

27 March 2017

Dr Josè A Herrera, Maltese Presidency of the Council of the EU

cc

Commissioners Miguel Arias Cañete and Phil Hogan

Climate and Forest Ministers in the EU Member States

Dear President of the Environment Council, Colleagues,

We wish to congratulate you, the Commission and other Member States on the progress made on global and EU's climate and energy policies. The Paris Agreement has entered into force, final consideration on emission trading is taking place and discussions on proposals on Effort Sharing Regulation and Land Use, Land-use Change and Forestry (LULUCF) are advancing both in the European Parliament and in the Council.

Ministers from ten forest rich countries sent the joint letter to Commissioner Arias Cañete and Commissioner Phil Hogan in May 2016 to give their views on how to include LULUCF into EU's climate and energy framework. Ideas introduced in the letter are still valid.

We, as ministers coming from very different parts of Europe, wish to highlight the importance of forest related issues and provide our collective views to facilitate the ongoing discussion on LULUCF proposal.

- LULUCF and in particular forests are important and integral components of EU's 2030 climate and energy framework. We need to move forward swiftly with LULUCF and effort sharing proposals.
- When establishing EU's LULUCF framework and accounting rules, we highlight that (i) LULUCF and forests have a key role in the long-term goal to achieve a balance between anthropogenic emissions by sources and removals by sinks of greenhouse gases in the second half of this century, (ii) accounting rules should take into account multiple functions of forests and incentivise actions beyond pure carbon sequestration, and (iii) accounting rules should maximise policy coherence within the EU and consistency with internationally agreed approaches and methodologies (especially IPCC and UNFCCC).
- There are significant national differences between Member States in terms of forest coverage, land use, forest management, natural conditions, GHG profiles and mitigation potential. We are concerned that the proposed LULUCF regulation is not balanced and fair

as forest rich countries' opportunities for sustainable forest management are restricted and possibilities to meet climate and energy commitments are severely compromised.

- We see the proposed cap for managed forest land (3.5 % of overall base year emissions) not appropriate anymore in the EU context since it was developed within the Kyoto Protocol to restrict flexibility within overall emissions in mind (article 8.2). In the current proposal the size of the LULUCF-flexibility is strongly limited and there is no need to set additional limitations for the positive contribution of managed forest land within the LULUCF framework.
- Proposed article 8.3 is most crucial for forest rich countries. We are of the view that accounting rules should allow countries to continue active and sustainable forest management practices in the future and incentivise positive contributions to climate change action. We believe that forest reference levels should not be bound by the past intensity of forest management practice.
- We believe that a transparent technical review process should be established for ensuring comparability of reference levels between Member States, while the reference levels should be nationally determined (articles 8.5 and 8.6).
- We recognize the importance and positive contribution of long-lasting forest products and support the inclusion of Harvested Wood Products into the accounting system.
- We believe that flexibilities within LULUCF and between LULUCF and effort sharing need further clarification. On the scope of the LULUCF flexibility to effort sharing, we support the inclusion of forests while ensuring the overall ambition and environmental integrity.

We look forward to continue working constructively with you, all other Member States, the Commission and the European Parliament to find a fair, balanced and forward-looking outcome.



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Minister of the Environment, the Czech Republic



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Minister of Agriculture and Rural Development
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Mr. Kęstutis Navickas
Minister of Environment of the Republic of Lithuania



Ms. Irina Kostova
Minister of Environment and Water,
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