

## UNFCCC

### **SUBMISSION TO SBSTA BY THE GOVERNMENTS OF SWAZIALND ON BEHALF OF THE AFRICA GROUP ON VIEWS ON ISSUES RELATED TO MODALITIES AND PROCEDURES FOR POSSIBLE ADDITIONAL LULUCF ACTIVITIES UNDER THE CDM**

#### **Background**

As referred to in paragraphs 117 of document FCCC/SBSTA/2012/2.

(FCCC/SBSTA/2012/L.30, paragraph 5)

#### **Context**

African Group recognizes and supports the idea of land use, land-use change and forestry (LULUCF) under Article 3, paragraphs 3 and 4 of the Kyoto Protocol and under the clean development mechanism, but the current approaches are not assisting the process and they discourages investment. As a result, the approaches work against the objectives of the Convention of reducing anthropogenic greenhouse gas emissions over time and to maintain the global average temperature rise below two degrees. The CDM in its current form and shape is also very complex, costly and limited in scope, i.e. only applies to A/R projects, which makes it very difficult for developing countries to implement; as a result there are very few LULUCF projects globally, compared to other projects, such as renewable energy projects, etc. Consequently, Africa has not benefitted much from the mechanism. The inclusion of additional activities might assist countries to participate in mitigation activities and contribute to the global effort to address climate change, but some of the rules will have to be reviewed.

#### **Elements of the Work Programme**

Based on the above, the African Group propose that discussion and considerations by SBSTA, on issues relating methodological issues under the Kyoto Protocol: Land use, land-use change and forestry under Article 3, paragraphs 3 and 4 of the Kyoto Protocol and under the clean development mechanism, at its 38<sup>th</sup> session should include the following:

## **Issues related to modalities and procedures for possible additional LULUCF activities under the CDM**

African Group is of the view, that in order to guarantee a viable long-term solution and mechanism, the modalities and procedures for possible additional LULUCF activities under the CDM should be developed to suit the national circumstances, capabilities and capacities within countries.

African Group therefore proposes that the following elements/proposals be further discussed and elaborated. This could be done during the 38<sup>th</sup> SBSTA sessions, in-session workshops and other technical workshops, in order for all Parties to have the same level of understanding:

1. The possibility or potential for opening new areas to facilitate investment;
2. The use of activities mentioned in article 3.3/3.4. However these will have to be further defined and potentially subdivided into additional categories;
3. The simplification of current modalities and procedures, because if these are not reviewed the inclusion of additional activities could be futile;
4. Streamlining of methodologies;
5. Simplify the rules of programmes of activities in order to integrate multiple activities;
6. Discuss and review the rules of eligibility, i.e. the 1990 rule and the small-scale threshold of 16000 tons;
7. Increased flexibility that takes into account country measurement capacity and also the associated transaction costs;
8. Refer to other examples and international standards (e.g. other carbon markets);
9. Consider existing methodologies (e.g. IPCC)

African Group also recognizes that there are a number of linkages between LULUCF and some of the issues on the UNFCCC agenda, which provides the potential of the outcomes of these discussions to stretch beyond CDM. Therefore lessons learnt from these discussions could also be important for items such as the nationally appropriate mitigation actions (NAMAs), REDD+, and the new market mechanism, especially as lessons learnt. There is also a need for the possible integration of activities, through a holistic or landscape approach. The links between the modalities and procedures for additional activities and comprehensive should also be carefully assessed.

African Group also proposes that the IPCC be invited at a later stage to revise the chapter on projects, and to provide further guidance, possibly after the additional LULUCF activities for inclusion under the CDM have been selected.