

UNFCCC

SUBMISSION TO SBSTA BY THE GOVERNMENTS OF SWAZILAND ON BEHALF OF THE AFRICA GROUP ON ISSUES RELATING TO A MORE COMPREHENSIVE ACCOUNTING OF ANTHROPOGENIC EMISSIONS BY SOURCES AND REMOVALS BY SINKS FROM LULUCF, INCLUDING THROUGH A MORE INCLUSIVE ACTIVITY-BASED APPROACH OR A LAND-BASED APPROACH,

Background

As referred to in Decision 2/CMP.7, paragraph 5 (FCCC/SBSTA/2012/L.3, paragraph 4)

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 discourage 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 current rules are complex, which makes it very difficult for developing countries to estimate emissions or removals from LULUCF activities; 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. A more comprehensive accounting system might assist countries to participate in mitigation activities and contribute to the global effort to address climate change more effectively, but some of the other related 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 to 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 38th session should include the following:

Issues relating to a more comprehensive accounting of anthropogenic emissions by sources and removals by sinks from LULUCF, including through a more inclusive activity-based approach or a land-based approach

African Group is of the view, that in order to guarantee a viable long-term solution and mechanism, the more comprehensive accounting of anthropogenic emissions by sources and removals by sinks from LULUCF, including through a more inclusive activity-based approach or a land-based approach 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 38th SBSTA sessions, in-session workshops and other technical workshops, in order for all Parties to have the same level of understanding:

1. Discussions should focus on process for now and requests for capacity building and training to encourage participation;
2. The solution(s) should not be a one-for-all and should take into account ecosystem/country context and be designed for developing countries to also be able to use, where baseline data (and data overall) is a challenge, and additional understanding/support might be required;
3. There should be a systematic approach for countries to be in different accounting categories/tiers (this might include project scale for developing countries versus land-based accounting for developed countries);
4. The issue of comparability;
5. There is an interest in land based accounting (versus activity based);
6. There is a need to avoid loopholes and double accounting;
7. For developing countries this could be attractive for incentive systems and not to ensure compliance; and
8. Expertise and technology should be linked to landscape approach through enhanced capacity building activities.

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. However, it should not preclude or pre-empt discussions on the post-2020 framework. The 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 are also possible linkages with IAR; ICA; means of implementation, including financial support/capacity building for developing countries; and national communications.

African Group proposes that further capacity building and training be provided to assist countries in considering implications for the future framework.