

Submission on procedures to demonstrate the eligibility of lands for A/R project activities under the CDM

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This submission is in response to an EB call for public inputs, based on paragraph 26 of the COP12 CDM decision. The following remarks may help the EB in resolving this:

- The intent of land eligibility conditions was to avoid incentives for deforestation in order to allow subsequent “CDM reforestation”. By requiring non-forest status since 1990 (or 2000, which was also considered in the negotiations leading up to the COP9 decision), this objective can be met. On the other hand, only requiring non-forest status on 31 December 1989 does not meet this objective. For example, there could be reforestation in 1992, deforestation in 2006, non-forest land use and then reforestation in 2008.
- In practice, however, this incentive for deforestation may not be significant, since there are other, more important drivers for land use.
- The forest-related definitions in the Marrakech Accords applies both to national level accounting for Annex I countries under Article 3.3, as well as to CDM reforestation projects. Therefore, the EB, in interpreting the definition of “reforestation” in the Marrakech Accord may want to consider the interpretation in the GPG LULUCF 2003, for example the excerpt below (page 4.52). In addition, in the context of Article 3.3, any lands that were non-forest on 31 December 1989, then reforested, and subsequently deforested, are counted under the “deforestation” class, and not under “reforestation” (see decision tree in Figure 4.1.1 of GPG 2003). Consistency would require that any lands that were forest at some time since 1990, but not before the project start, would not be eligible for CDM AR.

4.2.5.1 DEFINITIONAL ISSUES AND REPORTING REQUIREMENTS

Under the definitions of the Marrakesh Accords, both afforestation and reforestation refer to direct, human-induced conversion of land to forest from another land use. The definitions do not include replanting or regeneration following harvest or natural disturbance, because these temporary losses of forest cover are not considered deforestation. Harvest followed by regeneration is considered a forest management activity. The distinction between the two activities is that afforestation occurs on land that has not been forest for at least 50 years, while reforestation occurs on land that has been forest more recently, though not since 31 December 1989.

- A pragmatic way of resolving this question in the context of the CDM would be to require that the land is non-forest in 1990 and at a recent date before the project start, as a proxy for the non-forest status since 1990 (to be consistent with the interpretation of reforestation under Article 3.3). In this proposed solution, the non-forest status at a recent date before the project start is used to ensure that the activity is actually reforestation and not regeneration after harvest. This approach is also used in approved methodology AR-AM0001 (see page 2, http://cdm.unfccc.int/UserManagement/FileStorage/CDMWF_AM_QFWKNCDDDX7HG7UHQ8UPUXKWBFUPO)

4. Summary of baseline and monitoring methodologies

Baseline methodology steps:

The methodology is applicable for a proposed A/R project activity on degraded and degrading abandoned land.

The eligibility of land as an A/R CDM project activity is demonstrated using archives and/or maps of land use/cover and/or satellite image around 1990 and for a recent date before the start of the A/R CDM project activity, as well as a supplementary survey of land use in cases where land cover alone is not sufficient to distinguish between forest and non-forest (e.g., bare land that may be forest due to forest regeneration under way). This methodology applies approach 22(a) as a general baseline

- Going further into the future (e.g., in developing CDM AR rules for a second commitment period), it is recommended not to use fixed cut-off points for non-forest status (such as 1990 or 2000), but to use a rolling approach, whereby the land should be non-forest at least 5 or 10 years prior to the start of the AR project. This way the rules do not become outdated, as is currently the case. And with such a minimum time period an incentive for deforestation can still be minimized.