

EU Public consultation on the role of EU agriculture and forestry in achieving the EU's climate change commitments

Text of the public consultation

Part A was just registration of the participant (Organisation etc.)

B) How can land use activities contribute to climate change mitigation?

6) Do you consider that land use activities could make a significant and cost-effective contribution to climate change mitigation? (compulsory)

Yes

6-1) In what way(s) do you think land use activities could contribute and over which time horizons?

	by 2020	by 2020 to 2050	beyond 2050
Limit emissions in agriculture (optional)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Increase sequestration (uptake of CO2) in agriculture (optional)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Limit emissions in forestry (optional)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Increase sequestration (uptake of CO2) in forestry (optional)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Increase biomass production and use for substitution of carbon intensive materials (optional)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Increase biomass production and use for substitution of carbon intensive energy sources (fossil fuels) (optional)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

6-2) Please indicate for each mitigation measure below if you consider it could (i) contribute to overall climate change mitigation, (ii) increase GHG emissions, or (iii) have no significant effect on GHG emissions. When answering this question, please take into account leakage and rebound effects, if any.

	would contribute to mitigation	would increase GHG emissions	would have no effect on GHG emissions
Conversion from annually cultivated land to permanent cropping (especially on organic soils) (optional)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Incorporation of organic materials (farmyard manure, straw, crop residues) into cultivated land (optional)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Avoidance of burning in the field of harvest residues (which are not utilised for bioenergy or put into the soil) (optional)	<input checked="" type="checkbox"/>		<input type="checkbox"/>
Reduction in tillage frequency (conservation tillage, zero tillage) (optional)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Prevention of loss of topsoil by limiting soil erosion (optional)	<input type="checkbox"/>		<input type="checkbox"/>
Maintenance or restoration of the level of the water table in peat soils (optional)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Increasing grassland productivity (optional)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cover crops (optional)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Adapted crop rotation patterns (optional)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reduction or avoidance of the conversion of forest to other land uses (optional)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Afforestation (optional)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Leaving organic materials (farmyard manure, straw, stems, branches and foliage, crop and usually harvested residues) in and on the soil to maintain or enhance soil organic matter and fertility (optional)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Prevention of forest fires and storm damages (optional)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Modifying rotation lengths (optional)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Restoring woody landscape elements such as hedgerows and windbreaks (optional)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Use of harvested biomass to substitute materials associated with high greenhouse gas emissions (e.g. building with timber instead of steel, concrete, glass) (optional)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Use of harvested biomass to substitute fossil fuels (through direct combustion or biofuel generation) (optional)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reduction in the conversion of relatively high carbon stock land to arable land (optional)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

7) Which statement would best describe your view on the potential of land use activities to contribute to climate change mitigation? (compulsory)

<input type="checkbox"/> Land use activities are instrumental to a long term solution, as only ecosystems can absorb the carbon emitted to the atmosphere and provide biomass for material and energy substitution.
<input type="checkbox"/> Land use activities can make an important contribution, but the key challenge is to make our energy, industrial and transport systems more sustainable.
<input type="checkbox"/> Land use activities may provide a minor contribution, but they are under threat from climate change itself and the main focus in this sector should be on adaptation.
<input type="checkbox"/> The removals or reduced emissions achievable in the land sector are too uncertain to consider or would only dilute efforts in other sectors.



None of the above

C) The role of LULUCF in the EU's greenhouse gas reduction commitment

8) The EU has committed unilaterally to reduce greenhouse gas emissions by 20% by 2020 compared to 1990, and by up to 30% if conditions are right. Do you consider that emissions and removals related to LULUCF, either fully or partly, should be included in the EU's greenhouse gas commitment? (compulsory).

No

If question 8 is answered NO, 8-1 below needs to be answered:

8-1*) Why do you consider an inclusion of LULUCF undesirable? (you can select multiple items): (compulsory)

<input checked="" type="checkbox"/>	Because comparable and reliable information on emissions and removals may be lacking and/or be too uncertain
<input checked="" type="checkbox"/>	Because there is a risk that removals can be reversed
<input checked="" type="checkbox"/>	Because accounting rules could be inaccurate
<input type="checkbox"/>	Because it could hamper the use of biomass for material substitution
<input type="checkbox"/>	Because it could hamper the use of biomass for energy substitution
<input type="checkbox"/>	Because the benefits could be limited compared to the monitoring and reporting requirements
<input checked="" type="checkbox"/>	Because sufficient mitigation potential could be achieved through alternative solutions
<input type="checkbox"/>	Because it could have negative impacts on food security
<input checked="" type="checkbox"/>	Because it could have negative impacts on other ecosystem services
<input type="checkbox"/>	Other reason(s)

Question 8 was answered NO, therefore these answers (8-2 to 8-8) under YES were submitted separately to Oskar.LARSSON@ec.europa.eu and CLIMA-LULUCF@ec.europa.eu

8-2) Why do you consider the inclusion of LULUCF desirable (you can select multiple items): (compulsory)

- To incentivise additional mitigation in the sector
- To make sure that emissions and removals from all sectors in the economy are adequately accounted for

8-3) Under the Kyoto Protocol, LULUCF is divided into a number of different activities, and additional activities are considered in the international negotiations. Which activities should

be included in the EU's GHG reduction target and when? Please select from the options below.

	to count towards the 2020 target	to count towards later targets, if at all
Deforestation (optional)	<input type="checkbox"/>	<input type="checkbox"/>
Afforestation/Reforestation (optional)	<input type="checkbox"/>	<input type="checkbox"/>
Revegetation (optional)	<input type="checkbox"/>	<input type="checkbox"/>
Forest Management (optional)	<input type="checkbox"/>	<input type="checkbox"/>
Cropland Management (optional)	<input type="checkbox"/>	<input type="checkbox"/>
Grazing Land Management (optional)	<input type="checkbox"/>	<input type="checkbox"/>
Wetland Management (optional)	<input type="checkbox"/>	<input type="checkbox"/>
Changes in the harvested wood products pool (optional)	<input type="checkbox"/>	<input type="checkbox"/>

8-4) Under the Kyoto Protocol, accounting is mandatory for some activities and voluntary for others. In your view, should accounting for the following activities be mandatory for all Member States?

<input type="checkbox"/> Debits/Credits should be given for all net emissions/removals in the commitment period (Gross-Net)
<input type="checkbox"/> Debits/Credits should be given for a certain percentage of all the net emissions/removals in the commitment period (Gross-Net with a discount factor)
<input type="checkbox"/> Debits/Credits should be given up to a fixed amount (cap) for net emissions/removals in the commitment period (Gross-Net with a cap)
<input type="checkbox"/> Credits/Debits should be given for the change in net emissions/removals between the commitment period and 1990 (Net-Net)
<input type="checkbox"/> Credits/Debits should be given for the difference in net emissions/removals between the commitment period and a reference period (Reference level)
<input type="checkbox"/> Other

<input type="checkbox"/> Reported net removals/emissions for year 1990
<input type="checkbox"/> Reported net removals/emissions in the period 1990-2007
<input checked="" type="checkbox"/> Reported net removals/emissions in the period 1990-2012
<input type="checkbox"/> Reported net removals/emissions in the period 2008-2012
<input type="checkbox"/> Projected net removals/emissions period 2013-2020
<input type="checkbox"/> Other

	Mandatory	Voluntary
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Deforestation (optional)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Afforestation/Reforestation (optional)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Revegetation (optional)	<input type="checkbox"/>	<input type="checkbox"/>
Forest Management (optional)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Cropland Management (optional)	<input type="checkbox"/>	<input type="checkbox"/>
Grazing Land Management (optional)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Wetland Management (optional)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Changes in the Harvested Wood Products pool (optional)	<input type="checkbox"/>	<input type="checkbox"/>

8-5) If included, how should emissions and removals related to forest management be accounted for? Please consult the background documents (link at the top of this questionnaire) for more information about the different accounting methods. (compulsory)

What should the reference level for forest management be based on? (compulsory)

8-6) To what extent should emissions caused by natural disturbances (such as large storms or extreme fire seasons) be accounted for under forest management? (compulsory)

- All emissions associated with natural disturbances should be accounted for in the commitment period
- Some of the emissions associated with natural disturbances should be accounted for in the commitment period
- Emissions associated with natural disturbances could be carried over to the next commitment period
- None of the emissions related to the natural disturbance should be accounted for

8-7) Do you think that there is a need for further harmonisation or standardisation between Member States?

For the purpose of this question harmonisation means ensuring that various elements are comparable between Member States whereas standardisation means that various elements must be identical in all Member States.

	Harmonisation	Standardisation	Neither
Definitions (optional)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Monitoring (optional)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reporting (optional)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Verification (optional)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

8-8) Where do you think harmonisation or standardisation would be most needed (possibly beyond the categories listed here above)? (optional) (maximum 5000 characters)

There is definitely a need for further standardisation and harmonisation between different EU Member States. So far, the definitions used for example for “sustainable forest management”, are based on the very broad framework of the Ministerial conference of protection of forests

in Europe (MCPFE, now Forests Europe) which may be implemented differently in the various EU member states. This can lead to different emission/removal levels and therefore standardised definitions of e.g. sustainable management are needed, even though there might be a need for definitions according to forest types. As different EU Member States do have different financial and administrative means, the standardisation of monitoring might be difficult but it should allow at least for further harmonisation as otherwise the monitoring of emissions or reductions might lead to falsified results. The reporting for LULUCF related activities needs to be standardised as all the data used and all comments made will be linked towards the achievement of the overall reduction goals. In this way, all EU Member States will have to report about the same activities and report in the same way about emissions/removals. It would be highly desirable to standardise the verification of LULUCF but due to rather different structures for data collection and monitoring, it seems to be doubtful, whether a standardised verification can be achieved (comparable to monitoring), but the verification needs at least to be harmonised between the different EU Member States.

D) The role of the EU in policies addressing land use activities

9) Currently, the EU's greenhouse gas reduction commitment is regulated by the EU Emissions Trading System (Directive 2009/29/EC) and the Effort Sharing Decision (406/2009/EC). In your view, how should emissions and removals related to LULUCF be regulated if included in the commitment?

Emissions and removals in the sector, accounted for according to rules agreed by the EU, should count towards the EU's GHG reduction commitment through a separate framework and not be linked to the targets under the Effort Sharing Decision or the EU ETS

Emissions and removals in the sector, accounted for according to rules agreed by the EU, should count towards Member States' targets under the Effort Sharing Decision (406/2009/EC)

Emissions and removals in the sector, accounted for according to rules agreed by the EU, should be part of the single EU-wide cap on emission allowances in the EU Emissions Trading System

Emissions and removals in the sector should not be included in the EU's greenhouse gas reduction commitment

Other

9-1*) Please indicate your preferences below. Should there be a sector specific target in terms of net emissions/removals? (compulsory)

Yes, one target for each Member State

Yes, one target for the EU as a whole

No, no target
If no target, at what level should LULUCF debits and credits generated by emissions and removals in the sector be accounted for? (compulsory)

Debits and credits should be accounted for at the level of Member States

Debits and credits should be accounted for at the EU level

10) Do you consider that existing EU and Member States policies are sufficient to ensure that land use activities contribute to climate change mitigation? (compulsory)

No

If NO is ticked, the following questions 10-1 and 10-2 need to be answered:

10-1) In which areas do you think further action may be necessary? (optional)

<input checked="" type="checkbox"/> Deforestation	<input checked="" type="checkbox"/> Afforestation/Reforestation
<input type="checkbox"/> Revegetation	<input checked="" type="checkbox"/> Forest Management
<input checked="" type="checkbox"/> Cropland Management	<input checked="" type="checkbox"/> Grazing Land Management
<input checked="" type="checkbox"/> Wetland Management	<input checked="" type="checkbox"/> Increasing the stock of long-lived wood products
<input checked="" type="checkbox"/> Material substitution	<input checked="" type="checkbox"/> Energy substitution

10-2) How might this be best organized? (compulsory)

Through additional/amended policy instruments at the regional level

Through additional/amended policy instruments at the MS level

Through additional/amended policy instruments at the EU level

A combination of the above

11) In your view, should landowners be rewarded for net removals? (compulsory)

Yes, land owners should be rewarded for all net removals

Yes, land owners should be rewarded but only for increases in net removals or decreases in net emissions that are the direct result of action taken by the landowner

No

12) In your view, should landowners be responsible for net emissions? (compulsory)

Yes, land owners should be responsible for all net emissions

Yes, land owners should be responsible but only for decreases in net removals or increases in net emissions that are the direct result of action taken by the landowner

No

13) In your view, should use of harvested biomass to substitute materials associated with high greenhouse gas emissions (e.g. building with timber instead of steel, concrete, glass) be rewarded? Who should be rewarded? (compulsory)

<input type="checkbox"/>	Yes, the producer of biomass should be rewarded
<input type="checkbox"/>	Yes, the manufacturer of the harvested wood product should be rewarded
<input type="checkbox"/>	Yes, the intermediate user should be rewarded
<input type="checkbox"/>	Yes, the final consumer should be rewarded
<input type="checkbox"/>	No particular part of the producer/consumer chain should be rewarded

14) In your view, should the use of harvested biomass to substitute fossil fuels (through direct combustion or biofuel generation) be rewarded? Who should be rewarded? (compulsory)

<input type="checkbox"/>	Yes, the producer of biomass should be rewarded
<input type="checkbox"/>	Yes, the energy producer should be rewarded
<input type="checkbox"/>	Yes, the final consumer should be rewarded
<input type="checkbox"/>	No particular part of the producer/consumer chain should be rewarded

15) Would you like to make further comments on the questions or raise any other issues concerning land use, land use change and forestry and climate mitigation in the EU? (optional) (maximum 5000 characters)

<p>6-1 Due to issues of carbon debt on combustion of forest products, only short-lived energy crops could make a contribution within the 2020 timeframe. 6-2 Options that could make the most significant impact: not draining/restoring peat, reduction/avoidance of forest conversion, afforestation (favouring native species and avoiding planting on peatlands, high carbonstock ecosystems, and high biodiversity areas) and reduction of conversion of high carbonstock land to arable. Adapted crop rotation patterns only help mitigation if the adaption is to lengthen and increase the complexity of the rotation; modifying rotation lengths contribute only if the modification is to lengthen rotation length. Bioenergy, often touted as a mitigation measure, has serious risks of increasing GHG emissions. To address this, forest management accounting rules need to be designed so that they honestly account for emissions and the carbon debt issue needs to be addressed whereby trees take many decades to repay the carbon debt of their combustion (this is relevant at the landscape as well as the stand level). 8-1 A 30% GHG target that drives decarbonisation in energy, transport and industry is vital to achieve the necessary climate mitigation in these sectors. A 30% target is still insufficient according to the science and due to dilution of the current 20% GHG target by</p>

offsetting credits. An inclusion of land use related activities should therefore not lead towards lower reduction commitment in these other sectors. This would be highly likely if based on favoured proposals in the international accounting system, is highly flawed, allowing millions of tonnes of emissions increases from forest management to be ignored and allowing countries to pick and choose accounting for other activities. LU activities could be included into the EU reduction commitments but only if the conditions for inclusion are right. They should be covered by a separate target from the 30% and should include full accounting for both reductions and increases of all GHG emissions from LU and forestry activities, including full accounting for emissions from bioenergy. Genuine and additional mitigation should be rewarded but it should be ensured that accounting rules are clear, strict and transparent, allowing for real emission reductions, avoiding leakage or “hidden emissions”. Future emissions increases/decreases should be compared to past emissions (the best option would be a historical base period of 1990-2012, assuming legislation comes into force 2013). Environmental safeguards including for biodiversity and indirect LUC should be in place and coherence with other environmental protection legislation under EU law ensured.

Furthermore the inclusion of LULUCF in EU GHG reduction goals depends on the quality of available data. This needs improving across land uses but particularly for areas with high levels of uncertainty including cropland management– a “hot spots” approach using Tier 3 data for highly emitting approach could help with addressing this but would need trialling.

8-3 Ideally all activities should be included as mandatory activities, to reflect what the atmosphere sees and facilitate a move towards full land-based carbon accounting as soon as possible. However, revegetation would need to be complemented by an equivalent activity of devegetation to address unbalanced accounting; data uncertainties which are very significant for cropland management need to be addressed (see above); data issues also need to be addressed for harvested wood products.

9 – We believe that LULUCF sectors do require target-driven and enforceable regulatory frameworks however we do not believe these should be under the ETS and ESD. Taking account of LULUCF requires a) an EU wide sectoral approach with a target and common rules set at EU level to minimise internal market distortion b) an enforcement and compliance architecture must be established alongside a single monitoring, reporting and verification (MRV) system and robust systems of enforcement.

8-6 only statistically rare (to 2 standard deviations), extreme events would classify as force majeure (e.g. hurricanes); all other emissions from natural disturbance events should be included.

10 – far from actually achieving climate mitigation, current international rules are proposing to increase emissions from logging and not account for them so there needs to be a serious redirection of policy to achieve climate mitigation from the forest and land use sectors.

14 –The energy producer should only be rewarded if forest harvesting emissions are accurately accounted for, the full life cycle of biomass production transport and processing is included in the emissions profile and issues surrounding carbon debt are addressed. In addition, rewards should only be provided as long as they are over and above business-as-usual activities.

Annex to online submission to questions (8-2 to 8-8) that are only available under option ‘yes’ to question 8.

8-2) Why do you consider the inclusion of LULUCF desirable (you can select multiple items): (compulsory)

- To incentivise additional mitigation in the sector
- To make sure that emissions and removals from all sectors in the economy are adequately accounted for

8-3) Under the Kyoto Protocol, LULUCF is divided into a number of different activities, and additional activities are considered in the international negotiations. Which activities should be included in the EU's GHG reduction target and when? Please select from the options below.

	to count towards the 2020 target	to count towards later targets, if at all
Deforestation (optional)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Afforestation/Reforestation (optional)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Revegetation (optional)	<input type="checkbox"/>	<input type="checkbox"/>
Forest Management (optional)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Cropland Management (optional)	<input type="checkbox"/>	<input type="checkbox"/>
Grazing Land Management (optional)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Wetland Management (optional)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Changes in the harvested wood products pool (optional)	<input type="checkbox"/>	<input type="checkbox"/>

8-4) Under the Kyoto Protocol, accounting is mandatory for some activities and voluntary for others. In your view, should accounting for the following activities be mandatory for all Member States?

<input type="checkbox"/> Debits/Credits should be given for all net emissions/removals in the commitment period (Gross-Net)
<input type="checkbox"/> Debits/Credits should be given for a certain percentage of all the net emissions/removals in the commitment period (Gross-Net with a discount factor)
<input type="checkbox"/> Debits/Credits should be given up to a fixed amount (cap) for net emissions/removals in the commitment period (Gross-Net with a cap)
<input type="checkbox"/> Credits/Debits should be given for the change in net emissions/removals between the commitment period and 1990 (Net-Net)
<input type="checkbox"/> Credits/Debits should be given for the difference in net emissions/removals between the commitment period and a reference period (Reference level)
<input type="checkbox"/> Other

<input type="checkbox"/>	Reported net removals/emissions for year 1990
<input type="checkbox"/>	Reported net removals/emissions in the period 1990-2007
<input checked="" type="checkbox"/>	Reported net removals/emissions in the period 1990-2012
<input type="checkbox"/>	Reported net removals/emissions in the period 2008-2012
<input type="checkbox"/>	Projected net removals/emissions period 2013-2020
<input type="checkbox"/>	Other

	Mandatory	Voluntary
Deforestation (optional)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Afforestation/Reforestation (optional)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Revegetation (optional)	<input type="checkbox"/>	<input type="checkbox"/>
Forest Management (optional)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Cropland Management (optional)	<input type="checkbox"/>	<input type="checkbox"/>
Grazing Land Management (optional)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Wetland Management (optional)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Changes in the Harvested Wood Products pool (optional)	<input type="checkbox"/>	<input type="checkbox"/>

8-5) If included, how should emissions and removals related to forest management be accounted for? Please consult the background documents (link at the top of this questionnaire) for more information about the different accounting methods. (compulsory)

What should the reference level for forest management be based on? (compulsory)

8-6) To what extent should emissions caused by natural disturbances (such as large storms or extreme fire seasons) be accounted for under forest management? (compulsory)

<input type="checkbox"/>	All emissions associated with natural disturbances should be accounted for in the commitment period
<input checked="" type="checkbox"/>	Some of the emissions associated with natural disturbances should be accounted for in the commitment period
<input type="checkbox"/>	Emissions associated with natural disturbances could be carried over to the next commitment period
<input type="checkbox"/>	None of the emissions related to the natural disturbance should be accounted for

8-7) Do you think that there is a need for further harmonisation or standardisation between Member States?

For the purpose of this question harmonisation means ensuring that various elements are comparable between Member States whereas standardisation means that various elements must be identical in all Member States.

	Harmonisation	Standardisation	Neither
Definitions (optional)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Monitoring (optional)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reporting (optional)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Verification (optional)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

8-8) Where do you think harmonisation or standardisation would be most needed (possibly beyond the categories listed here above)? (optional) (maximum 5000 characters)

There is definitely a need for further standardisation and harmonisation between different EU Member States. So far, the definitions used for example for “sustainable forest management”, are based on the very broad framework of the Ministerial conference of protection of forests in Europe (MCPFE, now Forests Europe) which may be implemented differently in the various EU member states. This can lead to different emission/removal levels and therefore standardised definitions of e.g. sustainable management are needed, even though there might be a need for definitions according to forest types. As different EU Member States do have different financial and administrative means, the standardisation of monitoring might be difficult but it should allow at least for further harmonisation as otherwise the monitoring of emissions or reductions might lead to falsified results. The reporting for LULUCF related activities needs to be standardised as all the data used and all comments made will be linked towards the achievement of the overall reduction goals. In this way, all EU Member States will have to report about the same activities and report in the same way about emissions/removals. It would be highly desirable to standardise the verification of LULUCF but due to rather different structures for data collection and monitoring, it seems to be doubtful, whether a standardised verification can be achieved (comparable to monitoring), but the verification needs at least to be harmonised between the different EU Member States.