

**SUBMISSION OF TURKEY ON AGENDA ITEM 3 (MITIGATION SECTION OF  
DECISION 1/CP.21) OF AD HOC WORKING GROUP ON THE PARIS  
AGREEMENT (APA)**

Turkey welcomes the invitation to the Parties by Ad hoc Working Group on the Paris Agreement (APA) to submit their views on the agenda item 3, “Further guidance in relation to the mitigation section of decision 1/CP.21 specifically on: (a) features of Nationally Determined Contributions (NDCs) as specified in paragraph 26; (b) information to facilitate clarity, transparency and understanding of NDCs as specified in paragraph 28; and (c) accounting for Parties’ NDCs as specified in paragraph 31”.

**I. APA Agenda Item 3(a): Further Guidance on Features of NDCs**

***A. What is the understanding of features of NDCs under this agenda item?***

“Nationally determined” is the most crucial feature of Parties’ contributions according to Article 3 and 4 of the Paris Agreement. “Further guidance” phrase in this item must not undermine nationally determined nature of contributions and it must not mean to adjust the content of NDCs. It should create the operational essentials for submission and communication of NDCs. “Further guidance” must not interfere in format, adjustment, revision or way of implementation of NDCs and/or submission of successive NDCs for next implementation cycles of Paris Agreement. The features of the NDCs should reflect differentiated responsibilities, different national circumstances, development levels, capacities and needs of Parties and CBDR-RC. Contribution of NDCs towards achieving the goal of the Convention must be determined in a country driven manner.

***B. What should be the purpose of further guidance on features under this agenda item?***

The purpose of the further guidance on features is not to undermine the nationally determined nature of Parties’ contributions, not to dictate Parties’ preparation, communication and implementation of NDCs and not to introduce any new features or renegotiate the Paris Agreement. “Further guidance” also relates to operational aspects of how Parties to the Paris Agreement will communicate their NDCs, not on the NDCs themselves”. The purpose of the further guidance on features is to further implement the relevant provisions of the Paris Agreement to ensure the scope, differentiation and ambition of the NDCs, assist Parties during their domestic process of preparation of NDCs.

Flexibility should be provided to developing country Parties when they are applying the guidance. Developing country Parties should be allowed to choose, in a nationally determined manner, the sectors and gases covered in their NDCs and specific methodologies on accounting, in line with the content of their NDCs and in light of their national circumstances and capacities. While all NDCs have to adhere to the communication cycle stipulated under Article 4 (9), developing countries may choose the timeframe for their NDC keeping in mind their national circumstances. Developing countries, common timeframes is not appropriate, considering their differing and differentiated national capabilities and circumstances.

***C. What is the relationship, if any, between further guidance on features of NDCs under this sub-item, and further guidance on sub-items 3(b) and 3(c)?***

The relationship between this sub item (3a) and other two sub items is quite vague. The sub-items; features, information and accounting are providing some suggestions to Parties for preparing and communicating their NDCs and in facilitating the clarity, transparency and understanding of Parties' NDCs.

***D. How could this work be usefully structured and progressed?***

The work of the APA on guidance for the NDCs should be done in the context of enhancing the implementation of the Paris Agreement. The specific issues under each sub-item should be defined in a Party-driven manner. Guidance for the NDCs should enhance mutual understanding among Parties on crucial political issues, particularly the reflection of differentiation.

**II. APA Agenda Item 3(b): Further Guidance for Information of NDCs**

***A. What is the understanding of information to facilitate the clarity, transparency and understanding of NDCs under this agenda item?***

The guidance provided in Para 27 is not mandatory. It is clearly indicated in the language of this paragraph that the information to be provided by Parties communicating their NDCs is discretionary, optional and non-exclusive in nature, because it uses words indicating discretionary intent such as “may”, “as appropriate”, and “inter alia. Specific information of developing country Parties' NDCs should take into account their diversified climate actions, different national circumstances and capacities and support received.

***B. What should be the purpose of further guidance on information to facilitate the clarity, transparency and understanding of NDCs under this agenda item?***

The purpose of the information is to enhance the clarity, transparency and understanding of Parties' NDCs. The further guidance for the information should be consistent with the nationally determined nature of Parties' contributions, without introducing common format or undue burden on Parties. Article 13, paragraph 7 already puts a framework for the information to be provided by the Parties to facilitate clarity, transparency and understanding of NDCs. Parties may submit additional information, as appropriate, on a voluntary basis for their progress to be tracked. This encouragement of providing additional information must be non-intrusive.

The guidance for information of the NDCs should also aim to provide the reference or assistance for the domestic preparation of NDCs and assist developing country Parties to identify the capacity-building, technology transfer and finance needs on the preparation and implementation of their NDCs.

***C. What is the relationship, if any, between further guidance on information to facilitate the clarity, transparency and understanding of NDCs under this sub-item, and further guidance on sub-items 3(a) and 3(c)?***

The scope of guidance for information should be consistent with NDCs and means of implementation.

***D. How could this work be usefully structured and progressed?***

The work to developing the information guidance should be structured around all the elements of NDCs.

***E. What issues should be discussed and resolved under this sub-item?***

Purpose of the information guidance, basis of the work on information guidance, general information guidance for all Parties should be discussed and resolved under this agenda item.

**III. APA Agenda Item 3(c): Guidance for the Accounting for NDCs**

***A. What is the understanding of accounting for Parties NDCs under this agenda item?***

Accounting for NDCs” means that Parties should be responsible for their NDCs by giving an explanation through existing methods and approaches. The Paris Agreement requires Parties to account for their NDCs, i.e. to count emissions and removals corresponding to their nationally determined contributions in Article 4.13. The guidance for accounting should;

- i. be consistent with the nationally determined nature of Parties’ contributions.
- ii. take into account the different content of NDCs, accommodate various types of the NDCs and reflect CBDR-RC
- iii. be flexible and take in to account national circumstances and development priorities and objectives.
- iv. use the most recent IPCC guidelines/guidance.

***B. What should be the purpose of the guidance for accounting for NDCs under this agenda item?***

The aim of the guidance for accounting is not to alter the nationally determined character of Parties’ NDCs. The guidance for accounting must consider different features, components and types of NDCs, and it must also reflect the principles of CBDR-RC. The guidance for accounting for mitigation contributions of Parties should conserve the nature of differentiated NDCs of developed and developing countries as mentioned in Article 4.4. The purpose of the guidance on accounting is to promote the application of common metrics.

***C. What is the relationship, if any, between guidance for accounting for NDCs under this sub-item, and further guidance on sub-items 3(a) and 3(b)?***

The guidance on accounting should be organized individually from sub-items 3(a) and 3 (b), since the guidance on accounting is moderately different from them.

***D. How can Parties draw from existing approaches under the Convention and its related legal instruments?***

The Kyoto Protocol under the Convention lays a basis for the work on accounting with arrangements, modalities and methodologies on mitigation. Further work should be on how the existing arrangements could be improved. Developed countries could help developing countries by sharing their experiences and practices on applying the guidance on accounting Convention and its Kyoto Protocol.

***E. How could the work under this sub-item be usefully structured and progressed?***

The work under this sub-item should preface with common understanding of the word “accounting” and the disambiguation of purpose of the accounting under the Paris Agreement. The assessment and identification of current approaches under the Convention, its Kyoto Protocol and its related legal instruments could be step up for developing further guidance on accounting. Different types of NDCs by parties should be identified and classified, and then the guidance should be developed taking into account the different accounting approaches and parameters existing in NDCs. The relation with the transparency framework should be identified. The conditional part of NDCs should be considered throughout identifying the elements of further guidance on accounting.

***F. What issues should be discussed and resolved under this sub-item?***

- i. Common understanding of the word “accounting” under the Paris Agreement;
- ii. Purpose of the accounting;
- iii. Understanding the provisions of the Paris Agreement and relevant guidance on accounting in decision 1/CP.21;
- iv. General principles for the guidance for accounting, including differentiation and flexibilities to Parties in applying the guidance;
- v. Existing rules, procedures and experience under the Convention and its Kyoto Protocol;
- vi. Support component of NDCs, including finance, (informed by negotiation under paragraph 57 of decision 1/CP.21 and joint consultation if needed), technology development and transfer and capacity-building (joint consultation with relevant items under the SBI/SBSTA).