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Subsidiary Body for Scientific and Technological Advice

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Item 11(b) of the provisional agenda

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**

**Views on land use, land-use change and forestry issues
referred to in decision 2/CMP.7, paragraphs 5–7**

Submissions from Parties and admitted observer organizations

Addendum

1. In addition to the submissions contained in document FCCC/SBSTA/2013/MISC.8, one further submission has been received.
2. In accordance with the procedure for miscellaneous documents, this submission is attached and reproduced* in the language in which it was received and without formal editing.¹

* This submission has been electronically imported in order to make it available on electronic systems, including the World Wide Web. The secretariat has made every effort to ensure the correct reproduction of the text as submitted.

¹ Also available at <unfccc.int/5901>.

FCCC/SBSTA/2013/MISC.8/Add.1

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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.
