

VIEWS OF BRAZIL ON APA AGENDA ITEM 3

Further guidance in relation to article 4 of the Paris Agreement on:
(c) accounting for Parties' nationally determined contributions

The Government of Brazil welcomes the opportunity to present its views on further guidance in relation to article 4 of the Paris Agreement, on (c) accounting for Parties' nationally determined contributions.

2. It is the view of Brazil that "accounting for" for the purposes of the Paris Agreement, Article 4.13, has a broader meaning than accounting QELROS in the context of the Kyoto Protocol. Since the Kyoto Protocol has obligations of result and only one type of mitigation effort, accounting in that context is equivalent to compliance and counting units. The Paris Agreement, on the other hand, has obligations of conduct and a broad variety of mitigation efforts. "Accounting for" under the Paris Agreement relates to tracking progress towards demonstrating achievement of the objectives of Parties' nationally determined contributions, to be reported biennially under the enhanced transparency framework.

3. On a general level, the guidance to account for Parties' NDCs should allow to track progress towards achieving the objectives as they were communicated by Parties in their respective NDCs. The information provided in accordance with Article 4.8 and through the national inventory reports is the basis for accounting for Parties NDCs. In order to track progress and demonstrate achievement of such objectives through their biennial transparency reports, Parties would be expected to compare their most recent emissions levels, estimated through their national inventories, against the objectives set out in their respective NDCs, taking into account any assumptions or projections, as appropriate. This may require Parties to provide updates of some of the information to be provided with the NDCs in order to facilitate clarity, transparency and understanding.

4. In order to take into account the variety of NDCs and differentiation among Parties as reflected in Article 4 of the Paris Agreement, it is the view of Brazil that the guidance to be developed to account for NDCs requires different "layers" of accountability specific to each type of NDC. Accordingly, a Party with an economy wide limitation or reduction target would be expected to demonstrate in their biennial transparency reports that their emissions levels are within their budgets or consistent with a trajectory towards the objective set out in its NDC. Parties with projected scenarios or "business as usual" NDCs would be expected to show that their emission levels are consistent with their objectives, as well as demonstrate that the assumptions used to develop their projected scenarios remain valid. In a similar manner, Parties that have put forward intensity targets would be required to provide updated information on their intensity metrics.

5. Parties that wish to utilize Article 6 to demonstrate achievement of their respective NDCs would, nevertheless, be subject to an additional "layer" for accounting. It is the view of Brazil that Parties that wish to utilize Article 6 for the purpose of demonstrating achievement of their respective NDCs should be required to establish and quantify a budget of emission allowances or an annual trajectory of emissions towards their NDCs objectives, so that they are able to acquire

international transfers of mitigation outcomes and/or emission reductions resulting from the mechanism referred to in Article 6.4. This would allow Parties with different types of NDCs to account for their efforts utilizing Article 6 in a manner that is coherent, comparable and transparent, while promoting the highest possible ambition and environmental integrity.

Common Metrics

6. As per decision 1/CP.21, paragraph 31a, Parties shall account for anthropogenic emissions and removals in accordance with methodologies and common metrics assessed by the IPCC. In its 5th Assessment Report, the IPCC assesses mainly two metrics to quantify emissions from different gases, the Global Warming Potential (GWP) and the Global Temperature Potential (GTP)¹. Other metrics have also been proposed, including comprehensive metrics that account for both physical and economic dimensions, but their assessment need to be improved in the subsequent IPCC Assessment Reports".

7. The choice of metric depends to a great extent on the intended application. The IPCC states that "the most appropriate metric and time horizon will depend on which aspects of climate change are considered most important to a particular application. No single metric can accurately compare all consequences of different emissions, and all have limitations and uncertainties"².

8. The IPCC further states that "the GWP is not directly related to a temperature limit such as the 2°C target" whereas "end-point metrics like the GTP may be more suitable for this purpose" (IPCC WG1 AR5; Chapter 8.7.1.6, page 716). The guidance to be developed under this agenda item must recognize this, adopting the GTP as one of the common metrics for accounting for Parties' NDCs.

¹ See Myhre, G., D. Shindell, F.-M. Bréon, W. Collins, J. Fuglestedt, J. Huang, D. Koch, J.-F. Lamarque, D. Lee, B. Mendoza, T. Nakajima, A. Robock, G. Stephens, T. Takemura and H. Zhang, 2013: **Anthropogenic and Natural Radiative Forcing**. In: Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA. **pp. 710-720**.

See also Stocker, T.F., D. Qin, G.-K. Plattner, L.V. Alexander, S.K. Allen, N.L. Bindoff, F.-M. Bréon, J.A. Church, U. Cubasch, S. Emori, P. Forster, P. Friedlingstein, N. Gillett, J.M. Gregory, D.L. Hartmann, E. Jansen, B. Kirtman, R. Knutti, K. Krishna Kumar, P. Lemke, J. Marotzke, V. Masson-Delmotte, G.A. Meehl, I.I. Mokhov, S. Piao, V. Ramaswamy, D. Randall, M. Rhein, M. Rojas, C. Sabine, D. Shindell, L.D. Talley, D.G. Vaughan and S.-P. Xie, 2013: **Technical Summary**. In: Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. *Op.cit.* **pp. 58-59**.

² IPCC, 2013: **Summary for Policymakers, D.2 p.15**. In: Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. *Op.cit.*

9. The obligations of any legally binding agreement must be seen in the context of the goals of such agreement. As such, and given that the ultimate purpose of accounting for emissions and removals is to assess the global effort towards the temperature goal as stated in Article 2.1.a, it is the firm understanding of Brazil that the GTP metric is the most consistent with contributions to hold the increase in global average temperature as set out in Article 2 of Paris Agreement.

10. “Common metrics” certainly does not mean necessarily one single metric. Taking into account the variety of NDCs, the guidance to account for Parties’ NDCs should allow Parties to utilize the most appropriate metric to their circumstances, as long as it meets the condition of being both assessed by the IPCC and adopted by the CMA. It follows that the guidance should require Parties to inform which metric is being used in its NDC, from which IPCC Assessment Report the values refer to, as well as require Parties to use values from the same Assessment Report.

11. In order to ensure transparency, accuracy, completeness, comparability and consistency, all Parties should provide in its national inventory estimates of emissions and removals on a gas-by-gas basis and in units of mass, regardless of the metric adopted. This would facilitate the aggregation of data necessary to assess the collective progress towards achieving the long-term temperature goal as set out in Article 2 of Paris Agreement.