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General Secretariat

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**LIMITE**

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## **MEETING DOCUMENT**

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From:	General Secretariat of the Council
To:	Working Party on the Environment
Subject:	Non-ETS (LULUCF): WPE 18 September - LU proposal for an article 12. 2 a (new)

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With a view to the WPE meeting on 18 September delegations will find attached comments from Luxembourg on the above.

## Follow up of the WPE LULUCF on 19 July 2017

### LU proposal for an article 12. 2 a (new)

Please find below a LU proposal for an article 12.2 a (new), as announced and explained during the WPE on LULUCF on 19 July.

This proposal concerns a reporting obligation for Commission on emissions from all LULUCF land accounting categories referred to in Article 2, against the 2000-2009 reference period.

#### Article 12. 2 a (new)

The Commission shall report in 2027, for the period from 2021 to 2025, and 2032, for the period 2026-2030, on the Union balance of average net removals from the land accounting categories referred to in Article 2 in reference to the average reported in period 2000-2009.

#### *Justification:*

LU recognizes that the LULUCF text on the Council table, with accounting against FRL and compensation mechanism reflects the discussions inside the WPE, and the attempts to address specificities inside the EU. Consequently, the proposal, in its current form, is highly complicated and open to international skepticism.

However, in order to maintain the EU's credibility and leading role in terms of action against climate change, LU believes that an obligation for an EU wide net-net accounting would be a necessary improvement of the proposed legislation. LU would like to propose the introduction of a net-net accounting at an EU level of all emissions and removals, not only from forest land but from all land related categories, compared to the period from 2000 -2009.

This will allow documenting how the terrestrial sink will have increased or decreased over the years, it will allow the EU and its member States to verify that their agreed EU system functions well, and it will allow monitoring whether the LULUCF sector emissions evolve in coherence with the agreed objectives under the Paris Agreement. LU is of the opinion that this would not only be a necessary safeguard for the Member States themselves, but also be a guarantee for transparency towards the EU's international partners.