

Submission from Singapore to the Ad-hoc Working Group on Long-term Cooperative Action under the Convention (AWG-LCA) relating to Facilitative Arrangements
Agenda Items 3.2.1 and 3.2.2

This submission is prepared as a follow-up to the discussions at the Panama session of the AWG-LCA in October 2011 on the invitation to Parties to make textual submissions in response to the co-facilitators' draft non-papers on the items relating to a work programme for the development of modalities and guidelines listed in document FCCC/AWGLCA/2010/L.7 on Nationally Appropriate Mitigation Commitments or Actions by developed country Parties (Agenda 3.2.1) and on Nationally Appropriate Mitigation Actions by developing country Parties (Agenda 3.2.2).

Proposed Amendments to Non-paper by the co-facilitators on possible elements of draft guidelines for biennial update reports from Parties not included in Annex I to the Convention (172 kB) (version of 14 October 2011 at 16:30)

Para	Suggested Amendments	Remarks
3	<i>Invitation to the GEF and to Annex II and other Parties developed country parties and other developed country Parties in Annex II for provision of support for preparation of biennial update reports</i>	Amended to reflect Convention language.
1	Parties not included in Annex I to the Convention (non-Annex I Parties) shall submit reports on biennial basis as a component of their national communication and biennial update reports in years which Parties are not required to submit their national communications . Least Developed Countries (LDCs) and Small Island developing States (SIDS) may submit biennial update reports at their discretion	Current formulation seems to apply that two separate reports are needed in years when Parties submit their national communications.
2	Non-Annex I Parties will implement these guidelines consistent with their capabilities and the level of support provided by developed country Parties .	
3 (c)	To facilitate provision of information on mitigation actions, and their effects.	To delete 3(c) and combine with revised 3(f) below, taking reference from para 60 of 1CP/16.
3 (d)	To facilitate the presentation of information on finance, technology and the capacity building support required [and received] for the preparation of biennial update reports	The presentation of information on support received and required is not limited to only information on support for the preparation of biennial update reports.
3 (f)	To enable enhanced reporting by non-Annex I	To be amended to take reference

	Parties on mitigation actions and their effects, and support received, with additional flexibility to be given to the least developed country Parties and small island developing states. in accordance with their capacities and respective capabilities, and the availability of support	from para 60 of 1/CP.16.
7	Non-Annex I Parties which have not previously reported on their national greenhouse gas inventories should submit summary information tables of previously reported inventory or inventories for previous submission years (for example for years 1994 and 2000)	Reporting on previously reported data should only be necessary for Non-Annex I Parties who have not previously reported on their national greenhouse gas inventories.
26	Non-Annex I Parties [shall] [should] also provide up-to-date information on financial resources, technology transfer, capacity-building, and technical support received from the Global Environment Facility (GEF), Annex II Parties, any other Parties, developed country parties and other developed country Parties in Annex II, or bilateral and multilateral institutions, for activities relating to climate change and related financial, technical and capacity building needs, including for the preparation of the current biennial update report. The information should be based on the most recent information available and should cover two more recent years since the submission of the last report	Amended to reflect Convention language.
4 (f)	[Information on domestic measurement reporting and verification]	Reporting on domestic MRV system goes beyond the scope of the BUR.

Non-paper by the co-facilitators on possible elements of modalities and procedures for international consultation and analysis (version of 14 October 2011 at 16:30).

Para	Suggested Amendments	Remarks
1 (b)	To increase the transparency of [domestically funded] nationally appropriate mitigation actions of developing country Parties [supported by developed countries] [and their effects] and the financial, technological and capacity-building support provided by developed country Parties.	The ICA is an integral part of the MRV of support. The biennial update report includes information on support received and the ICA should be able to verify this information.
1 (e)	To promote continuous learning and improvement in implementing mitigation actions	Objective 1(e) is a repetition of 1(d)

Para	Suggested Amendments	Remarks
1 (g)	To assist Parties in addressing identifying technical difficulties faced in preparation of the biennial [update] reports and to provide recommendations, upon request, on how Parties may improve subsequent biennial update reports.	The current text seems to imply that the technical panel of experts will help to solve the technical difficulties faced by Parties. It would be more realistic to limit the scope of recommendations to how Parties may improve subsequent reports.
2 (b)	2(b) alt. To take note of a Party's mitigation actions and check if these mitigation actions are effective in achieving their objective(s) based on information submitted in the biennial update reports.	It would be difficult for the technical panel of experts to analyse whether Parties' actions are implemented based on information submitted by Parties alone. Instead, the experts should focus on checking for accuracy and/or completeness of information submitted.
4	4 (alt) Facilitate the universal participation of developing country Parties in the ICA process, through the provision of support by developed country Parties, and taking into account specific national and sectoral circumstances, and with additional flexibility to be given to the least developed country Parties and small island developing states. Prioritize the ICA process for all developing country Parties that submit biennial [update] reports in the first round of reporting. In subsequent rounds of biennial [update] reporting, frequency of the ICA process could be differentiated based on the frequency of submission of biennial [update] reports, which could be based on a Party's [share of global GHG emissions][strong progress in implementation of mitigation actions or recently updated biennial report] and their capabilities. SIDS and LDCs may undergo ICA as a group of Parties at their discretion.	Amendment to reiterate the principle of universal participation, drawing reference from para 3(b) of the draft BUR guidelines, and acknowledging the need for additional flexibilities for LDCs and SIDS. The proposal to introduce criteria for differentiation among developing country Parties will be contentious and may delay the implementation of the ICA process.
11	Two to three experts, of which at least one will be from a non-Annex 1 country and one from an Annex I country will focus on the analysis of national GHG inventories.	It is not clear why there is a need to stipulate the number of experts to focus on analysis of national GHG inventories. Nonetheless, if the decision is to do so, the number of experts

Para	Suggested Amendments	Remarks
		should be even numbers, with equal representation from Annex I Parties and Non-Annex I Parties.
13	Where necessary, experts will be authorized may request to meet directly with Party representatives, request additional documentation or information from the Party and, where consent is given, conduct in-country visits, as necessary.	Given that the ICA process should be conducted in consultation with the Party concerned, there is value in allowing the experts to meet with Party representatives. However, the reference “will be authorized” is inappropriate and it is not clear whose authorisation would be provided. In line with respecting a Party’s national sovereignty, it would be more appropriate to use the reference “may request”.
15	The output of the technical analysis by the technical experts team will be an analysis report. Prior to finalizing the report, the draft analysis report prepared by the expert team will be shared with the Party concerned for review and comment with the aim of resolving any difference of opinion between the expert teams and the Party on the report. The final analysis report, incorporating comments from the Party, should be made available at least two, and preferably four, weeks before the next session of the COP-SBI	The ICA process is conducted under the SBI.

Non-paper by the co-facilitators on Registry (version of 14 October 2011 at 16:00)

Para	Suggested Amendments	Remarks
2	The registry will be developed as a dynamic, user-friendly web-based searchable platform that facilitates matching of support to individual mitigation actions and recognizes recorded nationally appropriate mitigation actions by recording them in a section of the registry upon request.	The recognition function of the registry is accomplished by recording the NAMAs in a section of the registry.
7	Option 2 ¹ (option to paragraph 7)	The registry should be flexible enough to capture the diversity

¹ Paragraph 40 of annex to the decision 17/CP.8

	<p>A separate part of the registry will record the following information on [domestically funded] [domestically funded and internationally supported] mitigation actions submitted by developing country Parties for the purpose of their recognition, upon the request by developing country Parties. Based on national circumstances, non-Annex I Parties are encouraged to provide, to the extent their capacities allow, information on programmes and measures implemented or planned² which contribute to mitigating climate change by addressing anthropogenic emissions by sources and removals by sinks of all GHGs not controlled by the Montreal Protocol, including, as appropriate, relevant information by key sectors on methodologies, scenarios, results, measures and institutional arrangements.</p>	<p>of developing country Parties' mitigation actions and should not dictate the types of information developing country Parties may wish to submit.</p> <p>Proposed text takes reference from paragraph 40 of Annex to decision 17/CP.8 (guidelines for NatComms for Non-Annex I parties)</p>
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Non-paper by the facilitator on possible elements of draft guidelines for biennial reports of developed country Parties (version of 14 October 2011 at 17:00)

Para	Suggested Amendments	Remarks
7 (a)	<p>The emission reduction target expressed as a per cent reduction in emission levels, the base year and base year level of emissions against which the per cent emission reduction is set, the methodology used for its calculations, the year in which the target is to be achieved [, emission reduction trajectory and target converted into quantified emission limitation and reduction and assigned amount], [if applicable]</p>	<p>To allow for comparability.</p>
27	<p>Developed country Parties shall provide information on their provision of financial, technological and capacity-building support to developing country Parties in a complete, consistent, transparent, accurate and comparable manner. In reporting such information, to the extent possible, Parties should distinguish between support provided for mitigation activities, adaptation activities and other activities (such as capacity-building).</p>	<p>To increase transparency and comparability of financial, technological and capacity-building support.</p>
32	<p>[In reporting information, in accordance with paragraphs 30 and 31, Parties can categorize funding as related to mitigation or adaptation</p>	<p>To increase the transparency and comparability of reported information</p>

² Such as measures being considered by the government for future implementation

	according to the criteria [to be agreed by the Conference of the Parties][developed by the Organisation for Economic Co-operation and Development.s Development Assistance Committee (DAC)]. Parties should use the DAC codes for categorizing support by specific sectors. If Parties decide to categorize funding using a different methodology, they shall specify such methodology in their biennial report.	
32	bis Each developed country Party shall specify whether the financial contributions reported at the time of submission of the biennial report are pledged/planned, committed, allocated by a national governing body, or disbursed to the recipient.	To facilitate transparency on the status of developed country Parties' financial contributions.

Non-paper by the facilitator on possible elements of modalities and procedures for international assessment and review (version of 14 October 2011 at 17:00)

Para	Suggested Amendments	Remarks
1 (e)	To build confidence that the implementation of mitigation actions of developed country Parties are in line with their quantified economy-wide emission reduction targets	Similar to 1(g)
2 (c)	To promote ensure accuracy, completeness, comparability, consistency and transparency in the review of information	
3 (c)	To facilitate the [consideration of][review] comparability of effort among developed country Parties.	The IAR aims to facilitate comparability of effort among developed country Parties.
4 (b)	[An [assessment][review] of developed country Parties' implementation of the Convention, and for promoting compliance by developed countries Parties with their commitments under the Convention, which is conducted under the auspices of the Subsidiary Body for Implementation;]	To reflect similar language in the Decision 24/CP.7 (Procedures and mechanisms relating to compliance under the Kyoto Protocol)
5	IAR will [review][assess] and [assess][review] based on building upon the existing review process] for each developed country Party the following:	The IAR should be an enhancement on the current review process.
14d	<i>Additional bullet 14(d)</i> Additional information/ answers provided by the Party before or during	These inputs should also be considered as part of the

	the Review.	outputs of the review.
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