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Object. Call for inputs for the Definition of “Special Underdeveloped Zone” (SUZ) under the “Guidelines for the demonstration of additionality of microscale project activities”

Dear Members of the CDM Executive Board and SSC Panel,

This electronic submission is a contribution to the UNFCCC call for public inputs in relation to Definition of “Special Underdeveloped Zone” (SUZ) under the “Guidelines for the demonstration of additionality of microscale project activities”

The efforts undertaken by the CDM Executive Board and the SSC Panel to streamline and unify the definition of “Special Underdeveloped Zone” are laudable. Indeed using clear and specific indicators to define a SUZ should allow for more comparability between different countries and should therefore limit possible misuse of this status. However, we would like to express some concerns about the conditions that have been recommended by the SSC WG as indicators of regional underdevelopment.

Indeed in Ghana for example, even though statistics related to the above mentioned indicators are available at the national level, it is far more difficult to find relevant information at the sub-national level of region. Therefore regional disparities or inequalities can be quite difficult to highlight based on readily accessible data. For instance the North-South development divide between the Southern and Northern Ghana’s regions (North Region, Upper West Region, Upper East Region) is well known and has been covered by many studies (WB, 2011). It is such a well identified national issue that the government of Ghana established the “Savannah Accelerated Development Authority” in 2010 as a body tasked with providing a framework for the comprehensive and long-term development of the Northern Savannah Ecological Zone (Republic of Ghana, 2010). However it is not an easy task to find *relevant and recent* regional statistics related to the indicators selected by the SSC WG especially in non-LDC countries.

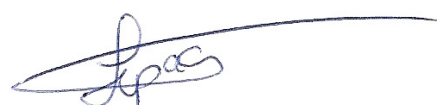
Therefore, we recommend that while such indicators are made available for the sake of simplification and streamlining of the characterisation of SUZ related to the additionality demonstration of microscale projects under the CDM, an alternative approach based on the former definition of SUZ should remain available for cases when statistical evidences or published literature related to the default indicators are inexistent.

Indeed it would preserve the spirit of the specific microscale guidelines which is to simplify the demonstration of additionality and therefore reduce transaction costs for project of a particularly small scale.

Yours sincerely,

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Cited Works

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