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UNITED NATIONS FRAMEWORK CONVENTION ON CLIMATE CHANGE

**Ad Hoc Working Group on Long-term Cooperative Action  
under the Convention**

**Fourteenth session**

**Bangkok, 5–8 April 2011, and Bonn, 7–17 June 2011**

Item 3.2.2. of the agenda

**Nationally appropriate mitigation actions by developing country Parties**

**Views on the items relating to a work programme for the  
development of modalities and guidelines listed in  
decision 1/CP.16, paragraph 66**

**Submissions from Parties**

**Addendum**

1. In addition to the 12 submissions contained in document FCCC/AWGLCA/2011/MISC.7 and Add.1, two further submissions have been received.
2. In accordance with the procedure for miscellaneous documents, these submissions are attached and reproduced\* in the language in which they were received and without formal editing.

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\* These submissions have been electronically imported in order to make them available on electronic systems, including the World Wide Web. The secretariat has made every effort to ensure the correct reproduction of the texts as submitted.

**FCCC/AWGLCA/2011/MISC.7/Add.2**

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\* This is a revised version of, and replaces, the submission from the Republic of Korea contained in document FCCC/AWGLCA/2011/MISC.7/Add.1.

**SUBMISSION BY GRENADA ON BEHALF OF THE ALLIANCE OF  
SMALL ISLAND STATES (AOSIS)**

**April 2011**

**Section III.B. Enhanced action on mitigation:  
Nationally appropriate mitigation actions by developing country Parties**

AOSIS welcomes the opportunity to present views on matters relating to a work programme for the development of modalities and guidelines listed in document FCCC/AWGLCA/2010/L.7 (decision 1/CP.16), paragraph 66, including with respect to the initial scheduling of the processes described in section III.B (Enhanced action on mitigation. Nationally appropriate mitigation actions by developing country Parties).

**I. Mandate**

In Cancun, by paragraph 66 of decision 1/CP.16, Parties agreed on a work programme for the development of modalities and guidelines for:

- Facilitation of support to nationally appropriate mitigation actions through a registry;
- Measurement, reporting and verification of supported actions and corresponding support;
- Biennial reports as part of national communications from non-Annex I Parties;
- Domestic verification of mitigation actions undertaken with domestic resources; and
- International consultations and analysis.

Although a work programme has been agreed, the work programme's timeframe and modalities have not. Parties have been invited to submit views on these items, including with respect to the initial scheduling of the above processes.

**II. General Views**

An impediment to assessing global progress toward the ultimate objective of the Convention has been the lack of up to date inventory information from Non-Annex I Parties. Non-Annex I National Communications have focused on reporting emissions in 1994 and 2000, and it is now 2011. For this reason, AOSIS welcomes agreement on more frequent national communications and biennial updates, as well as the agreement that flexibility will need to be afforded to LDCs and SIDS in this context by decision 1/CP.16.

In AOSIS's view, the goal of enhanced reporting by developing country Parties, and technical and financial support from developed countries for more frequent and enhanced reports from developing country Parties, must be to:

- enable transparent and consistent inventories from developing country Parties
- achieve a consistent format between biennial reports, national inventory reports (NIRs) and CRF tables to minimize the reporting burden for developing country Parties and ease the work of the secretariat
- move toward a consistent format for reporting between developed and developing country Parties
- enable a periodic assessment of global progress toward global goals through more up-to-date inventory information from developing country Parties

- demonstrate trends in the provision of support and allow this support to be verified.
- assist developing countries in identifying mitigation potential
- facilitate the matching of international funding with NAMAs requiring support, to realize this mitigation potential
- assist developing countries in putting in place institutional systems that support the ongoing collection of emissions data
- enable the identification and costing of NAMAs
- minimize the reporting burden on developing countries through support for a continuous reporting process
- enable more frequent reporting on adaptation-related issues and needs.

To achieve these ends, due consideration must be given to the resource constraints facing developing country Parties and national circumstances, which may necessitate a different level of coverage, detail and focus in these reporting and review processes.

Key priorities for 2011 will be agreement on the scope of biennial reports from developing and developed country Parties, revised guidelines for Non-Annex I Party national communications, NIR formats, and the development of CRF tables on financial, technology and capacity building support.

Although progressively more detailed reporting will need to be phased in over time, it is important to launch these processes as soon as possible in both developed and developing countries to support the review agreed under 1/CP.16 (paras. 138 and 139), and to facilitate the identification of emission trends and mitigation potential across all Parties.

### **III. Registry: facilitation of support**

A key goal of the registry is to highlight developing country mitigation potential and facilitate the matching of support with this potential. For this reason, *initiation of the registry is an urgent priority*. The registry should be visible on the UNFCCC website well before Durban and ideally should be in place in a pilot form on the UNFCCC website by SB-34 this June. The registry should be initiated and populated with NAMAs seeking international support as soon as possible.

While certain aspects of the registry will inevitably require further discussion, this should not delay initiation of the registry. At the outset, all quantified NAMAs that have been proposed to date should be reflected in the registry – those requiring support and those not requiring support. As further guidelines are developed for the listing of NAMAs, these further details can be supplied by Parties through dialogue with the secretariat (whether international support is requested, estimated costs, quantified emission reductions that are estimated to be realized in tonnes, basis for estimation, means of verification foreseen, type of support needed, timeframe for delivery, etc.) until all necessary information has been reported. Guidelines for the consistent presentation of aspects of NAMAs seeking international support should be adopted in Durban.

A related priority need is access to funding for preparation of NAMAs. Many countries will need financial and technological support to identify NAMAs, cost NAMAs, quantify the emission reductions that will result and present these NAMAs to the registry for inclusion. Developed country Parties have agreed to provide enhanced financial, technological and capacity-building support for the preparation and implementation of NAMAs (1/CP.16, para. 52). At the June session, the SBI should prepare draft guidance to the GEF, directing that adequate financial support be made available to countries for the preparation of NAMAs at the earliest possible time.

Funding for the preparation of NAMAs should also consider the need to build the capacity of staff and national institutions to identify NAMAs and improve national reporting capabilities over the longer-term. Many countries rely on external consultants for elements of work in connection with their national reports. A key aim of enhanced support

should be to ensure that national capacity exists for enhanced reporting. All Non-Annex I Parties should be eligible for support for the preparation of NAMAs, and for the establishment and capacity building of national institutions and staff.

Over time, consideration should be given to how the registry might relate to the international transactions log and CDM registry established under the Kyoto Protocol. A linkage to the ITL might prove useful for developing countries that wish to participate voluntarily in economy-wide trading or sectoral trading that will generate net global emission reductions, but that do not wish to incur the expense and burden of establishing their own registries.

**Possible elements of work programme:**

- Draft guidance to the GEF on procedures for making support available for the identification and development of NAMAs and for preparation of the first biennial reports under Article 12.1.
- Lunchtime demonstration at June session on the operation of the pilot version of the registry.
- Draft Guidelines for the presentation of NAMAs seeking international support
- Paper from secretariat setting out possible options for further design choices to improve the functionality of the registry (e.g., level of detail of information, searchability, confidentiality issues, presentation of information on support, means to avoid double counting).

**IV. MRV of supported actions and corresponding support**

**MRV of supported actions:** NAMAs proposed for support should contain an estimate of tonnes of emissions projected to be reduced, using indicators, guidelines and methodologies approved by the COP or COP/MOP to enhance transparency and consistency.

Some supported NAMAs will be readily verified through measured emission reductions. However, where quantification is difficult, or where actions with indirect impacts on emissions are involved, proxy indicators may be required. In these situations, MRV methodologies should use simple, directly observable indicators in a transparent way, to enable international review.

Consideration will need to be given to whether the measurement, reporting and verification of supported actions will take place through an international process or through an agreed bilateral process between donors and recipients countries with the opportunity for international review of methodologies.

Actions funded through market-based offsetting mechanisms must be reported separately from supported actions within the CRF tables and in the registry. Supported actions must generate net global emission reductions. Offsetting mechanisms, such as the CDM, do not generate net global emission reductions as they enable a corresponding increase in emissions in developed countries when used to meet mitigation targets; hence flows through the CDM should not be reported as supported actions. The registry and CRF tables should assist in tracking domestic contributions to global emission reductions.

If new market-based mechanisms under the Convention clearly yield net global emission reductions, then consideration can be given to reflecting a portion of the reductions achieved as supported actions. It will be important to ensure that the registry does not lead to double counting emission reductions between developed and developing countries.

Market-based mechanisms have their own built in monitoring, reporting and verification methodologies to assess emission reductions. Funding flows through other market-based mechanisms that yield benefits to investor countries but that have not been brought under the UNFCCC umbrella will have to be reported.

**MRV of support:** An internationally-agreed common reporting format (CRF) for support should be a deliverable from the Durban COP. This is needed to facilitate the submission of biennial update reports in 2012 and 2013. Both Annex I and Non-Annex I Parties should use CRF tables for these reports.

In the past, there has been a serious lack of consistency in reporting on financial flows to developing country Parties through Annex I Party National Communications, as well as inadequate detail in these reports. Some parties have failed to identify new and additional financing, some have inappropriately reported on their overseas development assistance (ODA), some Parties have failed to estimate or segregate out the climate change component of contributions made to multilateral bodies (e.g., the GEF) or included Parties that are not Non-Annex I Parties in their reporting (e.g., by listing contributions to the GEF as a whole). Some have included non-concessional loans and many have presented information at a general level of detail that makes any assessment of flows or trends completely unreliable.

For the monitoring, reporting and verification (MRV) of financing, technology and capacity-building support to be successful, there will have to be parallel reporting between developed and developing countries in the national communications and biennial updates that can enable systematic verification.

This requires agreement on *whether and how* specific sources and types of financing are to be reported and discussion on the appropriate treatment of different categories of financing (multilateral, bilateral, grants, loans, public, private, market-based, non-market based).

It will also be necessary to *breakdown funding* that is delivered to and through multilateral institutions such as the GEF in order to indicate the final destination of funds by country in a manner that can be electronically submitted and cross-checked with individual developing country reporting.

Without approval by the COP, OECD Development Assistance Committee (DAC) Rio markers will be inappropriate for use in reporting on climate-related financial flows. A tailored solution is likely to be needed for enhanced reporting on financial flows under the Convention. DAC markers raise a number of central transparency concerns in the context of UNFCCC commitments to new and additional financing, they include funds with mixed purposes, overstate amounts provided for climate-related ends, and do not themselves have a process for MRV.

Clear and internationally-agreed guidelines and definitions are needed for the reporting of financing that is *specific to adaptation* and *specific to mitigation* to avoid double counting and ensure transparency – which agreement must extend beyond agreement among OECD member countries.

Enhanced reporting is needed in national communications and biennial reports on support to both adaptation and mitigation. Reporting for these purposes must be in addition to the information reported to the registry in connection with the specific support provided for specific NAMAs.

Other issues that need to be discussed include:

- How to define clearly *define and segregate* adaptation and mitigation-related flows
- How to ensure that any flows reported as supporting mitigation are for *GHG reductions*, rather than broader investments in coal-fired power plants or the expansion of fossil fuel generation or infrastructure
- How to avoid *double counting* between Conventions (e.g., CBD v. UNFCCC; Montreal Protocol v. UNFCCC)
- How to avoid inclusion of funds with partial *overlap* in purpose (e.g., funds addressing disaster risk reduction initiatives, funds and expenditures that include earthquakes)

- How to separate general *development assistance* (ODA) from the new and additional funding required under the Convention (e.g., general support to health and education in vulnerable countries is not climate-related adaptation support).
- How to treat funding flows through *market-based mechanisms* that yield financial benefits to investor countries
- How to treat funding flows through market-based mechanisms that yield *offsets and other credits inside and outside* the Convention and Kyoto Protocols

An appropriate level of detail is needed for inclusion in revised reporting guidelines, CRF tables for biennial updates and software to be developed by the secretariat for future reports.

**Possible elements of work programme:**

- Compilation and synthesis of relevant sections of Fifth National Communications of Annex I Parties (financial resources, transfer of technology and capacity building), and Compilation and synthesis of relevant sections of supplementary information incorporated in Fifth National Communications submitted in accordance with Article 7.2 of the Kyoto Protocol
- Submissions of views on the contents of CRF tables and relevance of existing DAC RIO markers
- Synthesis of these views by the Secretariat
- Joint workshop across developed and developing country Parties, to discuss the appropriate contents of CRF tables on support.

**V. Biennial Updates**

By decision 1/CP.16, the Parties agreed to “enhance reporting in national communications, including inventories, from Parties not included in Annex I to the Convention (Non-Annex I Parties) on mitigation actions and their effects, and support received; *with additional flexibility to be given to the least developed countries and small island developing states.*” Para. 60.

Decision 1/CP.16 addresses the following enhanced reporting:

- more frequent submission of national communications – which should be submitted “every four years or in accordance with any further decisions on frequency by the Conference of the Parties taking into account a differentiated timetable and the prompt provision of financial resources. . .” (para. 60(b))
- enhanced reporting in national communications on “mitigation actions and their effects, and support received” (para. 60)
- Developing countries, “consistent with their capabilities and the level of support provided for reporting”, should also submit biennial update reports, which should include information on mitigation actions, needs and support received, the national inventory report, including a description, analysis of the impacts and associated methodologies and assumptions, progress in implementation and information on domestic measurement, reporting and verification, to be considered through international consultation and analysis (ICA) (paras. 60(c) and 64))

- Developed countries are encouraged to develop low-carbon development strategies or plans in the context of sustainable development (para. 65)

**First biennial update reports:** In Durban, Parties should establish **2013** as the target date for the first sets of biennial reports from Non-Annex I Parties and agree upon general guidance for these reports. Different components of biennial reports can be phased in over time as necessary or appropriate for countries that face more limited human and financial resources. More detailed guidelines for various components of these reports can also be phased in over time and should not delay initiation of the process. Funding support should be in place in ample time to enable preparation of these reports. Many second national communications have already been submitted to the secretariat, and funding support for biennial reports will help sustain the reporting capacity that has been put in place.

**Flexibility to SIDS and LDCs:** For SIDS, important areas of flexibility in national communication and related biennial reporting will be in the *content* and *level of detail* required in connection with enhanced national communications and biennial reports. Emissions from most SIDS are negligible in the global context. As a result of limited human and financial resources, it may be appropriate to offer flexibility to SIDS and LDCs in reporting on certain components of national communications and biennial reports, to create tiers of reporting obligations, or to allow certain Parties to merely note where no significant change has occurred between reports. This will enable some balance between the burden of reporting obligations on Parties and the value of the information received to the UN process as a whole. Information on support received is an important component of biennial reporting, and reports from SIDS and LDCs will be useful in cross-checking biennial CRF reports from Annex I Parties on support provided.

**Adaptation related issues and funding:** SIDS may wish to use the opportunity of biennial updates to report new or updated information on adaptation-related issues (vulnerability, climate change impacts and adaptation, research and systematic observation, education, training and public awareness, or national circumstances). These areas of biennial reporting should be adequately funded if requested by a Party. Moreover, information on adaptation-related financial and technical support received will be useful in cross-checking information received from Annex I Parties and multilateral bodies on support extended, and in assessing the relative shares of funding directed to adaptation and mitigation.

**Eligibility for financing for biennial reports:** The Cancun decision states that “Developing countries, *consistent with their capabilities and the level of support* provided for reporting, should also submit biennial update reports, containing updates of national greenhouse gas inventories including a national inventory report and information on mitigation actions, needs and support received” (emphasis added). All developing countries should be eligible for funding support to prepare biennial reports. The fact that a country is an LDC or SID, and therefore afforded flexibility in reporting, should not preclude these countries from accessing funding for biennial reports. All Parties have obligations under the Convention to formulate, publish and regularly update national programmes containing measures to mitigate climate change and measures to facilitate adequate adaptation. Regular reporting assists Parties in carrying out these obligations and in identifying appropriate mitigation measures and adaptation measures that can support sustainable development.

**NIR reports:** National inventory reports are requested from developing countries as part of the biennial updates. To be able to provide a global insight in emissions development it is essential that these reports are comprehensive, and prepared in line with agreed guidelines. These guidelines should take due consideration of IPCC Guidelines for National Greenhouse Gas Inventories and allow for appropriate flexibility for LDCs and SIDS, for example through a tiered approach.

## **VI. Domestic verification of mitigation actions undertaken with domestic resources**

By decision 1/CP.16, the Parties decided that domestically supported mitigation actions will be measured, reported and verified domestically in accordance with general guidelines to be developed under the Convention (para. 62). These general guidelines could provide:



- Guidance on Parties' national arrangements for measuring emissions in the sectors targeted by mitigation actions or for economy-wide reductions;
- Guidance on accepted methodologies and assumptions selected to establish baselines and estimate emission reductions projected;
- A methodology outline on quantification of achieved emissions reductions from actions;
- Guidance on systems to verify emission reductions or removals from identified actions.

These guidelines should support developing countries in their domestic activities and minimize resources needed to develop the appropriate national systems.

## **VII. International Consultations and Analysis**

Parties have agreed that a process of international consultation and analysis (ICA) of biennial reports in the SBI, in a manner that is non-intrusive, non-punitive and respectful of national sovereignty, that aims to increase transparency of mitigation actions and their effects, through analysis by technical experts in consultation with the Party concerned, and through a facilitative sharing of views. This process will produce a summary report (1/CP.16, para. 63).

Parties have further agreed that ICA should consider "information on mitigation actions, the national greenhouse gas inventory report, including a description, analysis of the impacts and associated methodologies and assumptions, progress in implementation and information on domestic measurement [and] reporting and verification and support received ... Discussions should be intended to provide transparency on information related to unsupported actions." (para. 64).

The ICA process could aim to begin in 2013 with a limited number of countries, possibly through a pilot version of the process for volunteer countries. ICA can be phased in to cover a broader grouping of countries over time. Given the number of Parties involved, consideration might be given to prioritizing ICA, and the frequency of ICA, over time for countries responsible for a relatively large share of emissions.

An entire ICA cycle of countries should aim to be completed over a fixed timeframe.

Flexibility should be afforded to LDCs and SIDS in the frequency and application of the ICA process. However, where these countries wish to participate, to highlight their mitigation efforts or progress or to highlight their adaptation efforts and needs, this should be encouraged and funded.

### **Possible elements of work programme:**

- Background paper from the Secretariat on the experience of other multilateral processes in conducting facilitative reviews that may share similar goals to ICA goals, including review processes are now conducted for Annex I inventories under the Convention and Kyoto Protocol.
- Submission of views from Parties on the scope, procedure and nature of the process, and on options for ICA cycles that are inclusive, but efficient in their use of resources.

## **VIII. Scheduling of initial processes**

Priority issues for the work programme are:

- Initiation of registry, populated with pledged actions of developing countries, and actions seeking international support

- Adopt Guidance to GEF expediting funding for NAMA prep and biennial reports
- Agreement on contents of biennial updates and areas of flexibility to LDCs and SIDS
- Agreement on date for first set of biennial updates
- Development of CRF tables for reporting on financing, technology and capacity-building support delivered and received
- Adopt Guidelines on presentation of NAMAs that require international support
- Agreement on Guidelines for preparation of biennial reports
- Agreement on revised Non-Annex I Reporting Guidelines

AOSIS proposes the following work programme under decision 1/CP.16, Section III.B:

<b>Date</b>	<b>Event</b>	<b>Outputs</b>	<b>Inputs</b>
March	CGE Workshop on Issues to be considered in possible revision of non-Annex I guidelines	Progress on NAI NC Guidelines	
March	3 <sup>rd</sup> Workshop on the revision of Annex I Guidelines	Progress on Annex I Guidelines	
April session	Workshop Annex I targets – to clarify assumptions, conditions	Quantification of gigatonne gap needing to be closed to achieve global goals; identification of information required for transparent, complete, consistent, comparable and accurate reporting	Technical paper based on Parties' submissions with aim of clarifying assumptions, conditions, comparison of level of emission reduction efforts
April session	Workshop on NAI actions, to understand diversity of actions, underlying assumptions, support needed (para. 51)	Identification of information required for transparent, consistent reporting in registry	
April session	Workshop on Technology Mechanism		
Inter-sessional	<b><i>Initiate Registry in pilot form</i></b>		Secretariat
June session	<b><i>Presentation of Pilot Registry for feedback</i></b>	Work programme to enhance registry functionality	Paper from secretariat setting out possible options for further design choices to improve the functionality of the registry
June session	Workshop on Annex I targets - to develop work programme on options and ways to increase mitigation ambition (para. 38)	Work programme to increase mitigation ambition	Technical paper on mitigation potential (update) Technical paper innovative sources of finance
June session	Workshop on NAI actions - to further consider support needed: innovative sources of finance (para.51)	Work programme on innovative sources of finance	
June session		Draft guidelines on procedures for accessing financing for the identification and development of NAMAs and for preparation	

		of the first biennial reports	
June session		Draft Guidelines on the presentation of NAMAs seeking international support	Secretariat paper on options and views from literature
June session		Draft Guidelines for biennial reports; agreement on areas of flexibility to LDCs and SIDS	
Sept/Oct session	Workshop on CRF tables on support	Progress on CRF tables to support Annex I and Non-Annex I reporting guidelines on MRV of support	Submission of views on content of CRF tables and relevance of DAC Rio markers  Synthesis of views by the secretariat
Sept/Oct Session	Workshop on ICA	Progress on ICA options and schedule	Secretariat paper on ICA in other multilateral for a and process now in place for Annex I Parties under Convention and KP
Sept/Oct session	Workshop on International Assessment and Review (IAR)	Progress on IAR and schedule	Secretariat paper on ICA/IAR in other multilateral fora and process now in place for Annex I Parties under Convention and KP
COP 17		Adopt revised AI and NAI Nat Communication Guidelines  Adopt AI and NAI biennial reporting guidelines and CRF for support  Adopt Guidelines on presentation of NAMAs that require international support  Adopt Guidance to GEF expediting funding for NAMA prep and biennial reports  Adopt guidelines for 2013-2015 Review	
2012	<i>Initiate Biennial Reports for Annex I Parties</i>		
COP 18		Adopt ICA Guidelines	
2013	<i>Initiate Biennial Reports for Non-Annex I Parties</i>		
2013	<i>Initiate International Assessment and Review</i>		
2013	<i>Initiate ICA for Non-Annex I Parties</i>		
2013	<i>Initiate First Review, to be completed by 2015</i>		

**SUBMISSION BY THE REPUBLIC OF KOREA**

**28 March 2011**

**Subject: Submission on “work program for the development of modalities and guidelines relating to MRV for developing countries and developed countries**

**1. Work Program for Developing Countries**

The Republic of Korea welcomes the progress made at COP 16 on mitigation actions by non-Annex I country Parties. The Republic of Korea has been constructively participating in the negotiations on mitigation actions by non-Annex I Parties based on the Bali Action Plan, and will continue to make contributions to the process.

Prior to establishing a work program, it is necessary to clearly define characteristics of mitigation actions in developing countries. Nationally Appropriate Mitigation Actions (NAMAs) by developing countries cover two types of actions, international and domestic. For such reason, measurement, reporting, verification (MRV) and international consultations and analysis (ICA) of NAMAs may differentiate depending on the type of action. However, their contribution to the fight against climate change should be evaluated on an equal basis.

As articulated in paragraph 66 of the Cancun Agreement, the COP decided on a work program for the development of modalities and guidelines for the:

- (a) facilitation of support to Nationally Appropriate Mitigation Actions (NAMAs) through a registry;
- (b) measurement, reporting and verification of supported actions and corresponding support;
- (c) biennial reports as part of National Communications from non-Annex I Parties;
- (d) domestic verification of mitigation actions undertaken with domestic resources; and
- (e) International Consultations and Analysis (ICA).

The Republic of Korea firmly believes that the basic aim of the work program focuses on building trust among the Parties that are indispensable to global efforts on tackling climate change. In this regard, mitigation actions in non-Annex I country Parties will be effectively facilitated if following principles are fully considered when implementing the work program.

- Securing transparency on administering the support from developed country Parties and on mitigation actions by non-Annex I country Parties.
- Providing appropriate evaluations and recognitions of developing countries' efforts against climate change, which would be exerted in accordance with the principle of common but differentiated responsibilities and their respective capabilities.
- Assisting developing countries build capacity to augment efficiency of implemented mitigation actions in the context of sustainable development.

The following explains the view held by Republic of Korea on the subject of work program, which consists of the five elements of paragraph 66 from the Cancun Agreements:

#### 1.1. Facilitation of support to Nationally Appropriate Mitigation Actions (NAMAs) through a Registry: Element (a)

If mitigation actions can be evaluated and the efforts recognized internationally through the registry, NAMAs will be further promoted. The registry will serve two purposes: efficient matching of NAMAs proposals and available support for such actions, and recording and updating information of all the mitigation actions by non-Annex I country Parties. In order for the registry to effectively promote NAMAs, a consensus on the role of the secretariat that receives information on NAMAs seeking support and available support should first be reached. We may also consider whether technical support during the preparation of the NAMA proposals and technical assessment related to the decision-making process on listing the proposals in the registry are necessary and, if so, how these functions can be embodied in an operating entity

In relation to the second purpose, it should be noted that recording and updating relevant information are essential for effective facilitation of NAMAs, and to giving international recognition through the registry.

#### 1.2. Measurement, Reporting and Verification (MRV) of Mitigation Actions: Elements (b) and (d)

Paragraphs 61 and 62 of the Cancun Agreement state that mitigation actions by Non-Annex I country Parties will be measured, reported and verified domestically in accordance with the guidelines to be developed under the Convention. This implies that domestic MRV institutions/systems with sufficient capacity should be established in non-Annex I country Parties. Therefore, the work program should address the needs of those Parties with respect to the domestic MRV in terms of capacity building, financial support, etc.

Also, Paragraph 61 clarifies that internationally supported mitigation actions will be subject to international MRV. However, the distinction between internationally supported action and domestically supported action has not been discussed sufficiently. To avoid any controversy

that may originate from this ambiguity, an operational definition for internationally supported NAMAs should be formed through the work program as soon as possible.

- **Measurement:** It is worthwhile to consider metrics other than GHG emissions that could be adopted to evaluate the NAMAs by developing countries. Individually measuring the effects of GHG emissions reduction may not only be technically challenging, but also prohibitively expensive and time-consuming for some developing countries. Therefore, the work program should pursue development of a metric that can indirectly measure the effects of GHG reductions and of a methodology for its usage. It may also explore ways to identify more cost-effective measurement methodologies that provide more flexibility to least developed country Parties and small island developing states.
- **Reporting:** Reporting formats should be designed to prevent developing countries from making redundant efforts, i.e. reporting via the registry, biennial reports and national communications. The work program should find an effective way to report the outcomes of NAMAs in the context of sustainable development as the Bali Action Plan suggests.
- **Verification:** The work program needs to establish verification modalities, so that the reports submitted by non-Annex I country Parties would be reviewed efficiently and effectively by limited number of experts.

### 1.3. MRV of Support to NAMAs: Element (b)

Priority should be placed on the functional relationship between the registry and the financial mechanism. The program must also identify the aspect of support to Annex I countries that will be subject to MRV (e.g. actual scale of the support, efforts to comply with the proposed schedule, source of the support, new and additional support, etc.).

### 1.4. Biennial Reports and International Consultations and Analysis (ICA): Elements (c) and (e)

Biennial reports should contain inventories of national greenhouse gases including a national inventory report and information on mitigation actions, needs, and support received (paragraph 60(c) of the Cancun agreement). Since these biennial reports are a part of national communication, developed countries shall provide new and additional financial resources to meet the agreed full costs incurred by developing country Parties. Possible hurdles to biennial reports must be lowered to help as many developing countries submit biennial reports that are consistent with their capabilities. For instance, biennial reports, under certain circumstances, could be produced mainly by adopting and slightly modifying the actions if they have been already recorded or updated in the registry.

The principles of ICA from paragraph 63 of the Cancun Agreement should be duly respected. Taking into account respective capabilities and national circumstances of developing countries, ICA should serve to recognize and help developing countries meet their needs, so that mitigation actions may be facilitated in developing countries.

## 2. Work Program for Developed Countries

The Republic of Korea welcomes the progress described in the Cancun Agreement with regard to the Further Commitments for Annex I Parties under the Kyoto Protocol. During the COP 17 negotiation process, Parties exerted their best efforts to have the results of AWG-KP adopted as early as possible and to avoid a gap between the first and the second commitment period of the Kyoto Protocol. In particular, based on historical responsibility and the principle of common but differentiated responsibilities, developed country Parties were expected to take the lead in combating climate change by raising their emission reduction targets.

As described in paragraph 46 of the Cancun Agreement, the COP decided on the work program for the development of modalities and guidelines for:

- (a) The revision of guidelines, as necessary, on the reporting of National Communications, including biennial report:
  - (i) The provision of financing, through enhanced common reporting formats, methodologies for financing and tracking of climate-related support;
  - (ii) Supplementary information on achievement of quantified economy-wide emission reductions targets;
  - (iii) Information on national inventory arrangements;
- (b) The revision of guidelines for reviewing National Communications, including the biennial submittal, annual greenhouse gas inventories and national inventory systems;
- (c) The establishment of guidelines for national inventory arrangements;
- (d) Modalities and procedures for international assessment and verification of emissions and removals related to quantified economy-wide emission reductions targets in accordance with paragraph 44, including the role of land use, land-use change and forestry (LULUCF), and carbon credits from market-based mechanisms, taking into account international experience.

The Republic of Korea firmly believes that the fundamental purpose of the work program lies in building and enhancing trust among the Parties, which is crucial to global efforts to respond to climate change. Accordingly, the following points must be taken into full account in the work program of Nationally Appropriate Mitigation Commitments or Actions by developed country Parties:

- Enhancing efficiency of post-2012 regime by building upon the existing mechanisms such as the United Nations Framework Convention on Climate Change, the Kyoto Protocol, and the Marrakech Accord;

- Promoting transparency of administration of GHG emissions reduction by the Annex I country Parties, as indicated in the recommendation in the Fourth Assessment Report of the Intergovernmental Panel on Climate, during the second commitment period of the Kyoto Protocol;
- Ensuring comparability among Annex I country Parties, including Annex I Parties that are not Parties to the Kyoto Protocol, in their efforts and other appropriate dimensions through rigorous, robust and transparent technical assessment;
- Improving reporting guidelines on support to developing country Parties based on Article 12.3 of the Convention.

The Republic of Korea regards paragraph 46 (a) of the Cancun Agreement, which sets guidelines for enhanced measurement, reporting and verification (MRV) for Parties included in Annex I, as a key component of the work program. The following expresses the view of the Republic of Korea on the matter.

#### 2.1. Revision of Guidelines on the Reporting of National Communications

In accordance with Article 7.2(d) of the Convention, measurement and reporting the effectiveness of greenhouse gas emission reductions should be improved. In particular, the revision for measuring and reporting guidelines should focus on transparency, since non-Annex I country Parties expect better reporting of the effects of emissions reduction from individual mitigation actions by Annex I countries. In addition, considering that the reduction target of Annex I country Parties, which is based on compulsory commitment, is substantially different from that of non-Annex I country Parties, a revision of the Guidelines should be made so that the effects of the emission reduction of non-Annex I countries denotes the real amount of greenhouse gases reduction.

Guidelines from the for reporting adverse social, environmental impacts in social, environmental, and economic sectors of developing country Parties derived from the implementation of Annex I country Parties' commitments, and their efforts to minimize the adverse impacts need to be consolidated.

It should be noted that the guidelines for reporting financial supports to developing countries are closely related to the registry for mitigation actions and financial mechanisms of the non-Annex I countries. While the discussion on the reporting guidelines must be based on the current reporting mechanism associated with Article 12.3 of the Convention, it is also desirable to refer to mechanisms outside the framework of the Convention, such as the Rio Marker.