

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

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It is imperative that Parties make progress on MRV issues, particularly Annex I reporting, review, compliance and financial support (see separate briefing) and Non-Annex I (NAI) reporting, review and facilitation. Many of these issues need to be resolved by Cancun (2010), with any remaining details completed by South Africa (2011). This brief examines where Parties need to make progress on one particular element of the MRV system for developing countries, namely, the NAI National Communications process.

National communications should serve three purposes:

- To report emissions data through a GHG inventory in a transparent, consistent and comparable manner with as complete and accurate information as possible;
- To outline a country's climate resilient low carbon action plan to 2050;¹ and
- To report on adopted and/or implemented policies and measures (NAMAs) to reduce GHG emissions, including a quantitative estimate of the impacts of individual policies and measures or collections of policies and measures, compared to a reference level, and the underlying assumptions.

From this list, one may derive three observations:

- Significant and sustained capacity building support (both technical and financial) will be needed to enable developing countries to meet these reporting challenges;
- Not all of this information needs to be submitted with the same frequency; and
- The current guidelines for national communications need significant revisions.

Capacity for developing country national communications must be built up over time. We will need a transition period which requires those countries that have capacity, and also contribute significant shares of global emissions, to produce national communications earlier. Those countries who clearly need more capacity should build that capacity over time, in line with the convention's principle of common but differentiated responsibilities and respective capabilities. All countries should receive adequate support for their individual capacity building needs.

By Cancun, Parties should:

- Agree that National Communications from developing countries should be submitted every 4 years, with an update, including a GHG inventory, submitted every two years. As many developing countries will complete their national communications in 2010, the first update should be due at the end of 2012, contingent to finance being provided in time. While not exempt from developing national communications, LDCs and SIDS may submit their updates as their capacity is enhanced over time.
- Agree that developing countries with more than 1% of global annual emissions (in a year to be decided by Parties) should begin formulating climate resilient Low Carbon Action Plans, LCAPs (or low emission plans) immediately, with technical and financial support by developed countries. The first provisional iteration of these plans should be incorporated into the national communications updates at the end of 2012. These plans should outline how developing countries plan to achieve their substantial deviation from baseline in emissions by 2020 and include indicative 2030/2050 aims for the transition to a climate resilient low-carbon economy. Parties would also identify their support needs. A full version of these plans should be included in the national communication due at the end of 2014.
- Other developing countries should also be required to submit climate resilient low carbon action plans in their national communications due at the end of 2014 but are encouraged to do so

¹ Developed countries would also be required to produce the more stringent zero emission plans.

earlier. LDCs and SIDS may submit these comprehensive plans at their discretion.

- Agree to a comprehensive support package for assisting developing countries to establish and maintain the national systems necessary to support this enhanced reporting, particularly with respect to GHG inventories and the climate resilient low carbon action plans. As with the rest of the activities under the Convention, equal attention should be given to mitigation and adaptation plans (including vulnerability assessments). Rapid disbursement of these funds will be crucial to enabling developing countries to meet these reporting requirements and ambitious timelines.

Prior to Cancun, Parties must agree on a process to ensure that all of the relevant guidelines are finalized by Cancun.

NAMA Registry

By Cancun, the NAMA Registry and the new climate fund need to be established. After Cancun, and in time for the South African COP, additional guidelines for the measuring, reporting and verification of *supported* NAMAs need to be agreed. To be clear, *supported* NAMAs should be internationally MRVed as part of the Registry process. There would be no international MRV of *unsupported* NAMAs; the MRV of unsupported NAMAs would only occur as part of the broader review of National Communications outlined above.

Verification and Facilitation

Who reviews developing country actions and to what effect is one of the key MRV issues. Parties must resolve these issues by Cancun. There are many ways this could be addressed, suffice it to make two points here:

>Developing country National Communications should be reviewed by expert review teams (ERTs)

The quality of developed countries' inventories has increased dramatically over the last decade in large part due to the expert review process. Developing countries will need time and support to develop robust inventories and the expert review process can play a significant facilitative role in enhancing their capacity to report. The composition of Expert Review teams must have balanced representation (as is current practice). Expert reviewers can also assist in building capacity for policies and measures and low carbon action plans. In-country reviews are likely to be the most beneficial and this option should be open to developing countries.

As the extent of the review process is being widened both in terms of countries and number of reports, it will be *crucial* to enhance the capacity of the review process, including: nominating and making available more reviewers, training more reviewers (especially from developing countries), providing financial resources to support the review process and expanding the capacity of the secretariat to support this process.

>A facilitation mechanism should be established to assist developing countries

Lack of capacity may become an issue that inhibits developing countries from implementing and reporting on their desired mitigation actions. A mechanism should be established to address instances where discrepancies exist in the implementation of NAMAs and/or their anticipated outcomes. The purpose of the mechanism should be to amicably resolve any discrepancies through the provision of further technical, financial or other assistance.

By Cancun, Parties should:

- Agree that developing countries' national communications should be reviewed by expert review teams, with an alternative option for in-country reviews based on internationally agreed guidelines.
- Establish a facilitative mechanism to assist developing countries in achieving their goals
- Commit to enhancing the capacity of the review process itself (training for national experts, etc).

It is imperative that Parties use the full negotiating time available to make significant headway on this issue.