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UNFCCC Secretariat  
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Washington DC, February 20, 2007

Ref: Call for public input on the procedures to demonstrate the eligibility of lands for afforestation and reforestation project activities under the CDM per the paragraph 26 of decision of the COP-12/MOP2.

Honorable Members of the CDM Executive Board,

Please find the enclosed inputs from the World Bank in response to the call for public input referred to above.

Yours sincerely,

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Enclosure

We request that the "*Procedures to demonstrate eligibility of lands for afforestation and reforestation project activities*" (version 02), contained in Annex 18 of EB26 report should be revised taking into account the recommendations below.

(1) Deleting the words "and minimum width" from paragraph 1(a) i; and deleting the second sentence related to minimum width in footnote 1.

*Explanation:*

The deletion of the minimum width avoids the inclusion of additional criteria in the definition of forest adopted in the *Decision 11/CP.7 (16/CMP.1)* for land use, land-use change and forestry activities under Article 3, paragraphs 3 and 4, and in paragraph 8 of the Annex of *Decision 19/CP.9 (-/CMP.1)*.

(2) Deleting paragraph 1 (a) ii and paragraph 1 (a) iii

*Explanation:*

The forest definitions under the Marrakech Accords apply to national accounting for Annex I countries under Article 3.3 and to non-Annex I countries under Article 3.4, which are also eligible to implement AR-CDM project activities. There exist differences in the interpretations of the Parties with regard to "reforestation" adopted under the Marrakech Accords vis-à-vis treatment of lands that were not-forested on 31 December 1989, then reforested, and subsequently unstocked through direct human intervention in the context of Article 3.3 (page 4. 52 and decision tree in Figure 4.1.1 in the GPG/LULUCF (IPCC 2003)). To resolve the variations in interpretations for the eligibility of lands, it is efficient to consider lands that had vegetation parameters below the thresholds of forest definition in 1990 and at the starting date of the project activity to be eligible for AR-CDM project activities to be eligible as reforestation activities under Article 3.4 of the Marrakech Accords.

(3) Deleting second sentence in paragraph 1(b)ii, which reads as follows:

*"For this purpose, project participants should provide evidence that the land was below the national thresholds for at least four single representative years within the time period of 50 years (e.g. 10 years, 25 years, 40 years and 50 years before the project start)".*

*Explanation:*

The inclusion of the above sentence is redundant and presents additional burden on the project participants as land use data at different intervals may not be available or could not be easily procured. The time period of 50 years of lack of vegetation is comprehensive in itself and there exists no additional benefit by including the sub-criteria of time in the eligibility criteria.

Moreover, from a climate change mitigation point of view, there are no implications if a project activity is an afforestation or reforestation activity. Therefore, the evidence

for sub-periods lack of forest within a 50-year period is redundant and should be deleted.

**(4) Deleting paragraph 1(b)iii**

*Explanation:*

As discussed in previous section, the paragraph is not consistent with the reforestation activity as per Article 3.4, as also pointed by the Parties representing the non-Annex I countries. Therefore, it should be deleted.

**(5) Deleting the footnote 3 of paragraph 2(a)**

*Explanation:*

The words "*including demonstration that any imagery used has adequate spatial and spectral resolution*" place additional burden on the project participants as the spatial and spectral resolution of the satellite images are limited by the technology of the time period and cost constraints in procuring the satellite images. Considering the absence of guidelines on "*adequate resolution*" and that in several instances the available satellite images is the best possible evidence that the project participants can present, the footnote should be deleted.

## **Procedures in demonstrating the eligibility of land for AR-CDM project activities**

The amended proposal presented below reflects the deletions recommended above for Annex 18 of EB26 report as well as additions proposed herewith with regard to verifiable information pertaining to the eligibility of lands for AR-CDM project activities. The proposal is also outlined as a flow diagram.

**Project participants shall present evidence that the land within the project boundary is eligible for AR-CDM project activities as per the procedures outlined below**

**Step 1: Demonstrate that the land at the starting date of the AR-CDM project activity is not a forest by providing information that:**

- i. The vegetation parameters (crown cover, tree height and minimum land area) are below the national thresholds of the forest definition under decisions 11/CP.7 and 19/CP.9 as communicated by the respective DNA; and
- ii. The land is not temporarily unstocked as a result of human intervention;
- iii. Environmental conditions, anthropogenic pressures, or lack of available seed sources prevent regeneration of natural woody vegetation that exceeds the thresholds of forest definition under decisions 11/CP.7 and 19/CP.9 as communicated by the respective DNA during the proposed crediting period.

**Step 2: Demonstrate that the activity is a reforestation or afforestation project activity:**

- i. For reforestation project activities, demonstrate that the vegetation parameters (crown cover, tree height and minimum land area) were below the national thresholds of the forest definition on 31 December 1989, under decision 11/CP.7 as communicated by the respective DNA.
- ii. For afforestation project activities, demonstrate that the vegetation parameters (crown cover, tree height and minimum land area) were below the national thresholds of the forest definition under decision 11/CP.7 as communicated by the respective DNA, for a period of at least 50 years.

In order to demonstrate steps 1 (a) and 1 (b), project participants shall provide one of the following verifiable information:

- i. Aerial photographs or satellite imagery complemented by ground reference data; or
- ii. Land use and land cover information from official sources - land records, cadastre, maps or datasets; or
- iii. Ground based surveys (land use permits, land use plans or owners register, land use or land management register); or
- iv. If options i, ii and iii are not feasible/applicable, project participants shall submit a written testimony which was produced by following a participatory rural appraisal (PRA) methodology. The written testimony submitted following the participatory rural appraisal methods may be based on indicators such as *inter alia*:
  - (a) Possibility to see the sky without any obstruction from vegetation on the plot;
  - (b) Number of trees (e.g. 10) above a minimum diameter (e.g. >10 cm diameter) within land parcels of a given size (e.g. 1 ha);
  - (c) Type and frequency of natural/anthropogenic pressure factors impeding natural regeneration;
  - (d) Current absence of woody vegetation is also reported for periods around 1990

If the written testimony is presented taking into account the above indicators of the PRA is affirmative, then the land shall be considered eligible for the afforestation and reforestation activity. As the written testimony based on PRA is intended for situations in which land use data and information is either lacking or insufficient to demonstrate the eligibility, it shall be used after demonstrating the non-availability of other verifiable sources of information.

For situations where the exact boundary of a proposed AR-CDM project activity will only be defined after the registration date , the following sub-steps shall apply.

- (a) Define the boundary of all potential afforestation/reforestation sites.
- (b) Demonstrate the eligibility of each potential site.
- (c) Define the baseline of each potential site.
- (d) Report in the PDD the boundary of all potential sites, the demonstration of their eligibility and the corresponding baseline.
- (e) At subsequent verifications submit the detailed information on the coordinates of land parcels on which planting activity was implemented from amongst the lands submitted as the eligible lands.
- (f) Planting sites outside the boundary of the potential sites may not be considered as part of the registered AR-CDM project activity.

## Land eligibility tool for Afforestation and Reforestation CDM project activities

