



**Submission by the Republic of the Maldives
on behalf of the *Alliance of Small Island States***

**APA Agenda Item 5 – Enhanced Transparency Framework for Action and
Support**

30 September 2016

On behalf of the Alliance of Small Island States (AOSIS), the Republic of the Maldives welcomes this opportunity to provide its views in response to the call for submissions regarding APA agenda item 5, “Modalities, procedures and guidelines for the transparency framework for action and support referred to in Article 13 of the Paris Agreement.” This submission builds on AOSIS’ previous interventions on APA agenda item 5.

Purpose and elements of the transparency framework

We believe that it is important to note at the outset that this new Enhanced Transparency Framework (ETF) covers both transparency of action and transparency of support, as outlined in Arts. 13.5 and 13.6 respectively. The development of the ETF, therefore, must proceed with equal weight given to these two components.

The ETF “builds upon collective experience” (Art 13.1) and will “build on and enhance” (Art 13.3) the existing arrangements under the Convention, with the aim of providing a more accurate picture than we have had in the past of progress in delivering the ultimate objective of the Convention, through climate change action and through support provided and received. The ETF must be more than a simple replication of the Convention arrangements.

The enhanced transparency framework must deliver the information needed to track progress towards implementation of nationally determined contributions, and to provide a clear understanding of climate change action in the light of the objective of the Convention as set out in its Article 2. It should, as well, provide confidence that developing countries are receiving the necessary financial, technical, and capacity building support.

In doing so, the ETF should be implemented in a “facilitative, non-intrusive, non-punitive manner, respectful of national sovereignty, and avoid placing undue burden on Parties.” To avoid placing an undue burden on parties, the ETF should be developed to ensure that domestic institutional arrangements, lessons learnt, and best practices amassed over the years remain relevant under the ETF, and hence facilitate continuous improvement in reporting over time.

In adopting the PA and decision 1/CP.21, the Parties have already agreed on many of the design elements and guiding principles for the ETF. These should be operationalised through the common modalities, procedures and guidelines (MPGs), and not be revisited or reinterpreted.

Development of Common MPGs

The development of the MPGs should be treated as a matter of urgency. The APA has been requested to develop recommendations for these MPGs with a view to their adoption at the first meeting of the Parties to the Paris Agreement, which may be as early as this year. Additionally, it should be recalled that Parties have already agreed that adopted MPGs will

supersede the MRV system established under the Convention, immediately following the submission of the final biennial reports and biennial update reports.

The ultimate goal of the MPGs will be to:

- Provide clarity in Parties' reporting on the progress of their individual efforts and deliver the aggregated information required for the global stocktake under Article 14 of the PA; and
- Generate sufficiently detailed information to track Parties' progress in implementing and achieving their individual NDCs.

Recognising the different starting points of each Party in terms of their capacity for reporting, the MPGs should facilitate improved reporting and transparency over time.

Flexibility for Developing Countries

An essential element in moving the development of these MPGs forward will be the identification of appropriate flexibilities for developing countries with respect to the scope, frequency and level of detail of reporting. It should recognise that developing countries are at different starting points in terms of their capacity for reporting. This capacity also varies across various aspects of reporting. The flexibility accorded under the ETF should reflect this reality.

However, this flexibility is not an excuse for backsliding on reporting. All Parties should at least maintain their existing reporting practices and aim to improve on them progressively. The ETF should thus allow for continuous improvement in reporting over time.

The MPGs should have built-in flexibility to address the specific challenges and resource constraints faced by SIDS, which include their negligible emissions, human resources constraints, financial constraints and lack of sufficient/robust data. Providing this built-in flexibility is critical to enable improved technical and institutional capacity over time to meet the transparency requirements of the new framework.

Capacity Building Initiative on Transparency (CBIT)

The Capacity Building Initiative on Transparency (CBIT) aims to assist in building this technical and institutional capacity through the provision of support to developing country Parties, upon request. For AOSIS countries, the CBIT is critically important and needs to be operationalised as soon as possible, in a manner that is reflective of and responsive to national needs and circumstances of respective AOSIS countries. Its early operationalization will help to put in place the domestic institutional arrangements and processes needed to meet the reporting obligations before the ETF comes into force.