

Submission by Norway: work of the Subsidiary Body for Scientific and Technological Advice (SBSTA) on methodological issues pursuant to the modalities, procedures and guidelines for the transparency framework

Introduction

The adoption of decision 18/CMA.1 with common modalities, procedures and guidelines (MPGs) for the enhanced transparency framework is important for robust reporting under the Paris Agreement. Norway appreciates the opportunity to present our views on the work referred to in paragraph 11 of SBSTA's conclusions for agenda item 10 at SBSTA's fiftieth session. This submission is structured around bullet points (a) to (d) of paragraph 11.

SBSTA's ongoing work on designing tables, tabular formats, outlines for reports and a training programme will be adopted by CMA 3 in 2020. Timely delivery on this work is key. Substantial work is needed, especially on developing tables. SBSTA should therefore consider options to facilitate the finalization of the work in 2020, one option being expert workshops.

(a) Experience with using the IPCC 2006 Guidelines, common reporting format (CRF) etc.

First, we want to stress that the 2006 IPCC Guidelines is an important improvement of the previous guidelines. This is not only in terms of improved accuracy and completeness, but also in terms of user friendliness. Both the restructuring of the guidance and the integration of all the good practise guidance into the methodology report have made the 2006 IPCC Guidelines easier to read and use in the inventory compilation process.

There is a lot of existing knowledge about what to do and how to best do the transition from the old to the new guidelines. Examples of existing relevant information are:

- Primer to the 2006 IPCC Guidelines¹. A 20 pages long document providing guidance on how to use the Guidelines. Five of these pages contain information on what is new/changed compared with the 1996 Guidelines.
- The IPCC Inventory Software². This can be used for calculating emissions according to the 2006 Guidelines. It can be downloaded for free from the website of the IPCC's Task Force on National Greenhouse Gas Inventories (TFI). There are links to a help desk and a web forum on this website, established to assist the users of the software. Annex 1 of the user manual for the IPCC Inventory Software³ provides a mapping table of the categories used in the 2006 and 1996 Guidelines.
- Similarly, table 8.2 in Chapter 8 of Volume 1 of the 2006 IPCC Guidelines⁴, gives information on the corresponding category codes: The first two columns give code and name of the categories

¹ https://www.ipcc-nggip.iges.or.jp/support/Primer_2006GLs.pdf

² <https://www.ipcc-nggip.iges.or.jp/software/index.html>

³ https://www.ipcc-nggip.iges.or.jp/software/files/IPCCInventorySoftwareUserManualV2_54.pdf

⁴ https://www.ipcc-nggip.iges.or.jp/public/2006gl/pdf/1_Volume1/V1_8_Ch8_Reporting_Guidance.pdf

according to the 2006 Guidelines, and the 4th column gives the corresponding category in the 1996 Guidelines.

- Specifically for IPPU, Annex 3 of volume 3 of the 2006 IPCC Guidelines⁵ provides a summary of the improvements made since the 1996 Guidelines.

In Norway the transition from reporting based on the 1996 IPCC Guidelines, to reporting through the CRF Reporter according to the 2006 IPCC Guidelines, took place over a period of 1.5 years. The project started around November 2013 with preparations and planning and ended in April 2015 with a complete reporting in the new format.

The three core institutions in the inventory compilation work were involved in the project. In addition to a group coordinating the work, there were five sectoral groups (energy, industrial processes and product use (IPPU), agriculture, land use, land use change and forestry (LULUCF) and waste.

Norway participated in a workshop organized by the EU that focused on energy and IPPU. The main objectives of the workshop were to discuss open questions or potential inconsistencies related to the guidance provided in the 2006 IPCC Guidelines and open questions regarding the implementation of 2006 IPCC Guidelines and the new CRF reporting tables. Documents used for the workshop were:

- a comparison of the methodological requirements in the different sectors in the IPCC 1996 Guidelines/IPCC Good Practice Guidance and the IPCC 2006 Guidelines
- an overview of changes made to the CRF tables
- an overview of default uncertainties in the different sectors.

Norway also participated in a Nordic workshop regarding changes in the LULUCF sector due to new guidelines.

The latest Common Reporting Format (CRF) tables were developed through a thorough process to enable electronic reporting of GHG data in accordance with the IPCC 2006 Guidelines and with the Annex I GHG inventory reporting guidelines in decision 24/CP.19. There are many reporting tables, but many of these are generated automatically by the CRF reporter software based on the input in the sectoral background tables.

(b) Common tabular format tables for tracking progress in implementing and achieving nationally determined contributions.

Chapters III.C, III.D, III.E and III.F are relevant for the SBSTA's work on common tabular format.

III.C Information necessary to track progress

The specific information requirements are captured in paragraphs 65-78 of the MPGs. What type of information a Party will present, and especially its form (number, description), will depend on a Party's NDC under Article 4. The common tabular formats must therefore accommodate presentation of various types of information, quantitative and qualitative. Some areas that seem especially relevant for presentation in tables are description of the NDC under Article 4, the structured summary required by paragraph 77 as well as the methodologies and assumptions.

The materials in the supplemental submissions in June by the European Union and the United States provide a useful starting point for developing a common tabular format.

⁵ https://www.ipcc-nggip.iges.or.jp/public/2006gl/pdf/3_Volume3/V3_x_An3_Improvements.pdf

III.D Mitigation policies mm

In Norway's view, SBSTA should develop one table for the information requested by paragraphs 82 and 85 of the MPGs. The table in option 1 in the co-facilitators' informal note for SBSTA agenda item 10b builds on CTF table 3 in decision 19/CP.18 and the provisions of the MPGs. It therefore provides a good starting point for SBSTAs work.

III.E Summary of GHG emissions and removals

Paragraph 91 of the MPGs requires Parties that submit a stand-alone national inventory report to provide a summary of its GHG emissions and removals in a tabular format. The information shall be provided for the reporting years corresponding to the Party's most recent national inventory report. The set of CTF table 1 in decision 19/CP.18 are today imported directly from the CRF Reporter's summary tables and a similar approach could be used. It will be useful for SBSTA to discuss the necessary level of details for such a table.

III.F Projections

SBSTA should develop one tabular format that can be used for all three types of projections. In addition, SBSTA should develop one tabular format for information on key variables and assumptions. The tables in annex II of the co-facilitators' informal note for SBSTA agenda item 10b builds on CTF tables 5 and 6 in decision 19/CP.18 and the provisions of the MPGs. It therefore provides a good starting point for SBSTAs work.

[\(c\) Tables for reporting on support needed and received, and support mobilized;](#)

Support needed and received

Paragraph 133 and 134 of the MPGs gives a list of the information regarding financial support needed and received developing country Parties should provide in a common tabular format to the extent possible, and as available and as applicable. The tables should allow for a high degree of flexibility. Parties can indicate through the use of Notation keys (e.g not available or not applicable) when information is not reported. In addition, Parties should have the option to provide more information in a footnote or a separate section of the report.

In Norway's view, separate tables should be made for support needed and for support received. Standardized response options are stipulated in the parenthesis of each subparagraph on the basis of 133 a – j, and 134 a – n. We acknowledge that some of the information to be captured, in particular in the table on support needed, could be uncertain or tentative. A standardized list of options for the category "sector" and "subsector" could be developed in order to increase consistency and comparability of reporting. On "Expected use, impact and estimated results" of the activities, we would suggest opening the possibilities for categories of estimated results, for example climate impact by CO₂-eq. tons avoided and number of beneficiaries. We would also recommend opening up for reporting on results achieved. One possibility could be to introduce categories such as "underachieved", "achieved", or "overachieved" beside the estimated results. More detailed information on use, impact and results could thereafter be included in a separate section of the report, in a textual format.

For the reporting on capacity building and technology development and transfer, duplication of information should be avoided. Much of this information will likely already be captured in the tables for support needed and received – and there is already a possibility to indicate whether the amount received has contributed to any of these elements. For these tables to add value they should focus

on information that is not captured in the tables for support needed and received, and just give a reference to the information given in the other table when included there.

Support mobilised

Paragraph 125 of the MPGs specifies how reporting on support mobilized through public intervention could be done in tabular and/or textual format. Norway considers that reporting in a tabular format would improve the transparency of information on financial support mobilized. The table should be designed on the basis of the paragraph 125 with subparagraphs (125 a-j) being distinctive reporting categories with options as stipulated in the parenthesis. Parties should according to paragraph 121 of the MPGs identify a clear causal link between a public intervention and mobilized private finance. The CTF could facilitate a more convergent classification on how to establish such causality (e.g. whether there is a "direct mobilisation" or an "indirect mobilisation"). Under 125 b "amount" parties would report the sum that the party is directly responsible for mobilising. Additional information, where multiple public actors are involved, could be included in a footnote or in a separate section of the report in order to clarify how there is no double counting of funds (c.f. paragraph 121).

(d) Approaches to operationalizing the flexibility for those developing country Parties that need it in the light of their capacities, as defined in decision 18/CMA.1.

The MPGs specify the flexibility that is available to those developing country Parties that need it in the light of their capacities (hereafter just referred to as flexibility). Paragraph 6 of the MPGs requires a developing country to clearly indicate the provision to which flexibility is applied. The MPGs do not specify where this is to be indicated, but a table in the biennial transparency report and/or the national inventory document could be useful. The MPGs also require a developing country to concisely clarify capacity constraints and provide self-determined estimated time frames for improvements in relation to those capacity constraints. This could be reported in or together with the table indicating the provision to which flexibility is applied.

It is important that the common reporting tables and the common tabular formats are indeed common. The flexibilities specified in the MPGs vary in nature, but can be operationalized through a combination of options such as notation keys, narrative descriptions, footnotes. Below we present Norway's views on how the flexibilities in the MPGs can be operationalized. This does not include the flexibilities in parts VII (technical expert review) and VIII (facilitative, multilateral consideration of progress) of the MPGs. This is because any application of the flexibilities in parts VII and VIII will be handled in a dialogue between the Party concerned and the secretariat. These flexibilities are therefore not relevant for SBSTA's ongoing work on designing tables, tabular formats, outlines for reports and a training program.

Part II of the MPGs (national inventory report)

Key category analysis (paragraph 25)

In short, the flexibility is that key categories can be identified using a threshold no lower than 85 per cent instead of 95 per cent. According to the IPCC 2006 GL, it is *good practice* to clearly document the results of the key category analysis in the inventory report and this will apply to all Parties, regardless of the threshold used. The current Common Reporting Format (CRF) table 7 - *summary overview for key categories* is filled in automatically based on the IPCC Tier 1 methodology. Such a table will also be useful as part of the common reporting tables that SBSTA currently is working on. It should be possible to specify a chosen threshold within the range 95-85 per cent in the MPGs.

Uncertainty (paragraph 29)

This provision is that each Party shall quantitatively estimate and qualitatively discuss the uncertainty of the emission and removal estimates. In short, the flexibility is to provide, at a minimum, a qualitative discussion of uncertainty for key categories, and are encouraged to provide a quantitative estimate of uncertainty. Quantitatively estimates of uncertainties will be reported in the national inventory document, so it will be clear if a developing country Part chooses to apply the flexibility in this provision.

Not estimated from insignificant emissions (paragraph 32)

The MPGs allow the use of the notation key “NE” (not estimated) when the estimates would be insignificant in terms of level through thresholds for each category and in total. The flexibility is that other specific thresholds can be used. Annex I Parties can today explain the use of the notation key NE for insignificant emissions in their national inventory report and/or in the Common Reporting Format (CRF) table 9 (*completeness – information on notation keys*). Such a table can be relevant for all Parties that use the notation key NE for insignificant emissions, regardless of whether the flexibility provision has been used or not. SBSTA should therefore develop such table as part of the common reporting tables and this can be based on CRF table 9. Parties that report NE for insignificant emissions could in their national inventory document report on the chosen thresholds, the likely level of emissions for the respective insignificant category and how this is in accordance with the various thresholds for insignificance.

QA/QC plan (paragraph 34)

This provision is that each Party shall elaborate an inventory quality assurance/quality control (QA/QC) plan. The flexibility is that it is *encouraged* to elaborate an inventory QA/QC plan. The QA/QC plan will be reported in the national inventory document, so it will be clear if a developing country Part chooses to apply the flexibility in this provision. Norway notes that this provision is not reflected in chapter 1 of the draft elements for the outline in the co-facilitators' informal note for agenda item 10d.

General inventory QC procedures (paragraph 35)

This provision is that each Party shall implement and provide information on general inventory QC procedures. The flexibility is that it is *encouraged* to implement and provide information on general inventory QC procedures. The general inventory QC procedures will be reported in the national inventory document, so it will be clear if a developing country Part chooses to apply the flexibility in this provision. Norway notes that this provision is not reflected in chapter 1 of the draft elements for the outline in the co-facilitators' informal note for agenda item 10d.

Gases (paragraph 48)

This provision is that each Party shall report seven gases. The flexibility is to instead report at least three gases (CO₂, CH₄ and N₂O) as well as any of the additional four gases (HFCs, PFCs, SF₆ and NF₃) in specified cases. If a developing country Party chooses to apply this flexibility, Norway's view is that relevant columns and tables should not be deleted as this will not be transparent reporting. Instead, the flexibility can be operationalized through notation keys and explanations in the national inventory document.

Starting year of annual time series (paragraph 57)

This provision is that each Party shall report a consistent annual time series starting from 1990. The flexibility is to instead report data covering, at a minimum, the reference year/period for its NDC under Article 4 of the Paris Agreement (and consistent annual time series from at least 2020 onwards). If a developing country Party chooses to apply this flexibility, it could be operationalized by reporting common tabular formats for years that are relevant for their time series. If time series are not reported starting from 1990, this could be explained in the national inventory document.

Latest reporting year (paragraph 58)

This provision is that for each Party, the latest reporting year shall be no more than two years prior to the submission of its national inventory report (n-2). The flexibility is to instead have the latest reporting year as three years prior to the submission of their national inventory report (n-3). If a developing country Party chooses to apply this flexibility, it could be operationalized by not reporting common tabular formats for the year n-2. Rather, this could be explained in the national inventory document.

Part III of the MPGs (tracking progress)

Estimates of GHG reductions for actions, policies and measures (paragraph 85)

The MPGs are in paragraph 82 clear that each Party shall report certain information on action, policies and measures, to the extent possible, in a tabular format. The provision in paragraph 85 is that each Party shall, to the extent possible, report estimates of expected and achieved GHG emission reductions for its actions, policies and measures. The flexibility is that it is encouraged to report this information, but it is Norway's clear understanding that all Parties will use the same tabular format. If a developing country Party chooses to apply this flexibility, it could be operationalized by not reporting estimates for the specific action, policy and measure in the tabular format that SBSTA is developing. This could be explained through footnotes to the tabular format and by text in the biennial transparency report.

Reporting projections (paragraphs 92, 95 and 102)

The provision in paragraph 92 of the MPGs is that each Party shall report projections. The flexibility is that it is *encouraged* to report these projections. In paragraph 95, there is flexibility in terms of how long the projections should be extended and paragraph 102 provides flexibility to report using a less detailed methodology or coverage with respect to paragraphs 93–101 of the MPGs. The flexibilities in paragraphs 92, 95 and 102 of the MPGs are included as footnotes in the co-facilitators' proposal for projections table in the informal note for agenda item 10b. If a developing country Party chooses to apply any of these flexibilities, it could be operationalized through footnotes to the tabular format and by text in the biennial transparency report.