

Recommendations for the UNFCCC National Communications Process for Developed Countries (25 June 2010)

By IndyACT, Germanwatch, Greenpeace and WWF

***Annex 1 National Communications guidelines should be revised to include guidelines for zero carbon action plans for 2050**

***The 6th National Communications to the UNFCCC should be submitted by December 31, 2012, including the first iteration of each country's zero-emission plan for 2050.** The 4-year cycle for full national communications should be continued, however biennial updates should be made.

***An annual financial inventory** should be required that includes robust accounting and reporting standards for support provided by developed countries to developing countries for mitigation, including REDD, and adaptation. This report would be in addition to annual GHG inventories that are already submitted by developed countries.

***The review and compliance process for Annex 1 National Communications and inventories should be revised and enhanced.** The scope of expert review should be expanded such that reviewers are able to flag early warning signals of non-compliance (e.g. when emissions are more than [15%] off of the linear trajectory to the target). Such instances would be addressed, and continued inaction by the Party would lead to consequences. The enforcement branch of the Compliance Committee should deal with all cases of ultimate non-compliance.

Zero Carbon Action Plan (ZCAP)

Zero Carbon Action Plans (or Zero Emissions Plans) for industrialized countries would not only assist in setting a pathway towards a low carbon economy for each country, they would also help to build trust globally by demonstrating that each country is indeed making adequate short and long-term institutional and financial investments to meet its emissions reduction target. ZCAPs need consist of an integrated adaptation and mitigation planning framework, projecting the many interlinkages and potential mutual impacts between mitigation and adaptation actions. Guidelines for this forward looking plan should require that Parties:

- Detail an emissions reduction trajectory through 2020, 2030, 2040, and 2050, that will have the country achieving near-zero emissions by 2050. Include details of where national emissions are relative to the outlined trajectory.
- Identify the transformation strategies, and policies and measures the country plans to implement to transform all relevant sectors of its economy to meet its quantified emissions reduction commitment and be on a trajectory towards near zero emissions by 2050.
- Develop a clear roadmap for the investments in clean technology with sustained scaling up of development, diffusion and deployment of clean technologies in the short, medium and long term
- Outline how a country proposes to meet its MRV finance, technology and capacity building support obligations
- include technology roadmaps, RD&D plans, and plans to remove long-lived high-emissions infrastructure that are commensurate with the 2050 vision, and take into account climate impacts

The ZCAP should be updated within each 5-year commitment period, in line with obligations for that period.

Annual Financial Inventory

The current financial reporting done through national communications is not frequent enough, and lacks consistency among countries. As discussed in a UNFCCC Secretariat document from 2007, a number of issues exist related to financial reporting (FCCC/SBI/2007/INF.6/Add.2). In addition to concerns raised by the Secretariat, the lack of a definition for 'new and additional' has hindered analysis of financial commitments by developed countries. To address the gaps in MRV of finance, an annual Financial Inventory should accompany the annual GHG Inventories produced by developed countries. Guidelines for these inventories should:

- Define the term 'new and additional', including a specific base year
- Define categories of acceptable funding, including a breakdown of specific activities financed (see Tirpak et al. 2010. Guidelines for Reporting Information on Climate Finance." WRI)
- Require that Parties distinguish funding for climate change within the total amount given to multilateral institutions and bilateral institutions. Current requirements to disclose the total amounts given to multilateral institutions are not sufficient for assessing contributions relevant to climate.
- Include recipient countries of finance
- Provide a common format for reporting of bilateral contributions, so that they can be compared across countries.
- Provisions for reporting on other types of support (technological, capacity building).

Cycle of Annex 1 National Communications and Inventories

Developed countries should be required to produce full national communications every 4-years with biennial updates. The 6th full national communication, including the first iteration of a country's Zero Carbon Action Plan, should be submitted by December 31, 2012. Zero Carbon Action Plans should be updated at least once a commitment period (at the beginning of the period). The submission of annual inventories should be continued, however an account of support provided to developing countries (a financial inventory) should be included.

Strengthened review and compliance process for Annex 1 National Communications and Inventories

The system for reviewing developed country reporting must give confidence that countries are complying with their obligations. The compliance mechanism established under the Kyoto Protocol is a step in the right direction, however this system has not been effective in detecting potential cases of non-compliance. A strengthened early-warning flag should be added (e.g. when emissions are more than [15%] off of the linear trajectory towards meeting a country's target). Specifically, expert reviewers should be empowered to flag early signs of potential non-compliance as assessed in national communications or inventories, and refer questions of implementation to the Compliance Committee. Such instances would be addressed, and continued inaction by the Party would lead to consequences. The Enforcement Branch of the Compliance Committee should deal with all cases of ultimate non-compliance. To ensure compliance with commitments, any mechanism must be part of a future legally binding treaty.