

## **SUBMISSION BY INDONESIA**

### **Land use, land-use change and forestry under Article 3, paragraphs 3 and 4, of the Kyoto Protocol and under the clean development mechanism (FCCC/SBSTA/2012/L.30, paragraph 5)**

#### **BACKGROUND**

SBSTA-37 invites further views from Parties and admitted observer organizations on issues related to land use, land-use change and forestry (LULUCF) referred to in paragraphs 116 - 118 of document FCCC/SBSTA/2012/2 (FCCC/SBSTA/2012/L.30, paragraph 5).

#### **VIEWS OF INDONESIA**

Forest and other land sector has a potential to significantly contribute to enhance the level of ambition in emission reduction to achieve target of holding the increase in global average temperature below 2 °C or 1.5 °C above pre-industrial levels, as well as to achieve sustainable development both in developed and developing countries. It is acknowledged that there are a number of outstanding issues to be addressed by SBSTA including issues set forth in the call for submission on LULUCF above. In this regard, Indonesia submits its views on the following issues :

##### **1. More comprehensive accounting for LULUCF**

Indonesia welcome the initiation of a work programme to explore 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, with the aim to report on the outcomes of this work programme to the Conference of the Parties serving as the meeting of the Parties to the Kyoto Protocol at its ninth session.

The inclusion of additional activities under Article 3.4 of the Kyoto Protocol in the second commitment period, demand for adjustment to the LULUCF accounting approaches used for the first commitment period. A more comprehensive LULUCF accounting approaches will be necessary for the second commitment period of the Kyoto Protocol, and without prejudging future decision, also for possible new arrangement post 2020. In this regard, further exploration of more comprehensive accounting approaches under SBSTA work-programme should include more indepth analysis on activity-based approach and land-based approach, without putting any preference on one to another approach. Considering the technical and scientific nature of the approaches and in order to facilitate effective discussion among parties on the issues, Indonesia views that SBSTA should request Secretariat of the UNFCCC to prepare 'Technical Paper' relating to a more comprehensive LULUCF accounting approaches, to be considered at the thirty-ninth session of SBSTA.

## **2. Additional LULUCF activities under CDM**

Forest and other land sector in non-Annex 1 parties play strategic roles not only in climate change mitigation and adaptation, but also in providing environmental services and livelihood of forest dependent people. However, A/R CDM, the only Kyoto Protocol mechanism which allow non-annex 1 parties to participate, has not generated meaningful benefits to non-annex 1 parties, because of eligibility criteria and a number of methodological and institutional issues.

Additional LULUCF activities under CDM is expected to provide developing countries (non-annex 1 parties) more options of eligible activities, that means open opportunities to developing countries to select the most appropriate activities for CDM according to their national circumstances and priorities. In this regard, SBSTA in its consideration of modalities and procedures for possible additional LULUCF activities, should assess possibility of eligible additional activities under Articles 3.4, to be also eligible for additional LULUCF activities under CDM.

Indonesia is willing to engage in the process of the development of modalities and procedures for possible additional land use, land-use change and forestry activities (LULUCF) activities under the clean development mechanism (CDM) in accordance with decision 2/CMP.7, paragraph 6. In order to progress towards recommending a draft decision of the Conference of the Parties serving as the meeting of the Parties to the Kyoto Protocol for adoption at its ninth session, the work programme should include technical workshop to address relevant issues by COP-19/CMP. 9.

## **3. Addressing risk of non-permanence under CDM**

Implementation of approaches to address non permanence in afforestation and reforestation project activities under the CDM in the first commitment period of the Kyoto Protocol guided by decision 5/CMP. 1 should has provided experiences and lessons learned on the strengths and the weaknesses of the approaches. Along with the development of science and technology and experience from the implementation of A/R CDM, the approaches need to be reviewed and alternative approaches should be explored.

Indonesia views that the work programme to consider and develop modalities and procedures for alternative approaches to address the risk of non-permanence under the CDM should include review of existing approaches under decision 5/CMP. 1.

Furthermore, under decision 1/CP. 16 annex 1, developing countries undertaking REDD+ should address similar issue, that is risks of reversals. While risk of reversals in REDD+ may be addressed at the national level with policy approaches, risk of non-permanence under CDM (project-based activities) may also be part of actions to address risk of reversals for REDD+ at the national level. This is, however, need to be discussed further and should be taken into account in the development of modalities and procedures for alternative approaches to address the risk of non-permanence under the CDM.

#### **4. General issue**

The work programme relating to LULUCF under different subsidiary bodies of UNFCCC should address issues relating to implication of different accounting approaches on the consistency of result of mitigation on LULUCF sector, both in developed countries and in developing countries. The work programme should also consider methodological issues relating to the transition from existing arrangement of LULUF accounting approaches into possible new arrangement post 2020.

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