EIG's views on the transparency work programme (SBSTA 50)

15 June 2019

In response to the call for submissions contained in decision 18/CMA.1 on the modalities, procedures and guidelines for the transparency framework for action and support referred to in Article 13 of the Paris Agreement, the Environmental Integrity Group (EIG) is pleased to submit its views on the SBSTA work programme, covering:

- Common reporting tables (CRTs) for the electronic reporting of the information referred to in chapter II, and common tabular formats (CTFs) for the electronic reporting of the information referred to in chapter III, V, and VI of the annex, taking into account the existing common tabular formats and common reporting formats;

- Outlines of the biennial transparency report (BTR), national inventory document (NID) and technical expert review report (TERR), pursuant to the modalities, procedures and guidelines contained in the annex;

- A training programme for technical experts participating in the technical expert review.

General remarks

The EIG welcomes the modalities, procedures and guidelines (MPGs) for the transparency framework for action and support referred to in Article 13 of the Paris Agreement, as adopted at COP24 in Katowice. These MPGs reflect the clear understanding of all Parties that a common transparency framework for action and support, based on the guiding principles defined, is essential for the successful implementation of the Paris Agreement.

In the EIG's view, the MPGs are a sound basis to guide Parties in the provision of information in line with Article 13 of the Paris Agreement. It is now important to develop, in line with the respective chapters of the MPGs, the complementary tools called for in paragraph 12 of decision 18/CMA.1 to facilitate reporting and review of information submitted under the transparency framework.

Common reporting tables and common tabular formats

Paragraph 12(a) of decision 18/CMA.1 calls for the development of common reporting tables (CRTs) and common tabular formats (CTFs) for the electronic reporting of information by Parties.

If well designed and implemented, CRTs and CTFs are an efficient means to facilitate the provision of information in a well-structured manner. In giving clear guidance on the contents, the format and the level of detail of information to be reported, they contribute to avoiding duplication of work and undue burden on Parties and assist these in reporting information in a consistent and coherent manner over time. In addition, CRTs and CTFs have proven their usefulness in the present transparency regime, including in the consideration of Party information in the context of technical expert reviews. This will be even more important in the future, as a much larger number of Parties is to provide information on a regular basis.

The EIG considers experience gained so far in the use of common tables and formats an important basis for further work. This is also acknowledged in paragraph 12(a) of decision 18/CMA.1, which states that the work undertaken by SBSTA should take into account existing common tabular formats and common reporting formats. Thus, Parties should bring their experience from the use of these formats, and from the modalities of transmitting information through such formats, to the upcoming process of designing the CRTs and CTFs. This will help all Parties to engage in the further discussion and to successfully

complete the development of the complementary tools, such as tables, formats, outlines and training programme of the MPGs by COP26 in 2020.

Organization of work

In order to ensure the timely completion of the mandate given to SBSTA, the EIG proposes the following arrangements for the transparency work programme:

(i)   **Availability of expertise:** To conduct the work programme addressed by paragraph 12 of decision 18/CMA.1, expertise in line with the topics covered is needed for the development of the different elements contained in the mandate to SBSTA. Thus, working arrangements must ensure that Party experts have the possibility to be in the room as specific, sometimes highly technical, topics are taken up. When scheduling negotiation sessions up to the conclusion of the transparency work programme, clashes between different agenda items requiring the same expertise must be avoided.

(ii) **Clustering of items:** There is need for dedicated time for all elements under consideration. The EIG agrees with the clustering outlined in the provisional agenda of SBSTA, item 10 (a) – (e).

(iii) **Sequencing of work and allocation of tasks:** Some elements of the work programme may need more time to generate a common understanding and to ensure a sound outcome by CMA-3. Others are more straightforward and may profit from the detailed specifications already contained in the annex to decision 18/CMA.1. The elaboration of the CRTs and CTFs in parallel under sub-items (a), (b) and (c) needs a lot of time and thus needs to start at SBSTA 50. For sub-items (d) and (e), the EIG suggests to give, based on the input and discussions of Parties on these agenda items, a mandate to the secretariat at SBSTA50 to elaborate draft outlines for BTRs, NIDs and TERRs as well as an initial version of the training programme for experts participating in the technical expert review. The draft outlines and the initial version of the training programme shall be made available to Parties before SBSTA52, in order to allow for adoption at COP26. In addition, the group believes it would be useful to give a mandate to the secretariat at SBSTA53 to develop, test and implement the IT solution for the electronic reporting based on the agreed tables. For a smooth start of reporting under the Paris Agreement, a well-functioning IT solution has to be ready and at hand well ahead of 2024, and lessons learned from the use of the current software have to be taken into account.

Initial thoughts on the development of CRTs, CTFs, outlines, and the training programme

(i)   **CRTs for the reporting of GHG inventory information (chapter II of the MPGs)**

There is extensive experience with inventory reporting tables (i.a., the common reporting format, as contained in annex II to decision 24/CP.19). For these tables, an IT solution for electronic reporting is also implemented and functioning. Thus, using these tables as a basis for the reporting of inventory information under the new transparency framework might be the most efficient way to proceed. Nevertheless, some amendments to existing tables would be necessary to fully accommodate the provisions of chapter II of the new MPGs (e.g., relating to the use of flexibility).

Working on the basis of the IPCC 2006 guidelines (Annex 8A.2 of Volume I) as well as the IPCC 2013 Supplementary Guidance, where applicable, would be another feasible option since the contents of chapter II of the MPGs are covered by these guidelines to a considerable extent. This option would imply more extensive amendments and additions to the templates proposed (e.g., no tables exist in the IPCC guidelines to document recalculations), while other tables (e.g., summary tables A and B or the AFOLU sector tables) would need to be improved to reflect Parties experiences with inventory reporting. Also, a new, user-friendly solution for electronic reporting on the basis of the amended IPCC tables would have to be developed.

(ii) **CTFs for reporting of the information related to tracking progress (chapter III of the MPGs)**

In addition to the inventory tables, tabular formats pertaining to the information requested by section III of the MPGs also exist. Examples can be found in decision 19/CP.18 or in some tables presently used for reporting of GHG inventory information. Related experience should be taken into account. However, to cover the full scope of chapter III of the Annex to decision 18/CMA.1, new reporting formats need to be developed.

CTFs must be developed for the chapters including III.C, III.D, III.E and III.F of the MPGs as stated in paragraph 79, 80, 91 and 101, respectively. From the EIG's perspective, using CTFs would also be very useful for a clear understanding of each Party's NDC in line with chapter III.B of the MPGs. Work on these topics could, at least in part, build on existing material or material developed under other items: For topic III.D, tables used in the context of present biennial reporting could be taken into account. The outcome of topic III.E could consist of a sub-set of tables developed under the work on tables for chapter II of the MPGs. For topic III.F, existing reporting formats developed for national communications could be a starting point.

For the elaboration of the structured summary referred to in paragraph 77 of the MPGs, proposals for tables that have been reflected in earlier drafts of the MPGs could serve as starting points for further work. This table needs to accommodate all types of NDCs, as well as information in relation to the LULUCF sector (paragraph 77c) and the use of internationally transferred mitigation outcomes (paragraph 77d). The information requirements reflected in paragraph 77d are a good basis for reporting on the use of ITMOs.

However, additional information is required to understand the transfer and use of ITMOs. This information has to be consistent with the outcome on Article 6 under SBSTA and needs to be integrated into the structured summary referred to in paragraph 77, including information requested in paragraph 77d (iii).

(iii) **CTFs for reporting of the information related to support (chapters V and VI of the MPGs)**

The common tabular formats for reporting of the information related to support should be developed based on existing formats. The experience from reporting countries with the current reporting system should be taken into account for the development of the new CTFs.

In the view of the EIG, CTFs are needed for the topics covered by chapters V.C, V.D para 127 and V.E para 129, VI.C para 133, VI.D, VI.E para 136 and VI.F para 138, VI.G para 140 and VI.H para 142 and VI.I para 144. The CTFs for the information related to capacity-building and technology transfer should facilitate reporting of case studies and best practices instead of an extensive list of activities in order to avoid double reporting with financial support provided, mobilized, needed and received.

The electronic implementation of the CTFs should facilitate the standardized data import from other sources into the UNFCCC reporting system, e.g. international statistical systems and / or databases such as the OECD Common Reporting Standard or the IATI Standard. This will be essential to ensure data consistency and avoid errors due to manual data handling and should therefore be considered in the development of the CTFs.

(iv) **Outlines of the biennial transparency report (BTR), national inventory document (NID) and technical expert review report (TERR)**

The outlines for BTRs, NIDs and TERRs should ensure that the general structure of reports submitted by Parties, or produced by TER teams, is identical. As regards the level of detail of the outlines, existing outlines, e.g., for national communications or national inventory reports, should

be used as a reference. Outlines, in their final form, should also contain references to the CRFs or CTFs that are to be reported under the respective headings.

In the context of the work on the TERR outline, the EIG considers the use of tables offering a summary or overview of review findings a useful way to enhance the usability of reports.

(v) **Training programme for technical experts**

The training programme for experts wishing to serve on a technical expert review team should be developed based on existing training programmes and experience with their implementation, taking into account the qualifications required for the technical review of Party reports in accordance with the provisions of chapter VII of the MPGs.