



RESPONSES TO THE SBSTA CHAIR GUIDE QUESTIONS FOR THE CONSULTATIONS ON ARTICLE 6 OF THE PARIS AGREEMENT

Submission by the Philippines

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1. If first transfers of 6.4 units from outside the NDC were not required to be subject to corresponding adjustments, how could Parties ensure double use is avoided? What information would host Parties need to provide and when?

- Our sense is that we should learn from our experience under the Clean Development Mechanism implementation of the Kyoto Protocol. For the Paris Agreement, it behooves us to have a clear accounting system where the critical elements are origin and destination to ensure integrity. The reality was that we did not have corresponding adjustments anywhere during the Kyoto Protocol period. There were also no uniform instruments which could serve as accounting base/reference for the concerned transacting Parties.
- The main issue is that pre- or post-Paris Agreement, the mitigation units can only be used once. Also, mitigation units not used prior to the IPCC 1.5⁰ C, unfortunately should no longer be used because whatever mitigation impact the projects which produced them generated, have already been taken into account/imputed into that global report.
- In our view, that is what the periodic stocktake is supposed to do: ground us in the realities of the timeframe where we are supposed to make adjustments in the situation, both in terms of mitigation and adaptation.
- In terms of information to be reported, the NDC reporting protocols should be able to enunciate clearly what will be needed. For example, making the NDC as reference, corresponding adjustments in both the NDC of origin and NDC of destination, should be a simple matter. This has to be complemented by an overall transparent global tracking and reporting system.

2. Should there be a transition period for first transfers of 6.4 units from outside the NDC during which a corresponding adjustment is not required and if so, how long would that period be?

- Our preference is to start to do what needs to be done immediately. With all of the technology and the needed information in the submitted NDCs, the system could be designed immediately. Realistically, however, we do recognize that there would be a lag time between planning and implementation.
- Therefore, we strongly suggest that the duration of the transition period be set reasonably and not to drag it out. However, the transition period should be focused on establishing a

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global transparent tracking and recording system rather than negotiate in a protracted manner, what to do with unused CERs when they could distort the climate picture and throw us off track in putting in place a scientifically acceptable system that would ensure environmental integrity.

3. Could there be an approach to avoiding double use for first transfers of 6.4 units from the perspective of use restrictions (e.g. no use towards an NDC)?

- There should not be any compliance attribution for the first transfers of 6.4 units especially if they were produced far from the operative period covered by the submitted NDC. But if the context is that described in #2 above, when the mitigation accomplishment can still be attributed within the NDC period and only a single use is being claimed, the eligibility claim can be considered. Such situation should be covered by a clear, operational decision from CMA.