Svebios svar på EU-konsultation om om LULUCF (Land Use, Land Use Change and Forestry)

Svebio har den 12 november 2010 svarat på en EU-konsultation om LULUCF. Frågeställningen gäller om EU-länder obligatoriskt ska inkludera växthusgasutsläpp från markanvändning som en del av klimatpolitiken.

Redan idag rapporteras påverkarn av markanvändning, förändrad markanvändning och skogsbruk (LULUCF) frivilligt av medlemsländerna, men utsläppen ingår inte i de klimatmål som ställts upp för de olika länderna eller för EU som helhet.

Svebio anser att det vore fel att inkludera markanvändningen av följande skäl:
Det skulle minska många länders ansträngningar att reducera utsläppen från fossila bränslen i kraftverk, industrier och transporter om man fick en rabatt för att binda kol i sina skogar och marker.
Det skulle kunna leda till att mark- och skogsägare får betalt för att inte använda sin skog och sin åkermark för produktion av timmer, jordbruksgrödor och biobränslen, och istället ägna sig åt kollagring. Det kan leda till minskad tillgång på biobränslen som kan ersätta fossila bränslen.
Skogen bör enligt Svebio användas för att producera virke och biobränslen. Hög produktion och hög tillväxt leder till stor kolinbindning och samtidigt stora möjligheter att substituera fossilt kol. Kolförrådet i skogarna kan öka samtidigt som produktionen ökar.

Här är Svebios svar på engelska:

We are negative to including LULUCF in the EU greenhouse gas commitment for the following reasons:
An inclusion of LULUCF would certainly dilute the efforts to reduce GHG emissions in other sectors. It would give member states arguments to lower their ambitions to reduce emissions in, for example, power plants and industries. Focus must be on reducing emissions from fossil fuels, and these emissions are in no way less harmful to the global climate if a country at the same time has good growth in its forests.
The LULUCF removals and emissions are very low compared to the emissions from other sectors – only 8 percent for EU as a whole. Only one country has a small LULUCF net emission (negative LULUCF balance). The rest of the countries have removals thanks to the growth of the carbon stocks in European forests. Furthermore, these removals have increased since 1990. The statistics show that there is no urgent problem at hand.
One strong reason to refrain from mandatory inclusion of LULUCF is that accounting, monitoring and verification is very difficult, and the uncertainties are much higher than, for example, for calculations of emissions from fossil fuel combustion. Estimations of LULUCF and of the numbers they are based on are often revised, and the margin or error for forest resource inventories can be as high as 30 percent. This makes it very difficult, or impossible, to include LULUCF in the Emission Trading System or in the Effort Sharing Decision.
Another problem is natural disturbances like forest fires and strong storms. LULUCF is supposed to only account for man-made (anthropogenic) effects, but it is very difficult to draw the line, and to make an accurate account for each year. This is also a reason not to relate LULUCF to ETS and ESD, which both require annual accounting.
For the timber and bioenergy sector it would be very harmful if the landowners were rewarded for removals. This would lead to lower activity in forestry, and produce less

biomass for energy, both as residues from industry, as residues from forestry, and as recovered wood.

In the short run it might be tempting to “save carbon” in the forests, but in the long run this is not a wise policy. The forests’ carbon binding capacity will reach saturation, and the yearly growth will go down, and consequently also the removal of carbon dioxide from the atmosphere. We may make a short term gain in the carbon emissions to the atmosphere, but in the middle and long term the emissions will be the same, or increase. The best strategy is to promote good sustainable forest management, with a high production of biomass for material and bioenergy, and thereby maximise substitution of material such as plastics and cement, as well as fossil fuels in the energy sector.

Rewarding the landowners would also require a bureaucratic system of assessing the carbon stock of forests and soils, with no guarantee that this system would be fair.

The best way to stimulate the use of renewable resources from forestry and to ensure maximum sustainable substitution of fossil fuels by bioenergy from forests is to use the Polluter Pays Principle and impose a carbon tax, besides developing the system of emission trading. The use of biomass for energy should not be rewarded (subsidised) – it is the fossil fuels that must pay their environmental cost.

Monitoring of LULUCF should however continue, the methodology should be refined and the numbers reported. This way it will be possible to ensure that in the long run the carbon stock of forests and soils continues to increase also in coming years.

EU should also increase its efforts to aid developing countries in protecting forests and carbon-rich soils and ecosystems, and to help developing sustainable systems for production of biomass for energy in these countries.