



Input from Wetlands International with regard to addressing emissions from peatlands and other wetlands, dd. 29 September 2009

Peatlands, REDD+ & NAMA's
Feedback to FCCC/AWGLCA/2009/INF.2, 15 September 2009

Peatlands contain a huge amount of carbon. Peatland deforestation, drainage and burning leads to very large greenhouse gas emissions in developing countries, in the magnitude of 800 Mt/CO₂/yr from drainage and another 400-1000 Mt/CO₂/yr from peat forest fires. Logged and drained peatland soils continue to release carbon dioxide for decades and degradation continues until they are either restored or completely depleted of peat. Avoiding and reducing the emissions from peatlands has a **very significant and cost-effective** GHG emission reduction potential.

Key objectives:

Reducing emissions from organic soils under (former) forests should be addressed in a REDD+ mechanism. Over time, all ecosystems with substantial carbon stocks should be included into a similar mechanism; including non-forested peatlands.

The restoration of yet deforested and drained peatswamp forests and the conservation and restoration of non-forested peatlands should also eligible as activity under REDD+ or be prioritized as low carbon strategies under NAMA's.

Textural guide

Objectives and Scope:

Paragraph 106.1

Besides the forestry sector, also **'other selected land-use and land-use sectors'** should be included in the REDD+ framework. Therefore the mechanism should provide flexibility for including over time additional land-use and land-use categories and activities on the basis of measurable, reportable and verifiable commitments and actions, including guidelines agreed by the COP.

Emissions from land use that follows after deforestation (like cropland or grassland) should be addressed, including emissions from below ground soil carbon. This would cover ongoing emissions after a peatswamp forest has been cleared (and drained).

Safeguards:

Paragraph 108, establish safeguards for:

- Biodiversity conservation *and other ecosystem services*.
- Against the conversion of natural forests to forest plantations

Measurement, reporting and verification of actions

Paragraph 119

For REDD+, all emissions, emission reduction or removals from all five carbon pools for forests – including soil carbon - (as described by IPCC 2006) should be accounted. If this is not possible in terms of MRV for all carbon pools while it is clear that emissions take place from those, no credits or other support should be given for calculated emission reductions or removals. This will prevent plantations on drained peatlands from getting credits for what would, in fact, be an ongoing emission.

Further comment to IPCC guidelines:

Knowledge on emissions from peatlands and other wetlands is increasing rapidly and there are now a lot of improved data available. Even though the IPCC 2006 guidelines have improved a lot, the default values are not based on the current best available scientific data. Although it is crucial, for providing incentives to reduce emissions from wetlands/peatlands, that the IPCC 2006 will be used for REDD as these incorporate organic soil carbon, *a revision or addendum that includes improved wetlands default value data is highly recommendable. Also IPCC guidance for methane (CH₄) emissions is necessary to address possible methane emissions that occur after rewetting drained peatlands. This is currently lacking, but can be improved as the scientific data base is significant.*

Other comments:

Peatland conservation and restoration: mitigation and adaptation benefits

Avoiding and reducing the emissions from peatlands has a very significant and cost-effective GHG emission reduction potential. At the same time many peatlands also play an important role in climate change adaptation because of their water regulation services: due to their capacities to store and maintain large quantities of water, peatlands play an important role in flood mitigation and ensure a continuous water supply in times with uncertain and fluctuating precipitation. Coastal peatswamps also play a vital role in coastal resilience and preventing salt water intrusion. This should be taken into consideration for selecting peatland conservation and restoration as a REDD+ and NAMA activities.

Support for enhancing MRV capabilities in developing countries.

The knowledge in many countries is very limited about organic soil carbon and the losses. There is a need to support developing countries on enhancing MRV in assessing their GHG emissions from organic soil carbon. Whereas further development is necessary and is being pursued in running research and implementation projects – these methodologies will enable cost-effective and reliable baseline setting and monitoring of GHG emissions. This will allow inclusion of peatland conservation and rewetting in a post-2012 climate framework.

Peatlands and LULUCF Kyoto Protocol

Feedback to FCCC/KP/AWG/2009/10/Add.3/Rev.1, 28 August 2009

Wetland degradation in developed (Annex 1) countries leads to significant greenhouse gas emissions, in the magnitude of 900 Mt/CO₂/yr. This makes wetland degradation and wetland restoration important LULUCF activities to address under KP. This policy brief reflects whether incentives to reduce greenhouse gas emissions from *wetland degradation* are appropriately addressed in the 'Proposed amendments to the Kyoto Protocol' d.d. 1 July 2009. Please find below our comments and recommendations.

It is proposed under C. Article 3, paragraph 4, Option 1 (page 17) to add *wetland management* under article 3.4, meaning that countries *may choose* to account for the accountable anthropogenic greenhouse gas emissions by sources and removals by sinks resulting from wetland management.

Although with this option emissions from wetlands are no longer entirely overlooked, this formulation

- A. still allows countries to ignore these significant emissions as the accounting remains voluntary, not obligatory;
- B. keeps open the option for draining pristine peatlands for forestry, especially in the boreal zone (the largest biome on earth with the largest concentration of peatlands), where drainage may initially in the shorter run lead to a net increase in biomass and litter carbon stock. As the biomass and litter stocks tend towards equilibrium but the peat carbon losses continue, the initial gains in carbon stocks are annihilated and change into net carbon losses on the long run. Such draining of pristine peatlands for short-term carbon gains (but long-term carbon losses) would also conflict with the aims of the Biodiversity Convention and the Ramsar Convention.

Wetlands International proposes the following amendments:

Nationally appropriate mitigation actions and commitments by developed countries should:

Include all substantial greenhouse gas emissions and removals in national accounting from wetland degradation and wetland restoration ***in a mandatory net-net accounting approach*** with preferably 1990 as a base year, provided this is technically feasible and reliable.

As including LULUCF emissions and removals in accounting implies lower costs of reducing emissions, we demand high, ambitious reduction targets in line with the IPCC recommendations to keep temperature rise within the 2 degree Celsius limit. Reducing Annex-I emissions through support for mitigation actions in Non-Annex 1 countries should be limited (cap).

The term "wetland restoration" should be chosen in favour of "wetland management" as wetland management might involve drainage for shorter term increase of forest growth.

The following definition under Article 3.4 is proposed under Option A. Definitions, (i), page 14:

[“Wetland] [“Peatland] management” is a system of practices for stewardship and use of [wetlands] [peatlands] that have an effect on [greenhouse gas emissions and removals] [carbon stock changes], including drainage of [wetlands] [peatlands] and restoration of drained [wetlands] [peatlands];]

Comments and recommendations Wetlands International:

This definition *does* appropriately cover both emissions and removals from wetlands. However, the incentive for countries to select this activity voluntarily *is limited* as countries are likely to select this activity only when net credits can be earned. Therefore *wetland degradation* should be defined as *a mandatory accounting activity*. With emissions from wetland degradation being mandatorily accounted, it will be sufficient to define restoration as a voluntarily activity.

In addition, as explained above, the term “wetland restoration” should be chosen in favour of “wetland management”.