



NEW ZEALAND

Submission to the Subsidiary Body for Scientific and Technological advice (SBSTA) on the development of reporting tables and formats, document outlines and training for technical expert review

April 2019

Context

1. At its first session (December 2018) the Conference of the Parties serving as the meeting of the Parties to the Paris Agreement (CMA) invited Parties to submit their views on:
 - (a) Common reporting tables for the electronic reporting of the information referred to in chapter II, and common tabular formats for the electronic reporting of the information referred to in chapters III, V and VI of the annex¹, taking into account the existing common tabular formats and common reporting formats;
 - (b) Outlines of the biennial transparency report, national inventory document and technical expert review report, pursuant to the modalities, procedures and guidelines contained in the annex; and
 - (c) A training programme for technical experts participating in the technical expert review.

2. This submission will address each of the above elements of this part of SBSTA's work noting that timely completion of this work is important, particularly in relation to electronic tables and formats that by their nature need sufficient lead-time for development and testing prior to use by Parties.

Common reporting tables and common tabular formats

3. As per (a) above, there are existing common tabular formats (CTFs) and common reporting formats (CRFs) that have been developed and are already in use by Parties for the electronic reporting of greenhouse gas inventory and other information under the Convention. These represent a good starting point for the CTFs now to be developed under the Paris Agreement's transparency framework, noting that the Paris system provides for enhanced transparency and will see many developing countries reporting some of the required information for the first time.

¹ The annex to decision 18/CMA.1 Modalities, procedures and guidelines for the transparency framework for action and support referred to in Article 13 of the Paris Agreement

Chapter II – greenhouse gas inventory data

4. Regarding chapter II of the annex (National inventory report of anthropogenic emissions by sources and removals by sinks), and the need to submit a national inventory document and common reporting tables, New Zealand notes that there has been considerable investment in the updated CRF Reporter software. It is New Zealand's view that the CRF Reporter software is fit for purpose and should be used by all Parties as the common reporting tables for the electronic reporting of greenhouse gas inventory information under Article 13 of the Paris Agreement. The CMA has decided that all Parties will use the 2006 IPCC Guidelines for their national inventory reports under the Paris Agreement (paragraph 20 of the annex to decision 18/CMA.1 refers) and we note that the development of the CRF Reporter software took into account the 2006 IPCC Guidelines. The CRF Reporter software already provides the inventory sector breakdown agreed in decision 18/CMA.1 and its annex (i.e. agriculture and LULUCF are separate sectors, not AFOLU) and retaining the existing software will also provide continuity for the Parties that are already using it.

5. New Zealand acknowledges that future updates of the CRF Reporter software might be necessary to take into account any subsequent version or refinement of the IPCC guidelines agreed upon by the CMA (in line with paragraph 20 of the annex to decision 18/CMA.1) including the current 2019 Refinement of the 2006 IPCC Guidelines. We also acknowledge that those national greenhouse gas inventory compilers that have not used the CRF Reporter will likely need training in order to become familiar with the software tool, and that the training will need to be backed up by on-going support (perhaps through a help-desk) as new users become more accustomed to its application.

Chapter III Section C – tracking progress

6. According to paragraph 79 of the annex, each Party is to report the information necessary to track progress made in implementing and achieving its nationally determined contribution under Article 4 of the Paris Agreement in a narrative and common tabular format, as applicable. Paragraphs 65 to 78 of the annex specify what that information is, with some aspects being particularly amenable to a tabular presentation e.g. the structured summary (paragraph 77 refers) and the emissions balance described in paragraph 77(d)(ii).

7. The CTF for biennial reports under the Convention can inform the development of the tabular format for the chapter III information, but the BR-CTF tables for reporting progress are not directly comparable/compatible. It will be necessary to go through each information element in paragraphs 65 to 78 of the annex in order to construct appropriate tables. The secretariat could prepare draft tables using this approach for Parties to use as a basis for discussions under SBSTA.

Chapter III Section D – mitigation policies and measures

8. In developing the tabular format referred to in paragraph 80 of the annex for providing information on mitigation policies and measures, Table 3 of the BR-CTF should be used as the basis.

Chapter III Section E – summary of greenhouse gas emissions and removals

9. The CRF Reporter contains tables that provide summary information of greenhouse gas emissions and removals which contain the information required in paragraph 91 of the annex. It is unnecessary to develop a new tabular format for provision of this information under Article 13 of the Paris Agreement. See paragraphs 4 and 5 above. We further note that in developing the BR-CTF, the set of tables 1 in the BR-CTF were directly imported from the summary tables produced by the CRF Reporter.

Chapter III Section F – projections of greenhouse gas emissions and removals

10. According to paragraph 101 of the annex, projections are to be presented in both graphical and tabular formats. Table 5 and tables 6(a) and 6(b) in the BR-CTF provide a good basis for the tabular formats for information on projections of greenhouse gas emissions and removals. New Zealand's view is that providing information on key variables and assumptions used to construct projections of greenhouse gas emissions and removals is an essential part of transparency and Table 5 of the BR-CTF addresses this.

Chapter V – Information on financial, technology development and transfer and capacity building support provided and mobilized

11. Existing BR-CTF tables 7, 7a, 7b, 8 and 9 provide a good starting point for designing reporting tables under Chapter V of the enhanced transparency framework. The MPG's for the enhanced transparency framework include new elements which will need to be reflected in the tables as appropriate. All of the aspects of sections C, D and E of Chapter V that are described as to be reflected in tabular format should feature in the new tables. Information in sections A and B of Chapter V (national circumstances and underlying assumptions, definitions and methodologies) lends itself to explanation through an accompanying textual narrative. For information to be reported in tabular format, additional columns could be included for new reporting parameters such as sector/sub-sector, more granular information regarding multilateral support (e.g. allowing for reporting on a voluntary basis of the climate-specific share of multilateral contributions and multilateral outflows). However the CTFs should be designed so that non-inclusion of information that is not "applicable" or "available" (where relevant) does not appear to be a deficiency in a Party's reporting.

12. Information on finance mobilised through public interventions is to be provided in textual and/or tabular format. To assist Parties who wish and are able to report in a tabular format, an optional table could be prepared covering the reporting elements. This will be important for countries like New Zealand whose mobilisation efforts are nascent and who may not immediately be able to report in full tabular format. Development of CTFs under the UNFCCC for mobilisation of finance could usefully draw lessons from experience on tracking climate finance mobilised under other initiatives, such as the OECD Research Collaborative on Tracking Private Climate Finance, and from the experiences of Parties.

Chapter VI – Information on financial, technology development and transfer and capacity building support needed and received

13. Design of the common tabular formats for the reporting of information on financial, technology development and transfer and capacity building support needed and received should use the elements presented in paragraphs 133, 134, 136, 138, 140, 142 and 144 as the starting points for each of the tables. As in paragraph 11 above, the CTFs should be

designed so that non-inclusion of information that is not “applicable” or “available” (where relevant) does not appear to be a deficiency in a Party’s reporting.

Outlines of the biennial transparency report, national inventory document and technical expert review report

14. Having agreed outlines for both the biennial transparency report and the national inventory document assists Parties to provide complete reports, and assists with efficient review of the content.

Biennial transparency report

15. At a very high level, in New Zealand’s view the outline for the biennial transparency report should follow the content of paragraph 10 of the annex to decision 18/CMA.1. Thus, the outline for the biennial transparency report would contain sections on:

- (a) The national inventory report
- (b) Information necessary to track NDC progress (implementing and achieving)
- (c) Information on climate change impacts and adaptation
- (d) Information on financial, technology development and transfer and capacity building support provided and mobilized
- (e) Information on financial, technology transfer and capacity building support needed and received

We would further note that (a) and (b) apply to all Parties as mandatory requirements and that (d) is only mandatory for developed country Parties - the outline will need to reflect this.

National inventory document

16. Whether or not the national inventory report is nested within the biennial transparency report, or is submitted as a standalone report, Parties will need to provide the same information, therefore only one outline needs to be developed. Paragraph 38 of the annex to decision 18/CMA.1 states that “the national inventory report consists of a national inventory document and the common reporting tables”. The outline for the national inventory document should follow the reporting requirements as decided in decision 18/CMA.1 and its annex, noting that the outline will need to reflect the associated flexibilities that have been agreed in decision 18/CMA.1 and its annex.

Technical expert review report

17. It has long been New Zealand’s view that we need a practical and efficient system for transparency of action and support that avoids placing an undue burden on Parties and the secretariat. Decision 18/CMA.1 and its annex go a long way towards realising such a system with its emphasis on provision of information in tabular formats where appropriate. We would also suggest that this approach be carried through into the design of the technical expert review report, with the review report using a checklist format.

18. There are several reasons for such an approach:

- The “customer” for the technical expert review report is the Party concerned, and this should be of highest priority in deciding the outline for the technical expert review report.

- Long narrative review reports that essentially present a lot of the information that can be found in the report under review serve little purpose for the Party concerned – the Party already knows the content of its own report.
- If there is a need to take into account a possible wider audience the technical expert review report can provide an electronic link to the Party's relevant report(s) [NIR/BTR].
- It would help ensure consistency and comparability between review reports from all Parties, and from year to year for each Party, providing a mechanism for tracking responses to recommendations, facilitating improved reporting and transparency over time.
- Careful design can ensure the critical information and conclusions (recommendations, encouragements, identification of capacity building needs as appropriate) are able to be included in such a format without the need for lengthy narrative.
- It could lead to a much more efficient review process, enabling each technical expert review report to be completed well within specified timeframes, with the potential to be completed/finalised during the review week, ready to go to the Party concerned.
- It would be more attractive to expert reviewers (and their employers) if the expectation is that the review report would be completed/finalised during the review week. Experts may be more willing to be involved, and their employers more willing to make their employees time available to the international process if this “gift of time” were finite and only a week in duration.
- We acknowledge that the lead reviewers (and possibly other members of the expert review team) would need to allow for some time availability once comments on the draft report have been received from the Party concerned. However, it should be easier for the Party to review a draft report in checklist format (which needs to have a logical flow to it), and reduce the time input necessary to finalise the technical expert review report.

19. Examples of checklists already exist in the materials and tools that are used in the current “review” processes under the UNFCCC. These can help inform the development of a checklist format for the TER report under Article 13 of the Paris Agreement e.g. the tables in Annex I of the summary reports of the technical analysis of BURs. New Zealand also provided a suggested checklist approach for review reports in two of its submissions to the APA (on Article 13 and Article 15) late in 2017. These are available via the following links:

https://www4.unfccc.int/sites/SubmissionsStaging/Documents/55_360_131517082976716789-New%20Zealand%20APA%20submission%20Article%2015%20FINAL%20September%202017.pdf

and

https://www4.unfccc.int/sites/SubmissionsStaging/Documents/55_360_131517082976716789-New%20Zealand%20APA%20submission%20Article%2015%20FINAL%20September%202017.pdf

Training programme for technical experts participating in the technical expert review

20. It is New Zealand's view that the integrity of the technical expert review system under the Paris Agreement rests upon having well trained technical experts that are able to demonstrate their proficiency through on-line (or other) testing. Parties need to feel confident

that reviewers are qualified to do the task, particularly regarding the in-depth review of greenhouse gas inventories which is a highly specialised task.

21. The design of training programmes for technical experts participating in the technical expert review under Article 13 of the Paris Agreement can be based on current training programmes for review and technical analysis. To inform the discussions on this topic at SBSTA 50 (June 2019) the secretariat could prepare a summary of the current training programmes as this may not be widely known or understood by Parties. New Zealand suggests the secretariat also be asked, on the basis of the existing training programmes, to put together a proposed training programme for the consideration of Parties at SBSTA 51. In undertaking this task of designing training programmes for experts participating in the technical expert review under Article 13, the secretariat should also seek input to from the current cohort of Lead Reviewers.

Conclusion

22. New Zealand looks forward to discussion at SBSTA 50 on the issues covered in this submission in order to make progress on the task given to SBSTA by the CMA. Timely completion of this work is important to ensure all the elements of the reporting and review system are in place well in advance of Parties beginning the preparation of their biennial transparency reports under the Paris Agreement.