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Attn. CDM Executive Board and SSC WG
cdm-info@unfccc.int

Subject. Call for inputs on standardized baselines in SSC methodologies for displacing non renewable biomass

Dear Members of the CDM Executive Board and SSC WG,

This electronic submission is a contribution to the CDM EB call for public inputs in relation to “standardized approaches for baseline emission calculations under SSC CDM methodologies for displacement of non-renewable biomass, and in particular how to quantify the fraction of non-renewable biomass and what default parameters for baseline fuel wood consumption would be appropriate”.

Several projects we are involved in consist in Improved Cookstoves dissemination for efficiency gains (AMS-II.G) or Non-Renewable Biomass switch (AMS-I.E), mostly in Least Developed Countries. We are therefore paying particular attention to these methodological evolutions as the underlying potential for Emissions Reduction is tremendous throughout Sub-Saharan Africa, whereby virtually 9 out of 10 people do rely on inefficient traditional cooking devices fired with charcoal or wood fuel from depleting sources.

The efforts undertaken by the CDM Executive Board and the SSC WG to simplify the baseline emissions calculation in AMS-I.E and AMS-II.G are laudable given their complexity and requirements which have hindered their application particularly in the Least Developed Countries where availability of data/survey is often low. However, we would like to express some concern about the conservativeness and high-level aggregation of the suggested standardized approaches, which are likely to turn CDM leverage for Improved Cookstoves initiatives even more unfeasible in some local contexts if no alternative/specific approaches left.

Indeed, in the Democratic Republic of the Congo (DRC) for example, at the sub-national level of Kinshasa city, the proposed methods lead to highly unrepresentative results for the following reasons:

- In the second largest forested country of the world (145 M. hectares, or 62% of the country's 2,345,409 km²), it cannot reasonably be assumed that the forests areas' sustainable increment of a given administrative unit (and its neighbouring units in case of urban areas context) is the first to be exploited (i.e. biomass resources would be rationally exploited – cf. WISDOM analytical Step 1). As a matter of fact, the wood-energy sector in DRC is mostly informal and the relevant forestry laws & regulations are insufficiently applied to enable any sustainable management of the forests at stake, according to the preliminary conclusions of an *Analysis of the wood energy value chain for Kinshasa and Kinsangani*¹, in a country which stands in the lowest 2 percentile of the World when it comes to “Government Effectiveness” and “Rule of Law”².
- Kinshasa unrepresentative fraction may be due to a computation over almost all of Bandundu and Bas-Congo neighbour provinces (or even second degree neighbours, although we have not accessed the detailed calculation) whereas average distance to sources of fuel wood and charcoal supplying Kinshasa were respectively found as 135 and 102 km¹ i.e. 5 to 10 times less than the overall area of Bandundu (and Bas-Congo) which obviously contain massive forest covers (over one tenth of the country's, in fact) most of which is untouched by Kinshasa demand.

¹CIFOR, Projet Makala (2011) -

http://makala.cirad.fr/index.php/projets/media/media_makala/les_produits/note_de_perspectives/notes_de_perspectives_n_2

² World Bank Policy Research, The Worldwide Governance Indicators (2010) -

http://info.worldbank.org/governance/wqi/sc_chart.asp

- This is further highlighted by a recently approved *Forest Investment Program*³ which identified Kinshasa's fuel wood supply area as restricted to the City-Province of Kinshasa, parts of Bandundu and Bas-Congo Provinces, where "deforestation rates are well above the national average" (which are already "relatively high in Central Africa and must be viewed in relation to the size of the forest area in the DRC, which is one of the 10 countries with the largest absolute forest loss each year"), outlining that "currently the supply of wood energy in Kinshasa is not sustainable and the deforestation belt around Kinshasa continues to grow alarmingly".
- Another unrepresentative factor is the potential Renewable Biomass fraction (pRBf and mfNRB) which "assumes rational harvesting practices, which may be quite different from those actually implemented in the field. For example, if the natural increment is neglected and the exploitation is entirely unsustainable, the true fNRB is 100% even in a biomass-rich area. On the opposite, if the entire sustainable increment is exploited before touching the forest capital, the true fNRB shows the lowest possible value, which corresponds to the value of mfNRB". Indeed, numerous references are available in expert literature to illustrate the rampant deforestation that has been damaging Congolese urban areas surroundings for decades, with wood fuel collection distances and prices ever increasing⁴, and other scarcity evidence directly contradicting the highly renewable results of the said WISDOM approach suggested. Such references will include CIFOR Makala project complete findings⁵ to be released by year end, as well as the future conclusions of the REDD National Coordination ongoing efforts to characterize deforestation reference levels in DRC.

Therefore, we recommend that while such standardized approaches are made available for the sake of simplification and streamlining of woody biomass saving projects under the CDM, alternative approaches based on more accurate knowledge from local expert work are clearly promoted together and that the indicative default values showcased for different countries at national and sub-national level are not to be detrimental to such alternative relevant approaches.

Yours sincerely,

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³ Ministry of Environment, Nature Conservation & Tourism, Investment Plan (2011) -

http://www.climateinvestmentfunds.org/cif/sites/climateinvestmentfunds.org/files/FIP%204%20DCR%20IP_0.pdf

⁴ 86% of the producers surveyed by the CIFOR study indicate that the distance to access the resource is increasing.

⁵ Preliminary findings have already precisely quantified the total wood energy demand for Kinshasa city in 2010 for example, accounting for 490,000 tons of charcoal and 60,000 tons of fuel wood (equivalent to 4.7 millions m³ of wood).