



Dear Delegate,

The Climate Action Network is urging you to protect the credibility of the Kyoto Protocol and the Clean Development Mechanism. Weak rules for sinks in the CDM can erode public support for this critical international treaty. We would like to draw your attention to some key priorities in regard to the CDM sink negotiations at CoP-9.

The challenge before you is to develop a final set of CDM sinks rules that deliver on the spirit and intent of Article 12 and the principles agreed in Marrakech. You must recall that you have already agreed that any land use projects “contribute to the conservation of biological diversity and the sustainable use of natural resources. You must put this principle into practice.

The issue is not whether rules allow some projects with biodiversity benefits. Rather, there is an urgent necessity to reach agreement on a sound rules framework so that *all* projects deliver biodiversity benefits and promote the sustainable use of natural resources. Furthermore, carbon accounting must fully represent all emissions and re-emissions.

Weak sinks rules will allow low-quality projects to swamp the CDM market. Failing to block business-as-usual sequestration and unsustainable projects, such as large commercial plantations, will discredit sinks, the CDM, and ultimately the Protocol itself. It is of highest priority to ensure that the Kyoto Protocol does not become a subsidy system for vast monocultures of non-native species, possibly on land already claimed by local people.

The following checklist highlights our most urgent concerns in regard to key issues in the current negotiation text and provides a guide to a successful outcome at CoP-9.

Thank you in advance for your help to design a better future,
Sincerely,

Your Climate Action Network



Dear Delegate, here is the checklist to judge the success of the negotiations...

Do CDM sink rules...

- ...include "Appendix E"?
Host countries, credit buyers, stakeholders and the public need sufficient information from the project design document to assess a project's social and environmental impacts. The weak Appendix E-Option 1 is the absolute minimum information necessary, and avoids imposing specific standards on host countries.
- ...reject Canada's "insurance approach" on the permanence issue?
The tCER (or rCER) approach is the most effective that is currently on the table, as it requires ongoing monitoring and liability for any re-emission of credited sequestration. The iCER approach undermines environmental integrity by allowing these provisions to expire. Choosing both 'temporary credits' and the 'insurance approach' is a false compromise. Furthermore, include incentives for long-term project design, such as a minimum project lifetime.
- ...include a meaningful additionality test that excludes projects that would have happened anyway?
- ...rule out invasive alien species and GMOs and stop large commercial plantations from swamping the CDM?
An environmental treaty that subsidizes invasive alien species and GMOs threatens to erode public support and causes environmental harm.

... and (the critical details)...

- ...exclude "positive" leakage? Contain 100% default leakage assumption?
Assume 100 percent leakage in the absence of adequate analysis. Exclude 'positive' leakage because nobody is liable for re-emissions under that scenario. Leakage must include 'shifted activities'.
- ...maintain the 1990 base year for reforestation projects?
- ...require that all GHGs are accounted for, not just CO₂?
- ...require geo-referenced location of projects?
- ...require early stakeholder participation and 60 days commenting period?
- ...reject fast-tracking of sinks?
(Anything > 100 ha is not "small!")
- ...require truthful baselines?
Prospective land use and other key factors should be taken into account for the baselines. Natural regeneration has to be part of the baseline.

Best regards,
Your Climate Action Network