

**Submission by the Arab Republic of Egypt
on behalf of the
African Group of Negotiators (AGN)
On
Methodological Issues under the Paris Agreement
November 2019**

1. Introduction

The African Group of Negotiators (AGN) is pleased to submit its views on methodological issues under the Paris Agreement in response to the call for submissions contained in paragraph 125 of the SBSTA report in June 2019 (FCCC/SBSTA/2019/2), covering the following areas:

- (a) Experience with using the *IPCC 2006 IPCC Guidelines for National Greenhouse Gas Inventories*, the common reporting format, the transition to the *2006 IPCC Guidelines for National Greenhouse Gas Inventories* and countries' experience with that transition, and the development of country-specific tools for facilitating GHG inventory reporting;
- (b) Common tabular format tables for tracking progress in implementing and achieving nationally determined contributions;
- (c) Tables for reporting on support needed and received, and support mobilized;
- (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.

In addition, given the importance of the provision of support to developing countries to the implementation of the Paris Agreement, we also submit our views under point (c) above on reporting tables for support provided and mobilized, and on the use of the CRF tables and associated reporting software for inventory reporting. We would also like to emphasize that for African countries, implementation of the enhanced transparency framework under the Paris Agreement will be heavily dependent on the adequate and timely provision of financial support for reporting and for the required capacity-building for developing appropriate and adequate reporting systems, and on the rapid implementation of concrete measures in this regard. We have made some specific proposals below, and also note that at COP 25, several items being discussed under other agenda items are very important in this regard, notably, the finalization of the terms of reference of the Consultative Group of Experts, both for capacity-building for current reporting under the COP (BURs and National Communications) and for reporting from 2024 onwards under the Paris Agreement, as decided in Katowice, under SBI agenda item 4(b), and the provision of support for reporting, under SBI agenda item 4(c).

2. Reporting tables for inventories

African countries have relatively limited experience with the 2006 IPCC guidelines. Figure 1 below portrays the use of the 1996 and 2006 guidelines in African countries' most recently submitted inventories (by submission date) – in other words, the number of countries using the 1996 and 2006 guidelines for their most recent GHG inventories, by year. The graph indicates both when the latest inventory report was submitted, and which guidelines were used.

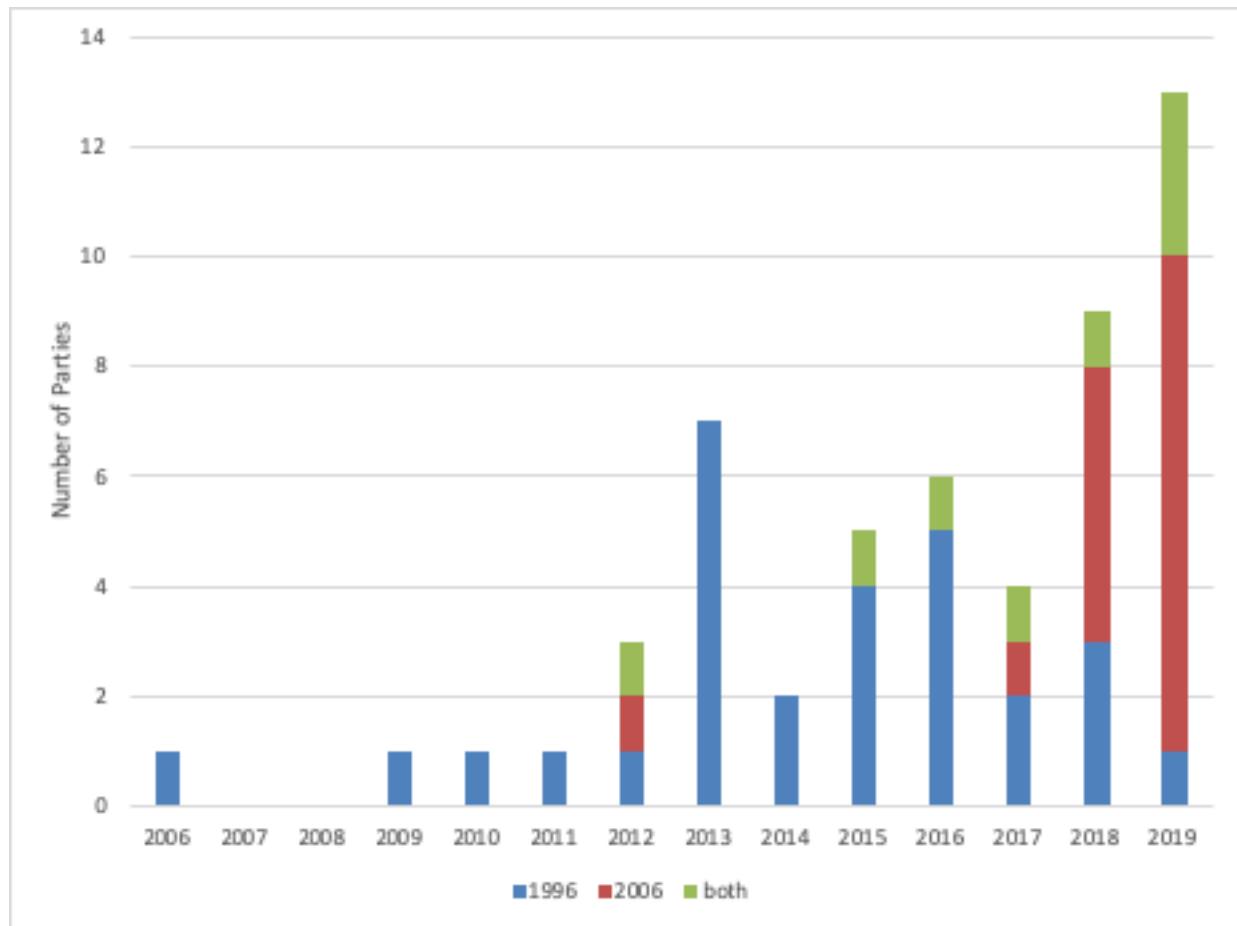


Figure 1 – IPCC Guidelines used for most recent GHG inventories by African countries, by submission date.

While there is an obvious recent shift towards African countries using the 2006 guidelines, and much evidence in recently-submitted NCs and BURs of relevant institution-building, a relatively small number of African countries have published inventories based on 2006 guidelines. Whereas 98% of African countries have published at least one inventory, only 30% have published inventories solely using the 2006 guidelines, and 15% have published inventories using both. Figure 2 below, which portrays the vintage of the most recently reporting GHG information, indicates the challenge of GHG reporting for African countries, of which only 33% are NOT LDCs or SIDS.

The objectives of the GHG inventory reporting system which is currently being finalized for the Paris Agreement's enhanced transparency system should cater for the reporting requirements of Parties with diverse national circumstances, and with different starting points. As per paragraph 42 of decision 1/CP.24, the inventory guidelines contained in the MPGs (and by implication the associated reporting tables and software) will be used by developed country Parties who are also Parties to the Paris Agreement to fulfil both their GHG inventory reporting requirements under the Convention (annual inventories) and under the Paris Agreement (in/with biennial transparency reports). On this basis, the AGN believes that the current CRF tables and associated software are a good basis on which to develop reporting tables and software for GHG reporting under the Paris Agreement for developed countries, and for developing countries which do not need flexibility on account of their capacities.

For those developing countries that need flexibility on account of their capacities, we cannot support the use of the (modified) CRF tables or reporting software due to their complexity.

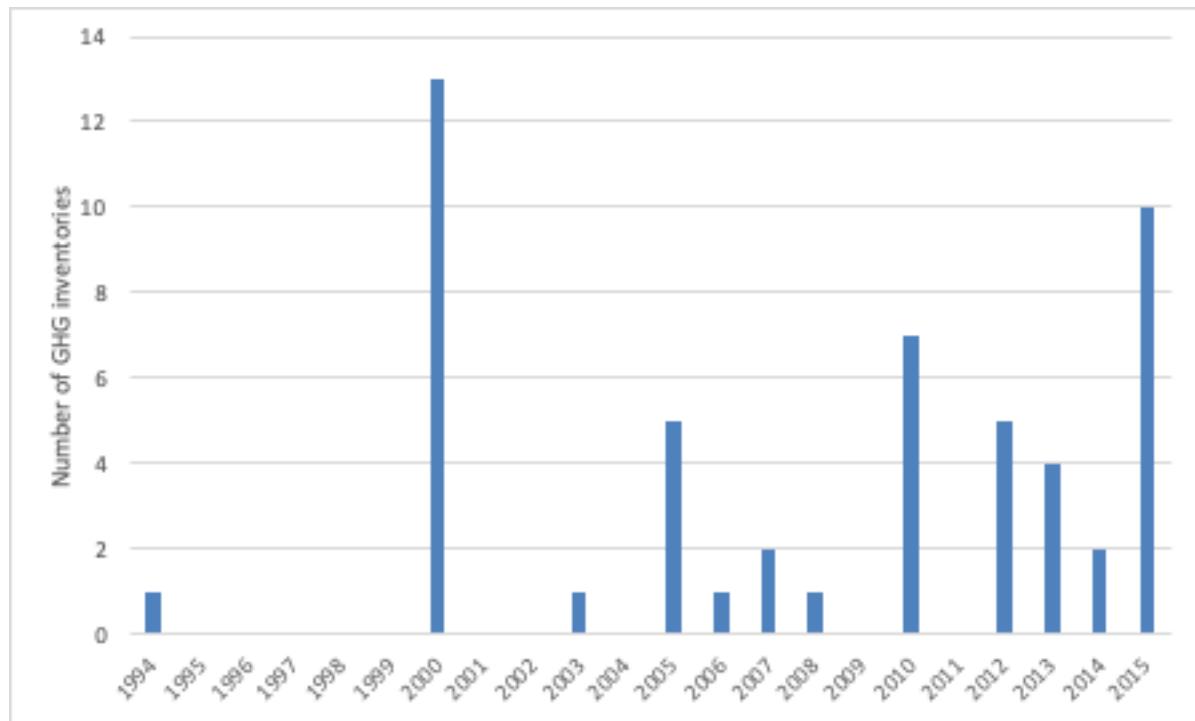


Figure 2 – Vintage of latest reporting year for African GHG inventories (number of inventories per year, by vintage of latest reporting year)

The AGN would therefore propose that to further the work in SBSTA item 11(a), i) the existing CRF tables should be updated to be fully consistent with the 2006 IPCC guidelines, and with the MPGs, and ii) that another solution needs to be found for developing countries that require flexibility due to their capacities.

The task of updating the existing CRF tables could be accomplished most efficiently by requesting the UNFCCC Secretariat to produce a technical paper, possibly as an input to an intersessional workshop, on what changes need to be made to the CRF tables, in consultation with lead GHG inventory reviewers and the CGE.

3. Reporting tables for tracking progress

For this section of the MPGs, the AGN anticipates that the following tables or sets of tables be developed:

- Description of a Party's NDC (Section B) – possibly including sub-tables for details on methodologies, etc, as applicable, and including elements from paragraphs 74 and 75.
- Indicators (Section C paras 65-67, and also elements from paragraphs 74, 75 and 76) - possibly including sub-tables for details on methodologies, etc, as applicable.
- Structured summary (paragraph 77)
- Mitigation policies and measures (Section D)
- Summary of GHG emissions and removals (Section E)
- Projections of GHG emissions and removals (Section F), consisting of two tables – one for GHG projections, and one for the projection of NDC indicators.

The AGN's key priorities regarding these tables are i) that the tables accommodate ALL NDC TYPES, and respect the nationally-determined nature of NDCs, and ii) that in this light, sufficiently detailed information be provided on methodologies used by different NDCs and associated indicators and accounting approaches to facilitate sufficient

transparency, clarity and understanding. We would therefore anticipate that in the tables which provide a description of a Party's NDC, and in the tables specifying the indicators to be used by Parties to track their NDCs, as much detail as possible is provided on relevant methodologies and approaches to defining key parameters. Since some of these (for instance, baselines) will not be applicable to all NDCs, some of the sub-tables in this section may be applicable only to a subset of NDCs. Therefore, whereas we would anticipate that tables for sections D to F are relatively straightforward, for sections B and C it may be necessary to develop more than one table for each section, and some of these tables may not be applicable to specific NDC types.

We also assume that each NDC has a "period of implementation", from the year after the last target year of the previous NDC (in most cases, 2025 or 2030 at present), to the target year in the next NDC, which will also be clearly communicated in the table describing a Party's NDC. Since BTRs may report on more than one period of implementation (the last year of a period of implementation of one NDC, and the first year of a period of implementation of the next NDC), it is possible that a single BTR will report information on tracking progress for more than one NDC. This would apply to all the tables in this section other than the summary of GHG emissions and removals. In these circumstances (depending on when in the NDC implementation cycle the description of a Party's NDC is reported), Parties would be reporting two sets of tables (one on each NDC). This would include the projections tables, since the indicators may have changed. We provide more detail below on each table or tables.

3.1. Description of a Party's NDC

The AGN anticipates that a table be developed for the description of Parties' NDCs (Section B), to provide transparent and comparable information on the key characteristic of Parties' NDCs. This would include the elements listed above.

3.2. Indicators

The importance of clearly defining the indicator(s) which will be used to track progress is such that we would propose a separate table to define them, providing the information contained in paragraphs 65-67, and also as relevant in paragraphs 74-76.

3.3. Structured summary

The AGN understands the reference to a "structured summary" in paragraph 77 to refer to a single table, designed so as to a) accommodate all types of NDC, b) reflect progress and achievement of Parties' NDCs during and after a specific NDC's implementation period, and c) contain relevant information reflecting corresponding adjustments in respect of internationally-transferred mitigation outcomes in terms of Article 6. The table should contain a time series corresponding to the period of implementation for each NDC, and should contain relevant columns to indicate achievement of the NDC.

3.4. Policies and measures

The table proposed by the co-facilitators in Annex I of their informal note is a good basis to develop a table for the reporting on policies and measures. The AGN would in addition propose to add a column for information as specified in paragraph 89 (how PAMs are modifying longer-term trends in GHG emissions), which would apply per PAM as well as to PAMS as a whole. It may also be worth considering providing a column for the direct outcome of each PAM/programme in non-GHG terms, if this is relevant to a Party's NDC (for instance MW installed). Documentation boxes can provide an opportunity to provide further information on methodologies for estimating the costs and GHG impact of PAMS (as applicable), with cross-references to an annex referenced in paragraph 86. It would also be useful, to the extent possible, to provide a way to link the PAMS table to the section on the report on projections.

3.5. Summary of GHG emissions and removals

Parties that have not submitted separate GHG inventory reports are required to provide a table of emissions and removals. For this, we would propose a simple table containing the time series and base year as applicable as reported in terms of paragraphs 57 and 58, and major IPCC categories, and totals with and without land use.

3.6. Projections

The table proposed by the co-facilitators in Annex II of their informal note is a good basis to develop a table for GHG projections, with flexible historical time series. The historical time series should be provided from the year from which Parties report time series, with a reference to the relevant flexibility. The AGN would in addition propose that documentation boxes be used for a concise summary of key methodologies and assumptions, with cross-references to more extensive textual information, and any references to external documentation (for instance to GHG emissions models, their methodology and assumptions). It would also enhance transparency and understanding of the key projection to list / cross-reference policies assumed / contained in the “with measures” scenario, and as applicable, in the “with additional measures” scenario, either in an additional table, in text, or via a cross-reference to the PAMS table above.

The AGN also propose an additional table in this section containing projections of key indicators, as specified in paragraph 97. Here we understand “key indicators” as those indicators identified by Parties in paragraph 65, and the relevant table should have a similar structure, with the same flexibility on the time periods for the projections as well as the historical data. Similarly, documentation boxes can be used to provide additional information on methodologies.

4. CTFs for support provided/mobilized and needed/received

The AGN welcomes the further opportunity to provide views on tables for support needed/received/mobilized, and we have at the same time provided views on tables for support provided. We would like to highlight the different legal nature of reporting on support provided and mobilized, and support needed and received. Reporting and review are mandatory for the former for developed countries, whereas reporting of support needed and received is non-mandatory, and there are currently no plans to review this information. The nature of the guidance on the relevant tables should take these differences into account. We have used existing tables 7, 7(a), 7(b), 8 and 9 in the Annex to decision 19/CP.18 as starting points for the tables on support provided and mobilized.

4.1. Tables for reporting on support provided and mobilized

Reporting on support provided and mobilized is a legal obligation for developed countries in the Paris Agreement. The AGN understands this to apply to ALL developed countries, and not only Annex II countries under the Convention. The MPG in section V contain three categories of information to be provided in tabular format on financial support (in paragraphs 123, 124 and 125), and one each on technology and capacity-building (paragraphs 127 and 129), as well as a preceding paragraph specifying information to be provided on “underlying assumptions, definitions and methodologies” (paragraph 120). The provision of detailed information contained in paragraph 120 is in the AGN’s view particularly important for the enhanced transparency framework for two reasons. First, unlike the provision of GHG inventory information (which relies on the IPCC guidelines), there are no agreed underlying methodologies and definitions for the reporting of financial information. Secondly, paragraph 120 also contains a requirement to report on how the provision of financial support aligns with key provisions in Article 9 of the Paris Agreement, including paragraph (p) on needs of developing country Parties, (q) on alignment with the long-term goals of the Paris Agreement, (r) on the provision of new and additional resources, and (s) on progression.

Some of the subparagraphs in paragraph 120 apply to individual items recorded in the

proposed tables, and others apply to all items in the tables. In the case of the former, we have included these as columns in the tables, and in the case of the latter, we have proposed the use of documentation boxes to accompany the tables for the provision of information contained in paragraph 120, in addition to the provision of this information in textual form. We also propose a summary table of support provided, which contains two years of summary information from the reporting years from the relevant BTR, and in addition contains a time series starting from 2011 (the first reported year in Annex I Biennial Reports), and continuing until the most recently-reported years. The aim of organizing the summary table in this way is to provide transparent information on progression. Amounts of climate finance have been disaggregated in the reporting tables by financial instrument, to facilitate aggregation and provide further transparency. Additional rows have been included in the summary tables to allow Parties to communicate information on indicative future amounts of climate finance on a voluntary basis.

The summary tables have been organized in the same way. Documentation boxes have also been provided for the provision of additional information contained in paragraphs 126 and 128 with the relevant tables. Information should be reported through an electronic format similar to current practice for Annex I Parties' reporting of inventory information in CRF tables

The proposed tables are provided in the accompanying spreadsheet titled "AGN Submission SBSTA 11 Nov 2019 Annex 1 tables for support provided" as follows:

Table 1 – summary table for financial support provided

Table 1 (a) – provision of public financial support through bilateral channels

Table 1 (b) – provision of public financial support through multilateral channels

Table 2 – finance mobilized

Table 3 – technology support provided

Table 4 – capacity-building support provided

4.2. Tables for support needed and received

Provision of information on support needed and received is non-obligatory, and it is also not obligatory for developing country Parties to provide such information in tabular format. To date very few developing countries provide detailed information on support needs and on support provided, and there are no existing reporting tables to draw on. The development of reporting tables for support needed and received will however potentially provide a useful starting point for reporting, will enhance comparability of reported information, will provide a useful guide for reporting to developing countries, and provide visibility to support received from constituted bodies of the UNFCCC. The proposed tables provided below are a first attempt by the AGN to consider what would be useful for developing countries, and further proposals will be forthcoming with further deliberation.

The proposed tables are provided in the accompanying spreadsheet titled "AGN submission SBSTA 11 Nov 2019 Annex 2 tables for support needed and received" as follows:

Table 5 – financial support needed

Table 6a – financial support received from bilateral sources

Table 6b – financial support received from multilateral sources

Table 7 – Support needed for technology development and transfer

Table 8 – Support received for technology development and transfer

Table 9 – Support needed for capacity-building

Table 10 – Support received for capacity-building

Table 11 – Support received for the current BTR (containing the reported information)

Table 12 – Support received for reports in progress

Table 13 – Support needed for future reports

Table 14 – Support received for transparency-related capacity-building / development of national transparency-related reporting systems, flexibility-related capacity-building and areas of improvement identified by the technical expert review teams

Table 15 – Support needed for transparency-related capacity-building / development of national transparency-related reporting systems, flexibility-related capacity-building and areas of improvement identified by the technical expert review teams

Based on experience with BUR reporting, it is helpful to report support received from multilateral sources separately from support received from bilateral sources, and so two tables have been provided for financial support received. In addition, the AGN attaches particular significance to reporting on support needed and received by developing countries for the implementation of Article 13, and associated capacity-building. Five tables have been proposed for this – tables to report on support received for the BTR in which the information is reported, support needed and received for future reporting, and support needed and received for reporting-related capacity-building / national reporting infrastructure development.

5. Approaches to operationalize flexibility

The AGN reiterates the importance of the operationalization of flexibility in the enhanced transparency framework, as provided for in Article 13 of the Paris Agreement, and would like to emphasize a number of principles in this regard:

- The AGN understands the specific instances of flexibility which are considered here to be narrowly-defined, and consistent with the Paris Agreement's Article 13.2, i.e. that flexibility should be provided “..to those developing country Parties that need it in the light of their capacities”. It is important to distinguish these specific instances from other instances in which different legal obligations apply to developing and developed countries as a whole (for instance, on reporting on support provided and mobilized). Therefore the views which follow apply to the following instances in which flexibility occurs in the MPG: in paragraphs 25, 29, 32, 34, 35, 48, 57, 58 in relation to GHG inventories, in paragraphs 85, 92, 95, 105 in relation to tracking progress, in paragraphs 159, 162(c), 162(f) in relation to the technical expert review, and in paragraph 192(c) in relation to FMCP (of the Annex to decision 18/CMA.1).
- The AGN would also like to emphasize that this does not preclude the provision of further flexibilities, as necessary, in the finalization of the current work on methodological issues under the Paris Agreement. For instance, a further flexibility in our view is required in terms of which inventory reporting software is used by Parties under the Paris Agreement, on account of their capacities.
- The AGN is of the view that flexibility should be fully accommodated within a common set of reporting tables.
- There are advantages for developing countries in communicating the use of flexibility as clearly communicated as possible, to a) inform the technical expert review teams clearly on the use of flexibility (which has legal implications for how the review is carried out), and b) to provide clarity on support requirements for capacity building for reporting.
- Developing country Parties who make use of flexibility provisions are required by

paragraph 6 of the MPGs to “..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”.

The AGN therefore proposes several measures to operationalize flexibility in the context of the reporting tables currently under consideration (for the GHGi and for tracking progress):

- The use of a specific notation key (for example, “F”/“FP”) where applicable to denote the use of flexibility provisions. The use of existing notation keys will not provide additional clarity;
- Parties who make use of flexibilities may choose in addition to use specific documentation boxes, which will concisely explain the flexibility in each table, and refer to the summary table below;
- A specific flexibility summary table should be developed to report on the use of flexibility, corresponding elements specified in paragraph 6. The table would usefully contain also a link to support requirements for reporting, and cross-references to the table under support needed/received dealing specifically with reporting. The use of the table, which is not mandated by 18/CMA.1, would be at the discretion of Parties.

We include some suggestions in the table below for the incorporation of features in tables for specific flexibility provisions, followed by a proposed table for reporting overall use of flexibility provisions.

GHG inventory reporting:

Paragraph	Flexibility	Reporting option
25 – Key categories	Flexibility to identify key categories with an 85% threshold rather than a 95% threshold	Reference to narrative report
29 – uncertainty assessment	Flexibility to provide a qualitative discussion instead of estimating uncertainty	Reference to narrative report
32 - completeness	Completeness assessment – flexibility to use a lower threshold for insignificant categories.	Use of flexibility notation key, reference in narrative report
34 – make a QA/QC plan	Parties that require flexibility are instead encouraged	Reference in narrative report
35 – implement and report on a QA/QC plan	Parties that require flexibility are instead encouraged	Reference in narrative report
48 - Gases	Flexibility to report only 3 gases, unless	Use of flexibility notation key,

	in NDC or subject of Article 6 activity	reference in narrative report
57 – time series	Flexibility to report time series from 2020 and including NDC base year (if applicable)	Assuming there is one set of tables per year (as in the current tables), Parties will report for less years, and this will be reflected in the narrative report. In addition, in the summary tables, where there are time series (e.g. current table 10s1), use of a flexibility notation key will be necessary.
58- vintage of reported information		Assuming there is one set of tables per year (as in the current tables), Parties will report for less years, and this will be reflected in the narrative report.

Tracking progress:

Paragraph	Flexibility	Reporting option
85 – estimates of PAMs emissions reductions	Flexibility to not estimate PAMs emissions reductions	Use of flexibility notation key, reference in narrative report
92 – flexibility to not report projections	flexibility to not report projections	Several options are possible.
95 – extent of projected time series	Flexibility to report a time series for projections to the end of the next NDC instead of 15 years etc.	Use of flexibility notation key and reference in narrative report
102 – less detailed projection methodologies	Flexibility to use less detailed methodologies for projections	Use of flexibility notation key, reference in narrative report

Technical Expert Review and FMCP:

Paragraph	Flexibility	Reporting option
159 – in-country review	Flexibility to choose not to have an in-country review	Report in next BTR
162(c) – response time to ERT initial questions	Flexibility to provide ERT with responses in 3 weeks rather than 2	Report in next BTR
162(f) – response	Flexibility to provide responses in 3	Report in next BTR

time to ERT report	months rather than 1	
192(c) – response time to FMCP questions	Flexibility to provide responses 2 weeks before rather than 1 month before FMCP	Report in next BTR

In addition, the AGN proposes the use of two “flexibility summary tables”, per relevant chapter of the BTR – one table for the GHG inventory chapter, and one for the chapter on tracking progress. In addition, the flexibilities which apply to the TER and FMCP processes would also require a table, and would have to be contained in a specific section of the BTR. Such tables would achieve several objectives. The first objective would be to fulfil the requirements contained in paragraph 6 of the Annex to decision 18/CMA.1”

“The application of a flexibility provided for in the provisions of these MPG^s 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. When a developing country Party applies flexibility provided for in these MPG^s, the technical expert review teams shall not review the Party’s determination to apply such flexibility or whether the Party possesses the capacity to implement that specific provision without flexibility.” (our emphasis)

In addition, the tables would also link the provision of the information above to the provision of support to developing countries referred to in Article 13.14 and 13.15 and also in paragraphs 7(d) and 9 of the Annex in terms of planned improvements and associated support needs, and could also cross-reference the relevant table pertaining to paragraphs 143-145 on support needed and received by developing country Parties for the implementation of Article 13 of the Paris Agreement and transparency-related activities, including for transparency-related capacity-building. We would therefore propose the following table (to be used in all three instances):

Table xx. Flexibility summary table

Flexibility provision	Description of the way in which the flexibility has been applied	References to tables and reports where the flexibility has been applied / where more information is provided	Concise description of the relevant capacity constraint	Self-determined estimated timeframes for improvement	Current support requirements for planned improvements relevant to the flexibility	Cross-reference to table x in BTR containing support needs for transparency
(e.g. paragraph 32)						

The AGN would like to reiterate that the inclusion of these tables would be at the discretion of developing countries.

6. Optional review of information reported on adaptation and on support needed and received

The AGN would like to raise the possibility of instituting an optional review by the technical expert review team during the review of BTRs of information reported on adaptation and on support needed and received, since these sections of BTRs will currently not be reviewed. The purpose of reviewing such information would be to facilitate improvement over time of reporting of this information. Since the technical expert review teams will be equipped with the expertise to review information on support, a useful role could be played by the TER in providing feedback to developing country Parties on this information, as well as providing comparative information on best practices. Regarding adaptation information, the AGN attaches particular significance to reporting on the implementation of the adaptation component of NDCs. Since expertise does exist in the UNFCCC's review system to review adaptation information (for the review of Annex I National Communications), the AGN would like to propose that a programme be established to review reported adaptation information on a voluntary basis.