

Submission to the SBSTA: General Guidelines for Domestic MRV of developing country Nationally Appropriate Mitigation Actions

This submission is made jointly by the following Umbrella Group countries: Canada, Japan, New Zealand¹, and the United States.

General Overview of Domestic MRV

What is Domestic MRV?

For the purposes of our work under the SBSTA, Domestic MRV refers to measurement of emissions/removals or other performance metrics of nationally appropriate mitigation actions, reporting on those outcomes, and domestic verification of the emissions/removals or other metrics.

Why is Domestic MRV important?

- MRV is a critical component of an effective policy framework by enabling the identification of significant actions and interventions
- Entities can only manage what they measure, which makes domestic MRV an essential piece of setting and tracking progress towards domestic goals and priorities
- The development of accurate, consistent and transparent data on GHG emissions is key to monitoring progress in reducing emissions as well as to help inform and direct the development of emission reduction programs and policies.
- Robust policy tracking through collection of emission/removal data or performance metrics can help inform future policy making and decision making around use of resources

Lessons Learned in Provision of Technical Assistance on MRV in Developing Countries

- A critical foundation for regular reporting is establishing clear and well-defined procedural, legal and institutional arrangements to ensure the compilation of national (regional, sectoral, etc.) emissions / removal estimates. To be most effective, these arrangements and removals (e.g. roles should contain the following elements; clear and well defined roles and responsibilities for the preparation of the estimates (both internally and externally), a quality assurance / quality control plan, a working archive system, and a description of the process of collecting data and developing estimates.
- Related to institutional arrangements, commitment from senior management and decision makers – including formal agreements among ministries/other stakeholders concerning data collection and sharing processes, where necessary – is essential to ensure that the relevant government institutions are dedicated and have clear responsibilities for overseeing compilation and management of emission information.

¹ New Zealand supports this joint submission as it is complementary to its individual submission of 25 March 2013.

- “MRV systems” should have procedures for documentation of the methodologies, QA/QC of data, and retention and archiving of data and information to ensure that emissions/removals data is transparent, reproducible and facilitates domestic review and verification.
- Establishing and maintaining partnerships, ranging from informal to formal arrangements as well as regular outreach with data providers, expert contributors, industry associations, consultants, universities, other government agencies and so on, is critical to ensure support and also long-term commitment.

Rationale for UNFCCC Guidelines:

- While many developing countries already have a form of domestic MRV in place, it is still important and worthwhile to disseminate the existing practices and common elements of domestic MRV among those countries to ensure best practice, and maximize opportunities for lessons learned in domestic MRV.
- Additionally, we believe that the convening power and political importance of the UNFCCC can be a useful tool in broadening the discussion of best practices in domestic MRV.
- Even though domestic MRV practices will vary widely from country to country and across mitigation actions, a knowledge base on the important elements of MRV is a useful tool for Parties to discuss and have available for developing and improving domestic MRV systems.

UNFCCC Guidelines for Domestic MRV for Developing Countries

- Guidelines should be, “general, voluntary, pragmatic, non-prescriptive, non-intrusive and country-driven, take into account national circumstances and national priorities, respect the diversity of nationally appropriate mitigation actions, build on existing domestic systems and capacities, recognize existing domestic measurement, reporting and verification systems and promote a cost-effective approach.”
- Just as diverse national circumstances and capacities among Parties lead to a wide range of potential mitigation actions, so too will the nature and extent of domestic MRV vary. There is, however, best practice to draw from to help Parties to establish or improve domestic MRV procedures
- We consider that any general guidelines developed by the COP would be just that, general. We do not consider that such guidelines would be in any way intrusive with respect to domestic policy. Instead, we believe that concise, general guidelines could lay out the basic features that would contribute to a robust and reliable system for domestic MRV.
- To the extent that mitigation actions are underway or proposed, either separately or as part of a low emission development strategy, and that Parties are considering how best to track the effectiveness of those actions in accordance with COP decision 1/CP.16, these guidelines can serve as a useful knowledge base for the development of a domestic MRV system.

Annex I

Draft Guidelines

I. Applicability

These guidelines are intended for the use of all Parties not included in Annex I of the Convention (hereinafter "Parties"). The provisions of these guidelines are general, voluntary, pragmatic, non-prescriptive non-intrusive and country-driven, take into account national circumstances and national priorities, respect the diversity of nationally appropriate mitigation, build on existing domestic systems and capacities, recognize existing domestic measurement, reporting and verification systems and promote a cost-effective approach, and be implemented accordingly.

II. Definition

Domestic MRV is the process/manner by which Parties measure emissions/removals or other performance metrics of nationally appropriate mitigation actions, report on those outcomes, and domestically verify the emissions/removals or other metrics.

III. Objectives

The objectives of guidelines for Domestic MRV under the Convention are:

- (a) To provide guidelines on the basic elements for domestic MRV systems to assist Parties in the development and implementation of their domestic MRV system;
- (b) To promote best practice in measurement, reporting and verification of domestically supported nationally appropriate mitigation actions;
- (c) To assist Parties to enhance their MRV capabilities

IV. General Institutional Structure

In the creation of a Domestic MRV system, Parties are encouraged to:

- (a) Establish and maintain the institutional, legal and procedural arrangements necessary to collect source data and perform the functions necessary to monitor nationally appropriate mitigation action effectiveness and complete reporting requirements under the Convention
- (b) Link their national greenhouse gas inventory with policy development tracking to ensure a coordinated approach to mitigation actions.
- (c) Ensure sufficient capacity of entities and competency of staff engaged in domestic MRV

V. General Procedures

Parties are encouraged to establish the following general procedures to optimize limited resources for domestic MRV:

- (a) Designate a single entity responsible for overall coordination of Domestic MRV
- (b) Assign roles and responsibilities for implementation of Domestic MRV system, including identifying entities responsible for collection and management of source/relevant data

- (c) Construct timelines and work plans that include all stages of MRV and ensure sufficient time and resources such that entities can follow best practice
- (d) Collect sufficient activity data, process information and emission factors, and/or other metrics (source/relevant data) as are necessary to support the quantification of emissions and removals, to track the impact of the implementation of emission reduction activities, and to subsequently verify the method chosen and its reported impact.
- (e) Measure emissions/removals or other performance metrics of nationally appropriate mitigation actions, evaluate progress of those actions and feed back to the development of enhanced nationally appropriate mitigation actions and needs of support.
- (f) Consider ways to improve quality of data and process, taking into account outputs of QA/QC processes outlined below, and outputs of any analysis processes under the Convention

VI. General Methodology

While specific methodologies conform to the type of mitigation action measured and national circumstances, Parties are encouraged to:

- (a) Endeavor to implement IPCC Guidelines where applicable and useful in the collection, management and formulation of data
- (b) Identify whether the most useful performance indicator for tracking the action is greenhouse gas emissions/removals or a different metric
- (c) Establish standardized reporting formats across action implementers to ensure national level comparability of results
- (d) Use scientifically sound methods that ensure accuracy and precision of results, and that are verifiable

VII. Quality Assurance and Quality Control (QA/QC)

Parties are encouraged to engage in regular QA/QC to ensure accuracy and improve MRV practices over time by establishing a QA/QC plan that describes specific procedures to be implemented during the MRV process, taking into account relevant IPCC guidelines. The QA/QC plan may include following elements:

- (a) peer or technical review of source data and methodologies, and provisions for public and/or relevant stakeholder input and review if applicable
- (b) Identification and review indicators that are capable of “verifying” results (e.g., total energy use or production volume of targeted entity)
- (c) routine quality control (QC) checks of activity data, calculations, emission factors, other estimation parameters and methods and create procedures for correction if check identifies errors;
- (d) process for integrating outcomes of QA/QC processes into future MRV systems to continue to improve domestic MRV

VIII. Reporting

In conducting a domestic MRV system, Parties are generally encouraged to:

- (a) Create a process for reporting information to relevant audiences in a way that is transparent, consistent, complete and made available to the public
- (b) Report with sufficient regularity, such that necessary policy adjustments or enhancements can be made in line with outcomes from MRV process

IX. Updating the Guidelines

These guidelines shall be reviewed and revised, as appropriate, by consensus in accordance with decisions of the COP, taking into account any relevant decisions.