



## Submission by Liechtenstein

### Additional views on elements of the review guidelines for national communication and biennial reports

Following the submission of Liechtenstein, on behalf of the Environmental integrity Group in September 2012 and in accordance with Paragraph 9 of FCCC/SBSTA/2013/L.10, Liechtenstein would like to take the opportunity to submit its additional views with respect to the key elements of the revision of the guidelines for the review of biennial reports and national communications, including the national inventory, from developed country parties.

Liechtenstein appreciates the fruitful discussions during the 38<sup>th</sup> session of SBSTA in Bonn and reaffirms its conviction regarding the necessity of national communications and biennial reports as well as the necessity of objective, efficient and coherent review procedures.<sup>1</sup>

However, Liechtenstein considers the development of the MRV framework an evolving and dynamic process. At its 36<sup>th</sup> session SBSTA took the same line when it was agreed that in revising the review guidelines, Parties should take into account experience in the reporting and review of information under the Convention and the need to have a cost-effective, efficient and practical review process that does not impose an excessive burden on Parties or the secretariat.<sup>2</sup>

The abovementioned goal to achieve a cost-effective, efficient and practical review process is not meant to be an attempt lowering the quality level of information submitted by party or decreasing transparency in any way. The need for a cost effective, efficient and practical review process is crucial in order to keep and strengthen the high level of the MRV integrity achieved so far.

The enhanced reporting and review obligations, which will commence in 2014, will substantively increase the pressure on Parties, experts and especially on the secretariat. At the request of SBSTA 36, the secretariat provided a comprehensive overview<sup>3</sup> of current review processes and described the respective challenges in the near future. To that respect paragraph 62 of FCCC/TP/2012/8 concludes:

**“An attempt to continue “business as usual” with the addition of the new processes would risk compromising the integrity of the overall reporting and review processes.”**

Liechtenstein is convinced that it is the responsibility of the Parties to keep the integrity of the overall reporting and review processes. The “streamlined options” A and B proposed by the inventory lead reviewers at their 10<sup>th</sup> meeting, described in paragraph 6 of FCCC/SBSTA/2013/INF.2, would represent appropriate ways to adjust the respective business as usual in a reasonable and practical way.

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<sup>1</sup> see also EIG Submission to UNFCCC from 18. September 2012, <http://unfccc.int/resource/docs/2012/sbsta/eng/misc17.pdf>

<sup>2</sup> see paragraph 71, FCCC/SBSTA/2012/2, <http://unfccc.int/resource/docs/2012/sbsta/eng/02.pdf>

<sup>3</sup> FCCC/TP/2012/8, <http://unfccc.int/resource/docs/2012/tp/08.pdf>

With regard to further elements to be considered at the October 2013 workshop, Liechtenstein refers to the content of the EIG's submission from September 2012.<sup>4</sup>

Liechtenstein looks forward to engaging in the discussions of the October 2013 workshop with the overall goal to maintain and further improve the MRV system as a whole.

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<sup>4</sup> <http://unfccc.int/resource/docs/2012/sbsta/eng/misc17.pdf>