



Submission on APA Agenda item 3, Further guidance in relation to mitigation section of decision 1/CP.21 by the Republic of the Maldives on behalf of the Alliance of Small Island States

25 September 2017

On behalf of the Alliance of Small Island States (AOSIS), and taking into consideration the views of members with certain ratification requirements, the Republic of the Maldives welcomes this opportunity to provide its views to the Ad Hoc Working Group on the Paris Agreement (APA) in response to the call for submissions contained in paragraph 11(a) of the draft conclusions of the co-Chairs of the Ad Hoc Working Group on the Paris Agreement (APA) contained in FCCC/APA/2017/L.2 on features, information, and accounting.

FEATURES

Elements

The term “feature” is not defined in the Paris Agreement, however, it can be understood to refer to the characteristics, elements, content, or attributes of NDCs.

Identify and list existing features

Existing mitigation-related features of NDCs contained in Article 4 of the Paris Agreement:

- NDCs are nationally-determined (Art. 4.2)
- NDCs are maintained (Art. 4.2).
- NDCs are to be supported by domestic mitigation measures that aim to achieve the objectives of the contributions (Art. 4.2).
- Each successive NDC will represent a progression beyond the Party's then current NDC (Art. 4.3).
- Each successive NDCs will reflect a Party's highest possible ambition, reflecting its common but differentiated responsibilities and respective capabilities, in the light of different national circumstances (Art. 4.3).
- NDCs of developed countries should continue taking the lead by undertaking economy-wide absolute emission reduction targets Art. 4.4).
- NDCs of developing countries are encouraged to move toward economy-wide emission reduction or limitation targets in light of different national circumstances (Art. 4.4).
- NDCs to consider mitigation co-benefits resulting from Parties' adaptation actions and/or economic diversification plans that can contribute to mitigation outcomes (4.7)
- NDCs are to be accompanied by the information necessary for clarity, transparency and understanding (Art. 4.8).
- NDCs are to be informed by the outcomes of the Global Stocktake (Art. 4.9).

- NDCs may be carried out by Parties acting jointly (Art. 4.16), in which case their communication is to be accompanied by the underlying agreement between Parties and each Party is accountable for its emission level.
- NDCs are communicated by each Party every five years (Art. 4.9).
- NDCs are adjustable at any time, with a view to enhancing their ambition, consistent with guidance (Art. 4.11).
- NDCs are recorded in a public registry maintained by the secretariat (Art. 4.12).

Further elaboration of existing features:

Further guidance might address, for example, among other issues:

- a) Quantifiability of NDCs in tonnes of CO₂-eq emissions (if applicable)
- b) Progression
- c) Highest possible ambition

Additional/new features that Parties may wish to address in guidance

Mitigation-related characteristics, elements, content, or attributes in NDCs submitted by some Parties include, for example:

- Timeframe
- Reference years or periods
- Statements of coverage in sectors or gases
- Statements of metrics and accounting guidance applied
- Conditional aspects
- The quantification of reductions in tonnes of CO₂-eq. emissions

The issue of common time frames (Art 4.10), which is to be considered by CMA 1, may be relevant to this agenda sub-item.

In anticipation of the completion of work under this agenda sub-item, Parties may wish to consider whether the list of features of NDCs may need to be revisited at some point in the future and the process for doing so.

INFORMATION

Elements

Recalling Article 4 paragraph 8 of the Paris Agreement that in communicating their nationally determined contributions, all Parties shall provide the information necessary for clarity, transparency and understanding in accordance with decision 1/CP.21, noting in particular paragraph 27, and any relevant decisions of the Conference of the Parties serving as the meeting of the Parties to the Paris Agreement.

Procedural guidance on information

- Detailed guidance on the information on facilitating CTU should be aimed at achieving at least two objectives:
 - To provide a clear picture of what Parties' NDCs will deliver for the atmosphere in aggregate.

- To enable a clear understanding of what is being pledged under each Party's NDC.
- Initial guidance should aim to address the challenges the secretariat encountered in developing its "Synthesis report on the aggregate effect of the intended nationally determined contributions" while trying to assess the aggregate effect of the iNDCs in terms of global GHG emissions.
- Guidance should not change the nationally-determined nature of the NDCs themselves.
- Guidance should take into account the diversity of NDCs submitted by Parties, information applicable to the form of the NDC submission, and the respective capabilities and national circumstances of the Party submitting this information.

Further guidance/elaboration of information elements, including in relation to decision 1/CP.21, paragraph 27.

- Guidance could clarify what types of information would facilitate CTU from different types of NDCs. As highlighted at pages 4-5 of the UNFCCC secretariat's Synthesis Report, most iNDCs fell into a relatively limited number of categories:
 - Economy-wide absolute emissions reduction targets relative to a base year, or absolute targets that establish an overall maximum absolute limit on emissions,
 - Economy-wide or sectoral emissions reduction targets relative to below a business as usual level,
 - Intensity targets,
 - Peaking year or timeframe, and
 - Strategies, plans, and actions.
- Guidance should recognize that not all types of info would necessarily be relevant to all forms of NDCs. The information provided by Parties should be relevant to understanding their respective form of NDC.
- Guidance on information could elaborate upon, inter alia:
 - Reference years or periods
 - Emission levels in reference year
 - Timeframes (e.g., 2025, 2030)
 - Statements of coverage in sectors and gases
 - Statements of metrics and accounting guidelines applied, and
 - Indicative GHG emissions of target in tonnes of CO₂ eq.
- Guidance should address, as appropriate, :
 - Use of common IPCC metrics
 - Coverage, sources and removals
 - Reference points
 - BAU baseline construction (where applicable)
 - Target years
 - Assumptions and methodological approaches including those for estimating and accounting for anthropogenic greenhouse gas emissions and, as appropriate, removals

ACCOUNTING

Elements

General accounting, including in relation to decision 1/CP.21, paragraph 31

- Accounting for NDCs is the process of measuring Parties' progress towards implementing and achieving their NDCs.
- Accounting is also important for determining the aggregate impact of NDCs in relation to the long-term temperature goal under the Paris Agreement, in the context of Article 4.1.
- Parties are required to apply the accounting guidance referred to in paragraph 31 to their second and subsequent NDCs, but they may also elect to apply this guidance to their first NDC.
- Accounting guidance should support Parties in accounting for their NDCs; promote environmental integrity and transparency, accuracy, completeness, comparability and consistency; and ensure delivery of each element of decision 1/CP.21, para 31 (a) to (d). Guidance should also support Parties in applying internationally agreed methodologies.
- A robust accounting framework is a pre-requisite for use of internationally transferred mitigation outcomes or use of market-based units toward NDCs under Article 6 in order to ensure the avoidance of double counting of emission reductions or units between Parties.
- A robust accounting framework is needed to assess the impact of NDCs that include the land sector, since the land sector involves a mix of anthropogenic and non-anthropogenic emissions.
- To facilitate aggregation of the impacts of NDCs in relation to the long-term goal, and to support the tracking of progress, accounting guidance should be applicable to Parties that have communicated different types of NDCs, including those that present target emissions levels as an end-point or over a multi-year period.
- In accordance with Article 13, paragraph 14 and Article 13, paragraph 15, support shall be provided to assist developing country Parties in the accounting of their NDCs, including integrating and incorporating accounting elements in national MRV systems.

Specific accounting guidance

- Specific accounting guidance is required for the following:
 - Application of internationally agreed methodologies
 - Relationship between accounting and GHG inventories, recognizing that detailed work on rules and guidance for cooperative approaches under Article 6.2 and use of the Article 6.4 mechanism, and for the transfer and use of ITMOs, will be undertaken in the related SBSTA work programme under Article 6.
 - Quantification of the mitigation aspects of different types of NDCs

CLOSING COMMENTS

Guidance should support Parties in preparing and communicating their NDCs. Guidance should respect and preserve the nationally determined nature of Parties' contributions, without placing an undue burden on developing country Parties, particularly on SIDS.

Given the urgency of the climate challenge, all Parties will need to do their utmost to implement

their NDCs at the earliest possible date. In this context, AOSIS recalls Article 4.5 of the Paris Agreement, which provides “that developing countries are to be supported in implementation of Article 4, in accordance with Articles 9, 10 and 11, recognizing that enhanced support for developing country Parties will allow for higher ambition in their actions.”

AOSIS further recalls that Parties shall take into consideration in the implementation of the Paris Agreement the concerns of Parties with economies most affected by the impacts of response measures, particularly developing country Parties, in accordance with Article 4 paragraph 15
