

Submission by the Arab Republic of Egypt on behalf of the African Group of Negotiators (AGN)

on

Further guidance in relation to the mitigation section of decision 1/CP.21

02 April 2018

Introduction

The African Group of Negotiators (hereafter African Group or AGN) welcomes the opportunity to provide further views on issues relating to further guidance in relation to the mitigation section of decision 1/CP.21 on: (a) features of nationally determined contributions, as specified in paragraph 26; (b) information to facilitate clarity, transparency and understanding of nationally determined contributions, as specified in paragraph 28; and (c) accounting for Parties' nationally determined contributions, as specified in paragraph 31. The Ad hoc Working Group on the Paris Agreement (APA) at the fourth part of its first session recalled its general call for submissions by Parties (FCCC/APA/2016/2, paragraph 23) and noted that focused textual proposals would be most helpful in allowing Parties to focus on substance in their deliberations on the APA agenda items. The present submission builds on the constructive engagement by the AGN during COP 23, with inputs made in track changes mode. The AGN notes that the 180-page informal note by the co-facilitators (final version, 13 November 2017) contains inputs by Parties, and that these remain on the table. As such, the AGN makes no comments on these inputs. The AGN looks forward to hearing the views of other Parties on these matters, is committed to engaging constructively in the negotiations and reserves the right to make further submissions in the process of negotiations.

Explanatory note to the Appendix

This submission by the AGN includes pages 3-8 and 73-79 of the informal note. Within the selected pages, the AGN has added and deleted text in some places, but expresses no views on other parts, which is indicated in the Appendix as follows:

SHADED – text added by AGN

****** - marker that text has been deleted within text or an option by the AGN (deleted text not shown – and options deleted entirely not shown, only Options preferred by the AGN retained)

Unshaded text – no view taken by the AGN

{placeholder or commentary, not textual input}

Appendix

I. Features

**

A. Identify and list existing features

Option 2:

- Recognize the work carried out so far;
- Features of NDCs relevant to mitigation are outlined in ** Article 4 ** of the Paris Agreement;
- While the efforts and level of ambition communicated by Parties are nationally determined, NDCs should be prepared and communicated pursuant to the Paris Agreement and the guidance adopted by the CMA, as applicable;
- Flexibility related to the nature of the features and characteristics included in NDCs shall be provided to developing countries, in particular to LDCs and SIDS;
- {placeholder for outcome of SBI work on common time-frames}
- Agrees to conclude the consideration of further guidance on features.

B. New/additional features

Option 2: no text

C. Guidance/Elaboration on features

Option 2: no text {preferred option of the AGN}

II. Information

A. Objectives

- Facilitate the implementation of Article 4, paragraph 8, of the Paris Agreement;
- Enhance the clarity, transparency and understanding of Parties' NDCs, or contribute to a better understanding of NDCs;
- Be a tool or reference document to assist Parties in preparing and communicating their NDCs in line with the Paris Agreement;
- Assist Parties' domestic preparation of their NDCs, facilitate the exchange of best practices among Parties and contribute to raising public awareness of what Parties are going to do about climate change in the future;
- Enhance the transparency and predictability of climate action and foster trust among Parties;
- Facilitate the tracking of progress;
- Facilitate the aggregation and synthesizing of NDCs, including by the secretariat, also with a view to facilitating the global stocktake;
- Suitable for and relevant for ** a range of NDCs (target types, national capacities and circumstances) and durable and designed to be relevant to absolute economy-wide emission reductions targets by developed country Parties, and over time economy-wide emission reduction or limitation targets by developing countries;
- **
- Not present an additional burden on Parties, especially developing country Parties, in particular LDCs and SIDS;
- **

B. Capacity of developing countries

- Recognize different starting points and capacities;
- Flexibility shall be provided to developing countries based on their NDC/type of NDCs, recognizing that LDCs and SIDS may communicate plans and actions for low GHG emissions development;
- Developing countries, in particular LDCs and SIDS, require support in order to develop and ** improve the information ** necessary for clarity, transparency and understanding of their NDCs.
- **
- Provide continuous and adequate support to developing country Parties to identify their capacity-building needs and increase their capacity for enhancing the clarity, transparency and understanding of their NDCs over time;
- **

C. Procedural elements

a. Channel

- Vehicle for communicating is the NDC, submitted to the NDC registry (Article 4.12);
- Parties are to put forward the information of NDCs when communicating their NDCs;
- The guidance should specify that the ICTU is to be provided in an information table that is annexed to the Party's NDC submission;
- Parties may provide additional or updated information at any time.

b. Timing/Application

- Second and subsequent NDCs/any future NDC submission, and Parties may elect to apply such guidance to their first nationally determined contribution, pursuant to para 32 of decision 1/CP.21;
- Parties should apply the guidance for information of NDCs to their subsequent NDCs (with the timeframe from 2031 onwards); {Supported, but this is common time-frames. Add it as a feature – with placeholder for outcome of SBI item 5}
- **

c. Revision

Option 1:

- The CMA shall define the year of the first review of the guidance**, after the first global stocktake.

D. Substantive elements

- Quantifiable information on the reference point (including, as appropriate, a base year);
 - Developed countries shall provide information relative to a base year, consistent with their absolute economy-wide emission reduction targets;
 - Developed countries may report various base years, but shall also report their AERTs in percentage against 1990 levels.
 - Developing countries may submit a variety of reference points, consistent with the diversity of mitigation efforts, for now
 - Over time, developing countries will provide information relative to a base year, consistent with economy-wide emission reduction or limitation targets.
- ** {outcome on common time-frames}
- Scope and coverage;
 - Developed countries shall include all sectors, consistent with absolute economy-wide emission reduction targets
 - Developing countries are encouraged to move over time to economy-wide emission reduction or limitation targets
 - Developed countries shall include CO₂, CH₄, N₂O, HFCs, PFCs, SF₆ and NF₃ in their NDCs;
 - Developing countries shall include CO₂, CH₄, N₂O, in their NDCs but be encouraged to include further GHG over time;
 - Other GHGs may be included following review by the UNFCCC of IPCC guidelines
- Planning processes;
- Assumptions and methodological approaches;
- Fairness and ambition and Article 2 of Convention;
- Additional¹ general information on the NDC;
- Additional¹ information on the mitigation target of the NDC;
 - Description of the target/of each of the different targets if there are several
- ** Information on adaptation {cross-reference to APA item 4}
 - Mitigation co-benefits resulting from Parties' adaptation actions and/or economic diversification plans can contribute to mitigation outcomes under this Article.
- ** Information on support: {cross-reference to negotiations on finance}

¹ Parties have different views as to whether the element is additional, not additional or needed at all.

- ** Information on finance;
 - ** Information on technology;
 - ** Information on capacity building;
 - ** Information on support needs **
- [other elements]

III. Accounting

A. Understanding of accounting

Option 1:

- Accounting means both being responsible for NDCs and being able to add up:
 - Parties should explain their NDCs in the communication and implementation stage in a responsible manner;
 - by ** consistent methodologies and approaches, such as which sectors and gases will be included in their NDCs and what the meanings of relevant reference, parameters and other aspects of NDCs are, NDCs can be added up;
- **

B. Objectives

Option 1:

- **
- Promote mutual trust among Parties and to provide the public a clear, accurate and comprehensive explanation on what Parties are planning to do on climate change;
- Help/assist Parties in fulfilling existing obligations under Article 4 of the Paris Agreement **;
- Have clear methodological approaches to estimate data;
- Provide guidance and/or support on how a Party could undertake a quantitative assessment on the achievement of its NDC;
- **
- Allow Parties to demonstrate that their most recent emission levels are consistent with targets, in accordance with the parameters and indicators they have set out in their own NDCs;
- **
- Facilitate analysis of the aggregate effects ** of NDCs in relation to the long-term goal on mitigation **;
- ** {flexibility is dealt with under C below}
- The adoption of further requirements to developing countries is contingent upon the provision of new, additional and adequate resources to meet their agreed full costs **;

C. Capacity of developing countries

- 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;
- Continuous and adequate support shall be provided to developing country Parties to increase their relevant capacities on implementing the guidance ** on accounting;
- **
- Developing countries, in particular LDCs and SIDS, require support in order to develop and improve the accounting for their NDCs.
- Provide continuous and adequate support to developing country Parties to identify their capacity-building needs and increase their capacity for accounting for their NDCs over time;
- Flexibility to be provided to developing country Parties, in particular LDCs and SIDS, in the scope and level of details related to application of the relevant guidance, with specific accounting

approaches in developing country Parties' NDCs **, in line with the general guidance referred to in Article 4.13 of the Paris Agreement and paragraph 31 and 32 of decision 1/CP.21;

- **

D. Drawing from approaches under the Convention and the Kyoto Protocol {useful in negotiating process but would not appear in the guidance}

- Approaches and institutional arrangements established under the Convention and Kyoto Protocol offer valuable lessons and approaches for the development of an accounting system under the Paris Agreement;
- The guidance for accounting for mitigation targets in the NDCs by developed country Parties [and/or all Parties] could be drawn from the experience from the application of the accounting rules for quantified emission limitation or reduction commitments under the Kyoto Protocol, bearing in mind the difference between single-year targets in the NDCs and multi-year targets under the Kyoto Protocol;
- Use of GHG inventories for the accounting for their NDCs when NDCs are expressed in terms of GHG emissions;
- Guidance related to emissions and removals from LULUCF that refers to approaches under the Convention and its legal instruments on which Parties could draw from;
- Outline of the existing methods and guidance under the Convention and IPCC with references to the appropriate decisions and/or IPCC Publications.

E. Principles

- Promote environmental integrity, transparency, accuracy, completeness, comparability and consistency, and to ensure the avoidance of double counting;
- Preserve the national determination of NDCs **, which correspond to their highest possible ambition in the light of different capacities and national circumstances;
- Reflect equity and the principle of common but differentiated responsibilities and respective capabilities, in the light of different national circumstances, stated in Article 2.2 of the Paris Agreement, particularly in line with the diversity of NDCs of developed and developing country Parties;
- **
- Parties should strive to increase coverage over time;
- Flexibility to be provided to developing country Parties in the scope and level of details related to application of the relevant guidance;
- Information used to be consistent with, and underpinned by, inventory;
- A framework whereby:
 - Developed countries use comparable methodologies and approaches, and to ensure methodological consistency between the communication of NDCs and reporting on implementation;
 - Developing countries are allowed to utilize methodologies and approaches to explain other references, parameters and other aspects of content in their NDCs, as appropriate, while making their best endeavor to ensure methodological consistency between communication and implementation;
- A framework for accounting in which all countries use comparable methodologies and approaches and ensure methodological consistency between the communication of NDCs and reporting on implementation;
- **
- Capacity principle: Expectation that the high income and upper middle income countries follow robust accounting guidance;

- Responsibility principle: Expectation that the biggest emitters follow robust accounting guidance.

F. Procedural elements

a. Channel

Option 1:

- In the NDCs documents;
- Under the enhanced Transparency Framework (Article 13 of the Paris Agreement);
- [PLACEHOLDER cross reference to guidance on Article 13]
- **

b. Timing/Application

- **In accordance with paragraph 32 of decision 1/CP.21, Parties shall apply the guidance for accounting in their subsequent rounds of NDCs (from 2030 onwards). Parties may elect to apply the guidance for accounting in their NDCs up to 2030;
- **
 - Parties that ** wish to avail themselves of Article 6, paragraph 2 or Article 6, paragraph 4 of the Paris Agreement in the achievement of the first or subsequent NDC, shall apply accounting guidance specific to markets.

c. Revision

Option 1:

- **The CMA shall define the year of the ** review of the guidance, ** after the first global stock-take. {Premature to decide on permanent revisions, at end of first review, can decide whether further review(s) are needed or not}

G. Specific elements

a. GHG inventories

- Developing, periodically updating, publishing and making available to the COP a GHG inventory is a commitment under the Convention, Article 4.1 (a).
- Parties account for anthropogenic emissions and removals in accordance with methodologies and common metrics assessed by the IPCC and adopted by the CMA (decision 1/CP.21, para. 31(a)):
 - Parties strive to use the most recent methods, guidance and metrics produced by the IPCC and adopted by the CMA. Developing country Parties who are unable to use the most recent methods and guidance for any particular estimation or accounting process should explain how they are striving to improve their practices over time;
 - Parties should use the same methodologies and metrics throughout the time frame of their NDC **;
 - Parties should use GHG emissions reported in the most recent national inventory reports based on the methodologies and metrics defined by the reporting guidelines under the transparency framework under Article 13 of the Paris Agreement;
 - Parties with GHG targets in their NDC need to ensure consistency between their NDC accounting and their national GHG inventories and report on progress;
 - Parties that refer to economic or demographic indicators (e.g. GDP, population) in their NDCs should ensure consistency with their national economic accounts and demographic statistics, as appropriate;

- **
- Develop guidance whereby:
 - Developed countries continue taking the lead in applying any updated good practice methodologies accepted by the IPCC, in particular the 2006 IPCC Guidelines;
 - Developing countries follow the IPCC methodology by choosing the most appropriate IPCC guidelines, or categories of emissions and removals, in light of their different capacities and circumstances.

b. Aggregate effects towards achieving the goals of the Paris Agreement

- Fairness and ambition of NDCs and contribution to achieving the objectives the Convention;
- How to aggregate NDCs, including comparability aspect of various NDCs;
- Use of indicators and other information that allows to understand progress on implementation of policies and actions that have the most significant impact on the NDC emission levels;
- Additional guidance for Parties with mitigation targets that are based on strategies, plans and actions for low GHG emission development (or adaptation actions that could take the form of mitigation benefits) should be provided for the design of tracking indicators (i.e.: increase of renewable energies installed capacity (GW)) and the estimation of GHG impacts of policies or actions implemented.

c. Methodological consistency

- Parties ensure methodological consistency, including on baselines, between the communication and implementation of nationally determined contributions (decision 1/CP.21, para. 31(b)).
 - Maintain consistency in accounting approaches, choice of assumptions and definitions used between communication of NDC and implementation, including on baselines;
 - Parties wishing to make improvements to their accounting approach or methodologies, would need to apply any necessary recalculations to their initial reference points, base years and baselines, as well as to the estimates;
 - Definitions, parameters, conditions and assumptions on the construction of reference points shall ** remain unchanged between the communication and the implementation of the NDC
 - For successive NDCs, ** Parties may update the projected emission level periodically or taking into account the latest socioeconomic circumstances, improvement of methodologies, data and other related assumptions during the timeframe and/or periods for implementation. In such cases, Parties should provide explicit explanations of why and how they update the projected emission level and the change in the methodologies and assumptions. These updates should not lower ambitions of the Parties' NDCs;

d. Scope and coverage

- Parties strive to include all categories of anthropogenic emissions or removals in their nationally determined contributions and, once a source, sink or activity is included, continue to include it (decision 1/CP.21, paragraphs c and d).
- **
 - Provide during the implementation period a description of sectors, gases, categories, pools covered and definitions;
 - A Party might exclude a category of emissions or removals from consideration in its national inventory, and by extension, from the GHG target in its NDC; in this case, the Party should

- clearly indicate the sources and sinks that are not considered and explain the reasons for such exclusions;
- Once a source, sink, gas, land category or activity is included in a Party's NDC, this shall be included in subsequent NDCs, provided that it still occurs;
 - Coverage may increase at any time and Parties should communicate any changes in coverage between implementation periods as well as definitions;
 - **
 - Develop guidance whereby:
 - Developed countries account for their economy-wide absolute emission reduction targets, ** and shall ensure all gases, sectors, sinks and activities included;
 - Developing countries ** choose the categories of emissions and removals, including sectors and gases covered in their NDCs, relevant to their enhanced mitigation efforts, and over time will account for economy-wide emission limitation or reduction targets, in accordance with Articles 4.4 ** of the Paris Agreement.
 - e. Article 6 Cooperative approaches
 - {placeholder: To be informed by the discussions on the use of internationally transferred mitigation outcomes under Article 6}
 - **
 - f. LULUCF, forests and REDD+
 - Parties are encouraged to include the land sector in their NDCs and those that include it shall continue to do so in the future;
 - No prejudging any requirements on mitigation in agriculture;
 - Develop specific guidance on:
 - Natural disturbances;
 - Harvested wood products;
 - Treatment of lagged emissions.
 - Develop guidance whereby:
 - Developed countries apply relevant rules under the Convention and its Kyoto Protocol and guidelines accepted by the IPCC, with the improvement of the existing rules on LULUCF to close any loopholes;
 - Developing countries may account for their actions on forest and REDD+ in accordance with the relevant arrangements under the Convention if their NDCs include such aspects.
 - g. Accounting for adaptation;
 - Placeholder for outcome under agenda item 4;
 - h. Support component of NDC:
 - Developed countries account for their NDCs on financial support in accordance with the modalities to be developed referred to in paragraph 57 of decision 1/CP.21, in order to ensure the requirement of "new and additional" and avoid double counting on financial support;
 - Developed countries to account for their NDCs on technology development and transfer and capacity-building with a view to clarifying the definition and scope of technology development and transfer and capacity-building support, developing the appropriate methodologies to count and calculate the scale and possible effects of such support and avoiding double counting;
 - i. Bunker fuels
 - Harmonization of accounting rules with those developed by ICAO and IMO.