

## SWITZERLAND

### Methodological issues under the Convention:

#### Work programme on a common reporting format for the “UNFCCC biennial reporting guidelines for developed country Parties (SBSTA)”

At its 36<sup>th</sup> session (agenda item 10(a)), the SBSTA initiated its consideration of the work programme on a common tabular format for electronic reporting of information in accordance with the “UNFCCC biennial reporting guidelines for developed country Parties” as contained in annex I to decision 2/CP.17 with a view that the Conference of the Parties, at its eighteenth session, adopting the format.

In its conclusions, the SBSTA agreed that the common tabular format will include tables for information specified in paragraphs 2, 5, 6, 9, 10, 11, 17, 18, 22 and 23 of the reporting guidelines and that it may also include tables for information specified in paragraphs, inter alia, 13, 19 and 24 of the reporting guidelines.

Switzerland is glad to submit its views on the proposed tables for information as contained in the [non-paper](#)<sup>1</sup> (dated 19 May @ 9.00) elaborated by the co-chairs, reflecting the discussions held during the 36<sup>th</sup> session.

#### Paragraph 2.

Since emissions and emission trends presented in the biennial report should be consistent with what is provided in the most recent annual inventory submission, it is reasonable to use a table that already exists. CRF table 10 contains all the information that needs to be presented in the biennial report, thus we suggest using it as such. We would like that Proposal 1 be retained.

#### Paragraph 5.

The Party’s economy-wide emission reduction target is well and fully described in table of Proposal 2 (which is the same as Proposal 3). The box entitled “other mechanism units under the UNFCCC” should be modified by adding “taking into consideration any relevant decisions adopted by the COP”, as it is specifically mentioned so in Paragraph 5 of the biennial reporting guidelines themselves.

Furthermore, the box entitled “other (specify)” should be removed as any mechanism used to reach the quantified economy-wide emission reduction target is (or will be) defined under the UNFCCC, for which there is already a box.

#### Paragraph 6.

Mitigation actions could be presented as in Proposal 1 or 2. Table 1 in national communication guidelines (Proposal 2) contains more or less the same headings as those suggested in Proposal 1. However, some issues might appear using Proposal 1 due to the constraint imposed by the “sectors and gases” filter function. Indeed, some actions might impact on several sectors at the same time and the part of reduction to assign to a sector might not be known. If Proposal 2 is chosen, it is important that a standardized

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[http://unfccc.int/files/national\\_reports/annex\\_i\\_national\\_communications/recent\\_developments/application/pdf/non-paper\\_19\\_may\\_0900.pdf](http://unfccc.int/files/national_reports/annex_i_national_communications/recent_developments/application/pdf/non-paper_19_may_0900.pdf)

format be defined in advance to allow comparison. In any case, the measures and policies emissions reduction should not be cumulated to provide an estimate of mitigation actions impact.

#### **Paragraph 9 and 10.**

It makes sense to estimate progress made towards the emission reduction targets when both market-based mechanisms and LULUCF activities are taken into account. Therefore, paragraphs 9 and 10 should be treated in the same table. Proposal 3 of paragraph 9 (which is the same as Proposal 3 of paragraph 10) covers the information that shall be reported and provides an overview of the emission estimates, without going into too much detail. Some countries do not transfer or acquire international units on a yearly basis, but rather proceed to a final accounting at the end of commitment period. Therefore, it should be allowed to report estimates or real units from market-based mechanism either on a yearly basis or as a total over the entire period.

#### **Paragraph 11.**

It would be convenient to report projections for 2020/2030 in a form similar to tables included in the national communication, to ensure coherence between the reports. Therefore Proposals 1 to 4 could be possible. However, the format in Proposal 2 would need to be clarified, or defined. From our point of view, it is not so important to report projections for each individual gas in this report, underlying assumptions used in the projections are far more important. However, it may be difficult to define a list of standardized key assumptions that are applicable to any particular method used for the projections. Therefore, some of the parameters may not be provided by all parties.

#### **Paragraph 17.**

We would like that Proposal 3 be retained, as it is the simplest one.

In Proposal 1, UNIDO is missing from the table entitled “Financial contributions to multilateral institutions and other relevant programmes and organizations: general support and ear-marked climate specific funding”. In the table entitled “Financial contributions to multilateral institutions and other relevant programmes and organizations, reporting period, in alphabetical order, climate specific”, the World Bank’s Partnership for Market Readiness (PMR) should be listed.

Still in Proposal 1, the table entitled “bilateral climate related support provide to account for financial support provided under the Convention” is difficult to fill out, as many bilateral development programmes aim at several of the sectors at once.

#### **Paragraph 18.**

We would like that Proposal 2 be retained, even if we face difficulties distinguishing between mitigation, capacity building and technology transfer (for example, in Switzerland, most programmes implemented by the Swiss State Secretariat for Economic Affairs combine elements of these three categories).

Furthermore, the definition of “new and additional” has never been agreed upon internationally. For Switzerland, “new and additional” was clear for the years 2010-2012 (Fast-Start), but for the years 2013 onwards, not anymore.

**Paragraph 19.**

None of the proposals to report on private finance is suitable, as there is no agreed definition of what is to be accounted for under this concept (investments? trade? IPR? human capital?, others?).

**Paragraph 22.**

None of the proposals is suitable, as climate-friendly technologies have never been defined (agreed) internationally. Basically, every new technology is more efficient than the previous ones and therefore could claim to be climate-friendly (for example new aircrafts). The discussions within the WTO on environmental goods and services show the same: there is no international consensus on what these are.

Switzerland is of the view that technology transfer must be facilitated by sound regulatory environment in the recipient countries, and that the proposed reporting tables do not seem to consider this crucial aspect.