

SUBMISSION BY GUATEMALA ON BEHALF OF THE AILAC GROUP OF COUNTRIES COMPOSED BY CHILE, COLOMBIA, COSTA RICA, HONDURAS, GUATEMALA, PANAMA, PARAGUAY AND PERU

30th of March, 2017

APA Agenda item 4–Further guidance in relation to the adaptation communication, including, inter alia, as a component of nationally determined contributions, referred to in Article 7, paragraphs 10 and 11, of the Paris Agreement.

AILAC welcomes the opportunity to submit its views on APA agenda item 4 to address the guiding questions of the co-facilitators¹ and provide inputs to the overarching question of the co-chairs² posed in their reflections note. In this sense, AILAC welcomes the useful note prepared by the secretariat³ upon request of the APA at the second part of its first session. Given the clear interlinkage this agenda item has with other elements of the Paris Agreement, this submission should be read in conjunction with prior submissions of AILAC particularly on APA agenda item 4⁴, APA agenda item 5⁵ and APA agenda item 6⁶ and the submissions on the mandates given to constituted bodies by Decision 1/CP.21⁷.

This submission is structured according to the five themes discussed at the past session of the APA and accordingly we respond to additional questions per theme that were posed by the co-facilitators in their aforementioned summary note.

THEME 1: PURPOSE OF THE ADAPTATION COMMUNICATION

Provided the urgent needs parties face in light of the increasing impacts of climate change AILAC believes the purpose of the adaptation communication should focus on enhancing adaptation action. The guidance of the adaptation communication should make the adaptation communication a useful tool for Parties to submit their nationally determined needs, priorities, actions and plans and in this manner facilitate further forms of collaboration and support where it is most needed (in accordance to Article 7.14 of the Paris Agreement).

Fortunately there are other instruments already available under the Convention that can help advance other interests i.e. the National Communication can continue to serve as a means for recognition of efforts developing countries carry out.

THEME 2: ELEMENTS

1. What information would serve the purpose of the adaptation communications?

The following proposal of two categories of information for the adaptation communication should be considered as an evolving one. The first category should be the common information that all Parties could address in their adaptation communication and the second category would include additional information that Parties could voluntarily submit if that information is available.

Some of the **common information** that all Parties could consider in their Adaptation Communications should be:

- Summarized context information on the country, in order to facilitate the understanding of adaptation priorities and needs, including national long-term adaptation objectives or vision, ideally indicating priority or strategic areas and a brief description of the vulnerability assessment and the expected impacts informed by temperature scenarios.
- Prioritized actions identified, including timeframes if available (short, medium and/or long term), including those defined in the National Adaptation Plans, as appropriate

¹ Informal summary note prepared by the Co-facilitator's https://unfccc.int/files/meetings/marrakech_nov_2016/in-session/application/pdf/apa_item_4_informal_summary_note_final_version_14112016_1920.pdf (last accessed on 30th of March 2017)

² Note by the Co-Chairs in Paragraph 20 of their Reflections note <http://unfccc.int/resource/docs/2017/apa/eng/1infnot.pdf> reads, "An overarching question for this item is how to get the evolving system of adaptation communications working coherently, with good alignment and taking full account of the range of vehicles available –including as a component of NDCs."

³ FCCC/APA/2017/INF.1

⁴ AILAC APA item 4 submission dated 30th September, 2016 available at http://www4.unfccc.int/Submissions/Lists/OSPSubmissionUpload/233_280_131197469405886489-160930%20AILAC%20Adaptation%20Item%204%20APA%20Submission%202016.pdf (last accessed on 30th of March 2017)

⁵ AILAC APA item 5 dated 1st of March, 2017 http://www4.unfccc.int/Submissions/Lists/OSPSubmissionUpload/233_323_131328374406197076-170228%20AILAC%20Submission%20Transparency%202017%20vf_P17.pdf (last accessed on 30th of March 2017)

and prior submission dated 30th September, 2016 http://www4.unfccc.int/Submissions/Lists/OSPSubmissionUpload/233_281_131197485029118930-160930%20AILAC%20Submission%20Transparency%202016.pdf (last accessed on 30th of March 2017)

⁶ AILAC APA item 6 dated 30th September, 2016 http://www4.unfccc.int/Submissions/Lists/OSPSubmissionUpload/233_282_131197470783548982-160929%20AILAC%20Submission%20Global%20Stocktake%202016.pdf (last accessed on 30th of March 2017)

⁷ AILAC submission dated 13th of January, 2017 http://www4.unfccc.int/Submissions/Lists/OSPSubmissionUpload/123_284_131293917741293274-AILAC%20Submission%20AC%20LEG%20mandates.pdf (last accessed on 30th of March 2017)

- Adaptation support needs by developing countries, including financial, technology transfer and development, and capacity building needs to implement identified adaptation actions (*if possible, distinguishing between conditional and national actions*).
- Development strategies through which the adaptation actions or priorities are to be implemented, including national development plans, local and sectorial plans, projects and linkages that exist with other agendas i.e. Sustainable Development Goals among others.

Parties could also include the following **additional information** in the adaptation communication (based on country specific interests and if it is available to Parties) inter alia:

- Information on how the country is planning to monitor and evaluate its progress at a national level.
- Nationally determined co-benefits including the mitigation co-benefits that adaptation action may provide.
- The local, sectoral, subnational, national, regional and international dimensions of adaptation priorities, plans and needs could be described.
- Specify how the upcoming adaptation actions to be implemented contribute to increase resilience, increase adaptive capacity and/or to reduce vulnerability (according to Art.7.1).

Decision text with respect to guidance should at least include the following considerations:

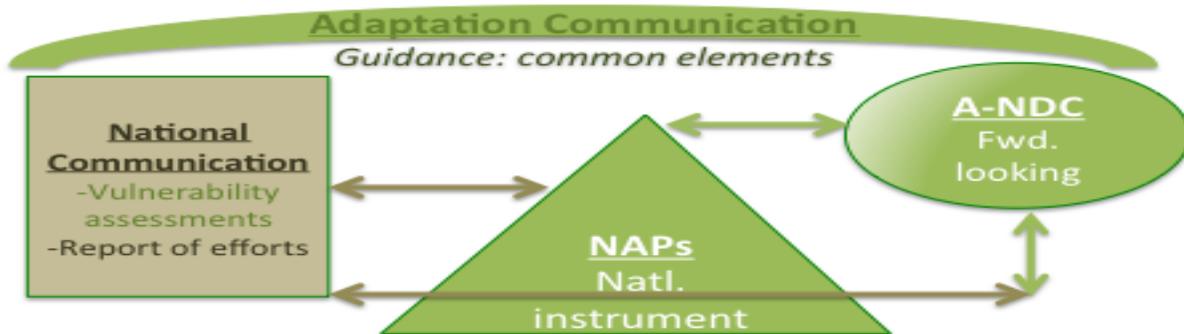
- the fact that the guidance would be of an iterative nature
- the common elements
- the flexibility for Parties to add additional elements.

2. Given the importance of avoiding additional burdens on developing country Parties, how could the adaptation communication build on existing types of communication? Are there technological tools that could reduce the burden?

As expressed in its previous submission for this APA agenda item, AILAC is mindful of the flexibility provided in Article 7.10 and 7.11 and each Party may chose according to its national circumstances and interests which vehicle (the National Communication, its NAP or its adaptation component of the NDC) it prefers to use as its adaptation communication. In addition, Parties can continue to use existing instruments to develop, provide input and even report progress on the adaptation communication. This can strengthen their adaptation agenda instead of overburdening it. Figure1 illustrates cases in which Parties have at their disposal all three instruments mentioned in Art.7.11: the National Communication, a NAP process and the adaptation component of their NDC and each is used for distinct purposes.

For AILAC, the National Communication has historically served multiple functions, mainly, it provides the opportunity of attaining vulnerability assessments and reporting progress of adaptation measures (as established in Article 4 paragraph 1 of the Convention) that Parties carry out in light of the objective of the Convention. In this sense, the National Communication serves both as an input and as a reporting mechanism to the NAP process and to the adaptation component of the NDC that each Party could develop. Furthermore, if the Party has a NAP process underway, the adaptation component of the NDC is a potent political instrument (both nationally and internationally) for the Party to highlight the plans, priorities, needs and actions it intends to carry out in the upcoming period by submitting the adaptation component of the NDC as its adaptation communication. In this sense, the adaptation component of the NDC would be the adaptation communication and it would include the aforementioned categories of information. Moreover, in that case, the NAP would be the national instrument to guide the implementation in a comprehensive manner and the National Communication would continue to be the reporting vehicle of the implementation carried out. These possible relations are expressed in Figure 1:

FIGURE 1. POTENTIAL LINKAGES AMONGST VEHICLES MENTIONED IN ART.7.11. IF PARTY CHOOSES TO USE THE RANGE OF INSTRUMENTS MADE AVAILABLE TO THEM.



THEME 3: POSSIBLE LINKAGES TO OTHER ISSUES, AGENDA ITEMS, OR ARRANGEMENTS UNDER THE CONVENTION

As established in the Paris Agreement, the adaptation communication will be subject to consideration or follow up at an international level. According to Article 13 and Article 14 of the Paris Agreement this consideration occurs through the Enhanced Transparency Framework and the Global Stocktake.

3. What is the relationship between the communication and the vehicle through which it is submitted?

The relationship between the communication and the vehicle through which it is submitted will vary according to the choice each Party makes because each vehicle has its own nature and purpose. Regardless of which vehicle the Party uses to submit its adaptation communication, the common elements designed as guidance for the adaptation communication will provide a level playing field for all Parties when submitting or updating the adaptation communication.

4. How should the guidance in relation to the adaptation communication relate to the guidelines for the different vehicles mentioned in Article 7, paragraph 11, of the Paris Agreement?

Guidance of the adaptation communication requires consideration of the different instruments used for adaptation in order to avoid unnecessary additional efforts. Examples of coherence amongst instruments (also illustrated in Figure 1) were presented in Theme 2.2.

- It is relevant to take into consideration that although there still is no guidance for the adaptation component of the Nationally Determined Contributions (a-NDC), more than 75% of Parties presented an adaptation component of their iNDC shedding light on priorities, needs, plans and adaptation actions which has already helped to raise political support for adaptation. In this sense for AILAC, the a-NDC, as per Article 3 of the Paris Agreement is considered as the most appropriate vehicle to communicate adaptation future action with the view to achieving Art.2.1 (b) and Art.7.1 given the functions the a-NDC provides both nationally and internationally. Article 7.4 of the Paris Agreement also provides a very relevant element to highlight the prominence of the NDC as a vehicle for the adaptation communication, considering that more mitigation will imply less adaptation efforts and costs. From this perspective, it is natural that both efforts (mitigation and adaptation) are linked in a single vehicle for upcoming climate action, such as the NDC.

5. Relationship between adaptation communications and the transparency framework?

In terms of adaptation in the Enhanced Transparency Framework (ETF), AILAC believes that the ETF should help understand progress (as established in Art.13.5) and share experiences and lessons learned in the spirit of cooperation (according to the spirit of paragraph 94 (c) of decision 1/CP.21) and as such, the ETF can also enhance action and support.

A relevant consideration mentioned in previous submissions is that adaptation action can have mitigation co-benefits. During implementation phases in many cases it has been found that, adaptation and mitigation policies are difficult to distinguish since they form part of specific responses to local challenges and processes of low-emission transformation. In these situations, it might be appropriate that Parties also consider including those adaptation actions that have synergies with mitigation policies and reflect more adequately the fulfilment of their NDCs.

Given the nature of the National Communication and the fact that Parties have historically used it to report on efforts as well as the fact that the Paris Agreement has now also established that these efforts should be reported, as appropriate, on a biennial basis, AILAC believes it would not be useful to also have the adaptation communication as yet another means to report on progress made. Rather, the adaptation communication should focus on forward looking elements such as plans, priorities, needs and actions (as described in Art. 7.10) in order to enhance upcoming efforts by Parties. As expressed in AILAC's submissions on the ETF, the National Communication will continue to play an important role in reporting information on climate action, specially, as a vehicle to report progress on adaptation, until Parties are in a position, as appropriate, to also submit this information on a biennial basis as established in paragraph 95 of decision 1/CP.21.

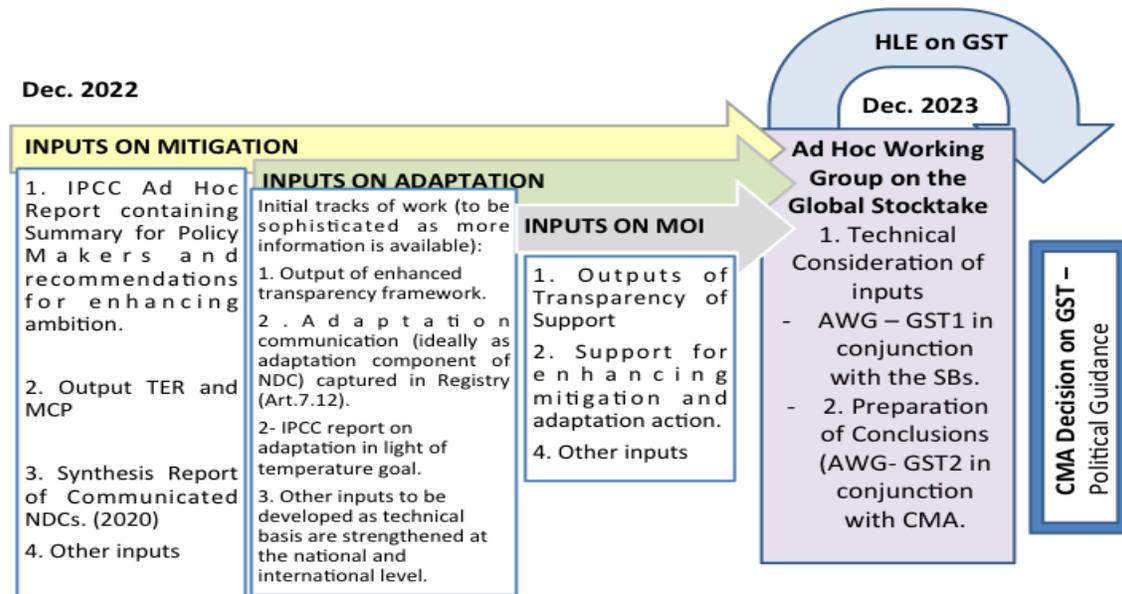
6. Given the role of the adaptation communication, as one of the inputs to the global stocktake, what types of information would be most useful to include in adaptation communications?

AILAC considers that the GST enables a periodic opportunity not only for important "backward-looking" processes such as the recognition of efforts (Art.7.14 a) or the assessment of overall support for adaptation and progress made towards the GGA (Art.7.14,c and d), for which the outputs of the ETF will play a key role as input to the GST, but also for future action. Recalling that the adaptation communication is established by the Paris Agreement as an input for the GST to "enhance the implementation of adaptation action" (Art.7.14 b) the aforementioned categories of information (in response to question 2) will serve to collect the adaptation priorities, needs and support of Parties and facilitate the identification of opportunities of action, including at broader scales than the national ones. Along with the financial information provided by Parties, the assessment of adequacy thereof can also be understood, as follow up to the adaptation communication.

In order to provide clarity for this international follow up of the adaptation communication, the registry established in Art.7.12 will be fundamental to centralize priorities, needs, plans and actions communicated by Parties in an effective manner.

As described in [AILAC's previous submission](#) the Registry should be informed by the agreed minimum elements/categories of information the adaptation communication will include in order to facilitate international collaboration and identification of trends and synergies to enhance adaptation action and make progress towards the global goal of adaptation. In terms of the linkage of the AC with the GST, figure 2 captured AILAC's view⁸ of how the GST would be structured (in its upcoming submission AILAC will provide updated details to this proposal).

FIGURE 2. STRUCTURE OF THE GST



Source: AILAC Submission on Global Stocktake

Considering that the outcomes of the GST entails that Parties will periodically revisit their adaptation communication, Parties will have an opportunity to assess their adaptation priorities as well as their support for adaptation and the needs identified, so as to increase these efforts in the light of GGA. AILAC is of the view that with regards to adaptation, the Global Stocktake will be a work in progress, given that there is less experience in terms of international follow up i.e. to upscale support for adaptation efforts, little experience in terms of metrics and internationally accepted parameters to facilitate aggregate assessment. Other inputs to fulfil the tasks given to the GST would include, compilation of efforts Parties wish to be recognized, synthesis and analysis of adaptation communications captured in its respective Registry, IPCC reports, outputs of the ETF and further inputs from non-state actors in regards to trans-boundary adaptation efforts i.e. ecosystem vulnerability assessments, reports associated to human health and climate change, adaptation efforts made to reduce vulnerability of commodity chains. As science evolves and capacities increase in countries there will be further inputs and modalities that may be considered to improve the GST and ensure that provision Art. 7. 14 is fulfilled comprehensively.

In the definition of inputs and modalities regarding adaptation, AILAC has considered how the formulation of priorities and needs will ultimately allow Parties to enhance adaptation actions, by means of providing specific guidance including to the different means of implementation mechanisms under the Convention and in other forms of enhancing support and the Paris Agreement. The inputs and modalities to be presented in AILAC's upcoming submission on GST will provide complimentary detail.

THEME 4: POSSIBLE VEHICLES FOR ADAPTATION COMMUNICATIONS

7. How and when should adaptation communications be communicated?

An adequate period of communication would be the one that allows for enhancement of implementation of adaptation actions and measure overall progress of the new commitments under the Paris Agreement, without creating undue burdens on developing countries. The frequency in which Parties submit their adaptation communication may vary depending on the vehicle the Party

⁸ AILAC GST submission dated 30th of September, 2016 available at http://www4.unfccc.int/Submissions/Lists/OSPSubmissionUpload/233_282_131197470783548982-160929%20AILAC%20Submission%20Global%20Stocktake%202016.pdf (last accessed on 30th of March 2017).

chooses to submit its priorities, needs and action. Nevertheless, considering the periodicity of the Global Stocktake, AILAC considers that Parties should update their communication on adaptation on the same period they will communicate their mitigation actions (5 year period), particularly if NDCs are to be the main vehicle to submit the adaptation communication. This will facilitate the follow up on adaptation efforts and support both under the global stocktake and the enhanced transparency framework.

8. What are the advantages and disadvantages of each of the possible vehicles?

The advantages and disadvantages of each of the possible vehicles are up to each Party to determine and further inputs for this analysis are available in the Elements Paper⁹ the Secretariat has provided.

THEME 5: FLEXIBILITIES REQUIRED OF THE ADAPTATION COMMUNICATIONS.

9. How to design adaptation communications that do not create an additional burden?

In order to avoid additional burdens, guidance for the adaptation communication should be provided particularly through the definition of common categories of information and additional desirable categories of information. This approach would help Parties to present information that is focused, concise and in many cases already exists. These categories of information shall be revised iteratively in order to ensure that the adaptation communication is being useful to enhance adaptation action throughout time and to further follow up and analysis.

These information categories should not be considered a requirement for accessing funding mechanisms of any source, as well as to accessing technology development and transfer not to capacity building.

10. How do we balance between flexibility and the need for uniformity of vehicle to facilitate comparison?

For AILAC the guidance required does not hinder flexibility given that flexibility is already enshrined in Paragraph 11 of Article 7.

- The guidance we believe is required includes the basic common information that would be defined collectively by the Parties. This guidance on basic common information would be indicative and take into account Parties national circumstances.
- Furthermore, this guidance will also consider the common information that any of the vehicles that a Party chooses to submit contains (as identified in paragraph 11 of Article 7).
- AILAC is of the view that at this stage, comparison among Parties' actions should not be pursued. In this sense, the importance of guidance is to facilitate proper follow up. With clear guidance, the adaptation communication could foster clear submission of Parties' adaptation priorities, needs (technology, finance and capacity-building needs) and plans which could facilitate Parties linking support to needed implementation and enhancement of adaptation actions; furthermore, create incentives for international funding to align with nationally identified adaptation priorities rather than having isolated efforts prioritized by the international agencies.
- Poor guidance or ambiguous purpose will make analysis or aggregate understanding difficult.

AILAC will further elaborate of the linkage of the adaptation communication and the GST in its upcoming submission on the GST. In the upcoming in-session workshop and in the APA sessions AILAC looks forward to engaging with other Parties in fruitful discussions particularly on the key overarching question¹⁰ the Co-chairs have presented in their Note

⁹ FCCC/APA/2017/INF.1

¹⁰ Note by the Co-Chairs in Paragraph 20 of their Reflections note <http://unfccc.int/resource/docs/2017/apa/eng/1infnot.pdf> reads, "An overarching question for this item is how to get the evolving system of adaptation communications working coherently, with good alignment and taking full account of the range of vehicles available –including as a component of NDCs."