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Subsidiary Body for Scientific and Technological Advice

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Agenda item 12(b)

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 issues related to modalities and procedures for
possible additional land use, land-use change and forestry
activities under the clean development mechanism in
accordance with decision 2/CMP.7, paragraph 6**

Submissions from Parties and admitted observer organizations

Addendum

1. In addition to the submission contained in document FCCC/SBSTA/2012/MISC.18, one further submission has been received.¹
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 Also available at <<http://unfccc.int/5901>>.

* 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.

FCCC/SBSTA/2012/MISC.18/Add.1

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Submission from Uruguay

Inputs on modalities and procedures for possible additional LULUCF activities under the CDM in response to the call for submissions per the decision 2/CMP.7, paragraph 6

The first commitment period of the Kyoto Protocol accepted only afforestation/reforestation activities as LULUCF activities under the articles 3.3 and 3.4 of the Kyoto Protocol. This restriction excluded land use and land-use change project activities that are important in terms of GHG fluxes and that may provide benefits for sustainable development in the agriculture sector.

The promotion of sustainable land use with activities as cropland management, cropland management, revegetation and forest management, among others may be significant in terms of carbon sequestration and reduction of emissions, and may contribute to sustainable development as GHG emissions are an indicator of inefficient use of natural resources. There is increasing understanding of the synergies and trade-offs between climate change mitigation and adaptation activities and food security and sustainable development. One example relevant to Uruguay is the restoration of degraded grasslands and croplands, rebuilding organic matter in soils and sequestering carbon. These project activities may also provide benefits in terms of food security, poverty reduction, resilience to climate change and progress in the direction of green and low carbon economies. Other example is sustainable forest management, e.g. natural forests that protect watersheds and provide many other environmental services.

In our view enhancing the number of LULUCF activities accepted in the CDM would also represent opportunities for learning and scaling up mitigation actions towards the implementation of NAMAs, involving a great number of farmers until now excluded from CDM.

Uruguay proposes that SBSTA considers additional LULUCF activities, as forest management, and cropland and grassland management, with a view to making recommendations for their inclusion under the CDM to CMP.8. In this regard, and in light of the first commitment period experience, it seems especially important to discuss new approaches to non-permanence that ensure that reversals of sequestration are adequately monitored and any reversal is accounted for, and at the same time ensure fungibility to increase the attractiveness of LULUCF CERs from carbon sequestration projects.

The existing 'Tool for the demonstration and assessment of additionality in A/R project activities' includes analysis of consistency with laws and regulations, investment, barriers, and common practice. In developing an approach to additionality, each of these elements should be considered, and an approach adopted that best ensures the integrity of projects under the CDM. Expansion of the CDM to include additional LULUCF activities will require consideration of how this analysis can be applied to expanded LULUCF activities, whether additionality tests will be incorporated into individual project methodologies, or whether a standardised approach is appropriate.

Under existing A/R CDM projects, the renewal of a project's crediting period requires project participants to update sections of the Project Design Document relating to the baseline, among other components. Within Australia's Carbon Farming Initiative, the identified positive list of additional activities undergoes regular review to reflect changes in common practices over space and time, with project participants required to

re-register their projects after specified time periods to confirm whether their project is still eligible based on whether they are still considered additional. Additionality factors, such as common practice, are variable over time and the inclusion of additional LULUCF activities under the CDM may require modalities and procedures to review additionality or baselines on a regular basis, such as when renewing a project's crediting period.
