

## **Submission of the United States of America**

### **Agenda item 3.2.2 - Possible elements of draft decision for adoption of the guidelines for biennial reports of developing country Parties**

Comments to be included in the draft text are included below by section:

- One principal comment that should be reflected throughout the text is the deletion of the word “update” when referring to biennial reports. In Cancun Parties agreed to submission of biennial reports, a biennial report coinciding with the full national communication, and a biennial update report in the intervening years. These guidelines should apply consistently across reporting, and guide the preparation of information for all biennial reporting. Therefore, the guidelines themselves should be titled “Guidelines for Biennial Reports”, and the word “update” should be bracketed wherever it appears.

#### **Section I. Possible elements of draft decision for adoption of guidelines for biennial reports from developing country Parties**

- Insert new paragraph before paragraph 1: “Adoption of the guidelines as contained in an annex to this decision.”
- Delete paragraph 4 – the frequency of submission has already been agreed, given that the name of the report clearly indicates that the frequency of submission is biennial, once every two years.
- Insert new paragraph after paragraph 6: “Decision to revise the guidelines to reflect the experience with reporting and review and of any further reporting requirements no later than [].”
- Insert new paragraph after the above paragraph: “Decision that the SBI will revise the national communication guidelines to include the annexed guidelines for biennial reports, as a standalone element within the national communications, to ensure consistency in reporting, for adoption at COP18.”

#### **I. Introduction**

- Paragraph 2: There are significant flexibilities built in to the various provisions of the biennial report guidelines which will account for the range of different capabilities of Parties implementing these guidelines, including many non-mandatory elements and through use of the IPCC guidelines which incorporate a flexible, tiered approach. Some elements of the guidelines should, however, be mandatory. Therefore this paragraph, which would allow for Parties to use absolute discretion in implementing these guidelines, is not appropriate or necessary, and we would support its deletion.
- Paragraph 4 - The scope of biennial reports is the elements described in 1/CP.16 paragraphs 60(c) and 64, so this paragraph should be edited as follows: “The scope of biennial reports is to provide information in the following areas:

- Paragraph 4(b) should be revised to more accurately reflect paragraph 64, as follows:  
“Information on mitigation actions, including a description, analysis of impacts, and associated methodologies and assumptions, and progress in implementation;” This would enable deletion of paragraph 4(c).

## II. National greenhouse gas inventory

- Paragraph 5: All Parties that submit a biennial report must include a national GHG inventory. The national inventory guidelines published by the IPCC have built in considerations of capacity, including various tiers to account for Parties with limited capacity, so the following language is not appropriate to include here and should be deleted: “to the extent [of the provision of funds from developed country Parties], and its capacities permit.”
- Paragraph 6: This paragraph should make clear the year for which all Parties should submit inventory data for each biennial report. A formulation of N-2 or 3 allows for subsequent biennial reports to provide guidance beyond a single year (as in 2010). For additional flexibility, Parties with less than 1.0% of global emissions should submit a year at their discretion for the first biennial report, but no more than N-4 or 5, and should submit N-2 or 3 in subsequent biennial reports.
- In paragraphs 7 and 8, the word “should” should be replaced with “shall.”
- Paragraph 9: All Parties must use the IPCC guidelines and Good Practice Guidance as a mandatory element,” though flexibility is shown in allowing for some Parties to continue using 1996 guidelines. This paragraph should be combined with paragraphs 12 and 13 to form a single paragraph that reads: “Non-Annex I Parties shall use the IPCC Guidelines and 2000 and 2003 Good Practice Guidance for estimating and reporting their updated national GHG inventories.”
- Paragraph 14 – this was required by paragraph 60(c) of Decision 1/CP.16 and so should be a mandatory element, with “shall” instead of “should.”
- Paragraph 15 should be amended to read; “Non-annex I Parties are encouraged to use the 2006 IPCC Guidelines.”
- It seems that paragraphs 16-23 would all be covered if a Party uses IPCC guidelines and UNFCCC reporting tools. It seems unnecessary to include this language, but if it is included we would suggest it be edited as below.
- Paragraph 18 should be amended to read: “Each non-Annex I Party, depending on its capacity and the significance of a gas should also provide in its national inventory, on a gas-by-gas basis and in units of mass, estimates on the following greenhouse gases: perfluorocarbons (PFCs) hydrofluorocarbons (HFCs) and sulphur hexafluoride (SF6).
- Paragraph 21 may be deleted as its content is included in paragraph 14.
- Paragraph 22: All Parties currently must collect the information necessary for filling in the IPCC sectoral tables (or the UNFCCC inventory software tool tables) for completing their current national inventories as part of national communications. This tabular information must be included in biennial reports in order to provide enough of the underlying information to understand the emissions inventory. It requires no additional effort on the part of the country to report this information once it is collected domestically. This paragraph should make clear that

reporting using the full set of IPCC sectoral tables (or UNFCCC reporting software tables) is a mandatory element, as follows: “Non-Annex I Parties shall include in their biennial update reports the inventory sectoral tables and worksheets of the IPCC, in electronic format.”

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### III. Mitigation actions

- We have a very strong preference for Option 1. Option 2 reverts back to antiquated and insufficient language from the national communications guidelines that are over a decade old. It does not contain the key elements we agreed to in 1/CP.16 and so is not a realistic basis for this important section.
- The following elements of paragraph 25 should be mandatory elements (reflected by using “shall” rather than “should”, as they relate directly to the content of 1/CP.16: sub-paragraphs a, b, c, f and g. The other sub-paragraphs could be optional reporting elements and should be contained in a separate paragraph. So, the chapeau to paragraph 25 should read: “For each mitigation action or suite of mitigation actions, including those actions contained in document FCCC/AWGLCA/2011/INF.1, non-Annex I Parties shall provide the following:”
- Paragraph 25(a): “Name and description of the mitigation action, including up-to-date information on the nature of the action, [base year] [start date and time frame], coverage (i.e. sectors and gases), quantitative goals and progress indicators, including a description of any parameter against which emissions are indexed (such as BAU or GDP);
- Paragraph (b) should be amended to read: “Objectives of the action and specific policies and measures to achieve that action;”
- Paragraph (c) should be revised to slightly to read: “Up-to-date information on the progress of implementation of the mitigation actions listed in FCCC/AWGLCA/2011/INF.1 and the underlying policies and measures, and the results achieved, such as estimated outcomes (metrics depending on type of action) and estimated emissions reductions, to the extent possible. Highlight whether the policy or measure is in the planning stage or is adopted or whether it is under implementation;
- Paragraph 25(g) should be moved up to follow after paragraph 25(a), as the information contained in each is directly related.

### IV. Financial, technological and capacity-building support

- Paragraph 26 – ‘Non-Annex I Parties shall also provide up-to-date information on public financial resources received.’
- Add a Paragraph 27bis – ‘To the extent possible, Non-Annex I Parties should also provide up-to-date information on private finance resources received, including carbon market finance.’

Suggested common reporting formats:

<b>Introduction</b> – include funding priorities, overview of recent support received, modalities for processing/managing support (e.g. via a national climate fund). Could include brief summary table based on tables below									
<b>Financial support</b> - Details on financial support received, broken down by theme – mitigation, adaptation, REDD+									
Financial flows/support	Donor (govt, int'l entity or fund)	Amount (Total USD and in natl currency)	Timeframe	Principle focus of funding (mit, ad, general, etc)	Public finance flows (separate out ODA from OOFs)	Channel (bilat, multilat)	Private flows (if appropriate)	Specific purpose of funding (e.g. NAMA support, etc)	Proposed outcome
<b>Other support (technology, capacity building)</b> - Technology and capacity building support received, broken down by mitigation, adaptation, REDD+									
Type of support received	Donor (govt, int'l entity or fund)	Timeframe	Principle focus of support (mit, ad, REDD+)				Specific purpose		
<b>Support needs</b> – Descriptive list, specifying type of support (ie, finance, technology, capacity building), sector or cross-cutting, etc									
Activity needing support	Amount needed (USD and natl currency)			Specific type of support requested			Funding amount broken down by preferred type		
				Cash, GBS, tech, training, etc			Loan, grant, in-kind, private, carbon market		