



Submission on APA Agenda item 3, Further guidance in relation to mitigation section of decision by the Republic of the Maldives on behalf of the *Alliance of Small Island States*

12 April 2017

APA Agenda item 3: Further guidance in relation to the mitigation section of decision 1/CP.21 on: (a) features of nationally determined contributions, as specified in paragraph 26; (b) information to facilitate clarity, transparency and understanding of nationally determined contributions, as specified in paragraph 28; and (c) accounting for Parties' nationally determined contributions, as specified in paragraph 31

On behalf of the Alliance of Small Island States (AOSIS), and taking into consideration the views of members with certain ratification requirements, the Republic of the Maldives welcomes this opportunity to provide its views to the Ad Hoc Working Group on the Paris Agreement (APA) in response to the call for submissions contained in paragraph 17 of the draft conclusions of the co-Chairs of the Ad Hoc Working Group on the Paris Agreement (APA) contained in FCCC/APA/2016/4, on features, information and accounting.

1. In Marrakesh, the APA invited Parties to submit, by 1 April 2017, their views on issues discussed under this agenda item, taking into consideration the questions identified by Parties as relevant for this item and listed in the annex to the informal note by the co-facilitators.¹ This submission is made with respect to the mitigation component of NDCs only.
2. Nationally determined contributions (NDCs) form the backbone of the Paris Agreement. Discussions on this agenda item should respect and uphold the nationally determined nature of Parties' contributions. At the same time, our ability to understand the mitigation implications of Parties' NDCs is important in order to determine their future aggregated effects and to evaluate progress towards the achievement of our long-term goals.
3. AOSIS recognizes that 1/CP.21 requires us to produce guidance on three distinct topics:
 - a) features under paragraph 26,
 - b) information under paragraph 28 and
 - c) accounting under paragraph 31.

We look forward to addressing these mandates constructively under this Agenda item.

4. More detailed guidance on these three items would assist Parties in preparing NDCs. All guidance should recognize the capacity constraints and special circumstances of SIDS, as recognized in the Paris Agreement.
5. AOSIS is of the view that due to the technical nature of the issues, in-depth discussions will be needed to further elaborate guidance on these topics. A series of technical workshops, technical papers, synthesis reports, etc. could be organized to inform and

¹ See: http://unfccc.int/meetings/marrakech_nov_2016/items/9974.php

structure work in 2017 so that appropriate guidance can be developed and delivered in 2018.

6. For example, one or more technical workshops could be scheduled for 2017 to progress work. Supporting technical papers could include:
 - a) a paper on the challenges faced by the secretariat in developing its Synthesis Report, with relevance to features, information and accounting.
 - b) a paper on lessons learned under the Convention and the Kyoto Protocol that would be relevant to discussions under APA Agenda item 3, including issues encountered and options for addressing these issues.
 - c) a paper on developing BAU baselines on economy-wide basis or for significant emitting sectors such as power generation, transportation and industry

Agenda sub-item (a): Features of nationally determined contributions, as specified in paragraph 26

What is the understanding of features of NDCs under this agenda item?

7. While the term “feature” is not defined in the Paris Agreement, it can be understood to refer to the characteristics, elements, content, or attributes of NDCs.
8. Current mitigation-related characteristics, elements, content, or attributes of NDCs, contained in Article 4 of the Paris Agreement, include:
 - a) NDCs are nationally-determined (Art. 4.2)
 - b) NDCs are maintained (Art. 4.2).
 - c) NDCs are to be supported by domestic mitigation measures that aim to achieve the objectives of the contributions (Art. 4.2).
 - d) Each successive NDC will represent a progression beyond the Party's then current NDC (Art. 4.3).
 - e) Each successive NDCs will reflect a Party's highest possible ambition, reflecting its common but differentiated responsibilities and respective capabilities, in the light of different national circumstances (Art. 4.3).
 - f) NDCs of developed countries should be economy-wide absolute emission reduction targets (Art. 4.4).
 - g) NDCs of developing countries are encouraged to move toward economy-wide emission reduction or limitation targets in light of different national circumstances (Art. 4.4).
 - h) NDCs are to be accompanied by the information necessary for clarity, transparency and understanding (Art. 4.8).
 - i) NDCs are to be informed by the outcomes of the Global Stocktake (Art. 4.9).
 - j) NDCs may be carried out by Parties acting jointly (Art. 4.16), in which case their communication is to be accompanied by the underlying agreement between Parties and each Party is accountable for its emission level.
 - k) NDCs are communicated by each Party every five years (Art. 4.9).

- l) NDCs are adjustable at any time, with a view to enhancing their ambition, consistent with guidance (Art. 4.11).
 - m) NDCs are recorded in a public registry maintained by the secretariat (Art. 4.12).
9. Some countries have submitted NDCs with the following aspects:
- a) reference years or periods
 - b) timeframes
 - c) statements of coverage in sectors or gases
 - d) statements of metrics and accounting guidance applied
 - e) conditional aspects
 - f) the quantification of reductions in tonnes of CO₂-eq emissions

What should be the purpose of further guidance on features under this agenda item?

10. Paragraph 26 of decision 1/CP.22 calls for the development of further guidance on features of the NDCs. This agenda sub-item should provide Parties with the opportunity to explore ways in which further guidance on the various features of NDCs could assist Parties in developing their new, updated, adjusted or successive NDCs, in the context of the purpose of the Paris Agreement as set out in its Article 2.
11. Further guidance might address, for example, among other issues:
- a) quantifiability of efforts in tonnes of CO₂-eq. emissions (if applicable)
 - b) progression
 - c) highest possible ambition

What is the relationship, if any, between further guidance on features of NDCs under this sub-item, and further guidance on sub-items 3(b) and 3(c)?

12. Our ability to aggregate the mitigation effects of NDCs is important for evaluating progress towards the achievement of our long-term goals. In this way, guidance on features, information and accounting are closely related.
13. More detailed guidance on these three sub-agenda items would assist all Parties when they start the process of updating their NDCs and developing new NDCs.
14. The issue of common timeframes under Article 4.10, which is to be considered by the CMA, is also relevant.

How could this work be usefully structured and progressed?

15. The discussion under this agenda sub-item should be informed by the experience gained by Parties with the initial preparation and submission of their iNDCs. Parties should be encouraged to identify those features that in their view require further guidance, the type of guidance they feel would be appropriate, and their reasons for why such guidance would further the purpose of the Paris Agreement as set out in Article 2.

Agenda sub-item (b): Information to facilitate clarity, transparency and understanding of nationally determined contributions, as specified in paragraph 28

What is the understanding of information to facilitate the clarity, transparency and understanding of

NDCs under this agenda item?

16. Article 4.8 of the Paris Agreement requires Parties to provide information necessary for clarity, transparency and understanding (CTU) of their NDCs, in accordance with Decision 1/CP.21 and any relevant CMA decisions.
17. Facilitating CTU has at least two central purposes:
 - a) To provide a clear picture of what Parties' NDCs will deliver for the atmosphere in aggregate.
 - b) To enable a clear understanding of what is being pledged under each Party's NDC.

What should be the purpose of further guidance on information to facilitate the clarity, transparency and understanding of NDCs under this agenda item?

18. Paragraph 28 of decision 1/CP.21 requests the APA to develop further guidance for the information to be provided by Parties in order to facilitate CTU of NDCs.
19. Guidance should aim to address the challenges the secretariat encountered in developing its "Synthesis report on the aggregate effect of the intended nationally determined contributions" while trying to assess the aggregate effect of the iNDCs in terms of global GHG emissions.
20. Parties under agenda sub-item 3(b) should work toward developing detailed guidance on the information that should be provided with NDCs to facilitate CTU, to help achieve the two central purposes of CTU:
 - a) To provide a clear picture of what Parties' NDCs will deliver for the atmosphere in aggregate.
 - b) To enable a clear understanding of what is being pledged under each Party's NDC.
21. To address the concerns of Parties on issues of national sovereignty, guidance should not seek to change the nationally-determined nature of the NDCs themselves.
22. Therefore, guidance on information to be provided should take into account the diversity of NDCs submitted by Parties, information applicable to the form of the NDC submission, and the respective capabilities and national circumstances of the Party submitting this information.
23. Guidance could clarify what types of information would facilitate CTU from different types of NDCs, recognizing that not all types of information would necessarily be relevant to all types of NDCs. Some information accompanying the NDCs that have been communicated by Parties include:
 - a) reference years or periods
 - b) timeframes (e.g., 2025, 2030)
 - c) statements of coverage in sectors and gases
 - d) statements of metrics and accounting guidelines applied, and
 - e) the quantification of reductions in tonnes of CO₂-eq. emissions.
24. Guidance might address, for example, reporting on:
 - a) use of common IPCC metrics

- b) coverage, sources and removals
- c) reference points
- d) BAU baseline construction (where applicable)
- e) time frames for submission
- f) target years
- g) outline of key assumptions

What is the relationship, if any, between further guidance on information to facilitate CTU of NDCs under this sub-item, and further guidance on sub-items 3(a) and 3(b)?

- 25. Our ability to aggregate NDCs is important for evaluating progress towards the achievement of our long-term goals.
- 26. More detailed guidance on features, information, and accounting would assist all countries, in particular capacity constrained countries when they start the process of updating their NDCs and developing new NDCs.

How could this work be usefully structured and progressed? / What issues should be discussed and resolved under this sub-item?

- 27. As highlighted at pages 4-5 of the UNFCCC secretariat's Synthesis Report, most iNDCs fell into a relatively limited number of categories:
 - a) Economy-wide absolute emissions reduction targets relative to a base year, or absolute targets that establish an overall maximum absolute limit on emissions,
 - b) Economy-wide or sectoral emissions reduction targets relative to below a business as usual level,
 - c) Intensity targets,
 - d) Peaking year or timeframe, and
 - e) Strategies, plans, and actions.
- 28. These NDC types would provide a good framework for beginning the discussion under this agenda sub-item. The NDC types listed above should not be considered exhaustive or prescriptive, and Parties could suggest other NDC types that should be discussed. The organization of this discussion by NDC type should not in any way undermine the nationally determined character of NDCs.
- 29. The discussion under this agenda sub-item could begin by sharing of views on how the types of information identified in paragraph 27 of decision 1/CP.21 apply to the various NDC types. Parties would also be encouraged to suggest additional information that might be provided with NDCs and to explain why that information would facilitate CTU. Capacity building must be central to efforts to improve CTU, including through the Capacity Building Initiative on Transparency.

Agenda sub-item (c): Accounting for Parties' nationally determined contributions, as specified in paragraph 31

What is the understanding of accounting for Parties' NDCs under this agenda item?

30. Accounting for NDCs is the process of measuring Parties' progress towards implementing and achieving their NDCs.
31. Accounting is also important for determining the aggregate impact of NDCs in relation to the long-term temperature goal under the Paris Agreement, in the context of Article 4.1.

What should be the purpose of the guidance on accounting for NDCs under this agenda item?

32. Parties are required to account for their NDCs under Article 4.13. Article 4.13 further provides that in accounting for emissions and removals corresponding to their NDCs, Parties shall promote environmental integrity and transparency, accuracy, completeness, comparability and consistency ("TACCC"), and ensure the avoidance of double counting.
33. Accounting guidance should support Parties in accounting for their NDCs, reflect application of the TACCC principles, and ensure delivery of each element of decision 1/CP.21, para 31 (a) to (d). It should also support Parties in applying internationally agreed methodologies
34. A robust accounting framework is a pre-requisite for use of internationally transferred mitigation outcomes or use of market-based units toward NDCs under Article 6 in order to ensure the avoidance of double counting of emission reductions or units between Parties.
35. A robust accounting framework is needed to assess the impact of NDCs that include the land sector, since the land sector involves a mix of anthropogenic and non-anthropogenic emissions.
36. To facilitate aggregation of the impacts of NDCs in relation to the long-term goal, and to support the tracking of progress, accounting guidance should be applicable to Parties that have communicated different types of NDCs, including those that present target emissions levels as an end-point or over a multi-year period.
37. Key issues for accounting guidance to consider include the relationship between accounting and GHG inventories, and reporting on LULUCF, recognizing that detailed work on rules and guidance for cooperative approaches under Article 6.2 and use of the Article 6.4 mechanism, and for the transfer and use of ITMOs, will be undertaken in the related SBSTA work programme under Article 6.

What is the relationship, if any, between guidance for accounting for NDCs under this sub-item and further guidance on sub-items 3(a) and 3(b)?

38. Information on features, information, and accounting, taken together, will help to:
 - a) provide a clear picture of what Parties' NDCs will deliver for the atmosphere in aggregate.
 - b) enable a clear understanding of what is being pledged under each Party's NDC.
39. More detailed guidance on features, information, and accounting will assist Parties when they start the process of updating their NDCs or developing new NDCs.

40. Parties are required to apply the accounting guidance referred to in paragraph 31 to their second and subsequent NDCs, but they may also elect to apply this guidance to their first NDC.

What issues should be discussed and resolved under this agenda item?

41. The discussion under this agenda sub-item should be informed by lessons learned from existing approaches under the Convention and its other related legal instruments, and lessons learned from the challenges faced in the preparation of the secretariat's Synthesis Paper aggregating the effect of Parties' NDCs.
42. This agenda sub-item is linked to discussions in other Articles of the Paris Agreement, for example Article 6 and Article 13. It would be useful to clarify which issues will be addressed under APA Agenda item 3 (features, information, and accounting) which under APA Agenda item 5 (transparency) and which under SBSTA Agenda item on Article 6, so that the same issues are not being debated in multiple fora.

Guidance on 6 May 2017 Roundtable

43. The APA has requested the secretariat to organize, under the guidance of the APA Co-Chairs, a roundtable that takes into account Parties' submissions and is also guided by the set of questions above.
44. This roundtable should be organised in a manner that enables the Co-Chairs to collate the views of Parties on each agenda sub-item, presenting options where options are identified, and to identify practical ways forward through future inter-sessional work that will facilitate the drafting of necessary guidance by the end of 2018.
45. Parties should mandate the Co-Chairs to produce a workplan with clear milestones that will guide the completion of the work by COP24.
46. Invite the Secretariat to produce technical papers on: a) information provided in Parties' submissions; and b) existing approaches under the Convention and its other related legal instruments.
