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SUBSIDIARY BODY FOR IMPLEMENTATION

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Item 3 (d) of the provisional agenda

**NATIONAL COMMUNICATIONS FROM PARTIES NOT INCLUDED IN
ANNEX I TO THE CONVENTION**

**FREQUENCY OF SUBMISSION OF SECOND AND, WHERE APPROPRIATE,
THIRD NATIONAL COMMUNICATIONS**

**Frequency of submission of second and, where appropriate, third national communications
from Parties not included in Annex I to the Convention**

Submissions from Parties

Addendum

In addition to the submissions included in document FCCC/SBI/2003/MISC.10, one further submission has been received. In accordance with the procedure for miscellaneous documents, this submission is attached and reproduced* in the language in which it was received and without formal editing.

* This submission has been electronically imported in order to make it available on electronic systems, including the World Wide Web. The secretariat has made every effort to ensure the correct reproduction of the text as submitted.

PAPER SUBMITTED BY JAPAN

Submission on the frequency of national communications from non-Annex Party submission

Government of Japan

The Government of Japan welcomes this opportunity to submit its view on the frequency of submission of second, and where appropriate, third national communications from non-Annex I Parties and on their experience with the GEF of its implementing agencies in relation to the preparation of national communications. Submission of national communications from both Annex-I and non-Annex I Parties is one of the most important implementations towards the achievement of the objective of the Convention. It seems that national communications contribute to not only international progress on the implementation of the Convention but also improvement of domestic policies and measures.

Japan has submitted its national communications three times so far. In the process of drawing up them, we have been able to review our progress on its whole climate change policies. From this point of view, Japan submits comments on the frequency of national communications from non-Annex I Parties. We hope this comment will contribute to effective implementation of the Convention.

Japan is of the view that it is necessary that the second, and where appropriate, third national communications from non-Annex I Parties are submitted not too later than January first 2006, when fourth national communications from Annex I Parties should be submitted. This will make it easy to compare and analyse national circumstances as to climate change in both Annex-I countries and non-Annex I countries, and to know how the convention is implemented from the global viewpoint, and to find the way to address climate change in terms of both adaptation and mitigation.

At the same time, however, the capability of the non-Annex-I Parties' submission should also be considered, bearing in mind that the new guideline for the second national communications from non-Annex I Parties has only recently been made at COP 8.

Article 12 paragraph 5 of the Convention gives non-Annex-I Parties three years to submit its initial national communications after the entry into force of the Convention for these Parties. Preparation of the second national communications, however, is likely to require relatively less cost and time, compared with the first ones, given existing resources including capable staffs organized to make the first submissions. Besides, too long span could make it hard to maintain the capability of those systems or even cause breakup of those resources.

Consequently, Japan believes that the second national communications need to be submitted no later than 3 years from the COP 9. As for the Least Developing Countries, taking its discretion into consideration, it is required to submit them no later than four years from COP 9.

Japan welcomes the effort of 112 out of 148 non-Annex I Parties, including those who have the intention to submit within this year, have submitted their initial national communications as indicated in FCCC/SBI/2003/INF.1. Japan strongly hopes that the non-Annex-I Parties that have not yet submitted them will do so as soon as possible.

Japan recognizes the significance of the financial and technical support provided by GEF, and the technical advice and support provided by the Consultative Group of Experts (CGE) in order to enable non-Annex-I Parties to make out the second national communications covering the requirements of the new guideline. Japan expects that GEF provides non-Annex I Parties with necessary financial and technical support in a timely manner so as to enable them to submit the second national communications along with the timetable mentioned above.
