



## SUBMISSION BY THE GOVERNMENT OF INDONESIA

APA 1.4 Agenda Item 5 – Modalities, procedures and guidelines for the transparency framework for action and support referred to in Article 13 of the Paris Agreement

Pursuant to the Decision 18/CMA.1 paragraph 12 and 13 of CMA 1.3 during UNFCCC COP-24 in Katowice, December 2018, on “**Modalities, procedures and guidelines for the transparency framework for action and support referred to in Article 13 of the Paris Agreement**” (FCCC/PA/CMA/2018/3/Add.2), the Government of the Republic of Indonesia herewith submits views on the work of (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 annex, 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 (c) A training programme for technical experts participating in the technical expert review as follows:

***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 annex, taking into account the existing common tabular formats and common reporting formats;***

1) Common reporting tables in chapter II National inventory report of the anthropogenic emissions by sources and removals by sinks of greenhouse gases:

Indonesia is of the view that common reporting tables should have flexibility in terms of gas coverage (MPGs Chapter II Section E para 35) which allows parties to report at minimum 3 gases (CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O) with time series data (MPGs Chapter II Section E.3 para 57). Common reporting tables should consider the information on Key Category Analysis (MPGs Chapter II Section C.2 para 25) derived from the rank of GHG emission estimation based on contribution. For uncertainty assessment (MPGs Chapter II Section C.4 para 29) parties have flexibility on the methodology of assessment in accordance with IPCC Guidelines. Indonesia also expresses the need for flexibility in applying the level of QA/QC for chapter II Section C.6 para 35 of the MPGs. Moreover, CRT should reflect the principle of CBDR-RC and the best available data in terms of the requirement of completeness (MPGs Chapter II Section C.5 para 30 and 31).

The flexibility provided by the MPGs as stated in Paris Agreement Article 13 paragraph 12 and MPGs Chapter I Section C para 6 of MPGs, flexibility provided for in the provisions of these MPGs for those developing country Parties that need it in the light of their capacities is to be self-determined. The developing country Party shall clearly indicate the provision to which flexibility is applied, concisely clarify capacity constraints, noting that some constraints may be relevant to several provisions, and provide self-determined estimated time frames for improvements in relation to those capacity constraints. However, this does not allow Parties to stay stagnant at certain level, improvement in inventory activity is still required as mentioned in MPGs Chapter I Section D .paragraph 7. Thus, capacity buildings and financial support in conducting inventory are needed to help Parties in improving inventory, such as collecting data activities and local emission factors as well as developing coordination mechanism in inventory especially for developing

country Parties. There is also a need to conduct activity on sharing experiences and knowledge amongst Parties in conducting inventory especially in transition period.

The key issue in developing detailed report on inventory is also determined by the engagement not only Party Stakeholders but also Non-Party Stakeholders. Country Parties should define the roles and contribution of PS and Non-PS in conducting inventory as well as developing two ways mechanism i.e. top down approach and bottom up approach to support national inventory. Capacity building and awareness raising at grass-root becomes crucial. Support from developed countries is needed in these areas.

- 2) Common tabular formats in chapter III Information necessary to track progress made in implementing and achieving nationally determined contributions under Article 4 of the Paris Agreement:

The Common Tabular Format for Chapter III should consist of seven main parts, namely:

- A. National circumstances and institutional arrangements
- B. Description of Party's nationally determined contribution under Article 4 of the Paris Agreement
- C. Information necessary to track progress made in implementing and achieving its nationally determined contribution under Article 4 of the Paris Agreement
- D. Mitigation policies and measures, actions and plans, including those with mitigation co-benefits resulting from adaptation actions and economic diversification plans, related to implementing and achieving a nationally determined contribution under Article 4 of the Paris Agreement
- E. Summary of greenhouse gas emissions and removals
- F. Projections of greenhouse gas emissions and removals, as applicable
- G. Other information: related to other additional elements such as adaptation elements, as appropriated and can be formed as narrative and qualitative format

Taking into consideration the various and different level of capacities/capabilities to use the upcoming CTF, there is need to have a liberty for improvement overtime gradually.

Refer to the above fact as well as the elements of existing Party's NDCs, each of the above mentioned part of CTF should cover some indications, as follow:

- A. National circumstances and institutional arrangements, in a narrative format and may not be translated into quantitative tabular. This section will contain following information, such as:
  - Government structure
  - Population profile
  - Geographical profile
  - Economic profile
  - Climate profile
  - Sector details
  - Information on how its national circumstances affect GHG emissions and removals over time
  - Information on the institutional arrangements in place to track progress made in implementing and achieving its NDC under Article 4, including those used for tracking internationally transferred mitigation outcomes, if applicable, along with any changes in institutional arrangements since its most recent biennial transparency report

- Information on legal, institutional, administrative and procedural arrangements for domestic implementation, monitoring, reporting, archiving of information and stakeholder engagement related to the implementation and achievement of its NDC under Article 4.
- B. Description of a Party's nationally determined contribution under Article 4 of the Paris Agreement, including updates
- Base period (year) which covers: the base year, some intermediate years (optional), and end of period
  - GHG Emission Level (unit CO<sub>2</sub>e) which covers: the base year, some intermediate years (optional), and end of period
  - Emission reduction target (unit CO<sub>2</sub>e) which covers: the base year, some intermediate years (optional), and end of period
  - Percentage of target (%) which covers: the base year, some intermediate years (optional), and end of period. The percentage of target can be compared to BAU, intensity, and others as defined by Party's NDC accordingly.
- C. Information necessary to track progress made in implementing and achieving its nationally determined contribution under Article 4 of the Paris Agreement, including updates
- Brief description of the mitigation actions
  - Sector(s) affected
  - GHGs affected
  - Objectives and/or activities affected
  - Progress of implementation and underlying steps taken or envisage
  - Start year of implementation
  - Implementing entity(ies)
  - Results achieved (in relation to emission reduction, ton CO<sub>2</sub>e)
- D. Mitigation policies and measures, actions and plans, including those with mitigation co-benefits resulting from adaptation actions and economic diversification plans, related to implementing and achieving a nationally determined contribution under Article 4 of the Paris Agreement. This section will feature:
- Brief description of actions, policies and measures
  - Objective
  - Type of instruments (in the format of regulatory, economic instruments or others)
  - Status (planned, adopted or implemented)
  - Sector(s) affected
  - Gas(es) affected
  - Start year of implementation
  - Implementing entity(ies)
  - Remarks (choose between "co-benefits resulting from adaptation actions" or "co-benefits resulting from economic diversification plans")
- E. Summary of greenhouse gas emissions and removals
- This part will refer to the summary of common reporting format of inventory, no need to develop a new tabular format.
- F. Projections of greenhouse gas emissions and removals, as applicable. The CTF for this section would have some points, such as:
- Model used for projections
  - GHG Emission Level (unit CO<sub>2</sub>e), which covers the number in: year of reported BTR, some intermediate years (optional), and end of period
  - Emission reduction target (unit CO<sub>2</sub>e), which covers the number in: year of reported BTR, some intermediate years (optional), and end of period

- Emission reduction achieved (unit CO<sub>2</sub>e), which covers the number in: year of reported BTR, some intermediate years (optional), and end of period
- Percentage of target achieved, compare to total target (%), which covers the number in: year of reported BTR, some intermediate years (optional), and end of period

G. Other information

- Related to cooperative approach under Article 6 of PA (if applicable), will covers:
  - Market-based mechanisms under the Convention and Paris Agreement (each mechanism)
  - Possible scale of contributions (estimated ton CO<sub>2</sub>e) for each mechanism

- 3) Common tabular formats in chapter V Information on financial, technology development and transfer, capacity – building support provided and mobilized under Articles 9 – 11 of the Paris Agreement:

Indonesia views that common tabular format for financial, technology development and transfer, capacity – building support provided and mobilized should be reported and reflected on BTR with guidance in Chapter V in MPGs of Transparency Framework for action and support.

- 4) Common tabular formats in chapter VI Information on financial, technology development and transfer on capacity building support needed and received under Articles 9 – 11 of the Paris Agreement:

Indonesia agrees on using common tabular format for reporting chapter VI, however Indonesia expressed the need to also add textual format for reporting information regarding financial support, technology development and transfer support needed, and capacity-building support needed.

In textual format, information regarding support needed as follows:

- Financial support needed:
  - Sectors for which the Party wishes to attract international finance, including existing barriers to attracting international finance
  - Description of how the support will contribute to its NDC and to long term goals of the PA
  - Description the engagement of PS and NPS in financial support
  - Requires to be determined minimum information should be given
- Technology development and transfer support needed:
  - Plans, needs and priorities related to technology development and transfer, including those identified in Technology Needs Assessment
  - Technology development and transfer related needs for the enhancement of local and indigenous capacities and technologies
- Capacity – building support needed:
  - Approach a Party seeks to take enhance capacity building support
  - Country-specific capacity building needs, constrains and gaps in communicating those needs and an explanation of how the capacity building support needed would improve the provision of such information
  - Processes for enhancing public awareness, public participation and access to information in relation to capacity building.
  - Description of engagement of NPS in raising awareness and capacity building for Climate Change

In tabular format, information regarding support needed as follows:

- Financial support needed:
  - Title (of activity, program or project)
  - Program/project description
  - Estimated amount
  - Expected time frame
  - Expected financial instrument
  - Type of support
  - Sector and subsector
  - Whether the activity will contribute to technology development and transfer and/or capacity building, if relevant
  - Whether the activity is anchored in a national strategy and/or an NDC
  - Expected use, impact and estimated results\*  
*\*)note: impact need to be define clearly in further negotiation process*
  
- Technology development and transfer support needed
  - Title (of activity, program or project)
  - Program/project description
  - Expected time frame
  - Type of support
  - Sector
  - Type of technology
  - Expected use, impact and estimated results\*  
*\*) note: impact need to be defined clearly in further negotiation process*
  
- Capacity-building support needed
  - Title (of activity, program or project)
  - Program/project description
  - Expected time frame
  - Type of support
  - Expected use, impact and estimated results\*  
*\*) note: impact to be define clearly in further negotiation process*

An approach to determine finance, technology development and transfer, and capacity building needed should be based on gap analysis (such as time frame needs, transparent methodology to count/assess the needs). Time frame to determine finance, technology development and transfer, and capacity building determine by Party and should be reported every 2 years in Biennial Transparency Report and every 4 years in National Communication. The type of support should be categorized based on sector and prioritize issues in each sector. Support needed also should be identified based on its support to achieve Party's NDC.

Regarding support received, Indonesia expressed that regarding amount of finance, technology development and transfer and capacity building received by Party should be counted based on support registered by Party's whether in the reporting vehicle in UNFCCC including in Party's National Registry System and/or UNFCCC's Public Registry. This is to ensure that the information regarding support received synchronize with information reported in finance, technology development and transfer, and capacity building (support) mobilized.

**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;***

Indonesia propose the Biennial Transparency Report including national inventory document (as part of BTR) and technical expert review should be consist of following content/chapter, such as:

Executive Summary

1. National Circumstances and Institutional Arrangement
2. National Inventory Report
3. Mitigation Actions and Their Effects
4. Adaptation Actions (reporting only section B on Impact, Risk and Vulnerability, as appropriate, section C on Adaptation Priorities and Barriers, and Section E on Progress in Implementation of Adaptation)
5. Domestic of Measurement, Reporting, and Verification
6. Finance Technology Development and Transfer, and Capacity Building Needs and Received
7. Information of tracking progress and achievement of NDC
8. Closure and Improvement Plan
9. Appendix

**c) *A training programme for technical experts participating in the technical expert review.***

- Technical expert review should also consider to consist of equal amount of experts from developed country Parties and developing country Parties. Indonesia expressed concern on experts in Roster of expert should also have knowledge on expertise on specific issues/sectors that will be review in certain country/Party, such as expertise in peat, forest and peat fire, mangrove, or specific issue on non-land based sector (energy and IPPU).
- Training on specific issue on sectors for improvement of activity data and emission factor, especially for capacity building for experts from developing country Parties.

**d) *Indonesia is of the view on the importance of conducting report in adaptation even though it is not mandatory to be reported in the BTR. Parties commitment in reporting adaptation is important for facilitating global stock take on adaption.***

The impediments might occur during reporting is lacking of data in up dating the progress and the methodologies applied to assess the vulnerabilities. Indonesia lack of experiences in reviewing short term progress in adaptation, in order to fulfill the requirement to conduct reporting every two years. Therefore, sharing knowledge and experiences amongst country Parties as well as training and capacity building are required.

In regards the MPGs guideline, we are of the view that the title of chapter 4 and its content is inconsistent due to covers also Loss and Damage. As we are aware well, Loss and Damage is regulated under article 8 of PA (not in article 7). For practicality in collecting the information and preparing the report, the structure of chapter 4 should be in line with the elements of the adaptation communication.

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