

## UNFCCC

### SUBMISSION TO SBSTA BY THE GOVERNMENTS OF SWAZILAND ON BEHALF OF THE AFRICA GROUP ON VIEWS ON ISSUES RELATED TO MODALITIES AND PROCEDURES FOR ALTERNATIVE APPROACHES TO ADDRESSING THE RISK OF NON-PERMANENCE UNDER THE CLEAN DEVELOPMENT MECHANISM (CDM)

#### Background

As referred to in paragraphs 116 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 approach is not assisting the process and it discourages investment. As a result, the approach works 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 and costly, 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.

#### Elements of the Work Programme

As a result of the abovementioned, the **African Group** proposes that discussions 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 38<sup>th</sup> session should include the following, but not be limited thereto:

**Issues related to modalities and procedures for alternative approaches to addressing the risk of non-permanence**

**African Group** is of the view, that in order to guarantee a viable long-term solution, the alternative approaches for addressing the risk of non-permanence should be developed in such a way that it ensures permanent credits, but at the same time maintains flexibility in order for countries to have options in selecting a suitable and implementable approach to suit their national circumstances, capabilities and capacities.

**African Group**, therefore proposes that the following approaches, suggested by various Parties, be further discussed and elaborated upon. 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 understand the various approaches and to engage in discussions from a common basis of understanding regarding issues relating to the risk of non-permanence. Approaches include:

1. The Buffer approach;
2. The CCS approach;
3. The possible extension of credits that are currently temporary to permanent credits;
4. Complementing credits with insurance;
5. A flexible criteria to assess the risk of non-permanence, and that takes into account different country situations (ecosystems). This will require the Government to be involved, by:
  - a. Subjecting LULUCF activities to a risk assessment in an attempt to determine or guarantee permanence,
  - b. Considering possible conversion of areas subjected to LULUCF activities to permanent conservation areas, and
  - c. Considering issues of land tenure.
6. The complementarity of activities;
7. The tracking of activities of carbon credits throughout the value chain;
8. Ensuring permanence by the demand side.

**African Group** also recognizes that there are a number of linkages between LULUCF and some of the issues on the UNFCCC agenda and would like to consider the various approaches with a long-term view. Therefore, we understand that the various approaches for addressing the risk of non-permanence could have potential or applicability beyond only CDM. These approaches could be important for items such as the nationally appropriate mitigation actions (NAMAs), REDD+, and the new market mechanism, especially as lessons learnt from the process.

Currently, LULUCF also has other associated issues, such as issues of scale/size; natural disturbances and processes; and transboundary issues that could be addressed through the three work programmes.

**African Group** re-emphasizes the importance of further discussing and elaborating on the alternative approaches for addressing the risk of non-permanence proposed by the various Parties and admitted observer organisations.