

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

Biomass use for energy and materials to substitute fossil fuels and fossil materials, as well as substituting materials with a large climate impact, such as cement, steel, aluminium and plastics, will gain in importance. Productivity gains in agriculture and a stabilized or decreasing population in many European countries will free large areas of farmland, suitable for bioenergy production, on top of the vast areas of set-aside land and abandoned farmland already available in EU and Central and East Europe outside EU. Wood resources for biomass will also be mobilised on a larger scale.

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?

Production of renewable energy from farming and forestry (biomass and biofuels for energy) for substitution of fossil fuels is by far a better strategy for mitigation than increasing the carbon stock in forests and soils. Increased harvesting of forest products will rejuvenate the forests and increase the forest growth, and thereby the sequestration of carbon. An active forestry with high growth and high production of materials and biomass for energy gives the highest climate benefits, both in the short and the long perspective. Increased use of biomass for energy also increases EU's energy security and creates employment and rural development.

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?

The individual member states have the best competence to design policies for mitigation, and a bottom-up approach should be favoured.

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?

All measures and methods that increase productivity and production from farming and forestry will also have positive climate benefits, besides improving the economy of farming and the rural communities. Trees and other plants are efficient solar collectors that store solar energy in biomass and sequester carbon.

Agriculture and forestry, as well as other sectors of the economy, must decarbonise during the coming years. Increased production of perennial energy crops, like SRC willows, poplars and perennial grasses is also an option for improved energy balance and increased soil carbon content.

Better use of set-aside farmland, abandoned farmland and unmotivated "ecological focus areas" will also improve mitigation in farming.

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

A major obstacle is the political unawareness of the potential of farming and forestry to use its resources for mitigation through increased production and substitution of fossil fuels. The recent ILUC-decision is a clear evidence of this unawareness.

The incentives for substitution are weak in most EU countries. The cost for climate gas emissions is very low in ETS, and in most countries there are no carbon taxes in the heating sector, where the potential for substitution is the greatest.

The most efficient policy for emissions reduction from forestry and farming is increased flux of carbon through increased growth. In forestry, this is reached by improved forest management, and often with increased fellings that will rejuvenate old forests.

In many parts of Europe, support to afforestation is also an option. Also, management of forests to reduce the risk of forest fires and using the harvested material for energy, is also a possibility.

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?

In the present rules, agriculture and forestry and their production of renewable resources are divided in the accounting. It is therefore difficult to analyse the total mitigation from the green sector, and the benefits are not obvious in the reporting. The climate benefits of biomass and biofuels are recorded in other sectors, like residential, industry and transport, indirectly, through reduced emissions from fossil fuels. In agriculture, only the "climate cost" (fuel use, fertilizers, manure handling, methane from cattle) is recorded, not the climate benefits.

Reporting of LULUCF numbers is still uncertain from many countries, due to varying standard of forest inventories, etc.

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?

We are opposed to flexible mechanisms for LULUCF. It is important to have accurate reporting, but positive LULUCF values, removals in forestry, should never be used to motivate lower ambitions to reduce fossil emissions in other sectors or in other countries.

There is a big risk that too much attention to LULUCF values will lead to less focus on the major problem – the combustion of fossil fuels.

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?

Option 1

Disadvantage: Maintains the non-CO2 emissions in the agricultural and forestry sector, and does not support coordinated mitigation efforts inside the sectors.

Advantage: Makes it clear that these "emissions" are different from other types of anthropogenic influences on the climate. Clear division between LULUCF and other emissions, makes it more difficult to use LULUCF to compensate for other emissions.

Option 2

Disadvantage: Still the agricultural sector would not be seen as a whole – as CO₂-emissions are still not counted in AFOLU. Unclear – would this also include methane from animal husbandry?

Advantage: A clearer view of the total effect of farming and forestry.

Option 3

Disadvantage: The temptation to use LULUCF to compensate for other emission. This could lead to negative effects for forestry in the short turn, with reduced harvesting, and to lower sequestration and lower LULUCF benefits in the long run.

Advantage: For some forest countries it would show that the total climate impact already is very low.

Which is your preferred option? Why?

Option 1 – LULUCF pillar

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

We prefer to have a separate pillar for LULUCF. It makes it possible for countries to compare the development over time, but it does not make it possible to use benefits in LULUCF to reduce the ambitions in other sectors.