



**Australian Government**

**Department of the Environment and Heritage**

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2 November 2006

Mr Yvo de Boer  
Executive Secretary  
United Nations Framework Convention on Climate Change  
PO Box 260124  
D-53153 Bonn  
Germany

Dear Mr de Boer

I am writing to express Australia's strong and ongoing concern about how the UNFCCC secretariat publicly presents information on national emissions inventories. In particular, I question why data from the Land Use, Land Use Change and Forestry sector was not included in the UNFCCC Greenhouse Data 2006 booklet, which was released on 30 October 2006.

Article 1 of the Framework Convention provides a clear indication of what is considered relevant for reporting emissions and Article 12 details that countries shall communicate "a national inventory of anthropogenic emissions by sources and removals by sinks of all greenhouse gases not controlled by the Montreal Protocol". Further, the design of the UNFCCC reporting guidelines against which Annex I party submissions are prepared requires parties to report on anthropogenic emissions by sources and removals by sinks of greenhouse gases not controlled by the Montreal Protocol, including from the Land Use, Land Use Change and Forestry sector. Given that Parties are required to and do provide a complete assessment of all emissions for which they are responsible, it is simply not credible for the secretariat to provide public information on only a subset of this data.

In Australia's case, the result is inaccurate and entirely misleading as it omits a very important component of Australia's emissions profile. When all sectors are included, Australia's emissions rise by 5% using UNFCCC accounting between 1990 and 2004 and by only 2% using Kyoto Protocol accounting, rather than the 25.1% increase as reported by the secretariat.

From our position, however, the issue is far broader than Australia's emissions profile and trends. From a policy perspective Australia believes what matters is the level of greenhouse gases in the atmosphere and that any development of an effective international response to climate change will need to fully incorporate the impacts of the land sectors. This is why deforestation, which represents between 10 and 35% of global emissions, is considered so important by Parties. This makes the exclusion of LULUCF in your publication even more baffling.

This is not the first time Australia has raised these concerns with the secretariat. The issue of how LULUCF was included in documents prepared for public release by the secretariat was discussed in plenary statements, in contact groups and informally with the secretariat at both COP 10 and 11, as well as in subsidiary body meetings. Additionally an officer from my department emailed the secretariat on 13 October requesting information on the timing of release of this document and details of how the LULUCF issues would be handled.

Accordingly, Australia is asking the secretariat to prepare, release and publicise updated emission figures for the period 1990 to 2004 that include all sectors as a matter of urgency. In addition, I seek your agreement that future reports of this kind are comprehensive and include all sectors.

I look forward to discussing this further with you in Nairobi.

Yours sincerely



Howard Bamsey  
Deputy Secretary  
Department of Environment and Heritage