

5 April 2011

English only

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 6 of the provisional agenda

**Work programme on enhanced measurement, reporting and verification  
for Parties not included in Annex I to the Convention**

**Views on the items relating to a work programme for the  
development of modalities and guidelines listed in  
decision 1/CP.16, paragraph 66**

**Submissions from Parties**

**Addendum**

1. In addition to the eight submissions contained in document FCCC/AWGLCA/2011/MISC.7, four 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. The exact dates of the resumed sessions of the ad hoc working groups will be announced in due course.

\*\* These submissions have been electronically imported in order to make them available on electronic systems, including the World Wide Web. The secretariat has made every effort to ensure the correct reproduction of the texts as submitted.

**FCCC/AWGLCA/2011/MISC.7/Add.1**

GE.11-

# Contents

	<i>Page</i>
1. Ethiopia (Submission received 4 April 2011).....	3
2. Japan (Submission received 1 April 2011).....	5
3. Republic of Korea (Submission received 1 April 2011).....	9
4. Switzerland (Submission received 3 April 2011).....	14

## **C. Proposed Procedures for supporting Nationally Appropriate Mitigation Actions (NAMAs) of Developing Country Parties**

### **1. Introduction**

Paragraph 67 of Decision 1/CP.16 of the Conference of the Parties to the UNFCCC taken in Cancun, Mexico, in December 2010, invites Parties to submit by 28 March 2011, their views on the procedure for supporting NAMAs. Therefore, Ethiopia is making the following suggestions.

Ethiopia's interest is in the substance of the ideas written hereunder and, if it so wishes, the UNFCCC secretariat can express them in different words and in any format it finds appropriate.

### **2. Connection of Donor and Recipient Parties through the Registry**

2.1 Paragraphs 53-56 of Decision 1/CP.16 invite developing country Parties to submit to the secretariat of the UNFCCC their proposed NAMAs together with estimated costs and emission reductions to put in the Registry for donor country Parties to choose from and provide support.

2.2 For transparency between the donor and the recipient, cooperation between the donor and recipient country Parties is best started at the planning stage of the action to be taken.

2.3 This would also make it possible for the donor Party to supplement and at the same time build the planning capacity of the recipient Party, which is usually limited.

2.4 The donor and recipient country Parties will then continue to cooperate in developing the detailed plan of implementation of the proposed actions as well as in the process of measuring, reporting and verification of the implementation carried out and the support provided.

### **3. Leveraging of further support**

3.1 Once the detailed plan of implementation has been finalized, further support can, if seen as required by both Parties, be solicited through the Registry and/or other channels that either the donor or the recipient Party or both may know of.

### **4. Measuring, reporting and verification**

- 4.1 To enhance both transparency and capacity-building, domestic measuring, reporting and verification of the emission reduced or forestalled are better done cooperatively by both the donor and recipient Parties for 2 or 3 reporting periods.
- 4.2 Of course international measuring, reporting and verification will also apply to each supported mitigation action as required by Paragraph 61 of Decision 1/CP.16 of the Conference of the parties to the UNFCCC.

## Paper no. 2: Japan

### Submission by the Government of Japan on the work program for the development of guidelines and modalities on nationally appropriate mitigation actions by developing country Parties

The Government of Japan welcomes the opportunity to submit the following opinion in accordance with paragraph 66-67 of the Decision 1/CP.16 (FCCC/CP/2010/7/Add.1) on the preparation of guidelines and modalities of nationally appropriate mitigation actions by developing country Parties.

#### *The purpose of the MRV and the international consultation and analysis (ICA) system for developing country Parties enhanced by the Cancun Agreements*

- (1) The MRV and ICA system on nationally appropriate mitigation actions by developing country Parties, based on the Cancun Agreements, Decision 1/CP.16, shall be developed in line with the following purposes in order to contribute to the objectives of the Convention:
  - ◆ to improve transparency of efforts including mitigation actions and support provided;
  - ◆ to grasp the progress in achieving or implementing mitigation actions of each Party;
  - ◆ to encourage mitigation actions of each Party;
  - ◆ to promote capacity building for measuring and reporting of information in each developing country Party and;
  - ◆ to improve transparency on each country Party's needs for support and to facilitate financial support and technology transfer.
- (2) The systems and processes should be multi-tiered, which will allow for flexibility for developing country Parties, taking into account their shares of world GHG emissions and capabilities of MRV (i.e. LDCs and SIDS), whereas it needs to be robust enough to deliver outcomes favorable for the objectives mentioned above. In a broader context, Japan views that the systems and processes of MRV and ICA will provide important information for the review system agreed upon in paragraph 138 of Decision 1/CP.16.

#### *Basic viewpoint on the preparation of guidelines and modalities for developing country Parties*

- (1) Prompt completion to the extent possible: Preparation of new modalities/guidelines or revising existing relevant modalities/guidelines should be completed as soon as possible, with a view to adopting them by COP17.
- (2) Establishment of an efficient system: The new systems and processes should be designed so that it does not impose an excessive burden on each Party, the Secretariat and other stakeholders. Therefore, feasibility and cost assessments on the assumed options of the systems and processes should be conducted in close coordination with Parties. We would like to request the Secretariat to evaluate implication in terms of funds and human resources in case where a set of MRV and the ICA are implemented following the relevant guidelines.
- (3) Securing smooth transition to new systems and processes: To examine relevant modalities and guidelines, a place for technical discussion should be provided such as organizing workshops, where experts from parties participate, and the work should be advanced efficiently. In addition, Parties should be given the opportunities to submit their views on modalities and guidelines after their drafts are prepared.
- (4) Capacity building and support to developing country Parties: To ensure the smooth implementation of MRV/ICA upon the preparation of guidelines and modalities, capacity building and support for MRV/ICA to developing country Parties are important. For example, further guidance to the GEF should be adopted by the COP so that the financial support for introducing a new reporting system including biennial reports can be implemented smoothly.

### *Measurement, reporting and verification of supported actions and corresponding support*

- The MRV guidelines on internationally supported mitigation actions under the Convention should be established so as to avoid duplication with the MRV guidelines developed by many international aid agencies which have already implemented MRV on mitigation actions they supported.
- The followings are possible elements that will be measured, reported and verified based on the MRV guideline on internationally supported mitigation actions:
  - Overview of policy/project of mitigation actions
  - Schedule of the implementation of mitigations actions
  - Implementation organization
  - Potential GHG reduction (amount of GHG reduced)
  - Total cost
  - Method of estimating reduced GHG amount
  - Other information (as appropriate, such as co-benefits)

### *Biennial reports as part of national communications from non- Annex I Parties*

- (1) The relationship between the Biennial Report (BR) and National Communication (NC)
  - The purpose of BR is to report updated important information including current status of GHG emissions and implementation status of mitigation actions to increase transparency and to facilitate mitigation action. On the other hand, the purpose of NC is to report comprehensive information including mitigation actions, GHG inventories and other related information.
  - Since the information in NC includes the content of BR, the structure of each report should be considered in order to avoid duplication and complication of work, so that we can reduce and prevent unnecessary burden to each Party.
- (2) Reporting contents and format
  - On the basis of paragraph 60 (c) of the Cancun Agreement, we would like to propose following contents to be included in BR and NC.

NC	BR
Overview (executive summary)	Overview (executive summary)
National circumstances	—
GHG inventory including national inventory report*	GHG inventory including national inventory report
Information on mitigation actions including status of implementing national mitigations, progress of policy and measures and effect of measures, including both supported and non-supported mitigation actions registered by Parties, information of its MRV and other related information each Party consider to be reported.*	Information on mitigation actions including status of implementing national mitigations, progress of policy and measures and effect of measures, including both supported and non-supported mitigation actions registered by Parties, information of its MRV and other related information each Party considers to be reported.
Assumptions of targets and data (in case of targets relative to BAU, also information on projections)*	Assumptions of targets and data (in case of targets relative to BAU, also information on projections)
Information on the needs of support and support received (including support provided to other Parties)*	Information on the needs of support and support received (including support provided to other Parties)
Vulnerability assessment and adaptation	—

\*BR would be submitted as a separated report but it would also comprise a part of NC, in order to reduce the reporting burden of the Parties.

- Taking into account the share of world GHG emissions and reporting capabilities of each developing country Party, the content of the reporting should be flexible.
- The common reporting format (CRF) and national inventory report (NIR) should be submitted as information on the GHG inventory. However, the reporting requirements for the CRF and NIR should be less stringent than that of Annex I Parties.

- The gases to be reported should be anthropogenic emissions by sources and removals by sinks of greenhouse gases not controlled by the Montreal Protocol, and to the extent possible, for all years after 1994. Parties should follow, preferably, the 2006 IPCC guidelines, using 100-year GWP as provided in the 2007 IPCC Fourth Assessment Report (AR4) to estimate total GHG emissions.
- The BR should be reported using a newly developed common reporting format, in particular GHG inventories, to increase transparency and facilitate the comparability of reporting among Parties.
- As the objective of the BR is to update the contents of the NC, the BR should be brief.
- When Parties submit NC every four years or other period in accordance with the decision to be adopted by the Conference of Parties, BR would be submitted as a separated report but it would also comprise a part of NC, in order to reduce the reporting burden of the Parties.

(3) Timing of reporting

- In principle, BR should be communicated every two years, while NC should be communicated every four years or in accordance with any further decisions by the Conference of the Parties. Taking into account the share of world GHG emissions and reporting capabilities of each developing country and the level of support provided for reporting, differentiation of timing should be established for both NC and BR reporting.
- Parties need to consider the challenges and the solutions to implementing the point above, taking into account the NC preparation status under the support of GEF. To this end, we will request the UNFCCC Secretariat to gather information and produce a report.

(4) Capacity building for reporting

- In order to facilitate MRV implementation, support for capacity building should be provided for developing countries.
- It may be considered that existing CGE (Consultative Group of Experts) and other organizations could provide capacity building on elaborating BR as well as NC.
- Further guidance to the GEF could also be considered so that financial support for introducing a new reporting system including BRs can be smoothly implemented.

*Domestic verification of mitigation actions undertaken with domestic resources*

- The plans and outcomes of the internationally supported mitigation actions and domestically supported mitigation actions should be verified by domestic resources in accordance with general guidelines on the verification of the domestic mitigation actions to be developed by the Convention.
- While the COP should establish such general guidelines, each Party should establish a guideline on the MRV of domestic mitigation actions which would make each Party's domestic MRV system sufficiently robust and transparent based on the general guidelines to be adopted by the COP. The contents to be reported through the domestic MRV should be flexible, taking into account the share of world GHG emissions and the capability to implement MRV of each Party.
- As an overview of the MRV on domestic mitigation actions, the followings should be reported in the BR based on the newly developed guidelines and common reporting format (CRF).
  - Overview of policy/project of mitigation actions
  - Schedule of the implementation of mitigations actions
  - Expected GHG reduction (amount of GHG reduced)
  - Method of estimating reduced GHG amount
  - The institutional arrangement of domestic MRV (roles and responsibilities)
  - Other information

*International consultations and analysis (ICA)*

(1) Process for ICA

On the basis of paragraph 63 and 64 of Decision 1/CP.16, which stipulates the outlines of the international consultations and analysis (ICA), we would like to propose following process of the ICA:

- As a first step, the BR submitted by developing country Party should be sent to the Secretariat of the

UNFCCC.

- The BR should be analyzed by the technical experts. The experts will prepare a draft analysis report for each country Party. Before conducting ICA, the analysis reports should be communicated to the Party concerned. Also these reports will be made publicly available. The Party concerned will have an opportunity to comment on the draft report. The draft report will be finalized taking into account the comments by the Party concerned.
- The consultation should be conducted for the BR and finalized analysis report in the Subsidiary Body on Implementation involving the Party concerned and representatives of regional groups. Other Parties may participate as observers. The consultations should be conducted in a non-intrusive and non-punitive manner considering respect for national sovereignty.
- The information considered should include mitigation actions, the national greenhouse gas inventory report, including a description, analysis of the impacts and associated methodologies and assumptions, progress in implementation and information on domestic measurement, reporting and verification and support received contained in BR.

(2) Cost effectiveness of ICA

- The Secretariat should make an estimation of the human and financial resources needed for further discussion of the ICA process.

(3) Frequency of the ICA

- Taking into account an efficiency of the ICA system and human and financial resources, the frequency should be differentiated. Basically, frequency of the ICA should be in line with the frequency of the submission of BRs, which should be determined considering the share of the world GHG emissions and the capability of each Party.
- It could be also considered that the differentiation of the length of the time taken for consultation. For example, the countries with large shares of GHG emission would have relatively longer consultations while the countries with small emission will be discussed collectively or with less intensity.

(4) Outcome of the ICA

- After the consultation in the SBI, the outcome will result in a summary report which is prepared by the Secretariat. On the basis of the summary report, SBI will provide advices and recommendations to the Party concerned.
- In response to advices and recommendations, it could be considered that the Party concerned should submit follow-up reports in a certain period to report an improvement of reporting and their actions.



**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 country Parties and developed country Parties”**

**1. Work Program for Developing Countries**

The Republic of Korea welcomes the progress made at COP 16 with regard to the mitigation actions of non-Annex I country Parties. The Republic of Korea has constructively participated 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.

Throughout the work program, it should be duly taken into account that while the characteristics of measurement, reporting and verification (MRV) and international consultations and analysis (ICA) of the Nationally Appropriate Mitigation Actions (NAMAs) by developing countries would be differentiated depending on whether the relevant supports are provided internationally or domestically, their contribution to combating climate change should be recognized 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 work programs should help build trust among Parties since it is indispensable for the global efforts directed toward tackling climate change. To this end, the following principles will provide guidance to the work program so that it may effectively facilitate the mitigation actions of non-Annex I country Parties:

- Increase the transparency of mitigation actions by non-Annex I country Parties and of the relevant support provided by developed country Parties;
- Recognize, in an appropriate manner, developing countries' efforts against climate change which would be exerted in accordance with the principle of common but differentiated responsibilities and their respective capabilities;
- Support capacity building in developing countries to assist them in their efforts to efficiently implement mitigation actions in the context of sustainable development.

The followings are the views of Republic of Korea on the subjects of the work program which consist of the five elements in paragraph 66 of the Cancun Agreements:

#### 1.1. Facilitate Support to Nationally Appropriate Mitigation Actions (NAMAs) through a Registry: Element (a)

A registry, as specified in the Cancún Agreement, 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. For the registry to efficiently promote NAMAs, consensus should be reached on the role of the secretariat to which all the information on NAMAs seeking support and the support available will be communicated. We may also consider whether technical support on 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 or around the registry.

Regarding the second purpose, it should be noted that recording and updating relevant information is essential for NAMAs to be effectively facilitated, while giving proper 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 Non-Annex I country Parties' mitigation actions 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 necessary capacity should be in place 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 possible controversy around this ambiguity, the operational definition of internationally supported NAMAs should be agreed on through the work program as soon as possible.

- Measurement: It is worth considering what metrics other than GHG emission reductions could be adopted in measuring the effect of NAMAs. Measuring GHG emissions reduction for individual NAMAs might not only be technically challenging but also incur prohibitively high transaction costs. In addition, it will take considerable time for some developing countries to acquire the necessary capacity. The work

program may explore ways to identify more cost-effective measurement methodologies, including ways that could help provide more flexibility to the least developed country Parties and small island developing states.

- **Reporting:** Reporting formats should be designed to help prevent developing countries from making redundant efforts since a single NAMA might be reported via the registry, biennial reports and national communications. The work program may address how to appropriately report the outcomes of NAMAs in the context of sustainable development.
- **Verification:** The work program needs to detail the verification modalities so that the reports submitted by non-Annex I country Parties would be reviewed efficiently and effectively by the 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 could consider which aspect of the support for NAMAs would go under the MRV (e.g. scale of actual support, efforts to comply with the proposed schedule, etc.)

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

Biennial reports should contain national greenhouse gas inventories including a national inventory report and information on mitigation actions, needs and support received. Since biennial reports are a part of national communications, developed countries need to provide new and additional financial resources to meet the agreed full costs incurred by developing country Parties. Possible hurdles related to the biennial report must be lowered so that as many developing countries as possible may submit biennial reports consistent with their capabilities. For instance, biennial reports, under certain circumstances, could be produced mainly by adopting and slightly modifying the actions that have already been recorded or updated in the registry.

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

## **2. Work Program for Developed Countries**

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

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 the review of 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 is to build and enhance trust among Parties, which is crucial to the global community's efforts to respond to climate change. Accordingly, the following points must be taken into account in the work program regarding nationally appropriate mitigation commitments or actions by developed country Parties:

- Enhancing efficiency by building upon the existing mechanisms based on the United Nations Convention on Climate Change, Kyoto Protocol, and Marrakech Accord;
- Promoting the transparency of GHG emissions reduction/removal by Annex I country Parties during the second commitment period of the Kyoto Protocol, which should be in accordance with the recommendation included in the Fourth Assessment Report of the Intergovernmental Panel on Climate Change;
- 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 the reporting guideline on supports provided by developed country Parties based on Article 12.3 of the Convention.

The Republic of Korea regards paragraph 46 (a) of the Cancun Agreement as the key component of the work program regarding enhanced measurement, reporting and verification (MRV) for Parties included in Annex I. The relevant views are as follows.

#### 2.1. Revision of Guidelines on the Reporting of National Communications

In accordance with Convention Article 7.2(d), measurement and reporting should be improved with respect to the effectiveness of measures to limit the emissions and enhance the removals of these gases. In particular, the future revision of the measuring and reporting guidelines should focus on the transparency of the emissions reduction effects of individual mitigation actions by Annex I country Parties, as non-Annex I country Parties are expected to report the outcomes of their individual NAMAs, when necessary.

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

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

**SWITZERLAND**

**Work programme for the development of modalities and guidelines: enhanced action on mitigation. Nationally appropriate mitigation actions by developing country Parties  
AWG-LCA 14**

**1. Introduction**

The outcome of the work of the AWG-LCA in Cancún (COP 16, 10 December 2010) invited Parties to submit, by 28 March 2011, their views on the work programme for the development of modalities and guidelines for:

- The facilitation of support to nationally appropriate mitigation actions through a registry;
- The measurement, reporting and verification of supported actions and corresponding support;
- Biennial reports as part of national communications from non-Annex I Parties;
- Domestic verification of mitigation actions undertaken with domestic resources; and
- International consultations and analysis.

Switzerland welcomes the opportunity to submit its views in response to this invitation.

**2. General considerations**

Developed countries have built strong institutional, legal and procedural arrangements at their national level along international guidelines, to comply with their reporting and review obligations. As developing countries are now planning for and implementing NAMAs, they should similarly benefit from a strong reporting and review system that allows them to monitor the effectiveness of their mitigation actions and to rectify them accordingly. In order to enhance the mutual understanding and recognition of NAMAs, the key modalities and guidelines should be defined at the international level, leaving enough flexibility to accommodate national circumstances and to respect the principle of common but differentiated responsibilities and respective capabilities. Eventually, these modalities and guidelines have to converge with those used by the developed countries.

This will require significant work based on technical expertise. In order to prepare decisions at Durban by COP 17, paving the way for a rapid operationalization of an enhanced MRV system for developing countries, Switzerland proposes to establish an expert group on MRV and another one on the Registry under the AWG-LCA with technical support of the SBs. In order to facilitate the work of these expert groups, specific intersessional meetings should be organized.

**3. Modalities and guidelines for the facilitation of support to nationally appropriate mitigation actions through a registry**

According to decision 1/CP.16, the Registry has two main functions, one to facilitate the matching of ready-to-be-implemented NAMAs with the best corresponding support (finance, technology, capacity building) and the other one to allow the recognition of the NAMAs implemented. Switzerland views the Registry as a repository tool where developing countries can voluntarily list their NAMAs, to seek either support for their implementation or recognition for their participation in the overall mitigation efforts that are deployed worldwide.

The scope of the matching function can be defined in many different ways and the work programme considered here should first define what it means to facilitate the matching. The recording of NAMAs seeking support in the Registry is a necessary, yet not sufficient, condition for the matching. What information about the NAMAs to record and how to present it in the Registry is certainly a question that should be addressed. Then, the information on potential sources of

support and the conditions for their disbursement should be made available in the Registry, allowing the developing countries to choose the most appropriate ones to contact with the aim to eventually implement their NAMAs. How to compile and regularly update such an information on potential sources of support is a question that should be addressed by the work programme as well.

Switzerland considers though that the Registry should remain a light structure having in itself no decision power for the matching (this will happen primarily through other channels) and no regulating function. For example, the Carbon Finance Assist and Partnership for Market Readiness of the World Bank already propose a guidance on how to structure the NAMAs to be implemented and on their quality before a public-private financial support can be provided.

The other part of the Registry, aiming at giving recognition to the listed implemented NAMAs, can pursue many goals. The work programme should ensure a rapid agreement on these goals and functions to frame the drafting negotiations afterwards. Will the Registry serve to keep track of the support provided to NAMAs (domestic and international) and/or to keep track of the estimated (or measured) emissions reductions? Will the Registry serve to analyse which countries are most/less successful in finding support for their NAMAs and/or what are the types of NAMAs that are most/less successfully implemented? These are some questions that should be addressed in the work programme considered here.

#### **4. Modalities and guidelines for the measurement, reporting and verification of supported actions and corresponding support**

NAMAs are implemented in order to yield emission reductions and the support they receive is a means to this end. Measuring the reductions obtained is therefore in the country's implementing the NAMAs own interest, but also in the interest of the country supporting them. For that, the reductions measured should also be reported. Most importantly, the way the reductions are measured must be understood by other countries, especially the one or the ones supporting the NAMAs, but generally all the countries participating the collective mitigation effort (each one having pledged its part of this effort).

To this end, modalities and guidelines for measurement and reporting of NAMAs should be established within the UNFCCC and be used by all developing countries having pledged to implement NAMAs. The results of the workshops to understand the diversity of NAMAs and their underlying assumptions will be a precious starting point of the work programme considered here. The guidelines framework to be decided upon by the COP should leave a certain degree of flexibility to the countries, to take into account their national circumstances.

Nevertheless, the guidelines alone are not enough: Conventionally, developed countries have the responsibility to support the enhancement of the capacity of the developing countries to measure and report on their NAMAs. With biennial reports to be eventually produced, the progressive building of procedural, legal and institutional arrangements in the developing countries, wherever feasible, should be the objective of such a support.

The verification has two sides, one relating to the respect of the measurement and reporting guidelines and the other relating to the effectiveness of the pledged NAMAs in terms of emission reductions. For the first side of verification, the review processes used by the developed countries should be a guiding objective. These processes have given the developed countries the opportunity to build their national systems and improve their measurement and reporting capacity.

For the second side of the verification, the international consultations and analysis process, based on the biennial update reports, should be the vehicle (see point 7 there under).

#### **5. Modalities and guidelines for the biennial reports as part of national communications from non-Annex I Parties**

As the emissions from the major emitting developing countries and emerging economies represent a growing part in the world total, they should be monitored more frequently. The biennial update reports as part of the national communications, foreseen in decision 1/CP.16, derive from that need. With these countries reporting biennially, in

parallel with the reporting from the developed countries, conditions are set for estimating the actual level of emissions worldwide more precisely (see also point 7 hereunder, on international consultations and analysis).

As already mentioned in point 4 here above, the capacity to measure and report so frequently should be enhanced accordingly, with the support from developed countries, according to Article 4, paragraph 3, of the UNFCCC.

The biennial update reports should only be produced by the major emitting developing countries and emerging economies, for a start those with a share of world emissions above 1%. About 20 countries worldwide would be concerned, representing collectively more than 85% of total emissions. Among them the half are developing countries and their emissions amount for more than 40% of total emissions. For these countries, biennial reporting should be compulsory. For the other developing countries, it would only be voluntary.

The work programme considered here should benefit from the work<sup>1</sup> undertaken by the OECD and the IEA on options to revise reporting guidelines for Non-Annex I National Communications.

## **6. Modalities and guidelines for the domestic verification of mitigation actions undertaken with domestic resources**

According to the Cancún Agreements, the NAMAs implemented with domestic support will be verified at the national level and will be reported in the national communications and the biennial update reports for the ICA process (see point 7 hereunder).

Nevertheless, among all the NAMAs implemented, it will be too heavy a process for the country to separate those supported domestically from those supported externally, without mentioning the NAMAs implemented with both domestic and international sources of support. In these conditions, having guidelines for the MRV of domestically supported NAMAs different from the ones for the MRV of internationally supported NAMAs seems to be impracticable.

A unique set of internationally agreed guidelines for the national verification of all implemented NAMAs should therefore be decided upon, regardless if these NAMAs were supported domestically or internationally (see also point 4 there above). Again, enough flexibility in the guidelines to accommodate the national circumstances of all the developing countries implementing NAMAs and reporting about them should be provided.

The domestic verification is necessary for the country implementing NAMAs to have a comprehensive picture of the emissions reductions yielded by all its NAMAs. The work programme considered here should strive to define such internationally agreed guidelines for the domestic verification, in close cooperation with the SBs.

## **7. Modalities and guidelines for the international consultations and analysis**

The process for international consultations and analysis would be based, according to the Cancún agreements, on the biennial update reports from developing countries. This process, as stated above in point 5, would apply first to the major emitting developing countries and emerging economies. In a pilot phase, only those countries emitting more than 1% of the world total should undergo such a process (around ten developing countries). It would allow the testing of the added value that ICA can bring to the countries concerned and to the other Parties in terms of transparency and capacity building.

The work programme considered here should be inspired by the many examples of review processes in other multilateral agreements and regimes from which the ICA modalities and guidelines could be drawn.

---

<sup>1</sup> Jane Ellis, Sara Moarif, Gregory Briner, Barbara Bucher and Eric Massey, *Options to revise reporting guidelines for Annex I and non-Annex I National Communications*, COM/ENV/EPOC/IEA/SLT(2010)4, 24 November 2010.