

SUBMISSION BY SOUTH AFRICA TO THE SUBSIDIARY BODY FOR SCIENTIFIC AND TECHNOLOGICAL ADVICE ON COMMON TABULAR AND REPORTING FORMATS, OUTLINES AND TRAINING PROGRAMME, BEING VIEWS ON THE WORK REFERRED TO IN PARAGRAPH 12 OF DECISION 18/CMA.1 ON THE MODALITIES, PROCEDURES AND GUIDELINES FOR THE ENHANCED TRANSPARENCY FRAMEWORK

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1. Background and mandate

South Africa is pleased to submit its views on the work referred to in paragraph 12 of 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". The SBSTA will develop common reporting formats and tables referred to in chapter II, III, V and VI of the annex; outlines of biennial transparency report (BTRs), national inventory documents (NID) and technical expert review reports (TERR), and a training programme for technical experts participating in the technical expert review process. This submission contains proposals and reflections on tables referred to in Chapters II and II, remarks on the outline for the BTR, NID and TER reports, and proposals for the development of a training programme for technical experts participating in the TER process. Proposals for and remarks on tables mentioned in Chapters III and IV may be contained in a later submission.

A note on terminology: Common reporting format (CRF) tables currently refer to tables which are used to report GHG inventory data by developed country Parties; common reporting tables (CRT) refer to the same tables in future. Common tabular formats (CTF) are tables that have used in reporting on mitigation, finance, technology and capacity-building, e.g. in decision 19/CP.18.

South Africa looks forward to exchanging views with other Parties on these important matters, and reserves the right to elaborate on these initial views in the process of negotiation.

2. Principles and approach

In developing CRFs and CRTs, some important principles should guide the approach. The principle of progression applies to Article 13, in that the efforts of all Parties will represent progress over time. The Paris Agreement and the consequent decisions made on reporting in Katowice dramatically increase the reporting obligations of developing countries. Progression means that there can be no back-sliding in reporting by developed countries.

A central principle in Article 13 of the Paris Agreement, and one which was highlighted in the negotiations of the MPGs, is that even though we have a common set of MPGs, developed and developing countries start from different points. This has two dimensions: 1) ALL developing countries have had different reporting requirements up to now from developed countries, and will all need to undertake the considerable work required to build their national reporting systems in preparation for the first BTR to be submitted in 2024; and 2)

developing countries that need it in the light of their capacities are afforded flexibility in the MPGs. Developing countries have only had regular (biennial) reporting requirements since 2014. This will require a massive short-term capacity-building effort for developing countries in preparation for 2024, and also ongoing support to continuously improve over time. These requirements should be considered in the development and application of reporting tables, and it should be taken as a given that the timely and successful implementation of reporting using these tables is dependent on the provision of capacity-building support to developing countries, and the appropriate provision of resources to the UNFCCC system, including the Secretariat and the Consultative Group of Experts. Regarding the latter's role, it should be recalled that the CGE's mandate was extended in 1/C.24, that 1/CP.24 also contained a provision stipulating that the same guidance should be used for National Communications and BTRs, and in decision 18/CMA.1 it was also decided that the CGE should serve the Paris Agreement.

Where there are existing tables which can serve as a basis for reporting under the Paris Agreement, we propose using these as a starting point. However, where such tables have applied only to developed countries in the past, their application by developing countries, as applicable, would depend on the provision of capacity-building support, thus providing flexibility for those developing country Parties that need it in the light of their capacities. Developed countries should continue to report at the highest level of detail that they have reported in the past.

Where new tables are developed, the mandatory or voluntary nature of reporting should be consistent with the Paris Agreement and its rule-book (the MPG).

Reporting should ensure that double counting is avoided. This principle applies to mitigation, the use of cooperative approaches and to avoiding multiple counting of finance (e.g. avoiding the application of leverage factors, or counting investments under both mitigation and financial obligations).

3. CRTs for GHG inventory (chapter II of MPG)

South Africa takes the view that common reporting tables should be based on the existing common reporting format tables currently used by developed Parties, taking into consideration the work which has already been done in developing the CRF Reporter software by the Secretariat. However, with this in mind, it needs to be recognised that developing countries will need to develop their national inventory systems to use these tables, and that this may require the development of additional tools for use by developing countries by the Secretariat. Many developing countries currently use IPCC inventory software, and there would need to be provision for a transition, or the use of supplementary software to translate between these.

4. CTFs for tracking progress (chapter III of MPG)

Developed countries must continue to use the CTF from decision 19/CP.18, in particular Table 1 to Table 6 c, modified as necessary for use under the Paris Agreement (the tables from 7 onward refer to support). South Africa would consider reporting any lesser detail to go against the principle of progression, as enshrined in the Paris Agreement.

In addition, to track progress, all Parties need to report:

4.1. Description of mitigation target(s)

Table 1: Description of NDC against which progress will be tracked (ch III.B of MPG)

	Element of NDC	Information provided by the Party, against which it will track progress and account
(a)	Target(s) and description	
(b)	Target year(s) or period(s)	
(c)	Reference point(s) and their respective value(s)	
(d)	Time frame(s)	
(e)	Scope and coverage	
(f)	Intention to use ITMOs towards NDCs	
(g)	Any updates or clarifications of previously reported information	

Note: Row (d) would depend on the outcome of negotiations on common time-frames, which were forwarded by SBI-49 to SBI-50.

4.2. Structured summary (para 65-77 of MPG)

The structured summary in paragraphs 65 to 77 is a similar concept to the NDC GHG balance sheet contained by a previous submission (RSA 2018), and explained during a roundtable in Bangkok (September 2018). What is required, now that we all have agreed on a structured summary in the MPG is the format of a table. We propose a format in .

Table 2 below.

Table 2: Illustrative tabular format of a structured summary

		Units required	Optional: other units	1 (start year)	2	3	4	5 (end year)	End year + 2
				<i>Time-frame and /or period of implementation</i>					
A	Indicator(s) selected								
B1	Base year or other reference point								
B2	and respective value								
C	Most recent level								
D	Compare most recent indicator level to base year / reference level								
E	Emissions and removals in GHG inventory	Gg CO ₂ -eq							

F	Net land sector emissions and removals (if not in inventory)	Gg CO ₂ -eq							
G	ITMOs transferred for achievement of NDCs (+) ITMOs transferred for other int'l mitigation purposes (+) ITMOs received (-) Net ITMOs (+ or -)	Gg CO ₂ -eq							
H	Accountable emissions	Gg CO ₂ -eq		<i>E+F+G</i>	<i>E+F+G</i>	<i>E+F+G</i>	<i>E+F+G</i>	<i>E+F+G</i>	
J	Restate mitigation target(s) in NDC	Gg CO ₂ -eq	<i>Units in NDC</i>						
	On track?				<i>On track / not</i>		<i>On track / not</i>		
	Achieved?								<i>Yes/ No</i>

Text in italics is explanatory, providing an indication as to how cells in the table would be populated.

The values in rows E to G are entered for each year during the time-frame and / or period of implementation. Each of these rows has more detailed calculations underlying them, summarising the results from other worksheets:

- GHG inventory would report emissions, removals and net Gg CO₂-eq.
- The Party may report totals with and without AFOLU.
- It is useful to report the land sector emissions, removals and net result separately, as this is a major source of uncertainty relevant to understanding whether a target is being achieved. For those Parties that do not include the land sector in their inventory, this is essential.
- ITMOs may be reporting as acquired (minus), transferred (plus) and net ITMOs (or possibly only net ITMOs) (depending on the outcome of ongoing negotiations in the SBSTA on Article 6).

The accountable emissions in row H are the sum of rows E, F and G.

That sum total is compared against the benchmark of the mitigation target(s) in the NDC. The targets are merely restated in row J, without changing them. If the target is not expressed in Gg CO₂-eq, then the mitigation outcome is to be reported. This is not a new requirement – guidelines for biennial reports and biennial update reports already include the mitigation outcome of mitigation actions. Accounting is comparing the value of an indicator against a benchmark. Hence the comparison between rows H and J is mitigation accounting, giving

effect to paragraph 72 of the MPGs, requiring consistency of information in chapter III.B and III.C with the decision on mitigation.

Any payment for the receipt of an ITMO must not be counted towards obligations to provide finance.

4.3. Mitigation policies and measures (PAMs; ch III.D of MPG)

The Paris Agreement requires Parties to “pursue domestic mitigation measures, with the aim of achieving the objectives” on their NDCs. Chapter III.D of the MPG elaborates how countries are to report on such mitigation policies and measures (PAMs).

The following table is based on the elements contained in Paragraph 82 and 85 in the Annex to decision 18/CMA.1. The table could also include information in paragraph 83 at the discretion of Parties.

Name of Policy or Measure	Description	Objectives	Type of instrument	Status <i>planned, adopted or implemented</i>	Sector(s) affected <i>energy, transport, industrial processes and product use, agriculture, LULUCF, waste management or other</i>	Gases affected;	Start year of implementation;	Implementing entity/ies	Estimates of expected and achieved GHG emissions reductions for its actions, policies and measures (for developing countries, to the extent possible)

Table 3: Information on PAMs

4.4. Emission projections

Each Party shall report projections pursuant to paragraphs 92–101 of the MPG. We propose that:

- Tables 5, 6(a), 6(b) and 6(c) of the annex to decision 19/CP.18 be used as a starting point for developing tables to report on projections
- Developed countries shall continue to provide all the information contained in these tables, demonstrating progression beyond existing reporting requirements;
- developing countries are encouraged to use the tables and those that need flexibility in in the light of their capacities can use a less detailed methodology (para 102 of the Annex to decision 18/CMA.1);
- Consistent with para 95, developed countries shall extend their projections in their first BTRs, submitted in 2024, starting from a 2022 inventory (x-2) and extending to 2040 (and later years in future), whereas developing countries are encouraged to provide projections and have flexibility in general and specifically to extend projection to the end point of their NDC (currently 2025 or 2030). Time-series for developed countries shall start from 1990, while developing countries may start from 2020.

5. CTF for support provided (chapter V of MPG)

Consistent with Article 13.9 of the Paris Agreement, developed country Parties shall, and other Parties that provide support should, provide information on financial, technology transfer and capacity-building support provided to developing country Parties under Articles 9, 10 and 11. The principle of progression must apply to reporting by developed countries, meaning that frequency and quality of reporting must improve over time. For information on support provided, common reporting tables should be designed in accordance with paragraph 123, 124, 125, 127, and 129 of MPGs.

6. CTF for support needed and received (chapter VI of MPG)

Consistent with Article 13.10 of the Paris Agreement, developing country Parties should provide information on financial, technology transfer and capacity-building support needed and received under Articles 9, 10 and 11. While provision of this information is voluntary, we are of the view that it would be helpful to develop common reporting tables, based on paragraph 133, 134, 136, 138, 140, 142, and 144 of the MPGs.

7. Outline of a Biennial Transparency Report

As an initial input to discussions, South Africa has taken the first and second-level headings in the MPGs, to produce the outline below. We consider that sections 5.3 and 5.4 are deserving of particular importance in developing the outline.

- 7.1. National circumstances
- 7.2. National greenhouse gas emissions and trends
 - 7.2.1. Summary of progress on inventory since previous BTR
 - 7.2.2. National inventory system
 - 7.2.3. GHG emissions inventory
 - 7.2.4. Trends by sector and gas
 - 7.2.5. Uncertainty analysis
 - 7.2.6. QA/QC
 - 7.2.7. Planned improvements
- 7.3. Description of nationally determined contribution
 - 7.3.1. Tracking progress in implementing and achieving mitigation target(s) in NDC
 - 7.3.2. Indicators selected, reference and most recent values
 - 7.3.3. Mitigation policies and measures and their effects
 - 7.3.4. Structured summary
 - 7.3.5. Emission projections
- 7.4. Information on impacts and adaptation including loss and damage, provided voluntarily by Parties
- 7.5. Support
 - 7.5.1. Support provided, pursuant to Article 13.9
 - 7.5.1.1. Finance
 - 7.5.1.2. Technology
 - 7.5.1.3. Capacity-building
 - 7.5.2. Support needed and received by developing countries, pursuant to Article 13.10
 - 7.5.2.1. Finance
 - 7.5.2.1.1. Support needs
 - 7.5.2.1.2. Support received
 - 7.5.2.2. Technology
 - 7.5.2.2.1. Support needs
 - 7.5.2.2.2. Support received
 - 7.5.2.3. Capacity-building
 - 7.5.2.3.1. Support needs
 - 7.5.2.3.2. Support received
- 7.6. Other reporting matters

8. Outline of National Inventory Document

The text of the national inventory document (NID) needs to explain the data in common reporting tables; together they form the National Inventory Report (NIR). We are of the view that chapter II of the MPG provides guidance on the NID, so the facilitative guidance can help indicate the headings one would expect to see, without renegotiating the MPG.

8.1. Executive Summary

- 1.1.1. Background
- 1.1.2. National trends
- 1.1.3. Gas trends
- 1.1.4. Sector trends
- 1.1.5. Improvements introduced
- 1.1.6. Key category analysis
- 1.1.7. Indicator trends
- 1.1.8. ES references

8.2. Introduction

- 1.1.9. Background information
- 1.1.10. National inventory arrangements
- 8.2.1. National entity or national focal point
- 8.2.2. Inventory preparation process
- 8.2.3. Archiving of information
- 8.2.4. processes for official consideration and approval of inventory
- 1.1.11. Inventory preparation: data collection, processing and storage

8.3. Definitions

- 1.1.12. Brief general description of methodologies and data sources
- 8.3.1. Methodologies, parameters and data
- 8.3.2. Key category analysis
- 8.3.3. Time-series consistency and recalculations
- 8.3.4. Uncertainty assessment
- 8.3.5. Assessment of completeness
- 1.1.13. Brief description of key source categories
- 1.1.14. General uncertainty evaluation
- 8.3.6. Quality assurance/quality control
- 1.1.15. Metrics

- 1.1.16. General assessment of completeness
- 1.1.17. Inventory improvements introduced
- 8.3.7. Energy
- 8.3.8. IPPU
- 8.3.9. AFOLU
- 8.3.10. Waste
- 8.4. Trends in GHG emissions
 - 1.1.18. Emission trends for aggregated greenhouse gas emissions
 - 1.1.19. Indicator trends
 - 1.1.20. Emission trends by sector
 - 1.1.21. Emission trends by gas 71
- 8.5. Energy (example of sectoral chapter)
 - 1.1.22. Sector overview
 - 1.1.23. Background information
 - 1.1.24. Source category 1.A Fuel combustion
 - 1.1.25. Source category 1.B Fugitive emissions from fuels
 - 1.1.26. Recalculations and improvements since previous inventory
 - 1.1.27. Planned improvements
 - 1.1.28. Appendix: Reference and sectoral fuel consumption
 - 1.1.29. References for chapter

(same format for IPPU, Waste, AFOLU)

9. Outline of technical expert review report

Paragraphs 13.11 and 13.12 of the Paris Agreement mandate a technical expert review (TER).. In their report on the TER, the teams shall not make political judgements. Rather, the focus is on consistency with the MPG and assisting Parties in improving reporting over time, particularly those developing country Parties that need it in the light of their capacities. Consequently, the TER teams must pay particular attention to the respective national capabilities and circumstances of developing country Parties.

As specified in para 187 of the MPG, a TER report shall contain the results of a technical expert review, in accordance with the scope identified in chapter VII.A . We propose that the outline of the TER report include the following headings, for each of which the TER team would report the results of its review relating to the heading, and reading paragraph 146 to 149 of the MPG as guidance.

9.1. Introduction and summary

9.1.1. Consistency of information submitted with the MPGs, taking into account flexibility

9.1.2. Implementation and achievement of NDC under Article 4

9.1.3. Information on tracking progress in implementing mitigation targets within the NDC

9.1.4. Information on policies and measures to achieve the objective of the NDC

9.1.5. Support provided

9.2. Assistance for continuous improvement

TER teams shall consider in their review that, pursuant to Article 13.14 and 13.15 of the Paris Agreement, support shall be provided to developing countries for the implementation of Article 13, and that support shall also be provided for the building of transparency-related capacity of developing country Parties on a continuous basis. Only the “shall” requirements shall be reviewed, taking into account the flexibility as per section 10 below. Where reporting provisions are voluntary (“may”), they can be encouraged but not reviewed in the sense of a mandatory “shall” requirement. In the TER report, the following results of the review must include the following:

9.2.1. Recommendations and encouragement

The TER teams may make recommendations and encouragement, based on their review. This may include improvements compared with the previous TER reports.

9.2.2. Capacity-building needs identified by Parties and suggestions for assistance
Capacity building needs are best identified by Parties themselves. The TER team should assess any efforts made by the Party under review to address any potential issues identified by the TER team during the current review or during previous reviews that have not been addressed. It should make suggestions for assistance to developing country Parties.

9.3. Sources of information used in the TER report

10. Application of flexibility

Recalling paragraph 6 in the MPG (Annex), South Africa proposes

Table 4, which applies to the MPGs in general when using flexibility.

Table 4: Application of flexibility by developing country Parties that need it in the light of their capacities

Provision to which flexibility is applied	Application of flexibility	Concisely clarify capacity constraints	Self-determined estimated time frames for improvements in relation to those capacity constraints
Para 48 - gases	Reported 3 mandatory gases, plus HFCs and SF ₆ and not PFCs and NF ₃	No available national data	xx years

11. Training programme for technical experts

A training programme for technical experts participating in the technical expert review should build on existing programmes for review. The secretariat should be invited to prepare a summary of existing training programmes, and to present a possible training programme for technical expert review under the enhanced transparency framework of the Paris Agreement. The Consultative Group of Experts, which serves the Paris Agreement pursuant to paragraph 15 of decision 18/CMA.1, must support process of training technical experts, providing technical advice and support to developing countries.

Reference

RSA (Republic of South Africa) 2018. Accounting across Articles 4, 6 and 13 of the Paris Agreement. Submission by South Africa to the Ad Hoc Working Group on the Paris Agreement and Subsidiary Body for Scientific and Technological Advice. 31 August. Bangkok, United Nations Framework Convention on Climate Change. <https://bit.ly/2wJzT75>