

The United States welcomes the opportunity to present our views on the revision of review guidelines for national communications and biennial reports for developed country Parties to the Subsidiary Body for Scientific and Technological Advice (SBSTA). In the SBSTA's 37th session, it solicited Parties' submissions on the general approach, structure, and content of guidelines for reviews of national communications and biennial reports. The United States recognizes the important role of guidelines to achieving consistency, efficiency, and effectiveness of reviews, and suggests the following approach.

The United States' submission includes the following sections:

1. Overall approach and scope
2. Structure of review guidelines
3. Streamlining the review process
4. Timing of reviews
5. Composition of review teams and location of reviews
6. Views on the agenda for SBSTA technical workshop on October 7-9, 2013

1. Overall approach and scope

The objectives of the revised review guidelines for national communications, biennial reports, and annual inventories are to promote thorough technical reviews for the provision of consistent, transparent, comparable, accurate and complete information on the progress of Annex I Parties in meeting the goals of the Convention, building off of current review processes in place under the Convention. The review process should undertake reviewing key quantitative and qualitative data points contained in national communications and biennial reports, reviewing policies and measures described in national communications and biennial reports, objectively assessing the information contained in national communications and biennial reports against relevant Conference of the Parties (COP) decisions on reporting requirements.

Given the interrelated nature of the biennial report, national communication, and annual inventories, SBSTA should take steps within the revised review guidelines to streamline and consolidate these reviews for Annex I parties. Some information reported in a national communication and biennial report may be developed concurrently in a year when both reports are submitted by Annex I Parties. To increase efficiency and effectiveness of reviews, Parties agreed at the SBSTA's 38th session (FCCC/SBSTA/2013/L.10, paragraph 4) to reviews of national communications in conjunction with biennial reports in years when both are submitted and to only one review of the same information submitted by Parties in national communications,

biennial reports, and annual inventories. To increase review effectiveness and fulfill the mandate under Dec. 2/CP 17 describing the separate functions of biennial reports and national communications, review guidelines should identify separate key issues for teams reviewing each type of report to prioritize.

2. Structure of review guidelines

The United States believes that SBSTA should develop a single set of revised review guidelines to encompass review of the three reports. The revised guidelines should include an introductory section that describes the general approach to the review, including: overall objectives, timing and procedures, expert review teams and institutional arrangements for the Secretariat, reporting and publication. The guidelines should also include three additional sections that describe the specific requirements for the review of greenhouse gas inventories (to be considered next year under a separate SBSTA agenda item), national communications, and biennial reports. In our view, this consolidated approach avoids unnecessary duplication in the guidelines and ensures efficiency and consistency of the review of information submitted by Annex I Parties.

3. Streamlining the review process

Acknowledging the demands that reviews place on Parties and review teams, the review guidelines should ensure that elements that are common to more than one report receive only one in-depth review. Reviewing information only once ensures that the Secretariat's resources are used efficiently and avoids conflicting and contradictory conclusions offered by different review teams with different areas of expertise. The following general 'hierarchy' should be applied, in which information first reviewed in one report should satisfy the requirements for review in subsequent reports:

- a. **Annual greenhouse gas inventories:** detailed review of inventory information for consistency with United Nations Framework Convention on Climate Change (UNFCCC) reporting guidelines and the Intergovernmental Panel on Climate Change (IPCC) Guidelines, including institutional arrangements.
- b. **Biennial reports:** technical review of characterization of commitment, mitigation, market mechanisms, projections, Land Use Land Use Change and Forestry (LULCUF), and financial, technological and capacity-building support. The technical review of the biennial report should focus on assessing the provision of consistent, transparent, comparable, accurate and complete

information as contained in the biennial report. The technical review should restrict its assessment to only those issues under its mandate, which, according to 2/CP.17 include the following four items:

- (i) All emissions and removals related to its quantified economy-wide emission reduction target;
- (ii) Assumptions, conditions and methodologies related to the attainment of its quantified economy-wide emission reduction target;
- (iii) Progress towards the achievement of its quantified economy-wide emission reduction target;
- (iv) Its provision of financial, technological and capacity-building support to developing country Parties;

This list outlines the mandate for the technical review and specifically does not include identifying potential issues in the fulfillment of a target. No prejudicial judgments, potential issues, or factors influencing the fulfillment of targets should be included in the review report.

- c. **National communications:** Review of areas not covered in biennial reports, including national circumstances, vulnerability assessment, climate change impacts, adaptation measures, education, training, public awareness, and research and systematic observation.

To further streamline the review process, the review guidelines should communicate to reviewers and Parties the scale and scope of reviews, including, *inter alia*, how reviewers should interpret reporting guidelines and the type and degree of issues that require Party response to a review team.

4. Timing of reviews and review reports

Each review team should produce a report on each in-depth review of the national communication and biennial report that should be submitted to the Subsidiary Bodies and International Assessment and Review (IAR), respectively. The review guidelines should provide a timeline for completing review of the review reports, including the following milestones:

- Each expert review team prepares a first draft of the review report and sends it to the Party for comments.
- The Party submits its comments on the draft review report.
- The expert review team integrates the Party's comments and sends the revised version of the report to the UNFCCC Secretariat for publication.

- The final report is published on the UNFCCC web site.

In developing review guidelines, to further streamline the review process and increase the consistency of review reports, Parties should consider an enhanced role for the Secretariat in preparing initial report drafts.

5. Composition of review teams and location of reviews

The Secretariat should select review teams *ad hoc* from the UNFCCC roster of experts and should select teams that vary in composition depending on the needs of each review, the national circumstances of the Party being reviewed, and the expertise of individual reviewers. The Secretariat should select members of the review teams in a way that will ensure that the collective skills of the team address the areas under review and that most experts in the teams have the necessary experience in the review process. The review team should include experts on greenhouse gas (GHG) inventories, policies and measures and analysis of GHG abatement issues, projections of GHG emissions and assessment of GHG abatement options, and technologies, including transfer, financial resources and development. Teams should be comprised of a balance of Annex I and non-Annex I Party nationals. The Secretariat should develop training procedures and provide training materials to all reviewers.

For each review team, two experts with substantial prior UNFCCC review experience will serve as lead reviewers, with one co-lead from an Annex I Party and one from a non-Annex I Party. For both biennial report and national communication review teams, the lead reviewers should ensure that the review in which they participate is performed according to these guidelines and is performed consistently across all Annex I Party reports under review by the review team. They should also ensure that the substance of the review report follows the review guidelines.

The sizes and required competences for review teams differ by review:

- a. **Annual greenhouse gas inventories:** to be addressed by the SBSTA in 2014.
- b. **Biennial reports:** For in-country reviews, each biennial report review team should have 5 to 7 members; for centralized reviews of multiple Parties occurring simultaneously, each team should have 10 to 14 members. Biennial report review team members must collectively have expertise in mitigation, market mechanisms, projections, LULUCF, and financial, technological and capacity-building support.
- c. **National communications:** A team performing a combined review of a biennial report and national communication should have an additional 1 to 2 members.

Both in-country and centralized review formats should be available. The location and format of each review should be determined on the basis of 1) the preference of the Party under review and 2) other considerations, including the number of reviews scheduled in a given year, the availability of resources and expert reviewers. The priority should be given to Party preference.

6. Views on the agenda for SBSTA technical workshop from October 7-9, 2013

As noted in the conclusions at SBSTA 38, the technical workshop to be held in October 2013 should focus first on mapping information requirements contained in the biennial report and national communications reporting guidelines to identify overlapping reporting requirements and unique information.

The U.S. believes that this initial exercise should lead to the following sequence of topics discussed at the workshop:

- Development of common elements related to:
 - Overall objectives
 - Timing and procedures
 - Expert review teams and institutional arrangements
 - Reporting and publication
- Development of detailed guidelines for review of biennial reports.
- Revision and updating of guidelines for review of national communications.
- Overall structure of the consolidated review guidelines.