

SUBMISSIONS TO THE UNFCCC-19 September, 2011

Pakistan appreciate efforts of the Secretariat in moving the climate change agenda forward and their efforts in effective reflection of the views of the Parties to facilitate the ongoing negotiation process. Pakistan would like to make submission on the items below.

5. Financial mechanism of the convention (SBI)

Information by parties on support provided to developing country parties and activities undertaken to strengthen existing and where needed establish national and regional systematic observation and monitoring networks

Response

National Environment and Economic Development Study (NEEDS)

An amount of US\$ 86,045 were allocated by the UNFCCC Secretariat for the NEEDS that aimed to bring out some of the priority areas for possible climate change mitigation while drawing out the probable future course of Pakistan's growth and the cost associated with moving towards a low carbon development pathway. The Government of Pakistan has completed the NEEDS report and the same has already been submitted to the UNFCCC Secretariat. Out of the US\$ 86,045, the UNFCCC Secretariat is yet to provide the last tranche of 10% amounting to US\$ 8,605. A request from the Government for release of this amount is pending action from the UNFCCC Secretariat.

Second National Communication

As a commitment under the UNFCCC framework to prepare an inventory of Green House Gases (GHGs) and submit a series of National Communications to UNFCCC, an amount of US\$ 15000 was received. The exercise of stocktaking and stakeholder consultation to prepare the Second National Communication for Pakistan is being finalized, and amount received has been utilized.

Glacier Lake Outburst and Flood (GLOF)

Pakistan has also benefited from the Adaptation Fund in the form of funding to the tune of US\$ 3.6 million for a project on "Glacial Lake Outburst Floods in the Northern Areas of Pakistan". The Government has contributed in providing US\$ 3.5 million in kind and UNDP through their core resources have allocated US\$ 500,000. The total cost of the project is US\$ 7.6 million.

As per the findings of the NEEDS, financing options for climate change need a two way linkage between global and local levels. Under the Kyoto market based instruments, Pakistan has institutionalized the Clean Development Mechanism by

developing an operational strategy and the process of host country approval. Thirty-eight projects have been accorded host country approval and 12 projects have already been registered with the CDM Board, which have earned Certified Emission Reductions.

Pakistan is already spending considerable amounts for planned climate change related activities through its public sector development programme each year. As per NEEDS report, a total of US\$ 4.5 billion were spent in two years (2007-2009), whereas the country is subjected to recurring climate shocks which resulted in a loss of more than US\$ 9 billion during the 2010 Super Floods. The future projections of funding required for various mitigation interventions range between US\$ 8 billion to US\$ 17 billion (NEEDS Report). Whereas the costs required for different adaptation actions range between US\$ 6 billion to US\$ 14 billion/year that Pakistan would have to spend at an average in the 2020-2050 time frame to cope with the effects of climate change.

Pakistan, therefore, requires the following:

- i. Support to improve national environmental information and management system
- ii. Support to strengthen observation networks and capabilities to compile data relating to climate change.
- iii. Bottom up adaptation costing studies in different sectors
- iv. Support for establishment of National Implementing Entity (NIE) for direct access to the Adaptation Fund.

The Government of Pakistan recognizing the importance of research and development in the field of climate change established Global Change Impact Studies Centre (GCISC) in 2002. This centre is dedicated for carrying out Climate Change research and providing assistance to national planners & policy makers for strategic planning in the wake of climate change. The areas of research include Climate Scenarios for Pakistan, Impacts on Water Resources, Impacts on Food Security, Adaptation Measures. The government of Pakistan is making effort for designation of GCISC as regional climate change centre for SARC regional countries. This is being perused in follow up to the recommendation of the regional climate change workshop held in Pakistan prior to COP 16. Pakistan would appreciate UNFCCC support to GCISC for establishing regional systematic observation and monitoring network facility in this centre.

7. Nairobi Work Program on impacts, vulnerability and adaptation to climate change (SBSTA)

Pakistan's National Climate Change Policy is in the final stages of its formal approval by the Cabinet. It has been developed with a major focus on identifying the vulnerability of the poor and building their capacity through knowledge development and sharing of information on adaptation to climate change at the local level. A National Plan of Action

on Adaptation and Mitigation has also being finalized through an extensive process of consultation with all stakeholders that include the Provincial Governments, Development Agencies, NGOs and the Private sector.

This Plan of Action involves practical interventions to prepare our marginalized groups for climate resilient development and to face the challenges posed by climate change. Pakistan is in the grip of these extreme events like changing pattern of Monsoon resulting in increased rainfall and floods on persistent basis. The 2010 experienced the Super Floods in major parts of the country; and this year's extreme rainfall in the Provinces of Punjab, Sindh and Balochistan has once again triggered floods affecting a sizeable population dependent on agriculture and subsistence livelihoods. Moreover, this phenomenon is further complicated by the rising incidents of Dengue Fever resulting from mosquitoes thriving on stagnant water caused by heavy rains.

The Government of Pakistan through the involvement of NGOs has shown its resolve to adapt to the challenges posed by changing climate. Various products in the form of documentaries, messages in the print and electronic media and brochures have been developed in laymen terms and local languages to send the message across to the affectees. Moreover, climate and seismic resilient construction of low cost houses with indigenous products/material has been initiated first on a pilot scale to test its durability and longevity and then replicated on a larger scale in the far flung areas impacted by the climate change. This has also resulted in building the capacity of local people in climate resilient reconstruction and rehabilitation.

8. Methodological guidance for activities relating to reducing emissions from deforestation and forest degradation and the role of conservation, sustainable management of forests and enhancement of carbon stocks in developing countries (SBSTA)

Views on modalities relating to forest reference emission levels and forest reference levels of the activities referred to in paragraph 70 of decision 1/CP.16

(a) Scope and/or purpose

i) The REL and RL is considered as a benchmark for assessing a country's performance in reducing total emissions and increasing removals associated with REDD+ activities implemented by the Party. The comparison is needed to assess whether and how policies and measures implemented for REDD+ have resulted in quantifiable mitigation actions, and is expected to be used to determine the appropriate REDD+ financing and incentives for a particular Party.

ii) Modalities for the development by non-Annex I Parties of forest reference emission levels and forest reference levels of the activities referred to in paragraph 70 of decision 1/CP.16 should be flexible in order to reflect national circumstances and allow

widest participation of countries, thus minimizing international displacement, implementing REDD+ activities for mitigating climate change.

(b) Characteristics, including elements listed in paragraph 1 of appendix I to decision 1/CP.16

iii) Therefore, REL and RL should be the expected amount of emissions and removals that would have been occurred if REDD+ activities had not been implemented.

iv) For each national or subnational unit [as an interim measure for phase 1 and 2, or when totaled in sum reaching a national scale], Parties may set a reference emission levels including emissions from deforestation and forest degradation only or may set a reference level including all emissions and removals associated with all REDD+ activities, namely deforestation, forest degradation, forest conservation, sustainable management of forests and enhancement of forest carbon stocks.

v) The REL and RL are valid for the whole duration of REDD+ activities and shall be recalculated periodically as agreed by the Parties, such as every five [5 years].

(c) Modalities for the construction

vi) The RL and REL should be characterized by transparency, accuracy and participation.

vii) Pursuant to the principle of flexibility and respect for national circumstances, Parties may opt to use a REL or a RL depending on national circumstances.

viii) The REL should include emission reduction from deforestation and forest degradation.

ix) The REL should be based on historical data only so assuming a constant impact on forest emissions of drivers that cause deforestation and forest degradation and that shall be addressed by the implementing policies and measures for REDD.

x) Historical data used REL and RL may refer to a period encompassing the most recent years for which data is available, but including at least 1990, 2000 and 2005.

xi) The RL should take into account carbon stock losses and gains and other emissions occurring on managed forest land, including those associated with change of use from forest to any other land use.

xii) In particular countries that have maintained high levels of Sustainable Management of Forests (SMF) and conservation of their forest stocks will be allowed to adjust their RLs so that these efforts will be adequately recognized.

xiii) RL, based on historical data, should take into consideration the impact of human induced variables that drive emissions and removals in forest land and their expected change in the period to which the reference level is applied, so that the historical data are adjusted by means of a Development Adjustment Factor (DAF) in order to determine the RL.

xiv) The DAF should be built on national circumstances determined by the use of the most recent relevant information, for example, last years' carbon stock changes and other emissions from the forest sector, per capita Gross Domestic Product (GDP), local and international prices of forest and agricultural goods, etc.

xv) To avoid inconsistencies in methods, carbon pools and lands reported for setting the REL and RL and those used for accounting during the commitment period, the REL and RL could be subject to technical corrections when and if needed.

xvi) Setting the REL and RL may start by estimating activity data utilizing the freely available Landsat satellite global data set for 1990, 2000 and 2005, provided by NASA, and estimating carbon stocks changes using IPCC default value tables.

(d) Process for communication

xvii) REL and RL should be submitted to the COP, be subject to an independent assessment made by an expert review team equitably composed by Annex I and Non Annex I experts assisted by the UNFCCC secretariat and adopted by the COP.

(e) Other relevant issues

xviii) REL and RL could be further modified to take into account the need to ensure that the total amount of net changes in emissions and removals accounted by mitigation activities implemented under the REDD+ mechanism account for a net reduction in emissions or enhancement of removals.

Views on guidance on systems for providing information on how safeguards referred to in appendix I to decision 1/CP.16 are addressed and respected

a) Characteristics

xix) The system, developed by the SBSTA, for providing information on how the safeguards are being addressed and respected should be:

- Consistent with the elements identified in paragraph 1 of Annex I to decision 1/CP.16;

- Flexible, including taking into account national circumstances and evolving conditions in the country;
 - Nationally led and developed, respect national sovereignty, legislation, diversity and socio-economic conditions;
 - Consistent with national development priorities, strategies, institutions, processes, so as to build upon existing infrastructure and national expertise;
- xx) Furthermore, transparency, regularity, consistency, reliability and broad participation should be guiding principles of the system.
- xxi) Responsibility for the system on informing how safeguards are addressed and respected should remain with the relevant national authorities.
- xxii) Guidance developed by the SBSTA should take into account national circumstances and should not be a prejudice to official national information systems.

b) Design

- xxiii) The systems for providing information on how safeguards are respected should be an integral part of REDD+ strategy and therefore should be simultaneously developed and implemented in phases so that the financial sources and levels of complexity supporting the design and development of the system can be identified and dealt with progressively.
- xxiv) The collection and type of information provided should be in conformity with relevant decisions by the Parties along with the relevant national regulations, procedures and modalities related to the implementation of safeguards (scope, standard, methods for gathering and processing information, presentation and assessment). Local institutions and existing information systems on forest related activities should be used.

c) Provision of information

- xxv) Information on how the safeguards referred to in Appendix I to decision 1/CP.16 are being respected throughout implementation of REDD+ activities should be provided only for supported actions and should be consistent with the level of development of the national REDD+ strategy and its agreed phases.
- xxvi) Information on safeguards should be regularly reported by the official authority, the National Focal Point to the UNFCCC, through existing systems such as national communications consistent with country capability and the level of technical and financial support received as part of the whole REDD+ strategy.

d) Potential barriers, including barriers, if any, to providing information on addressing and respecting safeguards

xxvii) Providing and gathering of information and participation of stakeholders should be adjusted to the existing national processes and modalities and the implementation must be progressive and consistent with the financial support provided and in accordance with national circumstances, policies and capabilities.

Views on financing options for the full implementation of results-based actions under REDD+

1. Pakistan wishes to submit the following text as written input to the co-facilitators with the view to enhance the work of the contact group on agenda items 3, 4, 5 and 6 established at the second part of the fourteenth session of the Ad Hoc Working Group on Long-term Cooperative Action under the Convention (AWG-LCA 14.2) in relation to financing options for the full implementation of results-based actions under REDD+ and would kindly invite the secretariat to make this submission available on the UNFCCC website and in accordance with the procedure for miscellaneous documents, to reproduce it in the language in which it was received and without formal editing.

2. Parties noted the following:

- Decision 1/CP.16 recognized the crucial role of REDD+ to mitigate climate change;
- REDD+ offers cost effective early action to mitigate climate change;
- Substantial delay in the disbursement of fast start funding that was agreed by many Annex I Parties in Copenhagen and re-affirmed in paragraph 95 of decision 1/CP.16;
- The back-tracking by developed countries on the promise of new and additional financing;
- Much of the funds that have been disbursed so far are in fact old and re-packaged [Official Development Assistance financial resources];
- Immediate action to disburse the fast start funds that were pledged is urged, particularly for REDD+ where it is needed, given that early mitigation can be achieved and developing countries are already making progress on their own;
- The lack of progress of the negotiations on financing REDD+ and the little time that has been spent after Cancun on long term sources of finance for adaptation and mitigation actions such as reducing deforestation and degradation, forest conservation, and sustainable management of forests;
- Progress made elsewhere in related areas of REDD +, notably modalities for MRV, reference levels and guidance on a system for providing information on safeguards;
- The work of the Transitional Committee for the design of the Green Climate Fund.

3. Decision 1/CP.16 specifically provides for adequate and predictable REDD+ support to developing countries [paragraph 71], notably:
 - Scaled-up, new and additional, predictable and adequate funding to be provided [paragraph 97]
 - Funds may come from a wide variety of sources, public and private, bilateral and multilateral, including alternative sources [paragraph 99]
4. For REDD+ actions to be effective, significant global financial resources must be mobilized that are transparent, adequate, predictable and sustainable over time. Furthermore, measurable, reportable and verifiable funding must be equitably mobilized from a variety of sources, including increased Official Development Assistance, auctions of authorized allowance units (AAUs), carbon taxes and other levies, private sector investment, cap and trade market instruments, etc.
5. REDD+ activities should be implemented in phases and the choice of starting phase is dependent upon national circumstances, capacities and capabilities and level of support received.
6. REDD+ can offer cost effective early action to mitigate climate change and the full implementation of results based actions in REDD+ can be achieved through support based on a full range of approaches including but not limited to market based and market linked financing to incentivize REDD+ mitigation actions, with appropriate an MRV process at the national level.
7. In accordance with decision 1/CP.16, paragraphs 76 and 78, financing for phases 1 and 2 of REDD+ should come through multilateral and bilateral channels while for phase 3 the AWG-LCA was instructed by decision 1/CP.16, paragraph 77, to explore financing options and agreed to consider various approaches, including opportunities for using markets. Furthermore, support should be coordinated, particularly at the national level [paragraph 78].
8. For phases 1 and 2, financial sources should come from fund based sources, including new and additional Official Development Assistance, revenues generated from the auction of AAUs and carbon taxes within Annex I Parties, transport levies, assessed contributions and Tobin tax.
9. These sources should be administered and disbursed through a REDD+ window in the Green Climate Fund under the authority and guidance of the COP.
10. For phase 3 financial resources should come from a flexible combination of fund based and market based sources. These latter sources should come from full and equitable participation in global carbon markets including instruments to stabilize dramatic fluctuations in supply and demand that could be supported by funds derived by the auction of AAUs and carbon taxes.

11. Issues related to environmental integrity, additionality and leakage will be addressed by a robust and transparent MRV process and safeguards information systems.

Views on modalities for measuring, reporting and verifying anthropogenic forest-related emissions by sources and removals by sinks, forest carbon stocks, and forest carbon stock and forest-area changes resulting from the implementation of the activities referred to in paragraph 70 of decision 1/CP.16

1. Most of the necessary elements regarding MRV for REDD+ have already been agreed by the Parties and discussions under SBSTA should be focused on missing elements only.
2. Monitoring: Decision 4/CP.15 contains guidance on the National Forest Monitoring Systems which should be based on a combination of remote sensing and ground-based forest carbon inventory. Reference materials could also be retrieved from the outcomes of the technical workshops and expert meetings organized by the Secretariat in the previous years. Countries should be allowed to have a “tiered approach” in setting their national forest monitoring system according with the approach used in the IPCC Guidelines and Guidance that Parties agreed to be used, in their most recent version as adopted or encouraged by the COP as a basis for estimating anthropogenic forest-related greenhouse gas emissions and removals.
3. Measuring: Measurements should be consistent with data requirements for estimating emissions and removals based on IPCC guidance and guidelines as for Decision 4/CP.15. Therefore, collected data should be representative of the whole variability, which is present in the country, of carbon stocks and their dynamic, be free of bias as far as can be judged and ensure spatial and temporal consistency of compiled databases.
4. Reporting: in paragraph (c) of Appendix II to decision 1/CP.16 the Parties agreed that MRV for REDD+ should remain consistent with any guidance for Nationally Appropriate Mitigation Actions (NAMAs) (paragraphs 60 to 64 of decision 1/CP.16). In particular:
 - a. National Communications: in paragraph 60(b), the Parties agreed to enhance reporting in National Communications, including inventories, with additional flexibility given to least developed country parties and small island developing states;
 - b. Frequency: in paragraphs 60 (b) and (c), the Parties agreed that National Communications should be submitted every four years, with biennial update reports submitted consistent with their capabilities and level of support provided for reporting;

- c. Content: in paragraphs 60, 60 (c) and 64, the Parties have agreed to provide national greenhouse gas inventories, including a national inventory report, and information on mitigation actions, needs and support received.

5. Therefore, Parties should set a permanent national system able to ensure continuity in the planning, preparation and management of the information to be reported, including its archiving, quality assurance (QA) and quality control (QC) and publication.

6. Verification: in paragraph 63 of decision 1/CP.16, the Parties agreed to conduct international consultations and analysis of the biennial reports under the SBI, in a manner that is non-intrusive, non-punitive, and respectful of national sovereignty and legislation, with the aim to improve 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 that will result in a summary report.

7. The procedures for monitoring, reporting and verification described above should apply to all phases of REDD+; noting that lower tiers for monitoring and reporting being consistent with IPCC Guidance and Guidelines may be implemented while national forest monitoring systems are being implemented, and therefore not fully operational, and that verification shall not include procedures set to ensure full equivalence of Party's carbon units. Accuracy of monitoring and reporting may improve depending on the support received.

8. Measurement, reporting and verification of the support provided by Annex I Parties to Parties not included in Annex I for activities referred to in paragraph 70 to decision 1/CP.16 should be carried out by an expert review team equitably balanced between members of developed and developing countries selected from the roster of experts of the Convention and supported by the secretariat in consultation with relevant national authorities in accordance with countries different capacity and capabilities.

9. Research and Systematic Observation (SBSTA)

The Government of Pakistan recognizes the importance of research and development in the field of climate change, which is impacting the lives of more than 170 million population. The Government in 2002 established Global Change Impact Studies Centre (GCISC) as a dedicated Centre for Climate Change research and providing assistance to national planners & policy makers for strategic planning in the wake of climate change. Since that time the GCISC has focused on the following:

- Climate Scenarios for Pakistan
- Impacts on Water Resources
- Impacts on Food Security
- Adaptation Measures

The on-going research activities of GCISC are based on the following:

- Dynamical downscaling of GCM scenarios using Regional Climate Models;
- Development of climate extreme indices for the South Asia region together with predictability of extreme events;
- Development of seasonal, inter-annual and decadal predictability systems.
- Prediction of crop yields under various climatic conditions, using Crop Growth Simulation Models;
- Assessment of Food Security and Water Security in Pakistan under Climate Change scenarios;
- Analysis of past hydro-meteorological data;
- Development of capacity to monitor temporal changes in Karakoram glaciers;
- Application of watershed models to simulate the flows of major rivers in Pakistan and to assess the impact of CC on their flows;
- Assessment of CC impacts on glaciers and river flows.
- Development of GHG inventory for Pakistan

The aforementioned research activities are not only shared with all stakeholders in Pakistan through seminars and conferences but are also taken to the grass roots level through various NGOs in the form of dissemination products in local languages. Moreover, the Government is encouraging initiatives for cross learning and exchange of information through visits and participation of the relevant scientists/researchers to present their findings and reports in seminars, conferences and workshops within the country and abroad.

10. Forum on the impact of the implementation of response measures at the thirty-fourth and thirty fifth sessions of the subsidiary bodies, with the objective of developing a work program under the SBSTA and SBI to address these impacts, with a view to adopting, at the Seventeenth Session of the Conference of Parties, modalities for the operational, modalities for operationalization of the Work Program and possible forum on the response measures (SBSTA/SBI)

Further views on the elements for the development of a work program and a possible forum on response measures

Response

Pakistan welcomes the initiative for the development of a work program under SBSTA and SBI for implementation to address the impacts of response measures and also support a forum on the impact of the implementation of response measures at the thirty fourth and thirty fifth sessions of the subsidiary bodies.

The elements of this work program should focus on promoting co-operation in scientific, technical, socioeconomic and other research to reduce uncertainties regarding causes,

effect, magnitude and economic and social consequences of various response strategies it should also take into account the principle of common but differentiated responsibilities and respective capabilities while reporting on the status of response measures in case of both developed and developing countries.

11. Materiality standard under the Clean Development Mechanism (SBSTA)

Views on:

- a) Whether the concept of materiality could be applied in the context of CDM;**

Response: The Government of Pakistan feels that the concept of materiality can be applied in the context of CDM

- b) If appropriate:**

- i) How materiality should be defined in the context of CDM**

Response: The Government of Pakistan defines material information as a piece of information whose omission or misstatement, or erroneous reporting, could change a decision by the Executive Board of the CDM on the registration of the project activity.

- ii) The appropriate thresholds used to define the conditions under which a piece of information should be regarded as material**

Response: The Government of Pakistan would request the Executive Board of CDM to adopt appropriate quantitative thresholds to define when the omission or misstatement of information or the non-compliance with a requirement related to a CDM project shall be considered material, taking into account the total amount of emission reductions achieved by the project activity.

- iii) The areas to which the concept of materiality should be applied**

Response: The concept of materiality should be applied in a consistent manner to the approved baseline; in the assessment of projects and monitoring methodologies.

- c) The relation, as well as the difference between uncertainty and materiality**

Response: Uncertainties occur towards measurement of the baseline and these uncertainties are then considered in addressing materiality.

14. Financial Mechanism of the Convention

Views and recommendations from parties on elements to be taken into account in developing guidance to the Global Environment Facility (GEF)

Response:

Pakistan is of the view that Global Environment Facility (GEF)'s support has been valuable in enabling countries to integrate climate change into their national development agendas. The move of the GEF towards country level programming has increased country ownership to some extent, but the current modalities for resource allocation require improvement.

There is scope to further simplify and streamline the GEF procedures, particularly the project identification phase, and improving timelines through the project cycle.

GEF needs a knowledge management strategy to improve learning and the sharing of best practices.

In view of above, the GEF should enhance its support to the developing countries by strengthening national capacities, development and transfer of technologies, practices and processes for mitigation. It should therefore, continue improving its modalities to increase responsiveness, effectiveness and efficiency of its support.