norway

Also in cooperation with:

- Center for Indigenous Peoples Research and Development (CIPRED)
- Federation of Community Forestry Users Nepal (FECOFUN)
- FERN
- Groupe de Travail Climat REDD , GTCRR, de la République Démocratique du Congo.
- PIVOT POINT
- RCA - Rede de Cooperação Amazônica assina
- Réseau Ressources Naturelles, RRN, de la République Démocratique du Congo