

## IGES submission to views on modalities, procedures and guidelines for the transparency framework for action and support referred to in Article 13 of the Paris Agreement

Institute for Global Environmental Strategies (IGES)

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This submission proposes elements as matters related to modalities, procedures and guidelines (MPG) for the transparency framework for action and support referred to in Article 13 of the Paris Agreement (PA). In this submission, we consider parts of the MPG relevant to:

- A. Introduction;
- B. National inventory report on anthropogenic emissions by sources and removals by sinks of greenhouse gases (GHG); and
- C. Information necessary to track progress made in implementing and achieving its nationally determined contribution under Article 4 of the Paris Agreement,

as referred to in the joint reflections note by the presiding officers of the Ad Hoc Working Group on the Paris Agreement, the Subsidiary Body for Scientific and Technological Advice and the Subsidiary Body for Implementation (Addendum 6: Matters relating to Article 13 of the Paris Agreement and paragraphs 84–98 of decision 1/CP.21) (UNFCCC, 2018; hereafter, referred to as JRN).

The structure of our submission is as follows:

- Under “IGES’s proposal”, whenever options are provided in a specific section of the JRN, we selected the option that is most recommendable from our point of view. Whenever terms in brackets are included within the option we selected (e.g., [shall] [should]), we removed the brackets from the term we recommend and underlined it. We also provided some wording as an addition to the original text of the option we selected, as necessary. In this case, we underlined the additional wording.
- Under “Rationale”, we explain the rationale for why we recommend and propose IGES’s proposals. Our submission is made based on the findings from two recently published IGES Databases; namely, IGES Nationally Determined Contributions (NDC) Database and Biennial Update Reports (BUR) Database. For details of these databases and related research publications, please visit our website at <<https://www.iges.or.jp/en>>.

**A. Introduction**

1. *A.5 Facilitating improved reporting and transparency over time (page 9)*

<p>IGES's proposal</p>	<p><u>IGES's selection of the terms and proposed addition specifically to section A.5 Paragraph 2 as underlined:</u></p> <p>To facilitate continuous improvement, each Party <u>shall</u> prepare, regularly update, and submit as part of a biennial transparency report, <u>planned improvements</u> in relation to its reporting pursuant to sections B, C, D, E, and F, as applicable, of these MPGs. Such <u>planned improvements</u> for B, C, D, E, and F <u>shall</u> include, as applicable:</p> <ul style="list-style-type: none"> <li>a. <u>Planned improvements</u> identified by the Party in relation to the implementation of Article 13 of the Agreement;</li> <li>b. How the Party is addressing or intends to address areas of improvement identified as part of a technical expert review;</li> <li>c. Efforts to improve a Party's reporting over time, including in relation to data quality and the transparency, accuracy, consistency, comparability, and completeness of reporting;</li> <li>d. Identification of reporting-related capacity-building needs, including those identified as part of a technical expert review;</li> <li>e. Timelines for <u>planned improvements</u>;</li> <li>f. Efforts to strengthen institutional arrangements in relation to the implementation of Article 13 of the Paris Agreement;</li> <li>g. For those developing country Parties that need flexibility in the light of their capacities, an explanation of the capacity constraint relevant to the provision, an associated timeline for how the Party will enhance its reporting to meet the common MPGs in the future, <u>and information on support needed, as applicable, in sub-section F.9.</u></li> </ul>
<p>Rationale</p>	<p>According to the IGES BUR Database (2018), around 70% of developing countries <sup>1</sup> have reported support they need for reporting (national communications/BUR and/or GHG inventory)<sup>2</sup> and around 60% have reported status in building institutional arrangements<sup>3</sup>. In addition, around 80% of all developing countries have participated in the international technical expert</p>

<sup>1</sup> Based on the BURs that were most recently submitted by 42 developing countries.

<sup>2</sup> See Figure 1 in Annex.

<sup>3</sup> See Figure 2 in Annex.

	<p>review process for at least their first BUR<sup>4</sup>. In light of supporting continuous improvement, it is our view that the above terms and proposed addition will help Parties strengthen improvement planning and identify, as applicable, necessary support for implementing the planned improvements.</p>
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**B. National inventory report on anthropogenic emissions by sources and removals by sinks of greenhouse gases:**

2. *B.3. Methods, a. Methodologies, parameters and data, {Use of IPCC Guidelines} (page 11)*

IGES's Proposal	<p><b>[Option 3.1.1.2],</b> with IGES's selection of the terms and proposed addition as <u>underlined</u>:</p> <p>Each Party shall use the 2006 IPCC Guidelines for National Greenhouse Gas Inventories, and shall use any subsequent version or refinement of the IPCC guidelines once agreed upon by the CMA. Each Party is encouraged to use the 2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands; those developing country Parties that need flexibility in the light of their capacities with respect to this provision have the flexibility to instead use the Revised 1996 IPCC Guidelines for National Greenhouse Gas Inventories, in conjunction with the Good Practice Guidance and Uncertainty Management in National Greenhouse Gas Inventories and the Good Practice Guidance for Land Use, Land-Use Change and Forestry <u>in their first national inventory report in an NDC cycle.</u></p>
Rationale	<p>According to the IGES BUR Database (2018), around 70% of developing countries which have submitted BURs, already used the most recent 2006 IPCC Guidelines<sup>5</sup>, despite the fact that existing BUR guidelines recommend developing countries to use the older set of IPCC Guidelines. This is because countries generally prefer the most recent IPCC Guidelines, which are scientifically robust, and also because the 2006 IPCC Guidelines are more user-friendly. Therefore, it is our view that there are reasonable incentives for developing countries which currently do not use the most recent IPCC Guidelines, to use those Guidelines in their subsequent national GHG inventory reports.</p>

<sup>4</sup> See Figure 3 in Annex.

<sup>5</sup> See Figure 4 in Annex.

	<p>Moreover, we cannot say the older set of IPCC Guidelines is less complex, meaning that the choice of which set of IPCC Guidelines to use does not depend on the capacity of a country. The fact remains that around 70% of developing countries which submitted BURs, have already used the most recent 2006 IPCC Guidelines and this indicates that transitioning from the older guidelines to the newer ones is possible, as long as countries have time to study the new ones. Therefore, we propose that those developing country Parties that need flexibility in the light of their capacities with respect to this provision may use the older set of IPCC Guidelines for their first national inventory report but they can and therefore, must use the most recent IPCC Guidelines from when they submit their second national inventory report.</p>
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3. B.4. Metrics (page 14-15)

IGES's Proposal	<p><b>[Option 4.2.1],</b> with IGES's selection of the terms and proposed addition as <u>underlined</u>:</p> <p>Each Party <u>shall</u> use common metrics as agreed by CMA to report aggregate emissions and removals of GHGs, expressed in CO<sub>2</sub> equivalent (CO<sub>2</sub> eq).</p>
Rationale	<p>Selecting which metrics to use does not depend on the capacity of a country. Switching from older to more recent metrics is also not dependent on countries' capacity. According to the IGES BUR Database (2018), only 20% of developing countries<sup>6</sup> which submitted BURs, used more recent metrics from the IPCC's Fourth or Fifth Assessment Reports. Hence, clear guidance for all Parties to use the most recent metrics, as agreed by CMA, is necessary to improve accuracy and comparability of national inventory reports.</p>

4. B.5. Reporting guidance, c. Time series, {End point for time series} (page 17)

IGES's Proposal	<p><b>[Option 5.9.2],</b> with IGES's selection of the terms and proposed addition as <u>underlined</u>:</p> <p>For each Party, the latest reporting year shall be no more than two years prior to the submission of its national inventory report; for those developing country Parties that need flexibility in the light of their capacities with respect to this provision, they have the flexibility to instead provide the latest reporting year as no more than <u>four</u> years prior to the submission of its national inventory report, <u>but shall report the latest reporting year as no more than two years</u></p>
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<sup>6</sup> See Figure 5 in Annex.

	<p><u>prior to the submission of its national inventory report containing the end year of NDC period and beyond.</u></p>
Rationale	<p>It is especially important to provide national inventory reporting in a timely manner to promote actions and support. According to the IGES BUR Database (2018), around 40% of developing countries<sup>7</sup> which submitted BURs, provided the latest reporting year of GHG emissions as four years prior to the submission of their BUR, following existing BUR guidelines. Interestingly, around another 30% of developing countries provided the latest reporting year as two to three years prior to the submission of their BUR, which goes beyond requirements under existing BUR guidelines.</p> <p>In addition, those countries which submitted BUR2, had previously provided the latest reporting year, on average, around eight years prior to the submission of their second national communications (NC2); however, those countries provided the latest reporting year around four years prior to the submission of their BUR2. This demonstrates that countries can gradually improve their capacity related to data availability by practicing making national reports. Therefore, it is our view that by introducing clear guidance, even developing countries that need flexibility will be able to provide the latest reporting year as no more than two years prior to the submission of their national inventory report containing the end year of the NDC period and beyond.</p> <p>According to the IGES NDC Database (2018), there was one non-LDC country, whose NDC period ends in 2025, and thus whose inventory report containing the end year of NDC period shall be submitted by 2027 (eight years from now at the longest). We believe capacity building support can make this rule workable for the country. For all other non-LDC developing countries, their NDC period ends in 2030. Thus, their inventory reports containing the end year of NDC period shall be submitted by 2032. We consider in this case, there is enough time for countries to improve data collection capacity over time.</p>

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<sup>7</sup> See Figure 6 in Annex.

**C. Information necessary to track progress made in implementing and achieving its national determined contribution under Article 4 of the Paris Agreement**

5. C.3. *Information necessary to track progress made in implementing its nationally determined contribution under Article 4 to date (page 20)*

<p>IGES's Proposal</p>	<p><b>[Option 3.2],</b> with IGES's selection of the terms and proposed addition specifically to Option 3.2 <b>paragraph 1 and paragraph 8</b>, as underlined:</p> <p><u>Selection of the terms and proposed addition to Option 3.2 paragraph 1:</u> Each Party shall identify, where appropriate quantitative, indicator(s) relevant to tracking progress towards the implementation and achievement of its nationally determined contribution under Article 4. <u>These indicators could include, as appropriate, for example:</u></p> <ul style="list-style-type: none"> <li>a. <u>Percentage reduction of GHG emissions below a specified base year, base period, baseline;</u></li> <li>b. <u>Percentage reduction of GHG intensity below the specified base year or base period;</u></li> <li>c. <u>Relevant indicators for a specific policy or measure;</u></li> <li>d. <u>Relevant indicators to track mitigation co-benefits resulting from adaptation actions or economic diversification plans;</u></li> <li>e. <u>Other (e.g. hectares of reforestation; percentage of renewable energy use or production; carbon neutrality; peak emission; share of non-fossil fuel in primary energy consumption; non-GHG related indicators, etc.)</u></li> </ul> <p><u>Selection of the terms and proposed addition to Option 3.2 paragraph 8:</u> <u>Information pursuant to paragraphs 1 to 7 shall be presented in narrative and tabular format.</u></p>
<p>Rationale</p>	<p>According to the IGES BUR Database (2018), around 60% of developing countries reported progress in mitigation measures using quantitative indicators<sup>8</sup>. Even though the BUR guidelines do not include such a recommendation, countries found benefits from using quantitative indicators to track the progress of mitigation measures, which relates to the progress towards the implementation of nationally determined contributions.</p>

<sup>8</sup> See Figure 7 in Annex.

	<p>Therefore, it is our view that our proposal to use quantitative indicators where appropriate is feasible, and encourages increased transparency to promote progress and actions.</p> <p>In addition, according to the IGES BUR Database (2018), around 80% of developing countries have included in their BURs information on mitigation policies and measures, presented in narrative and tabular format<sup>9</sup> as guided by the BUR guidelines (UNFCCC, 2011), including progress of mitigation policies and/or measures.</p>
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6. C.7 Mitigation actions, policies and measures (page 24)

<p>IGES's Proposal</p>	<p><b>[Option 7.1]</b>, with IGES's selection of the terms and proposed addition specifically to Option 7.1 <b>paragraph 1</b> as underlined:  <u>Each Party shall provide in its biennial transparency report information on mitigation actions, policies and measures that support the implementation and achievement of its nationally determined contribution under Article 4. This information shall be presented in narrative and tabular format.</u></p>
<p>Rationale</p>	<p>According to the IGES BUR Database (2018), around 80% of developing countries have provided in their BURs information on mitigation policies and measures presented in narrative and tabular format as guided by the BUR guidelines (UNFCCC, 2011)<sup>10</sup>. The information on mitigation policies and/or measures provided by countries in tabular format typically include name, description, objectives, type of instrument, status, sectors affected, gases affected, and implementing entities: elements being proposed under <u>Option 7.1 paragraph 3, (a) to (k)</u>. Around 70% of developing countries also reported estimated GHG emissions that can be reduced by mitigation policies and/or measures<sup>11</sup>. Therefore, it is our view that our proposal is workable and increases transparency to promote further actions.</p>

7. C.9. Projections of greenhouse gas emissions and removals, as applicable (page 26)

<p>IGES's Proposal</p>	<p><u>IGES's selection of the terms and addition specifically to section C.9 <b>paragraph 1</b> as underlined:</u></p>
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<sup>9</sup> See Figure 8 in Annex.

<sup>10</sup> See Figure 8 in Annex.

<sup>11</sup> See Figure 9 in Annex.

	<p>Each Party <u>with a nationally determined contribution containing GHG emissions as a target shall provide “without measures” and “with measures” projections of all GHG emissions and removals, and may provide “with additional measures” projections; those developing country Parties that need flexibility in the light of their capacities have the flexibility to instead provide projections that extend at least to the end point of the Party’s nationally determined contribution under Article 4.</u></p>
Rationale	<p>In developing and communicating nationally determined contributions, many countries have increased capacity to make GHG emissions and removals projection. According to the IGES BUR Database (2018), around 50% of developing countries which submitted BURs and have a nationally determined contribution containing a GHG emissions target, have included projections of GHG emissions, at least “without measures”, in their BURs<sup>12</sup>. Therefore, it is our view that our proposal is workable and can inform the periodical review on global mitigation efforts in meeting the Paris Agreement goals, as well as inform the progress of each Party towards achieving its NDC.</p>

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<sup>12</sup> See Figure 10 in Annex.

**Annex:**

The figures presented here are taken from the IGES BUR Database (IGES, 2018).

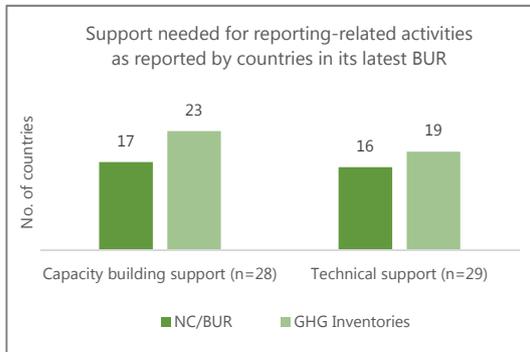


Figure 1. Support needed for reporting-related activities reported by countries

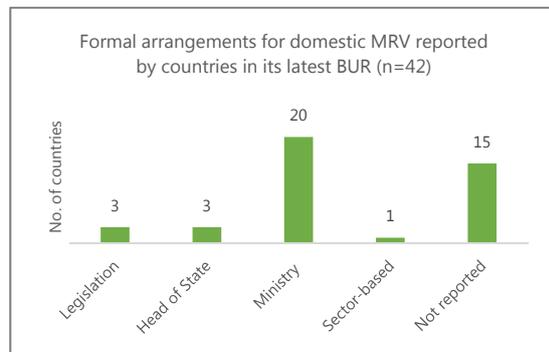


Figure 2. Formal arrangements coordinating domestic MRV in each country



Figure 3. Countries that have participated in international review process

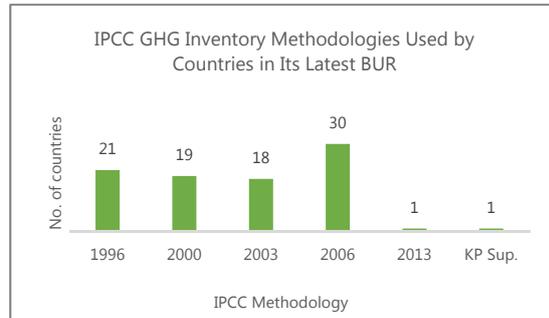


Figure 4. IPCC Guidelines used by countries

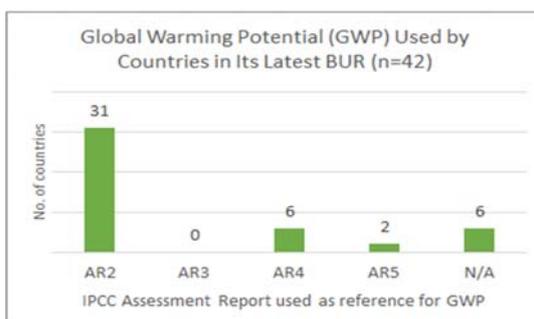


Figure 5. Global Warming Potential (GWP) used by countries

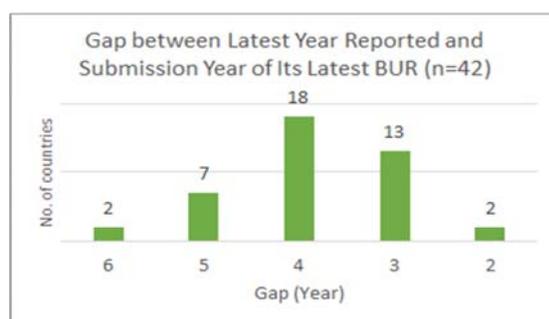


Figure 6. Gaps between the latest year reported and submission year of GHG inventory reports

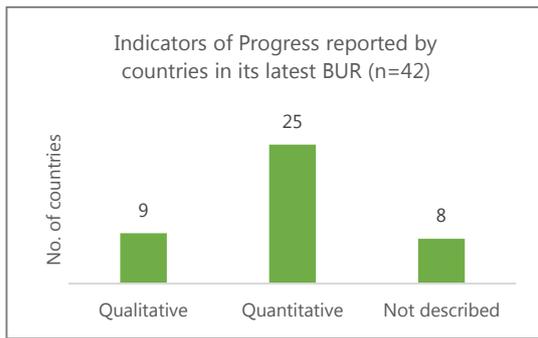


Figure 7. Indicators of mitigation action progress reported by countries

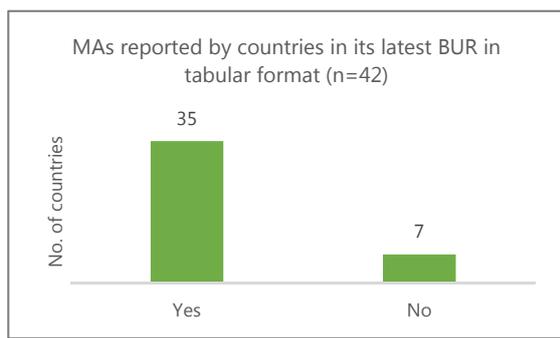


Figure 8. Mitigation actions reported by countries in a tabular format

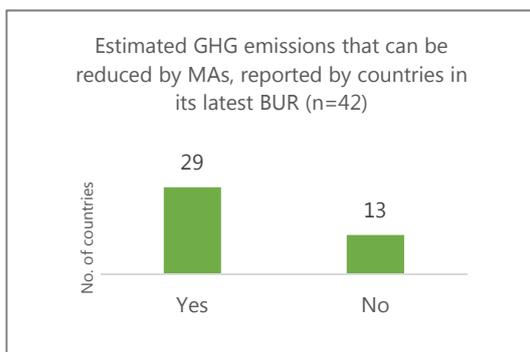


Figure 9. Estimated GHG emissions that can be reduced by mitigation actions

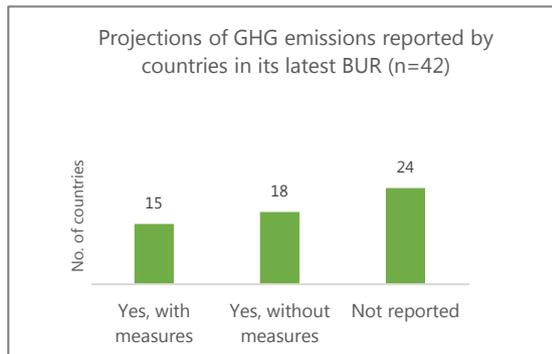


Figure 10. Projections of GHG emissions reported by countries

**References:**

IGES. (2018) IGES Biennial Update Report (BUR) Database. Available at:  
<https://pub.iges.or.jp/pub/iges-bur-database>

IGES. (2018) IGES Nationally Determined Contributions (NDC) Database. Available at:  
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