



SUBMISSION BY THE GOVERNMENT OF INDONESIA

APA1.2 Agenda item 5 - Modalities, procedures and guidelines for the transparency framework for action and support referred to in Article 13 of the Paris Agreement

Pursuant to the Informal Note by the Co-Facilitators on APA 1.2 Agenda item 5 about Modalities, procedures and guidelines for the transparency framework for action and support referred to in Article 13 of the Paris Agreement, this submission answer the following questions:

1. *What should be the **specific components** of the **modalities, procedures, and guidelines** (MPGs) for the transparency of action and support under Article 13, paragraphs 7, 8, 9, 10, 11, and 12?*

On the **specific MPGs** for transparency framework, Indonesia would like to reiterate points stated in our previous submission and add several new points. Indonesia is of the view that the MPGs should be based on existing arrangements under the Convention, and maintain the balance between transparency of action and transparency of support. To this end, the MPGs for transparency framework should uphold certain principles, serve its purpose/objective, encompass appropriate scope (as reflected in Indonesia's NDC), and adopt appropriate approaches.

Principal: the principals for specific MPGs for the transparency of action and support are (1) Common But Differentiated Responsibilities and Respective Capabilities (CBDR-RC) and take into account the country's sovereignty; (2) Flexibilities in terms of alignment with the country's regulations and arrangement and be built on existing national arrangement of transparency framework in each Party; (3) Avoid double-counting; and (4) implement the concept of clarity, traceability and understandable (CTU).

Purpose/Objective: the component of MPGs for transparency framework should be in line with article 13 para 5 and para 6 of Paris Agreement, so as to ensure the same level of transparency between action and support.

Scope: the scope of the MPGs for transparency framework is (1) Built on elements included in the National Communication, BUR, ICA, (BR and IAR) and Nationally Determined Contributions (NDC) documents; (2) Comprehensive, encompassing preparation, implementation, reporting (and review), as well as recognition of action and support; (3) Balanced, containing information on actions and support, including support provided by developed countries and support received by developing country; (4) Complete, covering relevant elements of transparency from all other COP decision; and (5) Consistent, using consistent methodology under the convention and allowing adjustment/updating as appropriate.

Approach: the appropriate approach for specific MPGs for transparency framework should be (1) Developed from existing mechanism reflected in the National Communication, BUR, ICA (BR and IAR) and NDC; (2) Apply step-wise approach according to the national circumstances, capacity and capability; (3) Recognize the importance of sharing/exchange of knowledge and experience in using methodology, which covers both the national experience and the experience of implementing transparency framework at national scope; (4) Reflect the national capacity, needs and priority for capacity enhancement including transfer of appropriate technology in line with actual financial supports; (5) Consider the importance of flexibility in designing capacity building for transparency framework to address different needs of developing countries and supported by financial availability.

Referring to the principles, scope, purpose and approach, as well as referring to the Paris Agreement, specific components of the MPGs for transparency framework are mainly:

Reporting and Technical Review. Each country should report information to track progress in implementing and achieving the country's NDC. In this regard, the developed countries need to report information on supports provided to developing country, including financial, technology transfer and capacity-building. The developing countries should also provide information on support received and support needed under Articles 9, 10 and 11, as well as problems encountered and constraints.

Methodology. Each country should use the IPCC guidelines that are agreed by the CMA and taking into account respective country's conditions. Countries are encouraged to use more updated IPCC guidelines as appropriate.

Interconnectedness. Transparency framework is closely related to other issues under the Paris Agreement. Therefore, Countries need to have some common tools managed by secretariat to track the progress of interconnected issue of transparency framework among agendas.

Step-wise. Built on transparency framework, in term of reporting processes, technical review, and implement appropriate methodology to the country national circumstances may differ from country to country and only reflects the country capacity, capability and national circumstances. The improvement of those components of transparency framework would refer to a step-wise approach, in regard to the support available, in term of finance, technology transfer and capacity building.

Sharing experiences and knowledges. Each country needs to share their experiences and knowledges in implementing the NDC, including best practice as well as tools and systems implemented. The secretariat with support from developed countries should provide an avenue for developing countries to share their experiences and knowledges in regular basis.

2. *How should the transparency framework **build on** and enhance the transparency arrangements under the Convention, recognizing that the transparency arrangements under the Convention shall form part of the **experience** drawn upon for the development of the MPGs?*

The transparency framework should be based on Parties' existing conditions which reflected in the National Communication, BUR, ICA, (BR, IAR) and Nationally Determined Contributions (NDC) documents of its parties. The transparency framework that has been developed from existing mechanism reflected in the National Communication, BUR, ICA, (BR

and IAR) and NDC would need some necessary adjustments as required to make all existing systems work simultaneously. The transparency framework for developed and developing countries should significantly base on and reflect the country national circumstances, capacity and capability.

Enhancement of the transparency arrangements under the Convention recognize that the transparency arrangements under the Convention shall form part of the **experience** drawn upon for the development of the MPGs. In case of Indonesia, as part of implementation of transparency framework of the Paris Agreement and its translation into the national context, Indonesia has built "National Registry System on Climate Change" (NRS CC) for collecting actions and supports on adaptation and mitigation that follows the rules of clarity, transparency, understanding and avoid double counting and double reporting. With support from developed country, Indonesia urges the secretariat to facilitate lesson learn and exchange of knowledge from such system or other similar system among countries in regular basis.

3. *With respect to the MPGs, how should **flexibility** for those developing countries that need it in the light of their capacities be operationalized?*

With respect to the MPGs, **flexibility** for developing countries that need it in the light of their capacities should be operationalized by (1) applying step-wise approach for implementation and based on the use of methodology that takes into account the national capability and circumstances of each party; and (2) ensuring capacity building on transparency framework in the respective country. Flexibility for developing countries should also:

- be based on the developing countries' experiences at all stages in implementing measurement, reporting and verification of their actions;
- In line with the development of developing countries' capacities for reporting, in particular, since the developing country Parties have a wide diversity of capacities;
- Flexibility of reporting should be reflected in terms of time-frame of the report, frequency of reporting, and the extent of detail of the information contained in the report.;
- Include flexibility for developing countries in the technical review process;
- For the review process, reviewers should have good knowledge and understanding of national circumstances, ecological, economic, and social conditions as well as local culture of the reviewees.
- Countries should have flexibility in developing their own registry, including the scope of registry system, detail components and point of interests.

A step-wise approach is imperativesince each country has their own national circumstances, as well as capacity and capability in handling reporting processes and its technical review. Progression and improvement in reporting and technical review of developing countries is contingent upon the availability of support, in terms of finance, technology transfer and capacity building.

4. *What **other elements** should be considered in the development of the MPGs, including *Inter-alia*, those identified in paragraph 92 of 1/CP.21?*

Other elements that should be considered in the development of the MPGs are interlinkages and consistency of transparency between article 13 of Paris Agreement with

other agenda items such as issues on mitigation, adaptation, finance, capacity building, transfer of technology, and global stock-take.

In addition, the MPGs for transparency framework should refer to the need of having strategic review on NDC (every 5 year), as well as refer to the article 13, paragraph 6 "The purpose of the framework for transparency of support is to **provide clarity on support provided and received** by relevant individual Parties in the context of climate change actions under Articles 4, 7, 9, 10 and 11, and, to the extent possible, to provide a full overview of aggregate financial support provided, to inform the global stock-take under Article 14", additional **elements** for Transparency of Action and Supports, are:

- Obtaining the necessary information to track progress in the implementation of the NDCs, including supports needed and provided. Indonesia views that tracking tool is an important modality for transparency.
- Reporting the provision of support from developed country Parties and other Parties including information on (1) public climate finance provided, (2) private finance collected through public engagement, (3) climate finance needed and received, (4) projection on climate finance needed, and (5) a description on finance realization given by developed country Parties.
