



**COUNCIL OF  
THE EUROPEAN UNION**

**Brussels, 8 June 2012**

**11140/12**

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**Interinstitutional File:  
2012/0042(COD)**

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**ENV 507  
ONU 77  
FORETS 43  
AGRI 401  
CODEC 1623**

**NOTE**

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from: General Secretariat  
to: Council

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No. prev. doc.: 10244/12 ENV 389 ONU 65 FORETS 38 AGRI 339 CODEC 1397  
No. Cion prop.: 7639/12 ENV 204 ONU 34 FORETS 23 AGRI 144 CODEC 655 - COM (2012)  
93 final

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Subject: Proposal for a Decision of the European Parliament and of the Council on  
accounting rules and action plans on greenhouse gas emissions and removals  
resulting from activities related to land use, land use change and forestry  
- Orientation debate  
= *Replies from Member States*

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Delegations will find in the Annex the written contributions received from CZ / DE / LV / NL / SK  
to the Presidency questions contained in document 10244/12.

CZECH REPUBLIC

*How do Member States assess the proposed phased approach?*

The Czech Republic supports the proposed phased approach to include LULUCF in the EU's greenhouse gas reduction commitment. It is a necessary first step towards establishing a robust accounting framework for LULUCF. However, this framework should be fully in line with the relevant COP decision from Durban, setting the rules for LULUCF accounting for the second commitment period of the Kyoto Protocol on the international level. For this reason, it is important to continue with the accounting of agricultural activities on a voluntary basis. The proposed accounting for the whole commitment period and not on an annual basis provides the necessary time to consider how to include the LULUCF sector in the EU's commitment. The Commission should provide information on the next planned steps, the timing and whether a specific sectoral target for the LULUCF sector is envisaged.

*How can Member States best stimulate the mitigation potential of the LULUCF sector at this stage, and how can all actors involved best share the experiences gained, e.g. through means such as the proposed LULUCF Action Plans?*

To stimulate mitigation measures in the LULUCF sector, preference should be given to using existing policy instruments, rather than developing new ones. The reformed Common Agricultural Policy should provide instruments which could be used to incentivise mitigation in this sector; these mitigation measures should be voluntary and based on incentives such as payments or subsidies rather than on mandatory requirements and restrictions.

In the short run, the most effective measures are those aimed at reducing carbon losses, e.g. reducing forest conversion or disturbances such as fire prevention; in agriculture this involves mainly the preservation of grasslands and organic soils with a high carbon content. An important tool in preserving grasslands and organic soils should be the implementation of standards of Good Agricultural and Environmental Condition (GAEC). In the longer run, measures such as afforestation could lead to enhanced carbon sequestration but the mitigation effect is delayed. Due consideration also needs to be given to balancing the use of wood for material and energy purposes, which could significantly reduce emissions in other sectors, and carbon sequestration potential.

The exchange of information and experience should take place in existing working bodies and should build on existing information channels and tools. The Czech Republic does not see a need to develop special National Action Plans for the LULUCF sector; this sector could be appropriately addressed, for example, in the context of the low carbon development strategies.

## GERMANY

As regards the two-staged approach:

- Germany welcomes the two-staged approach as proposed by the Commission. The current climate target of the EU of 20% was explicitly defined without taking a possible contribution by the LULUCF into account. Including LULUCF in the 20% target would weaken the environmental integrity of this target.
- In addition, we think that we still need a better understanding of the emission trends and mitigation potential of this sector before including it into our climate policy package like other sectors.

As regards a way to encourage Member States to realise the mitigation potential in the LULUCF sector:

- Germany is already implementing a number of mitigation measures in the LULUCF sector which, however, are not very visible at EU level. Our Länder are responsible for taking many of these measures i.e. they are taking place at regional level.
- A systematic assessment of emission trends, existing measures, possible additional measures and their respective potential for mitigation could help Member States to more systematically identify and realise the mitigation potential of the LULUCF sector. We are of the view that the responsibility for making such an assessment should rest with the Member States. Analyses and measures proposed by Member States should be in line with fundamental requirements of environmental integrity.
- The mitigation potential of the LULUCF sector can only be fully appreciated if indirect effects outside the sector are taken into account, such as bio-energy use or use of wood products.

As regards the possible role of LULUCF Action Plans:

- LULUCF action plans as proposed by the Commission have the potential to facilitate a systematic assessment of the trends and potentials of the LULUCF sector as mentioned above and to improve the visibility of action taken at Member State level.
- Germany could support the introduction of such national plans on the basis that the drawing up of such plans firmly remains within the competence of Member States. The Commission has no role in a substantive evaluation of these plans. Consequently, the proposal would need to be amended to reflect that.

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## LATVIA

*How do Member States assess the proposed phased approach?*

Latvia supports the Commission's proposed phased approach. However, we are of the opinion that, without a clear vision regarding the whole implementation of the phased approach, including both phases, the implications of the decision for the interests of Latvia cannot be evaluated precisely.

Latvia requests the Commission to provide further clarification with regard to possible flexibilities that could be foreseen within the implementation of the second phase.

*How can Member States best stimulate the mitigation potential of the LULUCF sector at this stage, and how can all actors involved best share the experiences gained, e.g. through means such as the proposed LULUCF Action Plans?*

Latvia considers that the sharing of best practices throughout the Community with regard to the most appropriate measures for the LULUCF sector is essential in order to effectively contribute to climate change mitigation. However, it is unlikely that the LULUCF Action Plans would be an effective means of implementation.

Latvia would like to stress that the EU Member States are already implementing a number of effective national level measures. Such forestry measures, while ensuring sustainability of forest management, also contribute to the climate stabilization and climate change mitigation.

At the same time, the multifunctional role of the forestry sector should be taken into account.

Latvia would like to stress that, according to the subsidiarity principle, forest policy falls within the competence of the Member States, and that has to be respected. In this context it is essential to ensure policy synergy not only at Member State level, but also at EU level.

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## THE NETHERLANDS

- *How do Member States assess the proposed phased approach?*

The Netherlands supports the phased approach. The inclusion of the LULUCF sector in the EU's Climate and Energy Package will affect the EU's greenhouse gas emissions reduction targets. The sector should be included when the reduction targets are revised. Clarity regarding the accounting rules will facilitate the negotiations on the inclusion of the sector in more ambitious EU climate commitments. It will also stimulate improved monitoring and reporting of LULUCF sector emissions and removals.

- *How can Member States best stimulate the mitigation potential of the LULUCF sector at this stage, and how can all actors involved best share the experiences gained, e.g. through means such as the proposed LULUCF Action Plans?*

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The Netherlands takes the view that it is up to Member States to decide how to stimulate the mitigation potential in the LULUCF sector. The characteristics of the sector are very different in each Member State. An effective measure in one Member State does not necessarily work in another Member State.

EU financing options to stimulate the mitigation potential exist, for example in the Common Agricultural Policy. It is up to Member States whether they would like to use these options and, if so, how.

The Joint Research Centre of the European Commission has organised several workshops to share experiences in monitoring and reporting LULUCF sector emissions and removals. Such workshops could provide a platform for sharing experiences on policies and measures to stimulate the mitigation potential in the sector.

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## SLOVAK REPUBLIC

### – **How do Member States assess the proposed phased approach?**

The Slovak Republic sees the proposal for a decision as a part of the efforts aimed at strengthening the European Union commitments in the field of accounting emissions and removals resulting from the LULUCF sector. From a global point of view, the LULUCF sector represents one of the most important sectors when it comes to attaining the objective of greenhouse gas emission reduction. Taking into account the very specific nature and profile of the LULUCF sector, we particularly appreciate the fact that the proposal establishes a legal framework for this sector which is separate from the frameworks regulating the existing commitments (EU ETS and Effort Sharing Decision).

### – **How can Member States best stimulate the mitigation potential of the LULUCF sector at this stage, and how can all actors involved best share the experiences gained, e.g. through means such as the proposed LULUCF Action Plans?**

The formal inclusion of the LULUCF sector in the European Union 20% emission reduction target is itself a way of properly using and stimulating the mitigation potential of the sector. This can be done only if proper conditions are in place. We believe that robust, harmonized and comprehensive accounting rules for the sector fulfil these conditions.

We are of the opinion that remarkable efforts have already been made to stimulate the mitigation potential of the LULUCF sector in Member States, mainly by implementing relevant national policies and actions in forestry and agriculture. Therefore, from this point of view, we see it as crucial for ensuring synergies between proposed LULUCF Action Plans and existing national policies and measures which also contribute significantly to the overall mitigation effort in the forestry and agricultural sectors. National Forest Programmes represent an important tool in this regard.

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