

Submission by South Africa
Views on the work programme on clarification of quantified economy-wide
emission reduction targets of developed country Parties
25 March 2013

The Conference of the Parties at its nineteenth session decided to establish a two-year work programme under the Subsidiary Body for Scientific and Technological Advice (SBSTA) to continue the process of clarifying the quantified economy-wide emission reduction targets of developed country Parties, particularly in relation to the elements contained in decision 2/CP.17, paragraph 5, with a view to:

- (a) Identifying common elements for measuring the progress made towards the achievement of the quantified economy-wide emission reduction targets;
- (b) Ensuring the comparability of efforts among developed country Parties, taking into account differences in their national circumstances;

South Africa appreciates the opportunity to provide its initial views on the work programme referred to in paragraph 8 of decision 1/CP.18.

In submitting its views, South Africa recalls and reiterates its full support for the submission by the African Group in Doha (CRP.7), including the need for the national quantified economy-wide emission reduction targets (QEERTs) of all Annex I Parties to be expressed in quantified emission limitation and reduction obligations from the base year of 1990 to be achieved by 2020, and further specified in terms of assigned amounts in tons carbon dioxide equivalent over a period of time; to continue the process in order to increase in the level of ambition of developed country parties to a level commensurate with science and equity; emphasising the need for a common accounting framework for all Annex I Parties for establishing *ex ante* the basis for measuring progress towards meeting their quantified emission limitation and reduction obligations, consolidating and enhancing methodologies, agreed by the COP, on calculations of emissions by sources and removals by sinks of greenhouse gases in accordance with Article 4, paragraph 2(b), taking into account the best available scientific knowledge, including of the effective capacity of sinks and the respective contributions of such gases to climate change, that policies and measures modify the longer-term trend as specified in paragraph 4.2(a) of the Convention; further building on the Kyoto Protocol accounting system *inter alia* on the following elements: metrics and coverage, rules for allowable additions and subtractions of other accountable elements and instruments and tools; and the importance of measurable, reportable and verifiable nationally appropriate mitigation commitments or actions, including quantified emission limitation and reduction objectives, by all developed country Parties, that shall reduce their GHG emission in absolute terms while ensuring the comparability of efforts among them, be defined over a period of time and be included in a protocol, another legal instrument or an agreed outcome with legal force under the Convention applicable to all Parties.

In that context, South Africa is of the view that the work programme for 2013 and 2014 should enhance the work in previous workshops and exchanges among Parties.

We believe that the information contained in FCCC/TP/2012/5 provides a useful summary, without being the only reference point. In section IV, the technical paper discusses “commonalities and differences in approaches to measure progress towards the achievement of economy-wide emission reduction targets of developed countries”. It does so by working through elements in decision 2/CP.17, paragraph 5, with Table 3 providing a useful overview. The work programme now must take this information a step further, filling information gaps and seek to narrow differences in approach.

The technical paper notes that exploration of the commonalities and differences is “limited to available information from several Parties”. Information gaps, including the ‘unknown’ column in Table 3 of FCCC/TP/2012/5, should be filled by further submissions from Parties and observer organisations, to provide complete information which would be captured in an updated version of the technical paper.

Base year

1990 should remain the base year under the Convention, and the technical paper notes that most developed country Parties used 1990. Other years could be reported in addition, “which, for example, could reflect a reference point for the Party’s national climate change policies”. The common base year enables comparability of efforts among developed country Parties.

Global warming potential values (GWPs)

Developed country Parties should use GWPs from the latest IPCC assessment report. Again, the technical paper notes that this is common practice among most already.

Coverage of gases

Parties agreed for national inventory arrangements for Annex I Parties to the Convention (15/CP.17, Annex I, part II, paragraph 28) that inventories “as a minimum requirement, shall contain information on the following GHGs: CO₂, CH₄, N₂O, PFCs, HFCs, SF₆ and NF₃”. This provides a solid basis for Parties to use the same set of gases for reporting progress in achieving QEERTs.

Overall, the revised UNFCCC Annex I inventory reporting guidelines provide, from 2015 onwards at the latest, a basis for Parties to use the same GWP values for GHG inventory reporting and measuring progress towards their QEERTs.

Coverage of sectors

The IPCC Energy, Industrial Process and Product Use (IPPU), AFOLU and waste sectors should be used by all Parties. LULUCF should be included in the estimation of all QEERTs. A focused expert meeting might also *inter alia* address the feasibility of including emissions from aviation.

Expected emission reductions

Progress in achieving QEERTs must be measurable, reportable and verifiable. Measuring and reporting complete, consistent, comparable, transparent and

accurate accounting rules and information is an essential precondition for a credible process of verification. An effective review is crucial for verification, while a review without any consequences might as well not be held.

Reporting on expected emission reductions is a core and essential component of reporting progress in achieving QEERTs. Developed country Parties should report both overall progress in the form of a trajectory or assigned amount and estimates of the effects of policies and measures in terms of emission reductions expressed in Mt CO₂ eq.

Information on progress in implementing mitigation commitments and actions, including QEERTs, shall be included in biennial reports, with the first round of reports due on 1 January 2014.

The verification of progress in achieving QEERTs is an essential element of transparency. The multi-lateral review process, international assessment and review (IAR), is essential for verification. IAR includes among its objectives, as outlined in the adopted guidelines, to “review the progress made in achieving emission reductions ... and to assess emissions and removals related to quantified economy-wide emission reduction targets under the Subsidiary Body for Implementation (SBI), taking into account national circumstances, in a rigorous, robust and transparent manner”. If the first review under IAR does not lead to any consequence, it is difficult to see how this would promote comparability or build trust.

The role of land use, land-use change and forestry

Clear, uniform and environmentally robust accounting rules are needed, but the practice by developed country Parties still shows significant differences, notably in the implementation of the Decisions that were use of the agreements that were reached in Durban. A focused expert meeting should be convened to discuss the existing menu of options. Such a workshop might result in technical briefing to Parties, for their consideration and drafting of a decision.

Carbon credits from market-based mechanisms

All developed country Parties should report on the use of carbon credits, distinguishing the sources among market-based mechanisms under the Convention and its Protocol. This information will be included in a Parties biennial report as agreed at COP 18, with the first round of reports due on 1 January 2014.

Assumptions and conditions related to the ambition of the pledges

The assumptions and conditions related to the ambition of developed country pledges have not been sufficiently analysed in the work to date. Analyses of pledges have been undertaken in academic literature, and therefore a focused expert meeting should examine the implications of assumptions and conditions for the ambition of pledges by developed countries. Following such a workshop, the Secretariat should produce an updated version of the technical paper to understand

the commonalities and differences in assumptions (which have been individually listed in FCCC/TP/2012/5) and their implications for the ambition of pledges.

Low emission development strategies

The lack of information provided by developed country Parties on the formulation of low-emission strategies is disappointing, despite repeated invitations to submit such information. The submission of information on progress made in the implementation of zero- or low-emission development strategies should be mandatory.