

Submission by Saudi Arabia Views on the Fully Operational Prototype of NAMA Registry

Saudi Arabia welcomes the opportunity to submit its views and comments on the fully operational prototype of the NAMA registry in line with decision 16/CP.18, which invites parties and entities to submit to the secretariat their views on matter included in paragraph 9 of the decision before the thirty eight session of the Subsidiary Body for Implementation.

Saudi Arabia recalls the need to hold on the principles of NAMA for developing country parties that are mentioned in Cancun Agreement decision 1/CP.16 which are as follow:

- NAMA for developing country parties in the context of sustainable development supported and enabled by technology, financing and capacity building
- Ensure voluntarily participation of NAMA for developing country parties who wish to inform the secretariat about their NAMAs.

Saudi Arabia also recalls the notes that stated in the manual of NAMA Registry on matters relating to the participation and usage of the Registry, which are as follow:

- Participation in the registry is voluntary.
- Participation in the registry is not a requirement to receive or provide support.
- The registry is not a system for formally reporting on proposed actions. The decision on what information to upload and what level of accuracy to use is entirely in the hands of users.
- There are no requirements to verify the information will be recorded in the registry. Hence, the responsibility for the quality and accuracy of the information lies within the entity responsible for the approval of this information.

The manual provides good guidelines for the NAMA registry prototype. However, there are specific areas of the manual that need to be modified to meet Saudi Arabia expectations. These modifications are as follow:

- **Access rights for the prototype of the NAMA registry** (Stated on Page 9)
 - **Comment:** It is important to recognize that the host party NAMA approver should be the entity responsible for approving any information related to the NAMA for that particular country. This would mean that the final approval authority for all NAMA activities submitted by the developer as well as support editor should be their responsibility. Therefore, the access rights for the Support editor must be treated accordingly and changed to be “Access rights for NAMA Support editor are granted by NAMA approver via registry. They can include

ministries, bilateral cooperation, multilateral and regional development banks, private and public banks and funds, foundations or others”.

- **Estimated Emission reductions**

- **Comment:** in the manual stated under estimated emission reductions that the baseline is constructed as projection of historical emission. We would like to stress the need that the baseline must include in addition to historical emissions, the future economic diversification plans along with projection of historical emissions.

- **Economic Diversification entry**

- **Comment:** Saudi Arabia would like to include economic diversification entry in the registry under “Relevant National Policies strategies, plans and programmes and/or other mitigation action” which will help countries with limited sources of income to raise their resilience to impact when they are diversifying their economies in the future.