

CDM-ARWG41-A01

Information note

Applicability of the A/R CDM modalities and procedures to project activities involving revegetation

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COVER NOTE

1. Procedural background

1. The Conference of the Parties serving as the meeting of the Parties to the Kyoto Protocol (CMP) at its tenth session requested the Executive Board of the clean development mechanism (the Board) to “assess the applicability of the modalities and procedures contained in decisions 5/CMP.1 and 6/CMP.1 to project activities involving revegetation, based on the definition contained in decision 16/CMP.1 annex, paragraph 1(e), including in areas with agroforestry and silvopastoral practices where the established vegetation is not likely to reach the forest thresholds selected by the host Party under decision 5/CMP.1, annex, paragraph 8, in the event that such project activities would be eligible under the clean development mechanism” (decision 7/CMP.10).
2. The CMP further requested the Board to report back at CMP 11 on “the outcome of the assessment referred to in paragraph 1 above, including an indication of sections of the modalities and procedures in which modifications would be needed in respect of the project activities referred to in paragraph 1 above”.
3. The Board, at its eighty-third meeting (EB 83) considered a concept note on the assessment of applicability of afforestation and reforestation (A/R) modalities and procedures to project activities involving revegetation and requested the A/R Working Group (A/R WG) to prepare a recommendation on this matter to be considered by the Board at its eighty-sixth meeting.
4. The A/R WG, at its fortieth meeting, considered the request of the Board and agreed to provide its recommendation to the Board.
5. The Board, at its eighty-fifth meeting (EB 85), considered the recommendation by the A/R WG and requested the A/R WG to consider this matter further and analyse in detail the implications of allowing revegetation project activities under the CDM. The Board identified certain specific issues and requested the A/R WG to consider these (CDM-EB85, paragraph 58).
6. The present document contains detailed analysis of issues, including the specific issues identified by the Board, related to applicability of the afforestation and reforestation (A/R) modalities and procedures to project activities involving revegetation.

2. Purpose

7. This annex contains the recommendation of the A/R WG in response to the request of the Board (CDM-EB85, paragraph 58) on applicability of afforestation and reforestation (A/R) modalities and procedures to project activities involving revegetation.

3. Key issues and proposed solutions

8. This information note analyses the following questions contained in CDM-EB85, paragraph 58:

- (a) If the A/R CDM modalities and procedures were to be applied, *mutatis mutandis*, to project activities involving revegetation, what kind of revegetation activities can be allowed and what could be the eligibility criteria for each of such activities?
 - (b) Which sections of the A/R modalities and procedures would require modification and what these modifications would be?
9. The answers to the above questions, as agreed by the A/R WG, are as follows:
 - (a) If revegetation activities were to be allowed as CDM project activities under the modalities and procedures contained in decisions 5/CMP.1 and 6/CMP.1, then all kinds of revegetation activities, including those listed in CDM-EB85, paragraph 58, can be allowed, provided that the activities are direct human-induced activities likely to increase carbon stocks on sites, involve establishment of vegetation in discrete land areas each of which covers a minimum area of 0.05 hectares, and the vegetation to be established is not expected to reach the forest thresholds selected by the host Party in which the activities are implemented.
 - (b) Section A of the annex to decision 5/CMP.1 would require modification. The modification would consist of insertion of a new paragraph as follows:

“1 *bis*. Revegetation activities under the CDM will be limited to revegetation occurring on those lands that did not contain forest on 31 December 1989.”

However, the above modification would not be required if the land eligibility criterion mentioned above is included in the decision by the CMP in which revegetation activities are made eligible under the CDM.

4. Impacts

10. Inclusion of the additional LULUCF activity of revegetation under the CDM could create opportunities for new mitigation projects that, while complementing the activities of afforestation/reforestation, could generate valuable co-benefits such as soil and biodiversity conservation, water resource management, combating desertification and land degradation, and could improve livelihoods, enhance food security, and generate employment for vulnerable populations
11. Supporting revegetation activities will not only help realize the mitigation potential of accumulation of carbon stocks in areas not classified as forest but will also enhance the resilience of local ecosystems and communities against adverse effects of climate change.

5. Subsequent work and timelines

12. This information note is intended to inform the consideration, by the Board, of the CMP request contained in decision 7/CMP.10. The outcome of the Board's consideration is expected to be a report to the CMP which is expected to be included in the annual report of the Board to the CMP for 2015.

6. Recommendations to the Board

13. The A/R WG recommends that the Board take into account this information note while considering their response to the request by the CMP contained in decision 7/CMP.10.

7. References

14. The following sources were used for the purpose of the analysis contained in this document:
- (a) CMP decisions: 16/CMP.1, 5/CMP.1, 6/CMP.1, 2/CMP.6, 2/CMP.7, 7/CMP.10;
 - (b) Party submissions: Submissions made by Parties and observation organizations are available at <http://unfccc.int/5900.php>;
 - (c) Other UNFCCC documents: FCCC/TP/2014/2 (Technical paper: "Options for possible additional land use, land-use change and forestry activities and alternative approaches to addressing the risk of non-permanence under the clean development mechanism").
 - (d) IPCC reports and guidelines:
 - (i) IPCC (2003): Good Practice Guidance for Land Use, Land-Use Change and Forestry;
 - (ii) IPCC (2006): 2006 IPCC Guidelines for National Greenhouse Gas Inventories, Volume 4: Agriculture, forestry and other land use.

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1. Introduction

1. The Executive Board of the CDM (the Board), at its eighty-fifth meeting (EB 85), considered a recommendation by the A/R WG on applicability of afforestation and reforestation modalities and procedures to project activities involving revegetation and requested the A/R WG to further consider this matter. The Board requested the A/R WG to analyse in detail the implications of allowing revegetation project activities under the CDM and to respond to specific questions identified by the Board (CDM-EB85, paragraph 58).

2. Key issues and proposed solutions

2. This section presents the background information and an analysis of general issues as well as the specific issues contained in CDM-EB85, paragraph 58, along with the proposed solutions for addressing such issues.

2.1. Eligible LULUCF activities under the Kyoto Protocol

3. Definitions and eligibility of land use, land-use change and forestry (LULUCF) activities under the Kyoto Protocol are contained in annex to decision 16/CMP.1.¹

2.1.1. Definitions

4. The following definitions are relevant in the present analysis:²
 - (a) "Forest" is a minimum area of land of 0.05–1.0 hectare with tree crown cover (or equivalent stocking level) of more than 10–30 per cent with trees with the potential to reach a minimum height of 2–5 metres at maturity in situ. A forest may consist either of closed forest formations where trees of various storeys and undergrowth cover a high proportion of the ground or open forest. Young natural stands and all plantations which have yet to reach a crown density of 10–30 per cent or tree height of 2–5 metres are included under forest, as are areas normally forming part of the forest area which are temporarily unstocked as a result of human intervention such as harvesting or natural causes but which are expected to revert to forest;
 - (b) "Afforestation" is the direct human-induced conversion of land that has not been forested for a period of at least 50 years to forested land through planting, seeding and/or the human-induced promotion of natural seed sources;
 - (c) "Reforestation" is the direct human-induced conversion of non-forested land to forested land through planting, seeding and/or the human-induced promotion of natural seed sources, on land that was forested but that has been converted to non-forested land. For the first commitment period, reforestation activities will be limited to reforestation occurring on those lands that did not contain forest on 31 December 1989.

¹ Decision 2/CMP.6 establishes that for the second commitment period the definitions shall be the same as in the first commitment period under the Kyoto Protocol.

² Decision 16/CMP.1, annex, paragraphs 1(a) – 1(c) and 1(e).

- (d) "Revegetation" is a direct human-induced activity to increase carbon stocks on sites through the establishment of vegetation that covers a minimum area of 0.05 hectares and does not meet the definitions of afforestation/reforestation contained here.

2.1.2. Eligible LULUCF activities under Article 3

- 5. Eligibility of the LULUCF activities is set out in decision 16/CMP.1 separately for the purpose of Article 3, paragraphs 3 and 4 (reporting and accounting of LULUCF activities by Annex I Parties), and for the purpose of Article 12 (LULUCF activities under the CDM).³
- 6. Eligibility of the LULUCF activities for the purpose of Article 3, paragraphs 3 and 4, has been revised subsequently and is at present as follows:⁴
 - (a) Mandatory activities:
 - (i) afforestation, reforestation, deforestation, forest management;
 - (ii) activities elected by a Party in the first commitment period;
 - (b) Elected activities: any of the following activities that were not elected in the first commitment period: revegetation, cropland management, grazing land management, and wetland drainage and rewetting.

2.1.3. Eligible LULUCF activities under Article 12

- 7. LULUCF activities eligible in the first commitment period under Article 12, as provided in decision 16/CMP.1, are limited to afforestation and reforestation activities.⁵
- 8. LULUCF activities eligible in the second commitment period under Article 12, as provided in decision 2/CMP.7, are the same as in the first commitment period, subject to future decisions of the CMP. The relevant paragraph in the decision reads as follows:

"Afforestation and reforestation are eligible project activities under the clean development mechanism in the second commitment period. Activities additional to afforestation and reforestation will be eligible if agreed by any future decision of the Conference of the Parties serving as the meeting of the Parties to the Kyoto Protocol."⁶

2.1.4. CMP request on consideration of additional LULUCF activities under Article 12

- 9. Through decision 2/CMP.7, the CMP requested the Subsidiary Body for Scientific and Technological Advice (SBSTA) "to initiate a work programme to consider and, as appropriate, develop and recommend modalities and procedures" for possible additional LULUCF activities under the CDM.⁷

³ Decision 16/CMP.1, annex, paragraphs 2 and 6.

⁴ Decision 2/CMP.7, annex, paragraphs 6 and 7.

⁵ Decision 16/CMP.1, annex, paragraphs 13.

⁶ Decision 2/CMP.7, annex, paragraph 17.

⁷ Decision 2/CMP.7, paragraph 6.

10. The SBSTA considered the above request by the CMP through its thirty-sixth to forty-first sessions.
11. During its consideration of this agenda sub-item, the SBSTA had considered the submissions by the Parties and observer organizations and a technical paper prepared by the secretariat.⁸
12. At its fortieth session, the SBSTA noted the possible additional LULUCF activities identified in the technical paper and agreed to prioritize in its consideration the following groups of possible additional LULUCF activities in the context of mitigation practices limited to changes in carbon stocks:
 - (a) Revegetation, including agroforestry and silvopastoral practices where the established vegetation is not likely to reach the forest thresholds selected by the host Party under decision 5/CMP.1, annex, paragraph 8;
 - (b) Cropland management and grazing land management;
 - (c) Wetland drainage and rewetting.
13. At its forty-first session the SBSTA recommended a draft decision by the CMP to request a report from the Executive Board of the CDM on applicability of the A/R CDM modalities and procedures, contained in decision 5/CMP.1 and 6/CMP.1, to project activities involving revegetation.
14. The draft decision recommended by the SBSTA was adopted by the CMP as decision 7/CMP.10 "Outcome of the work programme on modalities and procedures for possible additional land use, land-use change and forestry activities under the clean development mechanism".

2.2. Revegetation as a LULUCF activity under the Kyoto Protocol

15. As mentioned earlier, revegetation is one of the eight LULUCF activities defined under the Kyoto Protocol.
16. Revegetation is an elective activity under Article 3, paragraph 4. It is being considered as an additional LULUCF activity under Article 12 as described in paragraphs in 20 – 22 above.
17. Three Annex I parties had elected this activity in the first commitment period and for these Parties revegetation is a mandatory activity in the second commitment period.⁹
18. Only those human-induced revegetation activities can be accounted under Article 3, paragraph 4, that have occurred since 1990.¹⁰

⁸ FCCC/SBSTA/2014/2: "Report of the Subsidiary Body for Scientific and Technological Advice on its fortieth session, held in Bonn from 4 to 15 June 2014", paragraph 147.

⁹ FCCC/KP/CMP/2013/6: "Annual compilation and accounting report for Annex B Parties under the Kyoto Protocol for 2013", Tables 3 and 4.

¹⁰ Decision 16/CMP.1, annex, paragraph 8; decision 2/CMP.7, annex, paragraph 9.

2.2.1. Revegetation activities as described in the CMP request to the Board

19. The CMP request to the Board contained in paragraph 1 of decision 7/CMP.10 refers to “project activities involving revegetation, based on the definition contained in decision 16/CMP.1 annex, paragraph 1(e), including in areas with agroforestry and silvopastoral practices where the established vegetation is not likely to reach the forest thresholds selected by the host Party under decision 5/CMP.1, annex, paragraph 8”. The CMP request thus makes explicit reference to revegetation activities “in areas with agroforestry and silvopastoral practices”.
20. According to IPCC guidelines, revegetation activities can be undertaken in any type of land except forested land (see Figure 1). For the purpose of reporting and accounting by Annex I Parties under Article 3, paragraph 4, the activities involving establishment of vegetation in agroforestry and silvopastoral areas can be accounted either under cropland management and grassland management activities or under the activity of revegetation.
21. Decision 7/CMP.10 explicitly mentions that the activities of establishing vegetation in agroforestry and silvopastoral areas where the established vegetation is not likely to reach the forest thresholds are to be considered as revegetation activities while assessing the eligibility of revegetation activities under the CDM.
22. Under the A/R modalities and procedures (decisions 5/CMP.1 and 6/CMP.1), activities involving establishment of vegetation in agroforestry and silvopastoral areas can be proposed as afforestation/reforestation project activities if the vegetation intended to be established is expected to reach the forest thresholds. Projects involving establishment of vegetation in agroforestry and silvopastoral areas have already been registered under the CDM.¹¹
23. The same activities of establishment of vegetation in agroforestry and silvopastoral areas would only qualify as revegetation if these activities were to be implemented in a host Party where the forest thresholds are sufficiently high.
24. Thus the criterion for deciding whether activities involving establishment of vegetation in agroforestry and silvopastoral areas should be categorized as afforestation/reforestation activities or revegetation activities is whether the vegetation is expected to reach the forest thresholds or not. A given activity involving establishment of vegetation in agroforestry and silvopastoral areas can qualify as an afforestation/reforestation activity in one host Party and as a revegetation activity in another host Party.

¹¹ See, for example, registered CDM projects with project IDs 2510, 4531 and 8283.

Figure 1. Revegetation can take place in any land-use category except in forested land

TABLE 4.2.1 RELATIONSHIP BETWEEN ACTIVITIES UNDER ARTICLES 3.3 AND 3.4 OF THE KYOTO PROTOCOL AND THE BASIC LAND-USE CATEGORIES OF SECTION 2.2								
Read this table as follows: For example, if a land is initially cropland and then managed forest, then this event must constitute either afforestation or reforestation. Such mandatory Article 3.3-related classifications are highlighted in bold . On the other hand, if a land is first cropland and then managed grassland, then this may constitute GM or RV. The latter choice depends on the election of Article 3.4 activities by a country and on how national circumstances are applied to the definitions related to Article 3.4. Such Article 3.4-related, election-dependent classifications are printed in normal font.								
Final Initial	Managed Forest land	Unmanaged Forest land	Cropland	Managed Grassland	Unmanaged Grassland	Wetland	Settlements	Other land
Managed Forest land	FM or GM or CM		D*	D*		D*	D*	D*
Unmanaged Forest land	FM		D*	D*		D*	D*	D*
Cropland	A/R*		CM, RV	GM or RV		RV	RV	
Managed Grassland	A/R*		CM	GM or RV		RV	RV	
Unmanaged Grassland	A/R*		CM	GM			RV	
Wetland	A/R*		CM	GM		RV	RV	
Settlements	A/R*		CM	GM or RV		RV	RV	
Other land	A/R*		CM, RV	GM or RV		RV	RV	

* Transitions involving Article 3.3 activities have to be the result of direct human-induced activities.

Notes

1. "Initial" and "Final" refer to the categories before and after a land-use change. A – Afforestation (land has not been forested for at least 50 years), R – Reforestation (land has not been forested at the end of the year 1989), D – Deforestation, FM – Forest management, CM – Cropland management, GM – Grazing land management, RV – Revegetation (activities other than A or R that increase carbon stocks by establishment of vegetation).
2. If the "initial" categorization was done for a year of the commitment period, then the land must be classified under the same activity for all subsequent years, even if the land use changes once more.
3. All units of land subject to direct human-induced A/R activities are considered to be managed forests, and therefore unmanaged forest land cannot result from an A/R event in the table. Similarly, it is assumed that all units of land subject to direct human-induced D activities are managed lands. This includes natural D followed by a change to a *managed* land use.

(Source: IPCC (2003): Good Practice Guidance for Land Use, Land-Use Change and Forestry, Table 4.2.1)

25. The above analysis is not limited to activities involving establishment of vegetation in agroforestry and silvipastoral areas. It is valid for any activity that aims to increase carbon stocks on sites through the establishment of vegetation.
26. The above analysis makes it clear that revegetation and afforestation/reforestation activities form two parts of a continuum of LULUCF activities aimed at increasing carbon stocks on sites through establishment of vegetation. The forest thresholds selected by the host Party will determine whether a given such activity qualifies as an afforestation/reforestation activity, or as a revegetation activity.

2.2.2. Narrow vs. broad definition

27. The Board's request contained in CDM-EB85, paragraph 58, mentions specific examples of revegetation activities other than establishment of vegetation in agroforestry and silvipastoral areas, such as "planting trees and shrubs in unused barren lands, watersheds, steep slopes, along river banks, habitat restoration areas, soil reclamation and desertification control areas, shelterbelts and windbreaks along roads, canals, railways and other public and private lands, in rural and urban settlement areas (e.g. environmental forestry and urban forestry)".
28. The definition of revegetation provided in decision 16/CMP.1 is based on the biophysical characteristics of the vegetation intended to be established under the activity. This definition does not take into account the functional/economic objective of the activity or the type of land in which the activity is to be implemented.
29. According to this definition, irrespective of whether vegetation is to be established for the purpose of production of economic goods (e.g. timber, fruits, fuel wood, forage, coffee, cocoa), or for the purpose of creation of environmental goods (e.g. river bank protection, stabilization of mine spoils, habitat restoration, control of desertification), and irrespective of the type of land in which vegetation is to be established (e.g. sand dunes, barren areas, rocky areas) or the land-use type (e.g. waste/unused land, roadside/canalside land, urban/rural parks, agricultural fields, grazing lands), an activity will qualify as a revegetation activity if it meets the following criteria:
 - (a) It is a direct human-induced activity that is likely to increase carbon stocks on sites;
 - (b) It involves establishment of vegetation that covers a minimum area of 0.05 hectares;
 - (c) The vegetation to be established is not expected to reach the forest thresholds selected by the host Party in which the activity is to be implemented.
30. The definitions of "afforestation" and "reforestation", as well as the definition of "forest" contained in decision 16/CMP.1, are also function-neutral definitions and are based only on the biophysical characteristics of the vegetation to be established. Thus all the possible combinations of activities involving establishment of vegetation mentioned in the preceding paragraph can qualify as afforestation/reforestation activities if these activities are implemented in a host Party where the forest thresholds are sufficiently low.
31. Listing out all possible activity types by functional/economic objective and the type of land and land-use category in the global context can result in a long yet non-exhaustive list of activities. A given functional activity (e.g. soil reclamation) may be implemented in a variety of land types (e.g. saline land, dry land) and land-use categories (e.g. mine spoils, unused lands) and it can aim to achieve multiple objectives (e.g. soil reclamation, biodiversity conservation, water resource management).
32. An agreed framework for defining functional activity types is not available under the Kyoto Protocol. The only agreed definitions are the six land-use categories defined by the IPCC and the eight LULUCF activities defined under CMP decisions.¹² In view of

¹² The six categories of land identified by the IPCC are: forest land, cropland, grassland, wetland, settlements, and other lands (*IPCC Good Practice Guidance for LULUCF, Section 2.2*).

this, defining revegetation as a list of possible functional/economic activities does not appear to be technically or politically feasible.

33. The narrow definition of revegetation by listing out specific functional activities is not required from methodological considerations either, since the mitigation impact of LULUCF activities is estimated through quantification of *in situ* carbon stocks irrespective of the underlying functional/economic objective of the activity.
34. This is also evidenced by the fact that the approved A/R CDM methodologies do not take into consideration the underlying functional/economic objective of the activity. Irrespective of whether an activity is undertaken to produce timber, paper pulp, fruits/fodder, or to conserve biodiversity or protect steep slopes against soil erosion, the A/R CDM methodologies take into account only the biophysical characteristics of the vegetation (e.g. the diameter of trees, crown cover of shrubs) for estimating the carbon stocks and changes in carbon stocks in the baseline and in the project.
35. In view of this analysis, it appears that a narrow definition based on the functional/economic objective of an activity is neither required nor feasible for revegetation activities. The broad definition of revegetation contained in decision 16/CMP.1 is adequate for the purpose of implementation of revegetation activities under the CDM.

2.3. Applicability of the A/R CDM modalities and procedures to project activities involving revegetation

2.3.1. Afforestation/reforestation vs. revegetation

36. As noted in paragraph 26 above, revegetation and afforestation/reforestation activities form two parts of a continuum of LULUCF activities aimed at increasing carbon stocks on sites through the establishment of vegetation. The forest thresholds selected by the host Party will determine whether a given such activity qualifies as an afforestation/reforestation activity, or as a revegetation activity.
37. In view of this, it becomes clear that revegetation activities can be the same as afforestation/reforestation activities implemented in a different host Party context.
38. In general, the total amount of carbon stocks and changes in carbon stocks achieved *per hectare* by revegetation activities are likely to be lower than those achieved by A/R project activities.

2.3.2. Methodological aspects of revegetation project activities

39. As noted above, many registered A/R CDM project activities, including those involving establishment of vegetation in agroforestry and silvipastoral areas, would have qualified as revegetation activities if these were to be implemented in a host Party with sufficiently high forest thresholds. From this it becomes evident that the current approved A/R CDM methodologies are *mutatis mutandis* applicable to revegetation activities without any substantive modifications.
40. In view of this, it is seen that no methodological changes will be required in the approved A/R CDM methodologies if revegetation activities were to be made eligible under the CDM

2.3.3. Section-wise analysis for mutatis mutandis applicability of the A/R CDM modalities procedures to project activities involving revegetation

- 41. One interpretation of mutandis mutatis application of the A/R CDM modalities and procedures to project activities involving revegetation could be to replace every occurrence of the words “afforestation and reforestation” in the modalities and procedures with the words “afforestation, reforestation and revegetation”.
- 42. In view of this interpretation of mutatis mutandis application, a section-wise analysis of applicability of the A/R CDM modalities procedures to project activities involving revegetation is presented in Table 1 and Table 2.

Table 1. Section-wise applicability of annex to decision 5/CMP.1 “Modalities and procedures for afforestation and reforestation project activities under the clean development mechanism in the first commitment period of the Kyoto Protocol” to project activities involving revegetation

Section	Content of section	Applicability to revegetation project activities
A. Definitions	Terms related to A/R CDM project activities are defined.	The definition of “revegetation” is not included in paragraph 1. However, if mutatis mutandis application implies replacing every occurrence of words “afforestation and reforestation” with the words “afforestation, reforestation, and revegetation”, this issue gets addressed. The terms “forest”, “reforestation” and “afforestation” under paragraph 1 have been defined through a reference to decision 16/CMP.1, and the term “revegetation” is also defined in decision 16/CMP.1. However, while the definition of “reforestation” contained in decision 16/CMP.1 includes a second sentence that limits reforestation activities to “reforestation occurring on those lands that did not contain forest on 31 December 1989”, the definition of “revegetation” contained in decision 16/CMP.1 does not prescribe any such limitation. As a result, a corresponding land eligibility criterion will be required to be specified if the same modalities and procedures are applied to project activities involving revegetation.
B. Role of the CMP C. Executive Board D. Accreditation and designation of operational entities E. Designated operational entities F. Participation requirements	These sections contain the governance and participation provisions.	The provisions of these sections would apply mutatis mutandis to revegetation project activities just as they apply to A/R project activities. The selection of forest threshold values by a host Party under paragraph 8 will also define “revegetation” in that host Party.

Section	Content of section	Applicability to revegetation project activities
G. Validation and registration	Requirements in respect of validation and registration of project activities.	The provisions of these sections would apply mutatis mutandis to revegetation project activities just as they apply to A/R project activities.
H. Monitoring	Requirements in respect of monitoring of project activities.	The provisions of these sections would apply mutatis mutandis to revegetation project activities just as they apply to A/R project activities.
I. Verification and certification J. Issuance of tCERs and ICERs K. Addressing non-permanence	Requirements in respect of verification and certification, issuance of tCERs and ICERs, and options for addressing non-permanence of project activities.	The provisions of these sections would apply mutatis mutandis to revegetation project activities just as they apply to A/R project activities.
APPENDIX A Standards for the accreditation of operational entities	Generic requirement for accreditation of DOEs for conducting validation and verification.	The provisions of these sections would apply mutatis mutandis to revegetation project activities just as they apply to A/R project activities.
APPENDIX B Project design document	Generic format/ structure of the project design document.	The provisions of these sections would apply mutatis mutandis to revegetation project activities just as they apply to A/R project activities.
APPENDIX C Terms of reference for establishing guidelines on baselines and monitoring methodologies	Generic ToR for establishing guidelines on baselines and monitoring methodologies.	The provisions of these sections would apply mutatis mutandis to revegetation project activities just as they apply to A/R project activities.
APPENDIX D Additional requirements for the CDM registry	Registry level rules for accounting of tCERs and ICERs.	The provisions of these sections would apply mutatis mutandis to revegetation project activities just as they apply to A/R project activities.

Table 2. Section-wise applicability of annex to decision 6/CMP.1 “Simplified modalities and procedures for small-scale afforestation and reforestation project activities under the clean development mechanism in the first commitment period of the Kyoto Protocol and measures to facilitate their implementation” to project activities involving revegetation

Section	Content of section	Applicability to revegetation project activities
A. Introduction	This section describes the simplifications that will apply to small-scale A/R project activities and the type of small-scale A/R project activities for which the methodologies are to be developed by the Board.	The provisions of these sections would apply mutatis mutandis to small-scale revegetation project activities just as they apply to small-scale A/R project activities.
B. Simplified modalities and procedures	This section contains the requirements to be met by and the simplifications available to small-scale A/R project activities.	The provisions of these sections would apply mutatis mutandis to small-scale revegetation project activities just as they apply to small-scale A/R project activities.
C. Validation and registration	This section contains the requirements in respect of validation and registration that will apply to small-scale A/R project activities. These provisions replace the provisions contained in paragraphs 12 – 30 of annex to decision 5/CMP.1.	The provisions of these sections would apply mutatis mutandis to small-scale revegetation project activities just as they apply to small-scale A/R project activities.
D. Monitoring	This section contains the requirements in respect of monitoring of small-scale A/R project activities. These provisions replace the corresponding monitoring provisions contained in decision 5/CMP.1.	The provisions of these sections would apply mutatis mutandis to small-scale revegetation project activities just as they apply to small-scale A/R project activities.
APPENDIX A Project design document	Generic format/structure of the project design document.	The provisions of these sections would apply mutatis mutandis to small-scale revegetation project activities just as they apply to small-scale A/R project activities.
APPENDIX B Indicative simplified baseline and monitoring methodologies	Specifies list of land-use categories for which baseline and monitoring methodologies shall be developed by the Board.	The provisions of these sections would apply mutatis mutandis to small-scale revegetation project activities just as they apply to small-scale A/R project activities. The methodologies already developed for small-scale A/R project activities will also apply to small-scale revegetation activities and no further work will be required.
APPENDIX C Criteria for determining the occurrence of debundling	Specifies criteria when a proposed small-scale A/R project activity shall be deemed to be a debundled component of a large project activity.	The provisions of these sections would apply mutatis mutandis to small-scale revegetation project activities just as they apply to small-scale A/R project activities.

43. From the analysis presented in Table 1 and Table 2 it is evident that the modalities and procedures for A/R CDM project activities contained in decision 5/CMP.1 and 6/CMP.1 are applicable mutatis mutandis to project activities involving revegetation, including revegetation in agroforestry and silvipastoral areas where the established vegetation is not likely to reach the forest thresholds selected by the host Party.

44. At the same time, it can be noted that a provision will have to be added in annex to decision 5/CMP.1 limiting revegetation activities to revegetation occurring on those lands that did not contain forest on 31 December 1989.

2.3.4. Possible issues in implementation of revegetation project activities under the CDM

45. This sub-section examines the following possible issues affecting the environmental integrity of potential revegetation project activities under the CDM, along with possible ways to address such issues:

- (a) Perverse incentive for deforestation;
- (b) Revegetation project activities used for the purpose of bypassing the land eligibility requirement for A/R activities;
- (c) Devegetation occurring before revegetation.

2.3.4.1. Perverse incentive for deforestation

2.3.4.1.1. Issue

46. Land containing forest can be intentionally deforested in order to accommodate a revegetation activity in that land.

2.3.4.1.2. Possible solution

47. The issue of perverse incentive can be addressed in the same way as it has been addressed in the case of afforestation/reforestation project activities. Accordingly, the land eligibility for revegetation activities can be so fixed as to rule out the possibility of intentional deforestation taking place in order to accommodate a revegetation project activity in an area of land.

48. Since project participants could not have intentionally cleared forest in anticipation of accommodating a revegetation project activity before revegetation is made eligible under the CDM, the land that contained forest on the date of the consideration/decision by the CMP to include revegetation as an additional LULUCF activity under the CDM can be made ineligible for revegetation activities.

2.3.4.2. Revegetation project activities used for the purpose of bypassing the land eligibility requirement for A/R activities

2.3.4.2.1. Issue

49. The vegetation to be established under a revegetation project activity is not expected to meet the forest thresholds selected by the host Party. The evidence to assure that the vegetation to be established is not likely to meet the forest thresholds will be similar to

the evidence to assure, in the case of afforestation/reforestation activities, that the vegetation to be established is likely to reach the forest thresholds.¹³

50. If a revegetation activity reaches the forest threshold *ex post* implementation, the activity does not cease to be a revegetation activity because of this fact, just as an afforestation/reforestation activity does not cease to be afforestation/reforestation activity if the vegetation established does not reach the forest thresholds *ex post* implementation.¹⁴ It is important to note, in this regard, that the nominal type of a LULUCF activity is defined *ex ante* in terms of the 'expectation/potential' of the vegetation intended to be established. In other words, the nominal type of a LULUCF activity is based on the design, and not on the outcome of its implementation. In any biological system, the outcome of implementation of an activity is often uncertain and beyond full control of project participants.
51. In view of the possibility that a revegetation activity can reach the forest thresholds *ex post* implementation, revegetation activities can potentially be used for the purpose of bypassing the land eligibility requirement of A/R project activities (*viz.* the land did not contain forest on 31 December 1989). This would allow implementing afforestation/reforestation activities in the disguise of revegetation activities.

2.3.4.2.2. Solution

52. This issue can be addressed by adopting the same land eligibility cut-off date for revegetation activities as for afforestation/reforestation activities.

2.3.4.3. Devegetation before revegetation

2.3.4.3.1. Issue

53. The existing vegetation in the land in which a revegetation project activity is to be implemented can be deliberately cleared or thinned with the intention of achieving higher carbon stock changes under the project activity.

2.3.4.3.2. Solution

54. This concern, which relates to deliberate lowering of the baseline of a project activity, can be addressed in the same way as it is addressed in afforestation/reforestation project activities. The A/R methodologies require assessment of the appropriateness of the baseline at the time of validation of a project activity. If revegetation project activities apply the same approved methodologies that apply to afforestation/reforestation project activities, this issue will get addressed thereby.

¹³ Typically, the evidence for this comes from the design of the project activity (e.g. the tree/shrub species to be planted, the initial and final spacing between plants, etc.) and is validated through expert assessment.

¹⁴ Under the A/R CDM methodologies, it is not necessary that the vegetation must have reached the forest threshold at the time of monitoring/verification of the project activity (e.g. the trees have the potential to reach 5 m height but at the time of verification the trees are only 3 m in height).

2.3.5. Changes needed in the A/R CDM modalities and procedures

55. The requirement relating to land eligibility for afforestation/reforestation project activities is contained in the A/R CDM modalities and procedures through reference to the definition of “reforestation” contained in decision 16/CMP.1.¹⁵
56. A limitation on land eligibility for revegetation activities does not, however, appear in the definition of revegetation contained in decision 16/CMP.1.
57. If an extended interpretation is taken of the mutatis mutandis application by which it is implied that “all the conditions met by afforestation and reforestation project activities are also to be met by revegetation project activities”, then the corresponding limitation of land eligibility gets applied to revegetation activities and no changes would be needed in the A/R CDM modalities and procedures.
58. If, however, such an extended interpretation is not to be applied, it will be necessary to add a provision in the annex to decision 5/CMP.1 that limits eligible revegetation activities to revegetation occurring on land that did not contain forest on 31 December 1989.
59. On the other hand, if the requirement relating to limiting eligible revegetation activities to revegetation occurring on land that did not contain forest on 31 December 1989 is to be included in the CMP decision that makes revegetation activities eligible under the CDM, no changes in the A/R CDM modalities and procedures will be needed.

3. Conclusions

60. In view of the above analysis the specific questions contained in CDM-EB85, paragraph 58, are answered as follows:
 - (a) If revegetation activities were to be allowed as CDM project activities under the modalities and procedures contained in decisions 5/CMP.1 and 6/CMP.1, then all kinds of revegetation activities, including those listed in CDM-EB85, paragraph 58, can be allowed. The activity eligibility criteria for any revegetation activity are the following:
 - (i) It is a direct human-induced activity that is likely to increase carbon stocks on sites;
 - (ii) It involves establishment of vegetation that covers a minimum area of 0.05 hectares;
 - (iii) The vegetation to be established is not expected to reach the forest thresholds selected by the host Party in which the activity is to be implemented.

The land eligibility criterion for a revegetation activity should be the same as the land eligibility criterion for afforestation/reforestation project activities, viz. revegetation activities under the CDM should be limited to the revegetation activities occurring on land that did not contain forest on 31 December 1989.

¹⁵ Since afforestation occurs in land that was deforested at least 50 years before project start, limiting afforestation activities to lands that did not contain forest on 31 December 1989 is not required.

- (b) The following paragraph would have to be inserted in Section A of the annex to decision 5/CMP.1 if revegetation activities were to be allowed as CDM project activities:

“1bis. Revegetation activities under the CDM will be limited to revegetation occurring on those lands that did not contain forest on 31 December 1989.”

However, no modification in the A/R modalities and procedures will be required if the above land eligibility criterion for revegetation activities is included in the decision by the CMP in which revegetation activities are made eligible under the CDM.

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