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UNITED NATIONS FRAMEWORK CONVENTION ON CLIMATE CHANGE

**Ad Hoc Working Group on Long-term Cooperative Action
under the Convention**

Fourteenth session

Bangkok, 5–8 April 2011, and Bonn, 6–17 June 2011*

Item 3.2.1. of the agenda

**Nationally appropriate mitigation commitments or actions by developed
country Parties**

**Views on the items relating to a work programme for the
development of modalities and guidelines listed in
decision 1/CP.16, paragraph 46**

Submissions from Parties

Addendum

1. In addition to the seven submissions contained in document FCCC/AWGLCA/2011/MISC.6 and five in document FCCC/AWGLCA/2011/MISC.6/Add.1, two further submissions have been received.
2. In accordance with the procedure for miscellaneous documents, these submissions are attached and reproduced** in the language in which they were received and without formal editing.

* The second part of the fourteenth session of the Ad Hoc Working Group on Long-term Cooperative Action under the Convention will be held in conjunction with the second part of the sixteenth session of the Ad Hoc Working Group on Further Commitments for Annex I Parties under the Kyoto Protocol and the thirty-fourth sessions of the Subsidiary Body for Implementation and the Subsidiary Body for Scientific and Technological Advice.

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FCCC/AWGLCA/2011/MISC.6/Add.2

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* This is a revised version of, and replaces, the submission from the Republic of Korea contained in document FCCC/AWGLCA/2011/MISC.6/Add.1.

**Submission by Grenada on behalf of the
Alliance of Small Island States (AOSIS)**

Views on matters relating to a work programme for the development of modalities and guidelines listed in document FCCC/AWGLCA/2010/L.7, paragraph 46, including with respect to the initial scheduling of the processes described in section III.A

April 2011

Section III.A – Nationally appropriate mitigation commitments or actions by developed country Parties

Grenada welcomes the opportunity to present views on behalf of the forty three (43) members of the Alliance of Small Island States (AOSIS) on the items relating to a work programme for the development of modalities and guidelines listed in document FCCC/AWGLCA/2010/L.7, paragraph 46, including with respect to the initial scheduling of the processes described in section III.A.

I. Mandate

In Cancun, by decision 1/CP.16, the Parties agreed to *enhance Annex I Parties' reporting* in national communications on mitigation targets and on the provision of finance, technology and capacity building support, building upon existing reporting and review guidelines, processes and experiences (para. 40), through biennial reports, the submission of supplementary information on the achievement of quantified economy-wide reductions, and improvement of reporting on the provision of support. Parties further agreed to *establish a process for international assessment* of emissions and removals related to quantified targets to promote comparability and build confidence (para. 44), and decided that developed countries should establish *national arrangements* for the estimation of emissions and removals (para. 43) and develop *low-carbon development plans* or strategies (para. 45).

Paragraph 46 of decision 1/CP.16 decides upon a work programme for the development of modalities and guidelines for enhanced reporting and review, to include:

- Revision of guidelines, as necessary on the reporting of national communications, including the biennial report: (1) on the provision of financing, through enhanced common reporting formats, methodologies for finance and tracking of climate-related support; (2) supplementary information on achievement of quantified economy-wide emission reductions targets; and (3) information on national inventory arrangements;
- Revision of guidelines for the review of national communications, including the biennial report, annual greenhouse gas inventories and national inventory systems;

- Establishment of guidelines for national inventory arrangements;
- Modalities and procedures for international assessment and review of emissions and removals related to quantified economy-wide reductions targets in accordance with paragraph 44, including the role of land use, land-use change and forestry, and carbon credits from market-based mechanisms, taking into account international experience.

II. General Views on reporting and review

The pledges put forward by Annex I Parties following Copenhagen use *different* base years, *different* assumptions on the use of the mechanisms and *different* assumptions with respect to methodologies for accounting for emissions and removals from the LULUCF sector. This frustrates efforts to assess progress toward global goals, as well as the transparency and comparability of these pledged targets and of individual country mitigation efforts.

It is essential that the scale of emission reductions that the environment sees from Annex I Party pledges in aggregate, and from individual country mitigation efforts, be transparent and comparable. This requires that these pledged targets be understood using *common base years and methodologies*.

The goal of enhanced reporting should be to produce inventories that are *more transparent, more consistent, more readily comparable, more complete and more accurate* (TCCCA) than they are under current Annex I reporting guidelines.

The base year under the Convention is **1990** and no Party has proposed amending the Convention to alter this base year; hence to ensure consistency, completeness and accuracy, 1990 must remain the base year for the reporting and estimation of emissions for all Annex I Convention Parties other than for those economies in transition that report according to a more flexible historic reference year. All Parties' national inventories should report on *all gases* listed in the IPCC's Fourth Assessment Report, including the new gases identified in that report.

The annual inventory reporting process must enable a *year-on-year* assessment of developed countries' contributions toward global emission reduction goals, and countries' year-on-year progress in achieving quantified economy-wide emission reductions from 1990 (or earlier for economies in transition that have been given flexibility in historical reference years) through the most recent year reported.

Emission reductions achieved *domestically* must be reported separately from reductions achieved in other countries through the CDM or other offset mechanisms. Emission reductions with and without the inclusion of emissions and removals from *LULUCF* must continue to be clearly distinguished.

Reporting should also allow for an assessment of global progress toward global goals, that is free of double counting, and that does not suffer from *inconsistent methodologies* used by Parties to report

emissions and removals, or methodologies that have not been previously agreed by the Parties under the UNFCCC umbrella.

As virtually all Annex I Parties *already provide additional information* beyond that required by the UNFCCC reporting guidelines, as a result of their status as Parties to the Kyoto Protocol, enhanced reporting and review should now incorporate under the Convention each of the additional elements that has been required to date of Annex I Parties under *Articles 5, 7 and 8* of the Protocol and their implementing decisions. Extending these reporting requirements to **all Annex I Parties** will facilitate accurate inventory information and accurate accounting of emissions and removals. The process of enhancing reporting and review under the Convention shall not displace more stringent existing reporting and review rules under the Protocol.

Current eligibility requirements for access to the mechanisms must remain in place, and should apply equally to new mechanisms created under the Convention and to the acquisition and transfer of these units by developed country Parties.

Fifth National Communications of Annex I Parties were due January 1, 2010. In Cancun it was agreed that Sixth National Communications are due January 1, 2014. Hence, the first set of **biennial reports for Annex I Parties is due in 2012**. The first set of **low carbon development strategies** or plans should be submitted as part of Sixth National Communications **in 2014**.

AOSIS proposes that a *Workshop on ways and options to increase mitigation ambition*, and a *Workshop on innovative sources of financing* be held at the June session in 2011, to enable the development of work programmes in each of these areas (see table below). Work programmes in these areas may yield additional reporting requirements for incorporation in periodic reports or CRF tables over time.

III. Guidelines on provision of financing, technological and capacity building support

By decision 1/CP.16, Parties agreed to enhance reporting on the provision of financial, technological and capacity-building support (para. 40) through enhanced common reporting formats, methodologies for finance and tracking of climate-related support (para. 46(a)).

An internationally-agreed common reporting format (CRF) for support should be a deliverable from the Durban COP. This is needed to facilitate the submission of biennial update reports in 2012 (developed countries) and 2013 (first developing countries). Both Annex I and Non-Annex I Parties should use CRF tables for these reports. These reports should address and differentiate both mitigation and adaptation.

In the past, there has been a serious lack of consistency in reporting on financial flows to developing country Parties under Articles 4.3, 4.4 and 4.5 through Annex I Party National Communications, as well as *inadequate detail* in these reports.

Some Annex I Parties have failed to identify new and additional financing, some have inappropriately reported on their overseas development assistance (ODA), some Parties have failed to estimate or segregate out the climate change component of contributions made to multilateral

bodies (e.g., the GEF) or included Parties that are not Non-Annex I Parties in their reporting (e.g., by listing contributions to the GEF as a whole). Some Parties have included non-concessional loans under various funds and many have presented information at such a general level of detail that any assessment of flows or trends becomes completely unreliable.

For the monitoring, reporting and verification (MRV) of financing, technology and capacity-building support to be successful, there will have to be **parallel reporting** between developed and developing countries in the national communications and biennial updates that can enable systematic verification.

This requires agreement on **whether and how** specific sources and types of financing are to be reported and discussion on the appropriate treatment of different categories of financing (multilateral, bilateral, grants, loans, public, private, market-based, non-market based).

It will also be necessary to **breakdown funding** delivered to and through multilateral institutions such as the GEF in order to indicate the final destination of funds by country and purpose in a manner that can be electronically submitted and cross-checked with individual developing country reporting.

Without approval by the COP, **OECD Development Assistance Committee (DAC) Rio markers** will be inappropriate for use in reporting on climate-related financial flows. A tailored solution is likely to be needed for enhanced reporting on financial flows under the Convention. DAC markers raise a number of central transparency concerns in the context of UNFCCC commitments to new and additional financing, they include funds with mixed purposes, overstate amounts provided for climate-related ends, and do not themselves have a process for MRV.

Clear and internationally-agreed guidelines and definitions are needed for the reporting of financing that is **specific to adaptation** and **specific to mitigation** to avoid double counting and ensure transparency – which agreement must extend beyond agreement among OECD member countries.

Enhanced reporting is needed in national communications and biennial reports on support to both adaptation and mitigation – reporting must go beyond information submitted to the registry in connection with support for NAMAs.

Other issues that need to be discussed include:

- How to define clearly **define and segregate** adaptation and mitigation-related flows
- How to ensure that any flows reported as supporting mitigation are for **GHG reductions**, rather than broader investments
- How to avoid **double counting** between Conventions (e.g., CBD v. UNFCCC; Montreal Protocol v. UNFCCC)
- How to avoid including funds with partial **overlap in purpose** (e.g., funds addressing disaster risk reduction initiatives, funds and expenditures that include earthquakes) that overstate flows for climate needs
- How to separate development assistance (ODA) from the **new and additional funding** required under the Convention (e.g., general support to health and education in vulnerable countries should not be considered climate-related adaptation support)

- How to treat funding flows through *market-based mechanisms* that yield financial benefits to investor countries
- How to treat funding flows through market-based mechanisms that yield *offsets and other credits inside and outside* the Convention and Kyoto Protocols.

An appropriate level of detail is needed for revised reporting guidelines, CRF tables for biennial updates and software to be developed by the secretariat for future reports. The data collated should be able to be sorted by donor and by individual country recipient. It will be important for financial, technological and capacity building support reported by Annex I Parties to be able to be cross-checked against reporting by Non-Annex I Parties.

Actions funded through market-based offsetting mechanisms must be reported separately from supported actions within the CRF tables and in the registry. Supported actions must generate net global emission reductions. *Offsetting mechanisms*, such as the CDM, do not generate net global emission reductions as they enable a corresponding increase in emissions in developed countries when used to meet mitigation targets; hence flows through the CDM should not be reported as supported actions. The registry and CRF tables should assist in tracking domestic contributions to global emission reductions. If new market-based mechanisms under the Convention clearly yield *net global emission reductions*, then consideration can be given to reflecting a portion of the reductions achieved as supported actions. It will be important to ensure that the registry does not lead to double counting emission reductions between developed and developing countries.

Discussion among Annex I and Non-Annex I Parties will be needed on the contents of CRF tables and methodologies for finance. This can be facilitated by a *Joint Workshop on CRF tables* during an inter-sessional meeting, supported by submissions of views of Parties, and a synthesis of views prepared by the Secretariat.

IV. Supplementary information on achievement of quantified economy-wide emission reduction targets

Decision 1/CP.16, para. 40(b), provides that developed countries shall submit supplementary information on the achievement of quantified economy-wide emission reductions.

The purpose of enhancing reporting in this area should be to extend the requirements of Article 7 of the Kyoto Protocol beyond Annex I Protocol Parties to *all Annex I Parties* to the Convention. A second goal should be to ensure that progress on individual country mitigation efforts can be assessed on a *year-on-year basis*.

Virtually all Annex I Parties already have systems in place at the national level to comply with these reporting requirements. For this reason, extension of the contents of decision 15/CMP.1 and related decisions under Article 7 to all Annex I Parties under the Convention should not constitute an additional burden.

The objectives of these requirements are to promote the reporting of consistent, transparent, comparable accurate and complete information by Annex I Parties. This includes transparent, consistent, and accurate information on LULUCF activities.

In this context it will be very important to maintain clear, transparent and consistent accounting systems, information on changes in national systems, information on national registries, and information on the holdings of all units agreed under the UNFCCC umbrella's market-based mechanisms for all Annex I Parties (AAUs, ERUs, CERs, any units from new market-based mechanisms created under the Convention, etc.).

V. Establishment of guidelines for national inventory arrangements

Parties have agreed under decision 1/CP.16, para. 43, that developed countries should establish national arrangements for the estimation of anthropogenic emissions by sources and removals by sinks of all greenhouse gases not controlled by the Montreal Protocol. The work programme set out in paragraph 46 contains as one element the establishment of guidelines for national inventory arrangements.

All Annex I Parties to the Kyoto Protocol already report on their national systems for the estimation of emissions and removals, following guidelines developed under Article 5.1 and 5.2 of the Protocol. The purpose of enhancing reporting in this area under decision 1/CP.16 should be to extend these reporting requirements now to *all Annex I Parties*.

As a practical matter, all Annex I Parties to the Convention already have systems in place at the national level for the estimation of emissions and removals. For this reason, this extension should not constitute an additional burden.

Maintenance of a reliable national system /reliable national arrangements for the accounting of emissions and removals should continue to be an *eligibility* requirement for access to the mechanisms established under the Kyoto Protocol and for participation in emissions trading under Article 17 of the Protocol. Maintenance of a reliable national system should also be an eligibility requirement for the acquisition or transfer of units created under any new market based mechanisms approved by the Conference of the Parties.

VI. Revision of guidelines for the review of national communications, including the biennial report, annual greenhouse gas inventories and national inventory systems

By decision 1/CP.16, the Parties have agreed to enhance Annex I reporting in a variety of areas. Any revisions to the review guidelines should track and identify problems encountered with this enhanced reporting.

Decision 1/CP.16 should not be interpreted to relax in any way reporting obligations and review mechanisms that are in place for Kyoto Parties under the Protocol.

Instead, enhanced reporting and review provisions under the Convention should extend to *all Annex I Parties* these reporting and review elements for annual inventories and national communications now in place *under Articles 5, 7 and 8 of the Kyoto Protocol*, while at the same time maintaining these provisions in place under the Protocol. To these provisions should be *added stringent guidelines for the review of biennial reports*.

Building on the current review process under Article 8 of the Kyoto Protocol (see 22/CMP.1), the objectives of the review process, and corresponding guidelines, should be to:

- produce a thorough, objective and comprehensive technical assessment of all aspects of the implementation of targets,
- promote consistency and transparency in the review of information submitted by Parties,
- assist Annex I Parties in improving the reporting of supplementary information and information on implementation of commitments, and
- provide the Conference of the Parties with a technical assessment of progress on targets and whether these targets are on track to be met.

All portions of the existing Article 8 review should be extended to *all Annex I Parties*, including:

- the review of annual inventories,
- review of holdings of assigned amounts, ERUs, CERs, AAUs, RMUs, and other tradable units,
- review of national systems,
- review of national registries,
- review of information on minimization of adverse impacts under Article 3.14,
- review of national communications and supplementary information for purposes of ensuring compliance, and
- procedure for review of eligibility to use the mechanisms

The review should identify *problems of transparency, consistency, comparability, completeness and accuracy* with respect to inventory information and supplementary information required, which should be reported to the Conference of the Parties.

To ensure consistency and comparability, 1990 must remain the base year for the reporting and estimation of emissions for all Convention Parties, other than for those economies in transition that now report according to a different base year.

The enhanced reporting and review process should enable an *annual assessment* of Parties' progress in achieving reductions from 1990 levels toward targets, and *year-on-year progress*, taking into consideration any agreed LULUCF methodologies and use of credits from market based mechanisms that have been agreed under the Protocol and Convention.

A goal of the enhanced reporting and review process, and the process for international assessment and review, should be to ensure a place for *open consultation* among all Parties with respect to Annex I Parties' progress in achieving emission reductions that can complement substantive provisions for review under *Articles 5, 7, 8 and 18* of the Protocol.

VII. Low-carbon development strategies

All Annex I Parties should produce low-carbon development strategies or plans that contain emission reduction pathways consistent with a limitation of temperature increases **below 1.5 degrees** above pre-industrial levels over the longer-term as part of their national communications. The first set of low-carbon development plans should be submitted with Annex I Parties' Sixth National Communications, in 2014.

These plans should contain specific agreed timeframes and milestones – (e.g., 2015, 2020, 2025, 2030, 2040, 2050) -- and should provide quantitative estimates of the domestic economy-wide emission reductions projected to be achieved by these dates. Guidelines will need to be developed and agreed for the quantification of projections to be contained in these plans.

Low-carbon development plans should set out policies and measures - both economy-wide and in each reported sector - that are in place now, and that are expected to be needed to be in place to achieve reduction goals. These strategies or plans should report on planned energy efficiency targets and renewable energy goals and encompass all policies and measures directly and indirectly influencing emissions, including such policies that may enhance emissions (e.g. subsidies on fossil fuels).

Plans should respond to the most recent assessment reports from the IPCC and place their projected domestic emission reductions in this context.

VIII. International Assessment of emissions and removals

By decision 1/CP.16, the Parties agreed to "establish a process for international assessment of emissions and removals related to quantified economy-wide emissions reductions targets in the Subsidiary Body on Implementation, taking into account national circumstances, in a rigorous, robust and transparent manner, with a view to promoting comparability and building confidence" (para. 44). The Parties further agreed to develop modalities and procedures for this process "in accordance with paragraph 44, including the role of land use, land-use change and forestry, and carbon credits from market-based mechanisms, taking into account international experience" (para. 46).

To advance these modalities and procedures, **joint back-to-back workshops across developed and developing country Parties** should be organized in June. This would facilitate discussions on process options for international assessment and review, and for international consultations and analysis, and help to ensure consistent, comparable processes while taking into account appropriate differentiation.

To provide a basis for discussions it would be useful to mandate the Secretariat to prepare a **background paper** on the process now in place for Annex I Parties under Convention and Kyoto Protocol, as well as on experiences with review processes in other multilateral fora and options derived from these experiences on potential designs for enhanced developed country international assessment and review processes and developing Party ICA processes.

IX. Scheduling of initial processes

Priority issues are:

- Establishment of a Work Programme on options and ways to increase mitigation ambition
- Agreement on contents of biennial updates for Annex I and Non-Annex I countries and areas of flexibility to LDCs and SIDS
- Agreement on Annex I and Non-Annex I biennial reporting guidelines, and dates for first set of biennial updates (2012 for Annex I and 2013 for Non-Annex I)
- Revision of Annex I and Non-Annex I National Communication Guidelines
- Development of CRF tables and methodologies for Annex I and Non-Annex I countries for reporting on financing, technology and capacity-building support delivered and received
- Extension of guidelines for reporting and review of supplementary information on achievement of quantified emission reduction targets, including accounting modalities, to all Annex I Parties
- Extension of guidelines for reporting and review of inventory arrangements to all Annex I Parties
- Adoption of guidelines for Review 2013-2015
- Agreement on guidelines for the preparation of projections within low carbon development plans or strategies and biennial update reports
- Agreement on dates for first low carbon development plans or strategies (2014).

X. Proposed additional work programme elements:

Workshop on Options and Ways to increase mitigation ambition

- Technical paper on mitigation potential
- Technical paper innovative sources of finance

Workshop on Innovative Sources of Financing

- Technical paper on innovative sources of finance

Joint workshop on Common reporting format (CRF) tables for support and methodologies for financing across developed and developing country Parties

- Submission of views on the possible content of CRF tables on support, and relevance of DAC Rio markers
- Synthesis of views

Joint Workshop on process options for international assessment and review and on international consultations and analysis

Background paper prepared by the secretariat on the process now in place for Annex I Parties under Convention and Kyoto Protocol, and experiences with review processes in other multilateral fora and options derived from these experiences on potential designs for enhanced developed country international assessment and review and developing Party ICA processes.

AOSIS proposes the following work programme under decision 1/CP.16, Section III.A:

Date	Event	Outputs	Inputs
March 2011	CGE Workshop on Issues to be considered in possible revision of non-Annex I guidelines	Progress on NAI NC Guidelines	
March	3 rd Workshop on the revision of Annex I Guidelines	Progress on Annex I Guidelines	
April session 2011	Workshop Annex I targets – to clarify assumptions, conditions	Quantification of gigatonne gap needing to be closed to achieve global goals; identification of information required for transparent, complete, consistent, comparable and accurate reporting	Technical paper based on Parties' submissions with aim of clarifying assumptions, conditions, comparison of level of emission reduction efforts
April session	Workshop on NAI actions, to understand diversity of actions, underlying assumptions, support needed (para. 51)	Identification of information required for transparent, consistent reporting in registry	
April session	Workshop on Technology Mechanism		
Inter-sessional	<i>Initiate Registry in pilot form</i>		Secretariat
June session 2011	<i>Presentation of Pilot Registry for feedback</i>	Work programme to enhance registry functionality	Paper from secretariat setting out possible options for further design choices to improve the functionality of the registry
June session	Workshop on Annex I targets - to develop work programme on options and ways to increase mitigation ambition (para. 38)	Work programme to increase mitigation ambition	Technical paper on mitigation potential (update) Technical paper innovative sources of finance
June session	Workshop on NAI actions - to further consider support needed: innovative sources of finance (para. 51)	Work programme on innovative sources of finance	
June session		Draft guidelines on procedures for accessing financing for the identification and development of NAMAs and for preparation of the first biennial reports	
June session		Draft Guidelines on the presentation of NAMAs that require international support	Secretariat paper on options and views from literature
June session		Draft Guidelines for biennial reports; agreement on areas of flexibility to LDCs and SIDS	
Sept/Oct session	Workshop on common reporting format (CRF) tables on support	Progress on CRF tables to support Annex I and Non-Annex I reporting guidelines on MRV of	Submission of views on content of CRF tables and relevance of DAC

		support	Rio markers Synthesis of views by the secretariat
Sept/October session	Workshop on ICA	Progress on ICA options and schedule	Secretariat paper on ICA/IAR in other multilateral fora and process now in place for Annex I Parties under Convention and KP
Sept/Oct session	Workshop on International Assessment and Review (IAR)	Progress on IAR and schedule	Secretariat paper on ICA/IAR in other multilateral fora and process now in place for Annex I Parties under Convention and KP
COP 17 December 2011		Adopt revised AI and NAI Nat Communication Guidelines Adopt AI and NAI biennial reporting guidelines and CRF for support Adopt Guidelines on presentation of NAMAs seeking international support Adopt Guidance to GEF expediting funding for NAMA prep and biennial reports Adopt guidelines for 2013-2015 Review Adopt extension of the requirements of Article 7, Article 5.1 and 5.2 of the Kyoto Protocol, and related implementation to all Annex I Parties to the Convention	
2012	<i>Initiate Biennial Reports for Annex I Parties</i>		
COP 18 December 2012		Adopt ICA Guidelines Adopt Guidelines on International Assessment and Review (IAR)	
2013	<i>Initiate Biennial Reports for Non-Annex I Parties</i>		
2013	<i>Initiate International Assessment and Review</i>		
2013	<i>Initiate ICA for Non-Annex I Parties</i>		
2013	<i>Initiate First Review, to be completed by 2015</i>		

SUBMISSION BY THE REPUBLIC OF KOREA

28 March 2011

Subject: Submission on “work program for the development of modalities and guidelines relating to MRV for developing countries and developed countries

1. Work Program for Developing Countries

The Republic of Korea welcomes the progress made at COP 16 on mitigation actions by non-Annex I country Parties. The Republic of Korea has been constructively participating in the negotiations on mitigation actions by non-Annex I Parties based on the Bali Action Plan, and will continue to make contributions to the process.

Prior to establishing a work program, it is necessary to clearly define characteristics of mitigation actions in developing countries. Nationally Appropriate Mitigation Actions (NAMAs) by developing countries cover two types of actions, international and domestic. For such reason, measurement, reporting, verification (MRV) and international consultations and analysis (ICA) of NAMAs may differentiate depending on the type of action. However, their contribution to the fight against climate change should be evaluated on an equal basis.

As articulated in paragraph 66 of the Cancun Agreement, the COP decided on a work program for the development of modalities and guidelines for the:

- (a) facilitation of support to Nationally Appropriate Mitigation Actions (NAMAs) through a registry;
- (b) measurement, reporting and verification of supported actions and corresponding support;
- (c) biennial reports as part of National Communications from non-Annex I Parties;
- (d) domestic verification of mitigation actions undertaken with domestic resources; and
- (e) International Consultations and Analysis (ICA).

The Republic of Korea firmly believes that the basic aim of the work program focuses on building trust among the Parties that are indispensable to global efforts on tackling climate change. In this

regard, mitigation actions in non-Annex I country Parties will be effectively facilitated if following principles are fully considered when implementing the work program.

- Securing transparency on administering the support from developed country Parties and on mitigation actions by non-Annex I country Parties.
- Providing appropriate evaluations and recognitions of developing countries' efforts against climate change, which would be exerted in accordance with the principle of common but differentiated responsibilities and their respective capabilities.
- Assisting developing countries build capacity to augment efficiency of implemented mitigation actions in the context of sustainable development.

The following explains the view held by Republic of Korea on the subject of work program, which consists of the five elements of paragraph 66 from the Cancun Agreements:

1.1. Facilitation of support to Nationally Appropriate Mitigation Actions (NAMAs) through a Registry:
Element (a)

If mitigation actions can be evaluated and the efforts recognized internationally through the registry, NAMAs will be further promoted. The registry will serve two purposes: efficient matching of NAMAs proposals and available support for such actions, and recording and updating information of all the mitigation actions by non-Annex I country Parties. In order for the registry to effectively promote NAMAs, a consensus on the role of the secretariat that receives information on NAMAs seeking support and available support should first be reached. We may also consider whether technical support during the preparation of the NAMA proposals and technical assessment related to the decision-making process on listing the proposals in the registry are necessary and, if so, how these functions can be embodied in an operating entity

In relation to the second purpose, it should be noted that recording and updating relevant information are essential for effective facilitation of NAMAs, and to giving international recognition through the registry.

1.2. Measurement, Reporting and Verification (MRV) of Mitigation Actions: Elements (b) and (d)

Paragraphs 61 and 62 of the Cancun Agreement state that mitigation actions by Non-Annex I country Parties will be measured, reported and verified domestically in accordance with the guidelines to be developed under the Convention. This implies that domestic MRV institutions/systems with sufficient capacity should be established in non-Annex I country Parties. Therefore, the work program should address the needs of those Parties with respect to the domestic MRV in terms of capacity building, financial support, etc.

Also, Paragraph 61 clarifies that internationally supported mitigation actions will be subject to international MRV. However, the distinction between internationally supported action and domestically supported action has not been discussed sufficiently. To avoid any controversy that may originate from this ambiguity, an operational definition for internationally supported NAMAs should be formed through the work program as soon as possible.

- **Measurement:** It is worthwhile to consider metrics other than GHG emissions that could be adopted to evaluate the NAMAs by developing countries. Individually measuring the effects of GHG emissions reduction may not only be technically challenging, but also prohibitively expensive and time-consuming for some developing countries. Therefore, the work program should pursue development of a metric that can indirectly measure the effects of GHG reductions and of a methodology for its usage. It may also explore ways to identify more cost-effective measurement methodologies that provide more flexibility to least developed country Parties and small island developing states.
- **Reporting:** Reporting formats should be designed to prevent developing countries from making redundant efforts, i.e. reporting via the registry, biennial reports and national communications. The work program should find an effective way to report the outcomes of NAMAs in the context of sustainable development as the Bali Action Plan suggests.
- **Verification:** The work program needs to establish verification modalities, so that the reports submitted by non-Annex I country Parties would be reviewed efficiently and effectively by limited number of experts.

1.3. MRV of Support to NAMAs: Element (b)

Priority should be placed on the functional relationship between the registry and the financial mechanism. The program must also identify the aspect of support to Annex I countries that will be subject to MRV (e.g. actual scale of the support, efforts to comply with the proposed schedule, source of the support, new and additional support, etc.).

1.4. Biennial Reports and International Consultations and Analysis (ICA): Elements (c) and (e)

Biennial reports should contain inventories of national greenhouse gases including a national inventory report and information on mitigation actions, needs, and support received (paragraph 60(c) of the Cancun agreement). Since these biennial reports are a part of national communication, developed countries shall provide new and additional financial resources to meet the agreed full costs incurred by developing country Parties. Possible hurdles to biennial reports must be lowered to help as many developing countries submit biennial reports that are consistent with their capabilities. For instance, biennial reports, under certain circumstances, could be produced mainly by adopting and slightly modifying the actions if they have been already recorded or updated in the registry.

The principles of ICA from paragraph 63 of the Cancun Agreement should be duly respected. Taking into account respective capabilities and national circumstances of developing countries, ICA should serve to recognize and help developing countries meet their needs, so that mitigation actions may be facilitated in developing countries.

2. Work Program for Developed Countries

The Republic of Korea welcomes the progress described in the Cancun Agreement with regard to the Further Commitments for Annex I Parties under the Kyoto Protocol. During the COP 17 negotiation process, Parties exerted their best efforts to have the results of AWG-KP adopted as early as possible and to avoid a gap between the first and the second commitment period of the Kyoto Protocol. In particular, based on historical responsibility and the principle of common but differentiated responsibilities, developed country Parties were expected to take the lead in combating climate change by raising their emission reduction targets.

As described in paragraph 46 of the Cancun Agreement, the COP decided on the work program for the development of modalities and guidelines for:

- (a) The revision of guidelines, as necessary, on the reporting of National Communications, including biennial report:
 - (i) The provision of financing, through enhanced common reporting formats, methodologies for financing and tracking of climate-related support;
 - (ii) Supplementary information on achievement of quantified economy-wide emission reductions targets;
 - (iii) Information on national inventory arrangements;
- (b) The revision of guidelines for reviewing National Communications, including the biennial submittal, annual greenhouse gas inventories and national inventory systems;
- (c) The establishment of guidelines for national inventory arrangements;
- (d) Modalities and procedures for international assessment and verification of emissions and removals related to quantified economy-wide emission reductions targets in accordance with paragraph 44, including the role of land use, land-use change and forestry (LULUCF), and carbon credits from market-based mechanisms, taking into account international experience.

The Republic of Korea firmly believes that the fundamental purpose of the work program lies in building and enhancing trust among the Parties, which is crucial to global efforts to respond to climate change. Accordingly, the following points must be taken into full account in the work program of Nationally Appropriate Mitigation Commitments or Actions by developed country Parties:

- Enhancing efficiency of post-2012 regime by building upon the existing mechanisms such as the United Nations Framework Convention on Climate Change, the Kyoto Protocol, and the Marrakech Accord;
- Promoting transparency of administration of GHG emissions reduction by the Annex I country Parties, as indicated in the recommendation in the Fourth Assessment Report of the Intergovernmental Panel on Climate, during the second commitment period of the Kyoto Protocol;
- Ensuring comparability among Annex I country Parties, including Annex I Parties that are not Parties to the Kyoto Protocol, in their efforts and other appropriate dimensions through rigorous, robust and transparent technical assessment;
- Improving reporting guidelines on support to developing country Parties based on Article 12.3 of the Convention.

The Republic of Korea regards paragraph 46 (a) of the Cancun Agreement, which sets guidelines for enhanced measurement, reporting and verification (MRV) for Parties included in Annex I, as a key component of the work program. The following expresses the view of the Republic of Korea on the matter.

2.1. Revision of Guidelines on the Reporting of National Communications

In accordance with Article 7.2(d) of the Convention, measurement and reporting the effectiveness of greenhouse gas emission reductions should be improved. In particular, the revision for measuring and reporting guidelines should focus on transparency, since non-Annex I country Parties expect better reporting of the effects of emissions reduction from individual mitigation actions by Annex I countries. In addition, considering that the reduction target of Annex I country Parties, which is based on compulsory commitment, is substantially different from that of non-Annex I country Parties, a revision of the Guidelines should be made so that the effects of the emission reduction of non-Annex I countries denotes the real amount of greenhouse gases reduction.

Guidelines from the for reporting adverse social, environmental impacts in social, environmental, and economic sectors of developing country Parties derived from the implementation of Annex I country Parties' commitments, and their efforts to minimize the adverse impacts need to be consolidated.

It should be noted that the guidelines for reporting financial supports to developing countries are closely related to the registry for mitigation actions and financial mechanisms of the non-Annex I countries. While the discussion on the reporting guidelines must be based on the current reporting mechanism associated with Article 12.3 of the Convention, it is also desirable to refer to mechanisms outside the framework of the Convention, such as the Rio Marker.