

## **Submission by the United States of America**

### **Common tabular format for electronic reporting of information in accordance with the UNFCCC biennial reporting guidelines for developed country parties**

In Durban, Parties adopted guidelines for biennial reporting by developed country Parties (Annex I to decision 2/CP.17) and agreed that these guidelines would be the basis for reporting. Parties also agreed to establish a work program under SBSTA to develop a common tabular format for electronic reporting of information in accordance with those guidelines, with a view to adoption at COP18.

At its 36th session, SBSTA concluded that the common tabular format will include tables for information specified in paragraphs 2, 5, 6, 9, 10, 11, 17, 18, 22 and 23 of the reporting guidelines as contained in Annex I to decision 2/CP.17. Because there was no agreement among parties, SBSTA also concluded that the common tabular format may also include tables for information specified in paragraphs, inter alia, 13, 19 and 24 of the reporting guidelines, but that it would not necessarily do so. Paragraphs 13, 19 and 24 of the biennial reporting guidelines do not call for tabular formats, nor are they appropriate for reporting in separate tables, and therefore the U.S. would not support adoption of common tables for these paragraphs.

In Bonn, a non-paper was issued which includes draft common tabular formats based on the views provided by Parties during the discussions held at SBSTA 36. SBSTA invited Parties to submit their views, by 13 August 2012, on the common tabular formats contained in this non-paper. The U.S. is pleased to provide its views on the draft tabular formats contained in the non-paper.

#### **Purpose of common tabular formats and criteria for their development**

As agreed in Durban, developed country parties are to use the agreed biennial reporting guidelines in preparation of their biennial reports. Parties also agreed to revise these guidelines after based on experience gained in preparation of the first report. The purpose of the common tabular formats, which are to be based on the agreed guidelines, is to provide a clear structure for reporting information where tabular formats can aid the transparency and clarity of information. The guidelines themselves provide clarity on exactly what information is to be provided and in many cases in what format. Our job is to provide the tabular structure for this information to be presented, not to renegotiate the type of information and level of detail to be reported, which has already been negotiated in depth and resolved in the adoption of the guidelines in Durban.

With this in mind, the U.S. believes that the tabular formats created for the biennial reports should adhere to the following criteria:

- Consistency with the agreed biennial reporting guidelines (contained in Annex I of 2/CP.17);
- Relative consistency with the agreed national communication guidelines (for ease of integrating biennial reports into the national communication in years when they are submitted concurrently);
- Tables or fields should be no more specific than the guidelines themselves, or require additional detail not required by the guidelines;
- The clarity of information should benefit from presentation in a tabular format as opposed to being presented as text alone (i.e. the guidelines themselves provide specific categories of information that each party will report);
- The common tabular formats themselves should not include provisions (whether in the tabular format itself or in the footnotes) that modify or go beyond the requirements of the guidelines.

## **U.S. Views on draft common tabular formats (organized by section of the biennial report guidelines)**

### ***Section II. Information on greenhouse gas emissions and trends (paragraph 2)***

- As stated in the biennial report guidelines, the summary information should be prepared according to the UNFCCC Annex I inventory reporting guidelines and “the information provided in the biennial report should be consistent with that provided in the most recent annual inventory submission.”
- The biennial report CRF table for GHG inventory information should be taken directly from the inventory reporting guidelines themselves, in order to meet the requirements of the biennial report guidelines.
- We suggest that the Summary 2 common reporting format table ("Summary 2 - Summary Report for CO2 Equivalent Emissions") is the most appropriate summary table from the inventory guidelines to be included in the biennial report. The Summary 2 common reporting format table reported in the biennial report should be taken from the most recent inventory submission by the Party. There are additional summary tables in AI inventory CRF tables, but if the BR is to remain succinct and just reference information already submitted in an AI annual inventory, Summary Table 2 is sufficient.
- We would note that Summary Table 2 in the A1 inventory reporting guidelines has been modified for inventories starting in 2015, which means the summary table for the purposes of second and subsequent reports (starting in 2016 after the revised inventory reporting guidelines have been implemented) will be slightly different from the first biennial report (in 2014). We would suggest that the biennial report guidelines simply reference Summary Table 2 of the inventory reporting guidelines with the understanding that the second and future biennial reports will use the more recent version of this table.

### ***Section III. Quantified economy-wide emission reduction target (paragraph 5)***

- In this section in particular, it will be important to take into account the criteria above, including the need to follow the guidelines as agreed and not create tables that require additional detail. Proposals 2 and 3 include concepts or categories of information that are never mentioned in any of the LCA outcomes or in the guidelines themselves (e.g. “assigned amount” and “legal status”). These proposals also choose a single value as the basis for all targets (e.g. a single base year) which was not agreed in 1/CP.16 or 2/CP.17, or it narrows the types of approaches that can be reported, rather than allowing full transparency.
- Based on the criteria listed above, we support **proposal 1**, which is a simple table with rows consistent with sub-points (a)-(f) in paragraph 5. Proposal 4 provides a model for this type of approach. Parties have already submitted this information to the secretariat, and while all provided complete and comparable information, most used a slightly different format because the options available did not allow them to report transparently. Following the categories in the guidelines is a consistent way to report allowing Parties to provide full transparency of their target.

### ***Section IV. Progress in achievement of quantified economy-wide emission reduction target***

The biennial report guidelines for this section indicate two separate CRF tables should be developed: “Information on mitigation actions” (paragraph 6) and “Estimates of emission reductions” (paragraphs 9 and 10).

#### **Paragraph 6: “Information on mitigation actions”**

- Paragraph 6 states of the biennial report guidelines states:

*“Each Annex I Party shall provide information on its mitigation actions, including policies and measures it has implemented or plans to implement since its last national communication or biennial report to achieve its economy-wide emission reduction target. To the extent appropriate, Parties shall organize reporting of mitigation actions by sector and by gas.”*

- Based on the criteria laid out above, and the specific elements included in paragraph 6, the CRF table for “Information on mitigation actions” should be consistent with the guidelines themselves and not require additional information or more detailed information than outlined in the guidelines.
- The guidelines specify three elements for inclusion in a table: 1) information on mitigation actions (implemented or planned); and *to the extent appropriate* 2) organized by sector; and 3) organized by gas.
- The specific requirements of the biennial report guidelines are consistent with the reporting requirements for policies and measures contained in the Annex I national communication guidelines (4/CP.5), which should be used as a model for development of CRF tables that can be reported consistently every two years, whether in the biennial report or national communication.
- Below is Table 1 from the Annex I national communication guidelines, which allows reporting of information on mitigation actions (including policies and measures), organized by sector and by gas.

**Table 1. Summary of policies and measures by sector <sup>a</sup>**

Name of policy or measure <sup>b</sup>	Objective and/or activity affected	GHG affected	Type of instrument	Status <sup>c</sup>	Implementing entity or entities	Estimate of mitigation impact, by gas (for a particular year, not cumulative, in CO <sub>2</sub> equivalent) <sup>d</sup>		
						1995	2000	2005

<sup>a</sup> Separate tables shall be completed for each sector, as set out in paragraph 17.

<sup>b</sup> Parties should use an asterisk (\*) to indicate that a measure is included in the ‘with measures’ projection.

<sup>c</sup> To the extent possible, the following descriptive terms should be used: *implemented, adopted, planned*. Additional information may be provided on funding and the relevant time-scale.

<sup>d</sup> Parties may add columns for additional years (for example 2010, 2015, etc.).

- In order to remain within the scope of the both the biennial report and national communication guidelines, we propose that the above table be adopted as the CRF table for “Information on mitigation actions” and that it be modified to allow for reporting of estimates of impacts (the final column in the table) in a way that allows for reporting that is most relevant to each mitigation action. This may be done by removing reference to specific dates, as listed in the original table, and allowing instead the Party to identify the appropriate year for estimating impacts (based on the status of the measure and whether an ex post or ex ante estimation is available).
- **Proposal 1** follows this model and could be a useful place to start, however, the suggestion for drop boxes by sector and gas should allow for parties to organize the reporting of information “to the extent appropriate” by sector and gas.

**Paragraph 9+10: “Estimates of Emissions Reductions”**

- Paragraphs 9 and 10 of the biennial report guidelines clearly lay out the information to be reported, and should be the basis for development of the CRF table. Because paragraphs 9 and 10 contain the same elements for the base year (paragraph 9) and reporting years (paragraph 10), and to allow comparison from base year to reported years, this information should be combined into a single table.
- Following the criteria above, information in the table should reflect only the specific information required by the guidelines themselves, which is laid out in sub-paragraphs of 9 and in 10:
  - (a) Total GHG emissions, excluding emissions and removals from the LULUCF sector;
  - (b) Emissions and/or removals from the LULUCF sector based on the accounting approach applied, taking into consideration any relevant decisions by the COP (*of which there have been none*) and the activities and/or lands that will be accounted for;
  - (c) Total GHG emissions, including emissions and removals from the LULUCF sector; and
  - (10) Use of units from market-based mechanisms.
- The table included in **Proposal 4** on page 14 of the non-paper was mistakenly placed in the section on paragraph 6. This proposed table is instead meant to represent paragraph 9 and 10 on “Progress in achievement of target.” This is the only proposed table that follows the format of the biennial report guidelines and the content of paragraphs 9 and 10.
- Other proposed tables include information that is not found in the guidelines or any other COP decision, including terms like “QEERT,” “straight interpolation between base year and target year,” etc., and thus are not appropriate to include.

***Section V. Projections***

- Paragraphs 11 and 12 of the biennial report guidelines clearly indicate that reporting shall be consistent with the existing guidelines for Annex I national communications updated to include information for 2020 and 2030.
- Consistent with those guidelines, any CRF tables developed for this section should use the 2020 and 2030 timeframe. Parties wishing to include additional information are of course welcome to do so.
- The existing guidelines require (i.e. “shall”) reporting of “with measures” projections. “Without measures” and “with additional measures” are not required, but parties “may” report them. The CRF tables developed for the biennial report guidelines should be consistent with this approach. One way to do so is to create a single CRF table for projections that parties use for reporting the “with measures” scenario. If Parties decide to also submit information on without and/or with additional measures, they may use the same table for consistent reporting the other optional scenarios as well.
- For this reason, we do not support inclusion of the draft tables contained in proposals 1 and 4.
- The national communication guidelines on projections require that they be reported “*on a sectoral basis, to the extent possible, using the same sectoral categories used in the policies and measures section.*” The guidelines do not require or limit reporting to a specific sectoral breakdown, but instead allow some flexibility for Parties. The CRF tables to be developed for the biennial reports should continue this approach to maintain consistency and to ensure that the CRF tables do not go beyond what the guidelines require.

- This approach is reflected in **proposal 5**, which we believe best reflects what is required by the guidelines.
- Paragraph 12 of the biennial report guidelines indicates that each party should report any changes in the methodologies used for preparation of the projections, and this information could be usefully summarized in a table. Proposals 3 and 4 include reporting of information on underlying assumptions within the tables to report the projection results themselves. In order to keep the assumptions clearly separated from the projection results table, and in order to be consistent with the national communication guidelines, we would suggest retaining the original table from those guidelines (4/CP.5), which is copied below. This table could be updated to include more recent dates in the historic column and extend the projections out to 2030 as indicated in the biennial report guidelines.

**Table 2. Summary of key variables and assumptions in the projections analysis**

	Historic			Projected <sup>2</sup>			
	1990	1995	2000	2005	2010	2015	2020
Variable 1 (e.g. GDP growth)							
Variable 2 (e.g. world oil prices in US\$/barrel)							

#### **Section VI. Provision of financial, technological and capacity-building support to developing country Parties**

For Section VI of the reporting guidelines (the section which relates specifically to the provision finance), Parties agreed that the common tabular format will include tables for information specified in paragraphs 17, 18, 22 and 23. The section below discusses how the tables should best be created to follow the guidance included in those paragraphs.

#### **Table for paragraph 17 of the BR guidelines**

Paragraph 17 of the biennial report guidelines states:

*“Each Annex II Party shall provide information on the financial support it has provided, committed and/or pledged for the purpose of assisting non-Annex I Parties to mitigate GHG emissions and adapt to the adverse effects of climate change and any economic and social consequences of response measures, and for capacity-building and technology transfer in the areas of mitigation and adaptation, where appropriate. To that end, each Annex II Party shall provide summary information in a textual and tabular format on allocation channels and annual contributions for the previous two calendar or financial years without overlapping with the previous reporting periods, including, as appropriate, the following:*

*(a) The Global Environment Facility, the Least Developed Countries Fund, the Special Climate Change Fund, the Adaptation Fund, the Green Climate Fund and the Trust Fund for Supplementary Activities;*

- (b) Other multilateral climate change funds;*
- (c) Multilateral financial institutions, including regional development banks;*
- (d) Specialized United Nations bodies;*
- (e) Contributions through bilateral, regional and other channels;”*

- The guidelines specify two elements for inclusion in a table: 1) allocation channels (including, as appropriate, those listed in a-e of paragraph 17); and 2) annual contributions for the previous two calendar or financial years.
- While the guidelines in paragraph 17 do not specify which currency to use, all financial figures should be reported in (a) the domestic currency of the Annex II party and (b) in USD, to parallel paragraph 18 guidelines.
- The table should specify basis of accounting (e.g., whether the figures reflect the amount provided, committed or pledged, and how the donor defines this terminology).
- In reference to the allocation channels specified in (c), (d), and (e) above, it should be noted that, aside from climate-specific funds that some of these institutions manage, most funding going to regional, UN and multilateral institutions is through *general contributions* from Parties. By pooling these general contributions, the institutions themselves then decide how to allocate the resources towards thematic goals like climate mitigation and adaptation. It is therefore not possible to attribute the amount of a Party's support going to climate-specific activities through their general contributions to such institutions. Therefore, in addition to reporting on resources going to climate-specific bilateral, multilateral and regional funds, Parties should also report on the amount of general contributions made to multilateral and regional organizations/institutions, where funding has not been specifically earmarked for climate-specific funds or channels. The multilateral agencies and institutions should directly report the amount of pooled contributions that go to climate-specific activities and programs.

#### **Specific comments on the proposed draft tables in the non-paper (version of 19 May 2012, 09:00)**

- The proposed draft tables on page 22 and page 24 in the non-paper include elements that go beyond the guidelines and do not specifically relate to the guidance included in paragraph 17 (e.g. requiring information on general MDB channels with a separation on general contributions and earmarked funds on page 22, and the separation of grants and loans on page 24). Parties can always elect to report this information, but it should not be a requirement.
- We believe the proposed table on page 25 is an accurate reflection of paragraph 17 guidelines. For general contributions to multilateral, regional and UN bodies, another table may need to be created or another section of the same table which clearly distinguishes climate-specific contributions from general contributions.

#### **Table for paragraph 18 of the BR guidelines**

Paragraph 18 of the biennial report guidelines states:

*“Each Annex II Party shall provide the summary information, referred to in paragraph 17 above, for the previous two calendar or financial years in a textual and tabular format on the annual financial support that it has provided for the purpose of assisting non-Annex I Parties, including the following:*

- (a) The amount of financial resources (including the amount in original currency and its equivalent in United States dollars/international currency);*
- (b) The type of support (for mitigation and adaptation activities);*

(c) *The source of funding;*

(d) *The financial instrument;*

(e) *The sector;*

(f) *An indication of what new and additional financial resources they have provided pursuant to Article 4, paragraph 3, of the Convention; Parties shall clarify how they have determined that such resources are new and additional;"*

- The guidelines specify six elements for inclusion in a table: 1) amount of financial resources; 2) the type of support (for mitigation and adaptation activities); 3) the source of funding; 4) the financial instrument, 5) the sector, and 6) an indication of what new and additional financial resources have been provided.
- The table should specify basis of accounting (e.g., whether the figures reflect the amount provided, committed or pledged, and how the donor defines this terminology).

#### **Specific comments on the proposed draft tables in the non-paper (version of 19 May 2012, 09:00)**

- Proposals on page 27 and 28 go beyond the guidelines included in paragraph 18 (e.g. the table on page 27 requires information on pledged, allocated, *and* disbursed (where guidelines indicate providing information on “provided, committed and/or pledged”); information on flows counting towards ODA commitments; and breakdown of funding by recipient country – all of which go beyond paragraph 18 guidance). Parties can always elect to report this information, but it should not be a requirement.
- Because of the number of variables included in the paragraph 18 guidelines, the best approach is to create two tables to reflect the guidance: one which is organized by **funding channels** (both bilateral and multilateral) and one which focuses in on **bilateral programs and activities**. While the first table will also include summary information on funding through bilateral channels, the second table allows for more detailed information, including a breakdown by sector. Bilateral donors cannot assign sectoral breakdown of their support going through multilateral channels; the multilateral funds themselves would need to report directly on the sectoral breakdown of multilateral flows. The two tables below reflect this:

Donor funding through multilateral and bilateral channels	total amount		Source of funding (ODA, OOF, other)	financial instrument (grant, concessional loan, capital contribution, etc)	type of support	
	domestic currency	USD			mitigation	adaptation
GEF						
LDCF						
SCCF						
CTF						
SCF						
Adaptation Fund						
Etc						
Bilateral flows						
Describe what new and additional resources have been provided and how new and additional resources have been determined:						

Donor funding through bilateral channels	Total amount		Source of funding	financial instrument	type of support		sector
	domestic currency	USD	(ODA, OOF, other)	(grant, concessional loan, equity, etc)	mitigation	adaptation	
Program or activity 1							
Program or activity 2							
Program or activity 3							
Program or activity 4							
Program or activity 5							
Program or activity 6							
Program or activity 7							
Program or activity 8							
Describe what new and additional resources have been provided and how new and additional resources have been determined:							

**Table for paragraph 22 of the BR guidelines: “Technology development and transfer”**

Paragraph 22 of the biennial report guidelines states:

*“Each Annex II Party shall provide, in textual and tabular formats, information on measures and activities related to technology transfer implemented or planned since its last national communication or biennial report. In reporting such measures and activities, Annex II Parties shall, to the extent possible, provide information on the recipient country, the target area of mitigation or adaptation, the sector involved and the sources of technology transfer from the public or private sectors, and shall distinguish between activities undertaken by the public and private sectors.”*

- The guidelines specify that Annex II Parties shall provide information on two elements: 1) measures and activities related to technology transferred; and 2) whether the activity is undertaken by the public or private sector. There are three elements that Parties shall report on to the extent possible: 1) recipient country; 2) target area of mitigation or adaptation; and 3) the sector involved.
- Given part of the guidance in paragraph 22 states *to the extent possible*, the tables should reflect the fact that information is only to be provided to the extent possible.

**Specific comments on the proposed draft tables in the non-paper (version of 19 May 2012, 09:00)**

- Proposal 2 on page 22 goes beyond the guidelines in paragraph 22.
- Proposal 3 on page 22 provides a good basis, but should also include whether the activity is undertaken by the public or private sector.

**Table for paragraph 23 of the BR guidelines: “Capacity Building”**

Paragraph 23 of the biennial report guidelines states:

*“Each Annex II Party shall provide information, to the extent possible, on how it has provided capacity-building support that responds to the existing and emerging capacity building needs identified by non-Annex I Parties in the areas of mitigation, adaptation, and technology development and transfer. Information should be reported in a textual and tabular format as a description of individual measures and activities.”*

- The tables should reflect the fact that information is only to be provided to the extent possible.

**Specific comments on the proposed draft tables in the non-paper (version of 19 May 2012, 09:00)**

- Proposal 2 on page 34 goes beyond the guidelines in paragraph 23.
- We believe proposal 3 on page 34 is a useful starting point for discussion.