## MALAYSIA

## SUBMISSION OF VIEWS

# Land use, land-use change and forestry (LULUCF) under Article 3, paragraph 3 and 4 of the Kyoto Protocol under the clean development mechanism.

Issues related to A/R CDM:

#### a. Non permanence

Malaysia is of the view that the issue on non permanence must be resolved soon in order for A/R CDM projects to be viable. If this issue is not resolved, then A/R CDM will continue to generate tCER unlike the other CDM projects.

Ways to overcome non permanence:

- Demonstration of good governance, government policies, historic baselines/risk as well as buffer creation based on projects are undertaken.
- Good risk assessment and management are demonstrated and reversals are avoided

### b. New activities

The current eligible activities are quite limiting in that it is only applicable to afforestation and reforestation activities. Due to the limited activities and the very stringent rules, not many projects were generated and only a limited number of countries were able to participate.

Malaysia is of the belief that the current rules must be reviewed as per the Decision 5CMP/1 paragraph 4. Revisions to be included would be:

- a. Simplify the current rules and modalities including verification process by designated operational entities
- b. New activities besides A/R CDM, to include other type of land use like cropland management should be considered
- c. Rules for new activities must be simple, cost effective and respect national circumstance

#### c. Comprehensive accounting

While clarity is needed on comprehensive accounting as it is for developed countries only or post 2020, general features of a comprehensive accounting is proposed as follows:

- Comprehensive accounting should support an inclusive activity based approach if land based accounting is not possible.
- Inclusive activity based approach should be designed towards land based accounting.
- It is also expected that these activities are monitored at national level especially for activity based accounting.