



GÖTEBORG UNIVERSITY

To the UNFCCC Secretariat

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Response to the call for public inputs on new procedures to demonstrate the eligibility of lands for afforestation and reforestation projects activities under the CDM

The Annex 18 to the 26th EB meeting, in comparison to the Annex 16 to the 22nd EB meeting, increases the burden of demonstrating the eligibility of lands for afforestation and reforestation (AR) CDM project activities.

There is indeed a need for control and certainty in the development of AR CDM projects, but it needs to be balanced against the need to avoid creating barriers to the development of such projects. Uncertainty needs to be minimized while ensuring that the evidence and verification burdens for AR CDM projects do not make them practically unfeasible.

In its present form, the process to establish an AR CDM project presents a considerable challenge for countries and project developers. The suggested change (Annex 18 to the 26th EB meeting) in the procedures to demonstrate the eligibility of land implies an even more challenging process.

With the suggested new definition, it is difficult to see reasons to define a project as an afforestation project in contrast to a reforestation project: project developer will have a larger burden of evidence and will not gain economically. In terms of developing an AR project, there is rarely any point in separating afforestation from reforestation. For this reason afforestation might as well be excluded

and only reforestation remain, with the same definition (excluding the part of formerly forested land) and with an altered suitable name.

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