

New Zealand

A submission to the Ad hoc Working Group on Long term Cooperative Action under the Convention

Measurable, reportable and verifiable actions

30 September 2008

1. This submission outlines New Zealand's preliminary views on measurement, reporting and verification.

Key points summary:

2. Measurement, reporting and verification can provide an audit of global mitigation effort, better inform emissions projections, and provide an estimate of progress in relation to targets and goals.
3. Frequent and up to date greenhouse gas inventories and baseline projections - at least covering the bulk of global emissions¹ - will be essential now, up to and beyond 2012.

Bali Action Plan

4. We note the importance of measurable, reportable and verifiable (MRV) actions in the Bali Action Plan (Decision 1/CP.13). In particular in paragraphs 1 (b)(i) and 1 (b)(ii) as outlined below:

1 (b) Enhanced national/international action on mitigation of climate change, including, inter alia, consideration of:

(i) Measurable, reportable and verifiable nationally appropriate mitigation commitments or actions, including quantified emission limitation and reduction objectives, by all developed country Parties, while ensuring the comparability of efforts among them, taking into account differences in their national circumstances;

(ii) Nationally appropriate mitigation actions by developing country Parties in the context of sustainable development, supported and enabled by technology, financing and capacity-building, in a measurable, reportable and verifiable manner

The role of MRV

5. The concept of measurable, reportable and verifiable actions is important because in the first instance it enables us to measure and report progress against commitments, for example regarding greenhouse gas emissions and removals, financial assistance and technology transfer. Verification or assessment of "compliance" with commitments, actions and comparability of effort is then possible. Once national greenhouse gas emissions and removals are better

¹ Frequency of submission will be dependent on a country's contribution to global emissions; for example we anticipate major emitting economies would report annually and LDCs less frequently given that just over 80% of global emissions come from only 25 countries.

understood, and have been quantified and reported, mitigation opportunities are more readily identified. This applies to both developed and developing countries.

6. National communications (under Article 12) are at the heart of the Convention process – providing the vehicle for all Parties to communicate progress with implementation of the Convention. The UNFCCC website states the following about national communications and the importance of reliable data:

Accurate, consistent and internationally comparable data on GHG emissions is essential for the international community to take the most appropriate action to mitigate climate change, and ultimately to achieve the objective of the Convention. Communicating relevant information on the most effective ways to reduce emissions and adapt to the adverse effects of climate change also contributes towards global sustainable development².

7. Article 12 of the Convention provides a sound basis for all Parties to report on actions taken in response to the Convention. In New Zealand's view, we must build upon existing reporting and review processes and strengthen reporting requirements in key areas. Our own experience is that regular reporting of greenhouse gas inventories combined with a facilitative review process is extremely beneficial for inventory improvement.
8. National communications provide an opportunity for countries to report on the progress they are making to prepare for the adaptation to the impacts of climate change, to describe adaptation planning and identify needs and priorities. More regular reporting of this information by developing countries would assist in the development of adaptation plans, in estimating costs of adaptation, and in accessing financial resources for implementation.
9. Annex I Parties have a comprehensive and well-tested reporting and review process, based on the requirements under Article 12 of the Convention (and associated COP decisions) and supplemented with the requirements under Articles 5, 7 and 8 of the Kyoto Protocol (and associated CMP decisions). Annual greenhouse gas inventories for Annex I Parties have been a requirement since the COP adopted decision 11/CP.4 in 1998. We also note that Annex I national communications are comprehensive and already have a requirement to report on finance and technology transfer.
10. Requirements for the reporting of information under Article 12 of the Convention by non-Annex I Parties have resulted in much less regular reporting than that of Annex I Parties. A consequence of this is that actions already being taken by developing countries to implement the Convention and address climate change, may not be recognised nor are their adaptation needs and priorities understood.
11. The vast majority of non-Annex I Parties have submitted only one national communication. This means that for most of these countries the information is not current, and because there is no requirement for a national inventory system (as for Annex I Parties under the Kyoto Protocol) capacity building and institutional arrangements for national greenhouse gas inventories will likely be an issue that will need attention with each national communication cycle (instead of being an ongoing activity). While acknowledging the work of the Consultative Group of Experts on national communications from Parties not included in Annex

² See http://unfccc.int/national_reports/items/1408.php

I to the Convention, there is no formal review process for greenhouse gas inventories from these Parties.

What needs to change?

- Measurable, reportable and verifiable actions or commitments are central to the mutual accountability of all Parties under the Convention.
- Measurement, reporting and verification are necessary to ensure access to finance and the carbon market by non-Annex I Parties, for example via a mechanism that addresses the reduction of emissions from deforestation and forest degradation (REDD).
- Greenhouse gas inventory reporting and review requirements for major developing economies must mirror Annex I requirements.
- The frequency of reporting on financial resources and transfer of technology (actions to implement Articles 4.3, 4.4 and 4.5 of the Convention) could be increased, with the relevant national communication tables being submitted at the same time as the national inventory report.
- Enhanced implementation of Article 12 of the Convention is easily achieved with modifications to, and broader application of, current national communications guidelines.