

Sequencing under 6.2

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Outline

1. Canada's views on the sequencing issue
2. Reactions to the technical paper
3. What further guidance/clarity is useful

Mandate: 6/CMA.4 17(a)

Requests SBSTA ... to develop recommendations ... on:

- The sequencing and timing of the submission of the initial report, **the completion** of the Article 6 technical expert review of that report, and the **submission of the agreed electronic format**

Timelines for 6.2 reporting

Initial report: due “no later than authorization”
-or- “in conjunction with” the next BTR

Annual Information: due April 15 each year

Regular information: due alongside (“as an annex to”) the BTR
i.e. Dec 31, 2024, 2026, 2028, ...

Timelines for 6.2 reporting + **review**

Initial report: due “no later than authorization”

-or- “in conjunction with” the next BTR

Reviewed in 3–6 months after

Annual Information: due April 15 each year

Not reviewed, but ‘checked’ for consistency

Regular information: due alongside (“as an annex to”) the BTR

i.e. Dec 31, 2024, 2026, 2028, ...

Reviewed following submission, conducted before BTR review

-or- “together in a single review” with IR

What happens when IR and RI submitted together?

- 2/CMA.3 states: the two reports can be submitted “in conjunction”, “where practical” —*ideally avoided*
- This suggests that a Party may submit IR, AEF, RI together, posing challenges for the review of these reports—*Party cannot submit an AEF in absence of IR for that cooperative approach*
- 6/CMA.4 states: when submitted together “may be reviewed together” in a single A6 review—*there will still be separate review reports, each with recommendations*

Review process (from 6/CMA.4, para.21)

- 8 {
 - 8 weeks out: Secretariat to identify date for review week
 - 6 weeks out: Secretariat to assemble TERT
 - 4 weeks out: completeness check/Q&A with Party
- 1 {
 - Review week- : TERT prepares review report**
- 4 {
 - 2 weeks after: Party can respond to draft review report
 - 4 weeks after (2 more weeks): TERT finalizes review report

TOTAL = 8 + 1 + 4 = 13 weeks

Reactions to technical paper

- Para 113: *“any actions on an ITMO in an AEF from a cooperative approach for which the reporting Party has not submitted an initial or updated initial report **shall automatically be considered ‘inconsistent’**”*

(1) Rather: Party cannot submit AEF for ITMOs from a cooperative approach it hasn't submitted an IR for

- Para 114: options for when a Party submits an AEF for a cooperative approach whose Initial Report TER has not been completed,
 - Option 1: prevent Party from including actions from that cooperative approach
 - Option 2a: Parties can include, but marked “consistent (pending)”
 - Option 2b: Parties can include, but marked “inconsistent (pending)”

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- Para 114: options for when a Party submits an AEF for a cooperative approach whose Initial Report **TER has not been completed**,
 - Option 1: prevent Party from including actions from that cooperative approach
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(2) Distinction between not submitting IR, and that IR not having a completed review

(3) Conflates consistency and pending review, separate issues

Further clarifications on sequencing

1. Initial report must be submitted for a Party to report annual information (submit AEF) from that cooperative approach
2. The review of the initial report must be completed before the completion of review of regular information, which must be before the completion of the review of the BTR (3 separate review reports)
3. If review has not been completed, CARP to tag AEF information from that cooperative approach as “**pending IR review**”
4. Request Secretariat to accelerate review of Initial Reports, particularly early on, e.g.: prioritize training programs, equip experts, initiate review faster
5. Encourage Parties to submit IR well in advance of AEF, to allow for its review

'Checkpoints' for annual/regular information

Pre-submission consistency check: before submission of AEF—for Party use

Consistency check: after submission of AEF—public-facing, published on CARP

Completeness check: after submission of RI, before review—shared with TERT + Party

A6 technical review: after submission, review process:

- Q&A with Party (4 weeks out)
- Review week request more information (before or during review week)
- Draft Review Report (during review week) – Party has 2 weeks to respond

Figure 1

Review timing outline (an initial or updated initial report must be reviewed in the subsequent reporting period, i.e. either three or six months)

