
 <p align="center">CDM: Form for submission of queries from DOEs to the Afforestation and Reforestation Working Group regarding the application of approved A/R methodologies (version 01) (To be used by DOEs for presenting questions / proposals / amendments related to the applicability of approved A/R methodologies)</p>	
Name of the entity (DOE) submitting this form	TUEV-SUED
Reference number and title of the approved A/R methodologies	All AR-CDM methodologies
Title/Subject (give a short title or specify the subject of your submission, maximum 200 characters):	Consideration of herbaceous vegetation in baseline stocks
Attach CDM-AR-PDD example of project activity where applicability raises problem:	<input type="checkbox"/> Yes, is attached. (not applicable; applicable to all projects)
Date and signature for the DOE	06/02/2009 
<p>Submitted queries</p> <p>Please use the space below to substantiate the queries relating to the application of approved A/R methodologies. If the questions are related to a project activity under development or implementation, please describe the context in which they arose. If you are proposing amendments to approved A/R methodologies, please specify the text you want to change or introduce. If necessary, attach files or refer to sources of relevant information.</p> <p>If you have a question relating to the application of the approved A/R methodologies, please specify and provide reference to the exact project activity to which it applies.</p>	

EB 42 indicated that emissions from the removal of herbaceous can be neglected in accounting GHG emissions in A/R CDM activities.

It is considered unclear if the decision also applies to carbon stocks in herbaceous vegetation (i.e. vegetation outcompeted in the course of project implementation) that is assessed as part of the baseline and which is commonly discounted in the calculation of (ex-ante and ex-post) net anthropogenic GHG removals by sinks.

Clarification on the necessity to consider herbaceous vegetation as part of baseline stocks is requested.

Below we provide some general references that may be relevant in this context:

1. Consideration of biomass loss as emission source in AR methodologies:

Examples in regard to emission sources:

- AR-AM0005 (version 03) considers the removal of non-tree vegetation as source
- Several other methodologies, including ACM0001, consider biomass burning as source, indicating that CO₂ is covered via stock changes.

Carbon stocks (and removals) are assessed via baseline studies and enter the (ex-ante and ex-post) discounting of baseline amounts as part of the regular calculations approach.

2. Relevant A/R Methodological Tool:

The following tools are considered relevant for decisions on the accounting of herbaceous vegetation.

- a) "Tool for testing significance of GHG emissions in A/R CDM project activities" (Version 01)
- b) "Estimation of emissions from clearing, burning and decay of existing vegetation due to implementation of a CDM A/R project activity" (Version 01)

These tools are currently only applicable for ACM0001. They are indicated at this point only to summarize recent decisions and guidance on this matter.

Quotes:

- a) *Tool for testing significance of GHG emissions in A/R CDM project activities" (Version 01)*

Scope This tool facilitates the determination of which GHG emissions by sources, possible decreases in carbon pools, and leakage emissions are insignificant for a particular CDM A/R project activity. The sum of decreases in carbon pools and increases in emissions that may be neglected shall be less than 5% of the total decreases in carbon pools and increases in emissions, or less than 5% of net anthropogenic removals by sinks, whichever is lower.

...

- b) *"Estimation of emissions from clearing, burning and decay of existing vegetation due to implementation of a CDM A/R project activity" (Version 01)*

Scope

1. This tool can be used to estimate the increase in emissions of greenhouse gases due to live vegetation existing within the project boundary at the time an A/R project commences—the "existing vegetation"—being cleared, burned, and/or left to decay as part of site preparation or other project implementation activities¹.

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III. METHODOLOGICAL PROCEDURE: A SIMPLIFIED DEFAULT APPROACH TO ESTIMATION OF EMISSIONS DUE TO SITE PREPARATION

12. Site preparation for a CDM A/R project activity may involve the partial or total clearance (including by burning) of existing vegetation as a result of site preparation. Alternatively, competition from forest or other vegetation established as part of A/R project activities can result in the death and decay of existing vegetation. These losses of existing biomass are treated as an increase in GHG emissions within the project boundary. In general, emissions from loss of existing biomass will occur as two components: immediate emissions of CO₂ and non-CO₂ from biomass burning if slash-and-burn practices are used, and emissions of CO₂ over a period of months to decades from decay of remaining burned and/or unburned vegetation.

3. Scientific evidence on relevance of carbon stocks in herbaceous vegetation:

It several cases density in herbaceous carbon stocks is equivalent to about 3-4 t CO₂/ha. However, there are cases where herbaceous carbon stock can be > 30 t CO₂/ha. (Source: IPCC GPG LULUCF chapter 3.4, Table 3.4.2, reference data for standing live biomass ORNL DAAC NPP database http://www.daac.ornl.gov/NPP/html_docs/npp_site.html). Afforestation projects can need several years to sequester this amount of carbon.

If you propose an amendment to the approved A/R methodologies, please provide justification.

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In case you propose the amendment to the approved A/R methodologies, please provide your draft below, if not included in an annex:	
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<i>Date of submission of contribution:</i>	06/02/2009
Information to be completed by the secretariat	
Date when the form was received at UNFCCC secretariat	
Date of transmission to the AR WG and Executive Board	