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• No accounting for Non-CO₂ gases, because

Emissions of non-CO₂ gases are mainly related to the occurrence of forest fires for deforestation. It is hypothetical to determine how areas saved from deforestation would have been cleared. National defaults could be developed based on the role of fires in deforestation and would need to be applied for the historic reference level and the commitment period years. However, the impact of fires faces strong annual variability depending on climate effects in particular years. This means, such national defaults would fluctuate strongly over time. The efforts required to develop a reliable annual and historic national defaults seem too high compared to the benefits of such approach.



