

**Japan's views on
the implications of the inclusion of reforestation of lands with forest in exhaustion
as afforestation and reforestation clean development mechanism project activities**

March 2011

Japan welcomes the opportunity to express its views on “the implications of the inclusion of reforestation of lands with forest in exhaustion as afforestation and reforestation clean development mechanism (A/R CDM) project activities” as invited by the Subsidiary Body for Scientific and Technological Advice (SBSTA) on its thirty-third session (paragraph 93 of FCCC/SBSTA/2010/13).

Afforestation and reforestation project activities should be promoted under operationally feasible modalities, rules and guidelines of the clean development mechanism (CDM). From this point of view, amendment to the modalities, rules and guidelines should aim to reduce uncertainties over implementation of project activities without increase in their complexity, as well as to promote emission reductions and enhancement of removals relating to land-use. While inclusion of lands with “forest in exhaustion” might expand possibility for land use, land-use change and forestry project activities, further clarification and consideration for its implication is required. Japan believes that issues listed below need to be further considered and clarified.

(1) Relationship between “forest in exhaustion” and “reforestation”

It is necessary that interpretation of “forest in exhaustion” be consistent with the definition of “reforestation”. However, it is not clear whether project activities on the land which contained “forest in exhaustion” indicate “the direct human-induced conversion of non-forested land to forested land” as defined in paragraph 1(c) of annex to decision 16/CMP.1.

(2) Timing of conversion of the forested land to non-forested land

In terms of paragraph 2 of annex I to the annual report of the Executive Board of the CDM (CDM-EB) to the Conference of the Parties serving as the meeting of the Parties to the Kyoto Protocol (COP/MOP) contained in FCCC/KP/CMP/2009/16, conditions of projects could differ from each other by the timing of the conversion of forested land to non-forested land. For example, in case that “forest in exhaustion” means an area of land that contained forest on 31 December 1989 and/or the land at the starting date of the project activity is non-forested land, conversion of forest land to non-forest land before the starting date of the project activity could be accelerated. Another case could be assumed that vegetation would be naturally recovered in a few years after the final harvesting. From this point of view, it should be considered whether it is possible to objectively prove that the land would be converted to

non-forested land at the point of time, through final harvesting within [5] years of the proposed starting date of the project activity without negative impacts, and demonstrate how the change in the emissions and reductions resulting from the project activity would occur.

(3) Inconsistency in the interpretations of “forest in exhaustion”

There seems to be an inconsistency between paragraph 2 and paragraph 3 of the annex I to the annual report of CDM-EB to the COP/MOP at its fifth session contained in FCCC/KP/CMP/2009/16. It is mentioned in the paragraph 2 that ““forest in exhaustion” is an area of land that contained forest ... on 31 December 1989 and/or at the starting date of the project activity.” However, the paragraph 3 refers only to 31 December 1989 with regard to the eligibility criteria. Such inconsistency will lead to confusion in clarifying whether “forest in exhaustion” is eligible for the reforestation CDM activities.

(4) Relationship with other forest related activities

It should be noted that concept of “forest in exhaustion” could overlap with the concept of “forest management” stipulated in paragraph 1(f) of decision 16/CMP.1 and “deforestation” stipulated in paragraph 1(d) of the same decision. Taking into account the ongoing LULUCF activities in Annex I countries, “forest in exhaustion” should be carefully considered so as to avoid the negative influence to the LULUCF activities and the existing review mechanism under the Article 8 of the Kyoto Protocol.

Japan recognizes that project activities on the lands with “forest in exhaustion” noted in the recommendation by the CDM-EB are presumed to be implemented as reforestation CDM project activities in the first commitment period. However, it should be noted that the treatment of land use, land-use change and forestry projects activities under the CDM after the first commitment period including afforestation and reforestation activities, and other forest related issues are negotiated in the AWG-KP and AWG-LCA, and that some decisions related to forests have been adopted by CMP. Japan believes that issues on “forest in exhaustion” should be carefully discussed in such a way as to avoid duplication of works.