

SUBMISSION BY IRELAND AND THE EUROPEAN COMMISSION ON BEHALF OF THE EUROPEAN UNION AND ITS MEMBER STATES

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Subject: EU views for the Work Programme on 2020 Nationally Appropriate Mitigation Actions by developing countries under the Convention

A. Introduction and General Messages

1. The EU welcomes the Doha outcome regarding mitigation and strongly feels that the future discussions in the pledges work programmes for developed and developing countries will be **important to continue to build trust, achieve greater clarity and to determine where we stand in terms of mitigation outcomes globally - considering actions from both developed and developing countries**. This will help discussions on enhancing mitigation ambition under the Durban Platform (ADP), promote comparability around developed country's pledges and understand the assumptions, barriers and needs when implementing NAMAs.
2. The process of clarification of pledges up to now under the former AWG LCA included workshops and submissions following COP16, COP17 and COP18 and has given **valuable insights into the range and diversity of actions and targets from countries**. However participation and contributions have not covered all Parties and have not been as technical as needed and, as a result, there is **no complete overview of the mitigation pledges and a lot of uncertainties remain**.
3. The country policy experiences seem to be much broader than what could be shared so far under the UNFCCC¹. There is significant scope for countries taking climate action to

¹The list of NAMAs in FCCC/AWGLCA/2012/MISC.2, FCCC/AWGLCA/2012/MISC.2/Add.1, communication to the secretariat from countries (Burkina Faso, Gambia, and Guinea), and NAMA in the Registry reflects the diversity of mitigation actions (see UNEP Risoe NAMA pipeline for a consolidated list of these NAMAs <http://namapipeline.org/>).

In addition, other databases (from IEA/OECD/IRENA - <http://www.iea.org/policiesandmeasures>, from Mitigation Partnership <http://mitigationpartnership.net/map>, from LEDS Global Partnership - http://en.openei.org/wiki/LEDS_Global_Partnership_Activities), documents describing country national strategies supported by some programs (UN-REDD, UNDP-LECBP, EU Regional Facilities...) and studies (GLOBE 3rd Climate Legislation Study, Ecofys/PBL Policy Brief analysis of national climate policies of major economies...) describe a richer experience at country level.

reflect their experiences about designing, implementing and monitoring mitigation actions in the work under the UNFCCC. Biennial reporting and the ICA and IAR processes will be key instruments to make this information come forward regularly. However, regular reporting will only start in 2014, and ICA and IAR processes can be expected to start in 2015.

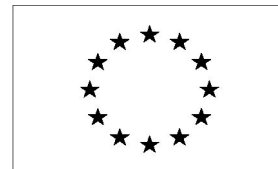
4. The clarification exercise will provide a **“home” to have up to date information in order to understand where we collectively stand towards our common goal, below 2°C**. This technical input is particularly important before 2014 to act as a matter of urgency to enhance ambition under the ADP as decided in Durban. Also, the information exchange will be useful to share experience and to promote implementation of national Low Emission Development Strategies in all countries (developed/developing).
5. It's important to recall that the years, between 2013 and 2020, will be a transitional period followed by the new 2015 agreement with mitigation commitments from all Parties in accordance with their respective capabilities and responsibilities. This is the first time we are following at the international level the co-existence and implementation of quantified emission reductions commitments from developed countries (with QELROs for those Annex I Parties joining a second commitment period under the Kyoto Protocol) as well as NAMAs from developing countries. We must **use this phase to learn as much as possible about the challenges that a diverse set of pledges and rules may represent** in terms of quantification of mitigation outcomes, and how to use common approaches (baselines, use of mechanisms, coverage of sectors and gases, establishment of base years...) adapted to each type of commitment.
6. The EU believes that this **technical clarification will be a very important learning ground for post 2020** - helping to build understandings and options for more structured and ambitious pledges in the 2015 agreement - where we will have to design a spectrum of commitments and a common set of rules for all in order to reflect different responsibilities and capabilities while being sufficiently ambitious to keep us on track for below 2°C, which is still to be discussed in the ADP. Given this context, the EU expects that the discussions in both work programmes will underline the need for a robust framework, with common rules and metrics. The EU hopes to reach the collective recognition that estimating the mitigation reductions necessary to achieve a goal, can enable a better understanding of the challenge in order to design appropriate policies and measures. In addition this systematic and comprehensive technical exercise will also be helpful to feed discussions under the 2013-2015 Review.

B. Establishing a structure for the Work programme for developing country Nationally Appropriate Mitigation Actions

7. In accordance with paragraph 19 of 1/CP.18, a work programme has been established under the SBI, from 2013 to 2014 to further understand the diversity of NAMAs with a view to facilitating the preparation and implementation of those NAMAS and should include focused interactive technical discussions, including through in-session workshops, including on:

- a. More information relating to NAMAS subject to availability as specified in decision 2/CP.17, paragraphs 33 and 34, including underlying assumptions and methodologies, sectors and gases covered, global warming potential values and estimated mitigation outcomes.
 - b. Needs for financial, technology and capacity-building support for the preparation and implementation of specific measurable, reportable and verifiable nationally appropriate mitigation actions, as well as support available and provided, access modalities and related experience gained;
 - c. The extent of the matching of mitigation actions with financial, technology and capacity building support under the registry;
8. The EU recognises that all elements agreed upon in paragraph 19 of 1/CP.18 should be addressed under the same work programme as they are interdependent in technical terms but complementary. However, the EU believes that **discussions under the SBI should begin with a deeper understanding of each of these different aspects, highlighted in sub-paragraphs a, b and c above, making use of structured independent discussions** in order to allow for more clarity on the challenges of each topic. Those steps could be concluded by a discussion on how highlighted issues interact together:
9. Regarding more information relating to NAMAs including underlying assumptions and methodologies, sectors and gases covered, global warming potential values and estimated mitigation outcomes the EU would like to highlight:
- a. Previous Workshops have shown how developing countries are putting together a great variety of NAMAs. We believe this exercise should be country driven, according with respective national circumstances and priorities. **We welcome the diversity of actions and emphasise how important it is to understand the assumptions and conditions behind each NAMA in order to enhance transparency and trust.**
 - b. Currently, there is a need for more clarity and deeper understating around different elements e.g. BAU emissions, estimated economic growth, scope of policies and measures, etc...), but also on how double counting of units will be avoided. This exercise should **improve the capacity to estimate mitigation outcomes with a view to determine if we are collectively in line with our goal to stay below 2°C.**
 - c. We also need to understand the challenges of planning and implementations of NAMAs and LEDS. This will reduce the uncertainty around what the mitigation pledges actually mean and also help understanding needs and how to better target support. Private investors and economic sectors seek countries where they see clarity on the national mitigation actions through appropriate regulatory frameworks, to plan their investments and maximise economic benefits from realising the transition to low-emission development.

10. The EU would like to propose to **invite outside input to highlight key concepts and main difficulties in clarifying the assumptions and methodologies and fully understanding** developing country pledges with a view to enabling their implementation. This input could be provided by, among others, for example UNEP, OECD, UNDP, WRI or Ecofys, IIASA, etc.
11. Building on this, the EU supports a **technical exchange amongst experts/Parties** on what are the methodologies and assumptions that would increase knowledge, transparency and trust around the pledges including exploring approaches and tools to estimate mitigation outcomes for the different types of actions. Some of the elements that we would like to explore are:
 - a. Assumptions associated with establishing baselines and business-as-usual projections;
 - b. Defining the scope of NAMAs and the resulting linkages to the GHG inventory, REDD+ or project-based mechanisms ;
 - c. Methodologies and assumptions to analyse the outcome of NAMAs,
 - d. Indicators to track progress with NAMAs
12. The EU believes that in 2013, with a view to delivering in Warsaw, the developing countries work programme should focus **on how this information needs to be structured** to allow for a clear view of the additional information needed and to start exploring approaches and the tools to estimate mitigation outcomes for the different types of actions. In addition to that, the EU supports the **preparation of a technical paper clustering the different types of NAMAs** and information provided, while respecting **their diversity**.
13. Regarding financial, technology and capacity-building support for the preparation and implementation of NAMAs, a well-developed and robust NAMA should include consideration of support (in terms of finance, technology and capacity building) needed for its implementation. These are likely to include a combination of resources (domestic/international; public/private) as well as potential policy or regulatory frameworks which deliver efficient implementation and underpin resource mobilisation. Workshops could explore how countries have considered and planned for these financial frameworks, and any experience or lessons from implementation regarding how to develop NAMAs that mobilise and deploy resources effectively.
14. A well developed and robust NAMA could for instance be further improved by demonstrating key elements such as:
 - a. Efficient and effective GHG emission reductions that deliver significant results beyond business as usual;
 - b. Linkage to a national strategy, e.g. the national development strategy or low emissions development strategy, and conducive policy and regulatory frameworks;
 - c. High potential for transformational change in the respective sector towards low-emission and climate-resilient development;



- d. Strong domestic support, in particular the backing and engagement of all the ministries relevant for its development and implementation;
 - e. More generally, that relevant institutions, capacities, and mechanisms are in place to ensure implementation is successful and sustainable.
15. Therefore, the EU would like to propose that for instance the following items should be discussed through interactive technical discussions or in-session workshops:
- a. How developing robust and ambitious NAMAs is a key means for mobilising resources, both domestic and international, public and private.
 - b. How to improve knowledge and accessibility of domestic and international support and funding initiatives available specifically for NAMAs and other mitigation activities. e.g. The NAMA Facility launched by two EU Member States in Doha, for instance, aims at facilitating international support;
 - c. Enhancing national institutional capacity for NAMAS: Are there barriers in practice specifically relating to receiving and managing support, e.g. the capacity to comply with fiduciary standards in order to improve eligibility for certain sources of funding? How do countries themselves combine/blend the different sources of support (private, international, domestic) and what are the barriers to access the different sources? How can capacity building best support the creation of enabling environments at the domestic level that attract financial support and investments from all levels?
 - d. The role of incentives in the market and how private finance can be leveraged.
 - e. The roles of the institutions created in the UNFCCC and the opportunities for investment.
 - f. Noting the need to add value and to avoid overlap, to the extent possible, with the work programme on long-term finance;
16. The EU would like to propose to invite outside input from practitioners in-country and from international financial institutions and multilateral and national development banks in order to have a view of the main barriers to international financing of NAMAS.
17. Regarding the registry and the matching of mitigation actions with financial, technology and capacity building support under it, the EU reiterates its view that the registry can be a useful voluntary tool for facilitating matching of actions and support. We welcome the information already put forward by some Parties on NAMAs and look forward to the registry becoming fully operational in the course of 2013 in order to make best use of it.

C. Final Remarks

18. Many countries have embarked on implementing national mitigation actions, and on decoupling growth from emissions, but, as the science shows, doing further so will require a fundamental shift in, and acceleration of, how we collectively approach emissions reductions and low carbon development. We need to understand further how different types of pledges, are creating incentives to move to low-emission development.
19. As the EU has previously stated, we are in favor of common rules applied to all post-2020. The EU believes that this technical clarification will be an important learning phase for the 2015 agreement where we will have to establish a common accounting

framework for all. During 2013-2014, Parties should benefit from these processes to begin to understand the building blocks of this future accounting regime, by exploring the methodological aspects of measuring progress towards the achievement commitments.

20. In our view, this technical exercise – both on developed and developing country pledges - to determine what the existing pledges mean in relation to the 2°C goal will be a vital complement to the work of the ADP, which should be the forum through which we address the collective ambition of pledges, and identify the challenges and opportunities to enhancing ambition. In this regard we welcome the initiative by the ADP co-Chairs to invite the Chairs of the SBSTA and the SBI and other appropriate bodies under the Convention to brief the ADP on relevant work being undertaken by them and would welcome this on an ongoing basis, as the work of these work programmes will be very relevant for the work of the ADP and we need to ensure the complementarity of discussions.