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UNITED NATIONS FRAMEWORK CONVENTION ON CLIMATE CHANGE

SUBSIDIARY BODY FOR IMPLEMENTATION

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Item 10 of the provisional agenda

MECHANISMS FOR CONSULTATION WITH NON-GOVERNMENTAL ORGANIZATIONS (NGOs)

Compilation of submissions

Note by the secretariat

1. In the light of the views expressed on documents FCCC/SBI/1997/14 and FCCC/SBI/1997/14/Add.1 dealing with mechanisms for consultation with non-governmental organizations (NGOs), the Subsidiary Body for Implementation (SBI), at its sixth session, invited all Parties to submit their views on this item by 25 August 1997. It further requested the secretariat to prepare a compilation of the submissions made (FCCC/SBI/1997/17 para.39).
2. Two such submissions have been received from Egypt and Uzbekistan. In addition, the secretariat has received a submission from each of the three non-governmental constituencies of business and industry, environment and municipal leaders and local authorities. It has also received a submission from the International Relations Committee of the National Association of Regulatory Affairs. In view of the nature of the agenda item under discussion, the secretariat deemed it necessary to include the four submissions* from the non-governmental community.
4. Based on the recommendations contained in the documents prepared by the secretariat at the SBI at its sixth session (FCCC/SBI/1997/14 and FCCC/SBI/1997/14/Add.1), the SBI may wish to recommend a draft decision on this item for adoption by the Conference of the Parties at its third session.
5. In accordance with the procedure for miscellaneous documents, these submissions are attached and reproduced in the language in which they are received and without formal editing.

* In order to make these submissions available on electronic systems, including the World Wide Web, these contributions have been electronically scanned and/or retyped. The secretariat has made every effort to ensure the correct reproduction of the texts as submitted.

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PAPER NO. 1: EGYPT

(on behalf of the Department of Environment and Sustainable Development)

The Ministry of Foreign Affairs of Egypt (Department of Environment and Sustainable Development) presents its compliments to the Secretariat of the United Nations Framework Convention on Climate Change, and with reference to the recommendation of the Subsidiary Body for Implementation in its sixth session, Bonn, 28 July-5 August 1997, to urge the parties to present their proposals concerning the criterias related to “Mechanisms For Consultations with Non-Governmental Organizations”, has the honour to inform that the criterias proposed to be fulfilled by the NGOs are as follows:

On the institutional level:

- Legitimate status of the organization on the national level (registration, and compliance with the national legislation)
- Adequate capacities in the administrative and organizational matters and sufficient qualifications to represent effectively the national interests on the international level (languages, experience in the negotiations etc..)
- Financial capacities to be able to participate in the international conferences

On the technical level:

- The ability to cooperate with the government to implement the environmental national policies
- The capacity to prepare and to apply the environmental projects and programmes and to cooperate with the international organizations to respond to the society needs.

The Ministry of Foreign Affairs of Egypt (Department of Environment and Sustainable Development) avails itself of this opportunity to renew to the Secretariat of the United Nations Framework Convention on Climate Change the assurances of its highest consideration.

PAPER NO. 2: UZBEKISTAN
(on behalf of Glavgidromet)

It is recommended to encourage the participation of NGOs (ecological business making group and local authorities) as an expert in the process of the fulfillment of FCCC obligations by the Parties.

At present it is expedient to follow the order of admittance of NGOs to the participation in COP and its bodies providing them the official accreditation at COP session. With this it is necessary to follow the norms of NGO registration procedure existing in UN system.

The accreditation conditions and criteria of NGO admittance to the process of Convention implementation should be presented as the separate COP decision.

The involvement of accredited NGOs to the consulting process is possible at the stage of discussing the concerned issues before the decision making. NGOs do not participate in the decision making.

Participation of individual persons concerned as the experts in consideration of special matters on FCCC implementation is possible.

The widening of NGOs access to official information and participation in discussions of Convention bodies is expedient during discussion of the relevant issues.

The participation of NGOs in national delegations should be determined by governments of Parties.

The information on accredited NGOs opinions and its presentation for Parties should be made on regular constant basis through Convention Secretariat.

PAPER NO. 3: THE INTERNATIONAL CHAMBER OF COMMERCE
(on behalf of Business and Industry)

In response to the request of Chairman Mohamed Ould El Ghaouth of the Subsidiary Body on Implementation, we are writing to offer further comments on SBI-6 Agenda Item 9, regarding mechanisms for consultations with non-governmental organizations under the UN Framework Convention on Climate Change (UNFCCC).

Our comments are based on: recommendations business NGOs have shared with you over the past 18 months; the conclusions of the March 1996 NGO Workshop; comments offered on the Consultants' report; previous oral interventions; as well as on our recent discussion with you on August 6 in Bonn. We draw your particular attention to the enclosed "Principles for a Business Consultative Mechanism" from the March 1996 Workshop, which expresses our support for an arrangement that permits unfiltered two-way communication of diverse business views and expertise on climate change issues.

We understand that the next consideration of this topic could result in a draft decision for consideration at COP3. In our view, the full consideration that this topic warrants is best delayed until after Kyoto. The high priority issues that face delegates in the short period before the COP will demand their full attention. Most importantly, any enhanced NGO consultative arrangements should be tailored to whatever conclusion COP3 reaches, thus having that conclusion in hand will better inform decision-making on this issue.

With that in mind, we offer further suggestions at this time with an aim to strengthening NGO consultative procedures so that they are helpful to delegates and effective in bringing the expertise and views of business NGOs into relevant discussions without burdening the secretariat.

Geographical representation of non-governmental organizations

Several delegations expressed concern that NGOs, including those representing business and industry, did not include participants from developing country. In fact, as we noted in our recent discussion with you, many business organizations such as the International Chamber of Commerce, IPIECA, and others, do represent companies that are headquartered, sited or have operations in developing countries. Our organizations speak for small- and medium-sized companies, as well as regional business associates in Africa, Latin America and Asia.

Every effort should continue to be made to consult and involve all business group members to help ensure geographical balance and representation from developed and developing countries. However, these efforts should not discourage business representatives from OECD countries who, in large measure, will be called upon to provide the technology, capital and technical expertise necessary to implement any new climate agreement.

Additional Information about NGOs. Criteria for Participation and Support for UNFCCC Objectives.

It is not clear how additional information about NGOs would be used once it was gathered or what benefit such information would render. Furthermore, this exercise would be labor-intensive for the secretariat, using time and resources that potentially could be better spent elsewhere, given the pressures it is under.

The same concern would apply to mandating a statement of support for the UNFCCC's goal from NGOs. As Article 7.6 provides, the emphasis should be on engaging the fullest range of NGOs "which (are) qualified in matters covered by the Convention". Instituting an allegiance pledge, defining criteria, or increasing reporting burdens would prove counter-productive for all involved, potentially undermining business and public support for any new agreement.

NGO Access to Documentation and Meetings

Numerous delegations supported a more predictable arrangement to ensure that documentation is available to NGOs, namely that NGOs would be given a few copies to reproduce and distribute more broadly among themselves. Further, delegates stated their support allowing access, as appropriate and agreed by the Chairman, for NGO representatives to meetings, (including informal meetings), by extending the "SBSTA" model. We look forward to working with the secretariat to facilitate implementation of both recommendations.

With regard to business NGO involvement in the remaining session before COP3, and during and beyond COP3, we believe that the priority should be to improve communication mechanisms. Doing so would enhance the ability of business groups to provide the full range of views on various issues before the UNFCCC. We appreciate the efforts you and your staff have made to accommodate business NGOs and the daily briefings by Ambassador Estrada and other subsidiary body chairmen have been very helpful.

Nevertheless, we urge the Bureau to consider the importance to business NGOs - whose members will be called upon to implement the conclusions of Kyoto - of hearing the discussions that lead to those conclusions, and reconsider its decision to close AGBM non-group meetings to observer organizations. Consultation with business will be essential to draw on the resources that the private sector offers in formulating and implementing climate change actions to ensure competitiveness, social and economic growth and employment.

We appreciate the opportunity to offer these comments, and look forward to

discussing the issue with you further. We will keep you informed as we progress our discussions of how business groups can continue to make a positive and constructive contribution to the work of the Parties through improved communications at the national, regional and international levels.

**“PRINCIPLES OF BUSINESS CONSULTATION WITH THE BODIES ESTABLISHED
UNDER THE FRAMEWORK CONVENTION ON CLIMATE CHANGE”**

**A Presentation At
The Workshop on Consultative Mechanisms
for Non-Governmental Organization Inputs
into The Framework Convention on Climate Change**

**Delivered By
Leonard S. Bernstein
on Behalf of
Business Groups Participating In The Workshop**

**United Nations
Geneva
2 March 1996**

Principles of business consultation with the bodies established under the Framework Convention on Climate Change

Business groups, which include industrial and financial organizations, have been present as accredited observers at all meetings of the process which led to the development and implementation of the framework convention on climate change. During these meetings we have provided input on the topics under discussion. However, under existing procedures, our ability to provide information was often limited. We, therefore, welcomed the decision at COP1 to hold a workshop on consultative mechanisms for non-governmental organization inputs into the United Nations Framework Convention on Climate Change.

Business NGOs began to discuss their input to the workshop soon after the decision to hold one was reached. All business organizations which had participated in the FCCC process were invited to attend, and efforts were made to invite groups which had participated in the FCCC process. Additional meetings were held and there was also an extensive exchange of written information. As a result of these efforts we now have agreed on a set of ten principles, and I would like to spend the rest of this talk presenting them.

The first principle is that a business consultative mechanism should **provide business with a convenient, direct and effective additional channel of communication**. Business representatives strongly believe that if their input is to be of value to the FCCC process, it must be transmitted to the relevant FCCC body without filtering or editing of its content.

Our second principle is that a business consultative mechanism should **further enable business to both volunteer information to, and respond to questions from, all the bodies established under the Framework Convention on Climate Change in a timely manner**. The consultative mechanism must serve the needs of the Framework Convention process by being responsive to requests for information. However, as active observers of the FCCC process, business has also identified many issues on which they can provide useful input. The consultative mechanism will be far more valuable to the FCCC process if it provides an additional means for business to volunteer its expertise on these issues.

Third, a business consultative mechanism should **further enable business to provide information to all of the parties and to the intergovernmental organizations participating in the FCCC process**. The parties to the FCCC are responsible for making all of the decisions related to its implementation. Thus, the value of information from business will be enhanced if it is shared with all parties. Similarly, since input from other intergovernmental organizations is an important source of information for the FCCC process, the process will benefit if they receive information from business for their deliberations.

Fourth, an industry consultative mechanism should **further enable business to provide its views on the full range (policy, socio-economic, technological, etc.) of issues being addressed under FCCC**. Much of the discussion on consultative mechanisms has focused on the input business can provide on the technological issues being addressed by the FCCC process. Business has much to offer in this area, but our potential contributions are not limited to technological issues. The experience of implementing new enterprises in both

developed and developing nations has given business practical expertise in the socio-economic impacts of the introduction of new technology. This expertise is directly relevant to the policy initiatives which the FCCC process will have to consider.

Business also has experience in dealing with the implications of a broad range of policy options. Our input on the practical implications of policy-making can help achieve a positive outcome of the FCCC process. The consultative mechanism should be broad enough to benefit from the full range of business experience.

Fifth, a business consultative mechanism should **be open to all business NGOs accredited by the FCCC process who wish to participate**. The broader the range of business groups providing input to the FCCC process, the greater the value of that input. To date, business NGOs who have expressed interest and are actively involved in the FCCC process are primarily from Annex I countries. Several participating business NGOs represent geographically diverse interests, including from non-Annex I countries. However, we share the desire of the G-77 and China to broaden that participation.

Sixth, a business consultative mechanism should **be able to convey the full range of business positions on an unfiltered basis**. Business may seek to develop consensus on the issues before the FCCC process. However, a consultative mechanism which conveys the diversity of business views will be more valuable to the FCCC process than one which demands consensus on all items under discussion. The full range of business views will demonstrate the complexity of the issues which have to be addressed in making policy decisions about climate change, and provide the FCCC process with relevant, comprehensive and useful information.

Seventh, a business consultative mechanism should **not be a process for negotiation of commitments from business, or for the selection of technology “winners and losers”**. Business view the consultative mechanism as a method of facilitating communication. The organization set up to facilitate that communication will not be empowered to “represent” business and cannot enter negotiations with the FCCC process.

Business feel strongly that the marketplace is the most effective mechanism for determining the most suitable technology. Often this choice is dependent on local circumstances, and can change, sometimes rapidly, as innovative new approaches become available. The consultative mechanism can, and should, provide information about the performance and cost of technologies of interest to the FCCC process. However, neither the consultative mechanism nor the FCCC process should select technology “winners and losers”, since that process will not be able to anticipate all of the local circumstances which could impact on the decision. More importantly, selection of technology “winners” creates a significantly higher barrier to the development and adoption of new generations of innovative technology and can hinder the achievement of long-term policy goals.

Eighth, a business consultative mechanism should **be an addition to, not a replacement for, existing or new business consultation at the national and international level**. Members of the business sector have well-established channels of communication with the governments of the countries in which they operate, and regularly provide input on the

full range of issues affecting the sector. These channels have been used to provide input on issues related to the FCCC process and they will continue to be business' main vehicle for input. Communications at the national level is critical to the on-going relationship between companies and the governments of the countries in which they operate. However, a comprehensive business consultative mechanism at the international level will enhance communication with the FCCC process and will be a valuable addition to existing communication at both national and international level.

While the business sector visualizes a consultative mechanism that provides an additional method for accredited NGOs to communicate with the FCCC process, we also recognize that business NGOs may continue using their existing modes of communication at the international level or develop new ones.

Ninth, the business consultative mechanism should **be treated by the FCCC process in a manner comparable to all other NGO consultative mechanisms, in terms of access and administrative support, including funding for participants from developing nations.** The FCCC process will be best served by having the active participation and support of the broadest range of stake-holders. This goal is best achieved by treating all stake-holders in an equitable manner.

Tenth, and finally, a business consultative mechanism must **be subject to and consistent with national and regional anti-trust and competition laws and regulations.** Clearly, any activity which is undertaken as part of the FCCC process must meet all national and regional legal requirements.

To summarize: A business consultative mechanism should:

1. **Provide business with a convenient, direct and effective additional channel of communication;**
2. **Further enable business to both volunteer information to, and respond to questions from all of the bodies established under the Framework Convention on Climate Change in a timely manner;**
3. **Further enable business to provide information to all of the parties and to the intergovernmental organizations participating in the FCCC process;**
4. **Further enable business to provide its views on the full range (policy, socio-economic, technological, etc.) of issues being addressed under the FCCC;**
5. **Be open to all business NGOs accredited by the FCCC process who wish to participate;**
6. **Be able to convey the full range of business positions on an unfiltered basis;**
7. **Not be a process for negotiation of commitments from business, or for the selection of technology “winners and losers”;**

- 8. Be an addition to, not a replacement for, existing or new business consultation at the national and international level;**
- 9. Be treated by the FCCC process in a manner comparable to all other NGO consultative mechanisms in terms of access and administrative support, including funding for participants from developing nations; and**
- 10. Be subject to and consistent with national and regional anti-trust and competition laws and regulations.**

We believe that a consultative mechanism constructed in accordance with these principles will provide the FCCC with a valuable flow of information from business and help in achieving the goals of the Framework Convention on Climate Change.

PAPER NO. 4: CLIMATE ACTION NETWORK (CAN)
(on behalf of Environmental NGOs)

Environmental NGOs look forward to working with the Secretariat and the Parties to create a living Convention in which all stakeholders are able to participate in a meaningful, dynamic manner now and long into the future. Outlined below are the environmental NGOs' ideas for how to move this issue forward in a constructive manner.

Principles

The Note by the Executive Secretary in document FCCC/SBI/1997/14/ADD.1, raises a number of interesting questions in the discussion about NGO participation in the Convention process. Environmental NGOs would like to open the dialogue on a number of core issues. The truth is that we currently have a Convention with many observers who we really do not know. Due to lack of specific information on the participants, we are not clear on what their specific interest is in participating in the process.

In order to get a clearer picture, we call for increased transparency in the accreditation and registration process. Specifically, each accredited observer should fill out a questionnaire that asks for information on their membership and the regions in which it is active, their funding sources and assets, how many people work in the NGO's office and, in the case of business NGOs, in which types of business activities the group is active.

This would allow all of us to begin to understand who is already participating and who, perhaps, we may wish to involve more fully in the future. This picture could be later supplemented by requesting each accredited NGO to submit a report or completed questionnaire on its activities in relation to the Convention every 3 years. The Secretariat could facilitate this process.

Environmental NGOs would also request the Secretariat to explore other Conventions regarding requirements that an NGO support the objective and the implementation of those Conventions before it is granted accredited status. This would seem a consistent and logical requirement in order to obtain observer status in the Climate Convention. Indeed, governments that have ratified the Convention bind themselves to working toward the objective of the Convention, why should observers be given any different treatment? The current accreditation process should be reviewed with the objective of the Convention in mind.

When we look into the future of an operational Climate Convention, environmental NGOs envision wider participation than we have today. In order to build a foundation for inclusion of further constituencies, we should ascertain who they are and who they could be. We therefore ask the Secretariat to assess participation up to this point, with an eye to the future to allow flexibility to include additional constituencies, and propose a list of various constituencies for consideration. As a matter of principle, any participation mechanism should provide geographically-balanced input. For example, it could be recommended that each constituency

ensure that it has participation from all of the UN-specified regions. This would begin to address the extreme geographic imbalance of accredited NGOs reflected in the Secretariat's document.

Improvement of Existing Mechanisms

In the view of environmental NGOs, the single most important thing to improve the relationship between NGOs and the FCCC process would be to move towards a more dynamic exchange between Parties and NGOs during the meetings of the subsidiary bodies, the AGBM, and the COP. We draw on the experience of the Montreal Protocol, the IPCC, the Biodiversity Convention and the GEF. NGOs should, at the discretion of the Chair, be able to intervene on specific agenda items - among Party interventions - in order that their viewpoints become part of the debate, not just after-the-fact statements. SBSTA has begun this process with positive results. The other bodies should therefore follow suit. This naturally requires access to the floor of all Convention meetings. Disruptive activities in the past from other constituencies should not have the effect of excluding access for everyone else.

Access by NGOs to documentation

It goes without saying that all NGOs should have access to documentation in a timely, effective manner. To reduce costs, a choice could be given as to whether hard copy or electronic copies are delivered. Participation by NGOs in national processes NGOs should be included in the drafting of national communications, the in-depth review process and capacity building activities. These elements should be included in the revision of national communication and in-depth review guidelines. The SBI should also encourage Parties to implement this on the national level.

Participation by NGOs in National Processes

NGOs should be effectively included in the drafting of national communications, the in-depth review process and capacity building activities. These elements should be included in the revision of national communication and in-depth review guidelines. The SBI should also encourage Parties to implement this on the national level.

Public Education

Environmental NGOs are natural and essential partners in educating citizens around the world about climate change. We would like to work with the Secretariat on developing a long-term strategy on better informing the public on the realities of climate change.

Possible New Mechanisms

The principle of parity is paramount not only in the Framework Convention on Climate Change but throughout the entire UN system. It is therefore beyond the environmental NGOs comprehension why a mechanism for only business NGOs, which allows only them to submit their views in an unfiltered manner to the Parties, is currently part of the Secretariat document. We would like to believe this element of the paper is an unnoticed error and will be deleted immediately.

We could rather envision a process by which the Secretariat, Parties or the Chairperson of a body to the Convention ask for NGO input on specific issues, perhaps through an Internet list server. Accredited NGOs could then respond to this request electronically or manually which could then be placed on the UNFCCC Website. This would provide for the inclusion of unfiltered views for each NGO in an egalitarian manner. Anything else is, honestly, unacceptable.

Policy Dialogue Forums

In short, we would be happy to be partners in the elaboration of policy dialogue forums if a few elements were added:

- Minutes to the forums should be distributed by the Secretariat to the Parties in a suitable format such as a MISC. or INF. document and taken note of in the conclusions of the subsidiary bodies.
- The Trust Fund for Supplementary Activities should be utilised to ensure developing country NGO participation in the forums.
- The Secretariat should consider holding regional consultations, thus reaching new constituencies not able to come to Bonn.
- Such forums would create an opportunity for NGOs and Parties to have a dialogue on timely and tough issues. This has been most effective in other Conventions (e.g. the Global Biodiversity Forum). These forums could take place before the Conference of the Parties or when relevant meetings occur, and offer an opportunity for increased participation in Convention processes.
- We all have an opportunity to build a base for a well-functioning, inclusive Convention. We look forward to working with you on this mission.

PAPER NO. 5: INTERNATIONAL COUNCIL
FOR LOCAL ENVIRONMENTAL INITIATIVES (ICLEI)
(On behalf of municipal leaders and local authorities)

Local authorities, given the important role they can play in reducing local greenhouse-gas emissions, believe that better communication between them and the Conference of the Parties to the UNFCCC and Subsidiary Bodies could enhance the work of those Bodies, since local government officials have many years of experience in reducing emissions through a multitude of policies and measures.

The Cities for Climate Protection Campaign comprises local governments that to date represent 100 million people around the world. Those local governments have pledged to reduce their local greenhouse-gas emissions in order to abate global climate change. The participants at the Second Municipal Leaders' Summit on Climate Change in Berlin 1995 represented 250 million people and in their Communiqué to COP-1 urged national governments to "reduce their 1990 level of anthropogenic emissions of carbon dioxide by at least 20% by the year 2005" and to "adopt specific targets and timetables to limit or reduce greenhouse gases". This clearly demonstrates the desire of local authorities to work with national governments in climate protection to move the Convention forward and this is the position that ICLEI, on their behalf, brings to the COP and the meetings of the Subsidiary Bodies.

Local authorities are not really NGOs. They are legitimate government authorities that should be classified, working through their accredited international associations such as the International Union of Local Authorities (IULA) and ICLEI, as "local government organizations" or LGOs. The SBI should give serious consideration to the application of the General Assembly's Rule 61 to the COP, which provides for local authorities, through their accredited international associations, to participate on a non-voting basis in UN bodies. ICLEI will submit suggestions on how this modality could be implemented in the context of the COP and its Subsidiary Bodies.

ICLEI would like to offer the following comments regarding the role of local authorities in the UNFCCC process and the criteria for accreditation of local authorities:

1. **Transparency** should be incorporated into the **accreditation and registration** process. Essential to transparency is a due diligence review of the actual legitimacy of any group seeking local authority accreditation to ensure that they are an established, representative, democratic local authority association. This issue was handled very well in both the UNCED and Habitat II process, where accreditation was provided to established international associations of local authorities. Such a litmus test was critical in the Habitat II process to deal with situations in which individual city council members with single issue agendas (in one case, for instance, an anti-abortion lobby used a city councillor from a small town in Utah, USA to speak on behalf of all local authorities!). If the FCCC does not clearly define its criteria, any number of lobbies will seek to usurp the local authority position for their special positions, thereby also

usurping the established worldwide policy making processes of the international associations of local authorities.

The FCCC does not need to look far to see what criteria are being applied and which associations are being recognized by the United Nations as local authority representatives. These associations tend to have ECOSOC status, accreditation with the UN CSD and/or are affiliated with the International Union of Local Authorities (IULA) the World Assembly of Cities and Local Authorities Coordination (WACLAC) established at Habitat II.

2. The accredited participants should be required to submit a **formal declaration of support** for the Convention's aims. We all recognize that this will exclude some groups. However, if the Secretariat's charge is to implement the Convention and not to debate its appropriateness etc., then the Secretariat should engage those groups who are working on implementation. Those who are unable to express their support should be "recruited" to become supporters through special outreach programmes of the Secretariat.
3. Concerning **participation from the floor**, the SBSTA approach should be used as a framework, but the process can only work if the accredited local authority representatives are the only ones invited to make interventions from the floor. Without this discipline, the legitimate and serious local authority partners to the FCCC will be discouraged from participating at meetings, as they will constantly face efforts by single-issue or other front groups to misrepresent developed local authority positions. In some countries there is already well-documented experience of specific fuel lobbies "seeding" national associations of local government with their positions via individual city councillors. This will not produce transparency, fair representation or quality inputs into the FCCC, and we fear that the floor participation process has already been compromised by such misuse. Again, the only way that legitimate organizations will stay involved is if the process is disciplined; otherwise the Convention process will be left with only those groups that have recently put on a local authority hat as a means to lobby for some non-transparent interest.

NGO and LGO participation from the floor should not be confined to the one prepared statement per session. NGOs/LGOs should be allowed to intervene on specific agenda items, as the respective Chair sees appropriate, so that they can contribute constructively to the debate. This should apply to all Bodies. NGOs/LGOs should be granted access to **all** meetings.

4. The suggestion of sending out **documents** in advance to the sector "coordinator" (item 19 of FCCC7SBI/1997/14) is a good one, but again raises the issue of selecting and accrediting the most legitimate coordinator. Presently, it is ICLEI's experience that in some instances an organization posing as a local authority representative has not been a legitimate representative, even at the national level, of local authorities. We would submit documentation on this if requested by the Secretariat.

The SBI should encourage national governments to include local government expertise and experience in drafting their national communications.

5. Concerning **public awareness on climate change**, local government is that level of government closest to the people and cities have undertaken a variety of community and stakeholder projects to stimulate broader awareness of climate change, also working together with local businesses and local NGOs. Hence local authorities have a major role to play in educating the public on climate change and can help the Parties and the Secretariat to move this Article of the Convention forward.
6. Local authorities see no need for a **new mechanism** for consultations, especially a mechanism that would be set up for only one constituency.
7. As regards the **geographic distribution** of accredited NGOs, ICLEI would like to ask the Secretariat to note that ICLEI has regional offices in the following locations: World Secretariat, Toronto, Canada; European Secretariat, Freiburg, Germany; Asia Pacific Secretariat Japan Office, Tokyo, Japan; Office of the Africa Regional Coordinator, Harare, Zimbabwe; Office of the Latin America Regional Coordinator, Santiago, Chile, ICLEI US Office, Berkeley, California USA.

PAPER NO. 6: THE INTERNATIONAL RELATIONS COMMITTEE OF THE
NATIONAL ASSOCIATION OF REGULATORY AFFAIRS

I offer the following reflections and hope that this will aid in your consideration:

1. Transparency should be incorporated into the accreditation and registration process. This may include a one-time background record filing with the secretariat.
2. If one continues to assume that the desire to participate in Convention deliberations signals support of Convention aims, then there is no need for a formal declaration of support.
3. It is more than clear that NGO constituencies are not homogeneous in their opinions on matters of concern. A broadening of opportunities for the expression of differing views may be beneficial for the future work of the parties as we move into the implementation phase of the convention. This should not be used to make the process more cumbersome but make officially available more than one source of information for consultations and technical input.
4. The SBSTA model of NGO floor participation should be made available at all meetings of the Convention. This would greatly facilitate the flow of accurate information.
5. No new mechanisms for consultations are needed in order to reflect the above points.

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