



# Note

## Challenges for Compliance with the Enhanced Transparency Framework of the Paris Agreement

### Setting the Scene and Remaining Needs for Developing Countries

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#### Summary

Transparency in climate governance has, since the signing of the United Nations Framework Convention on Climate Change (UNFCCC) in 1992, been acknowledged as cornerstone principle encouraging cooperation, rationalising decision-making, playing a role in securing more accountable and environmentally sustainable outcomes and rising countries' climate ambitions. With the Paris Agreement (PA) reached at COP21, the transparency requirements were heightened, and the modalities of reporting and reviewing data on greenhouse gases emissions, climate change mitigation actions and support changed. This paper looks at developing countries' challenges with transparency, the needs expressed during the PA negotiations and the expected challenges they will face with the new Enhanced Transparency Framework.

## Abbreviations

APA	Ad Hoc Working Group on the Paris Agreement
BR	Biennial Report
BTR	Biennial Transparency Report
BUR	Biennial Update Report
CBDR	Common Differentiated Responsibilities Principle
CBIT	Capacity Building Initiative for Transparency
COP	Conference of the Parties
ETF	Enhanced Transparency Framework
G77	Group of the 77
GCF	Green Climate Fund
GEF	Global Environment Facility
GHG	Green House Gases
ICAT	Initiative for Climate Action Transparency
IPCC	Intergovernmental Panel on Climate Change
KCP	Katowice Climate Package
LDC	Least Developed Countries
MPG	Modalities, Procedures and Guidelines
MRV	Measurement Reporting and Verifying system
NC	National Communication
NDC	Nationally Determined Contribution
NID	National Inventory Document
PA	Paris Agreement
SBSTA	Subsidiary Body for Scientific and Technological Advice
SIDS	Small Island Developing States
UN	United Nations
UNFCCC	United Nations Framework Convention on Climate Change

## Introduction

Since the signing of the United Nations Framework Convention on Climate Change (UNFCCC) in 1992, transparency in climate governance was reputed as a cornerstone principle. Indeed, under the Convention, all Parties are obliged to communicate to the Conference of the Parties (COP) information relevant to the implementation of the Convention (Article 12). In that sense, Parties are required to communicate information on Green House Gases (GHG) emissions and the actions taken to reduce them, as well as *“on adaptation and means of implementation such as finance, technology transfer and capacity-building. The transparency and reporting system allows to understand ambition and progress on climate actions and support by Parties, – and informs the COP deliberation and guidance on these matters.”*<sup>1</sup>

Transparency is in effect a key element to effective national and international action, to encourage cooperation, to rationalise decision-making and ensure all countries engage in the processes and respect the requirements established. By promoting transparency and sharing information, trust, confidence and accountability amongst Parties is increased and freeriding reduced. Sharing information in an uniform manner with common guidelines is also a key to secure more accountable and environmentally sustainable outcomes and rising countries' climate ambitions. The intended idea with the “governance by disclosure” is to further a variety of goals, including holding disclosers to account and improving sustainability performance.

Being transparent means among other things : (i) having a robust monitoring of the impact of activities implemented; (ii) gathering and collecting reliable data on greenhouse gases emissions; (iii) using a system in charge of the monitoring and data collection on climate actions; (iv) finding standardised metrics, and (v) sometimes having national sovereignty under scrutiny and threat because of naming or sanctions imposed.

Over time and the different climate agreements and action plans, the transparency regime and requirements evolved. The national reporting arrangements of the Convention (article and the Kyoto Protocol (Articles 3; 6 and 8) were revised and transformed in a more comprehensive Measurement, Reporting and Verification (MRV) framework. Measures to enhance transparency of action and support under the Convention were adopted in the Bali Action Plan at COP13 and completed by subsequent decisions of COP sessions. The MRV focuses on all measures which Parties take to collect data on emissions, mitigation actions and support, and to compile this information in reports and GHG inventories which are then subject to some form of international review or analysis.

In Cancún in 2010 (COP16), it was also decided that all Parties will submit National Communications (NC) to the UNFCCC every four years in order to enhance the transparency of action and provide other Parties with national climate-related information. It was also agreed that Annex I countries will submit Biennial Reports (BRs) every two years and non-Annex I countries will submit Biennial Update Reports (BURs) in the same

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<sup>1</sup><https://unfccc.int/process-and-meetings/transparency-and-reporting/the-big-picture/what-is-transparency-and-reporting>

intervals. The aim of those reports and communication is to provide clarity and transparency about the Parties' level of global emissions and attest the ambition and efforts undertaken to combat climate change at the national and international level.

The transparency regime was finally enshrined in the Paris Agreement (PA) reached at the COP21 organised in 2015, in France. In fact, if this COP was highly publicised, it is because it led to a new international climate agreement, applicable to all countries, aiming at keeping global warming below 2°C, and more generally organising the legally binding core of the post-2020 climate regime. It covers all key elements, including mitigation, adaptation, loss and damage, finance, technology, capacity-building, education, transparency, stocktaking, compliance, procedural issues, and institutional arrangements. It also includes a new "Enhanced Transparency Framework" (ETF) which was seen as the creation of the backbone of climate governance and takes into account Developing countries and Least Developed countries difficulties in reporting and measuring their climate mitigation and adaptation actions.

Indeed, for developing countries, transparency mechanisms can be burdensome due to institutional and technical capacity constraints. In that sense, the G77 group, Africa Group and Least Developed groups raised their voices during the Paris Agreement negotiations and asked for specific provisions dealing with their accompaniment in their reporting requirements and for funds from the developed countries to become able to respect the transparency measures. Yet, they had to compromise on their demands with other groups of countries during the negotiations, leaving them with uncertainties and difficulties.

This paper discusses the developing countries challenges in complying with transparency requirement before, and after the adoption of the Paris Agreement. This paper begins by first setting the scene and expounding the transparency challenges faced by the developing countries as well as their positions during the PA negotiations. Thereupon, it presents the ETF and its implementation rulebook: the Katowice Climate Package (KCP). Afterwards, some capacity-building support initiatives for developing countries are also exposed. Ultimately, this paper makes some suggestions to consider moving forward to respect the transparency mechanisms in developing countries.

## Methodology

This paper is based on a literature review: toolkits, project documents, reports, publications, peer review and academic papers including sources from the UN agencies, especially the UNFCCC and Intergovernmental Panel on Climate Change (IPCC) were considered. An online survey with CUTS' partners on the ground was also conducted to better understand the realities of compliance of the ETF and the challenges developing countries are currently facing.

## Assessing the challenges relating to climate transparency faced by developing countries

Many developing country Parties are struggling in being transparent on their climate action and to respect the transparency requirements set under the UNFCCC. Indeed, the developing countries and LDCs often lack the capacity to effectively monitor and report their progress vis-à-vis national greenhouse gas emission reduction and track progress in their NC implementation. Some of these challenges faced by the G77 countries have been noted in their BUR submitted on the UNFCCC website and are reported in ANNEX 1.

### A closer look at developing countries' challenges

Developing capacities and abiding by requirements is a process that takes time and is constantly reinforced on the basis of learning by doing. Japan is an example of developed country that have built its capacities during a period of 20 years. Expecting developing countries to build their capacity in a short period of time is completely unrealistic according to the World Resources Institute<sup>2</sup>. Indeed, despite 20 years of international assistance, developing countries still have numerous capacity needs and are hindered by insufficient human and financial resources, lack of scientific or technical knowledge, and institutional weaknesses. It seems that only building on their own experiences and lessons and giving them time is the best way for developing countries and LDCs to strengthen their measurement, reporting and verification system. This is for instance reflected in Ghana's efforts to

enhance domestic MRV under their Climate Ambitious Reporting Program established in 2013<sup>3</sup>.

By early 2017, it was reported that only 36 developing countries had submitted their first BUR which were due by the end of 2014. Although reporting requirements for developing countries are less stringent than those for developed countries, this figure suggests that developing countries are experiencing difficulties in reporting and measuring their GHG emissions and climate mitigation and adaptation actions. These late and lack of submissions bring us to considering (i) technical challenges; (ii) institutional challenges; (iii) human challenges; (iv) technological challenges; and lastly (v) financial challenges.

#### ● Technical challenges

The technical challenges, limited knowledge and understanding, faced by the developing countries are multiple and important as they can trigger other challenges. Indeed, a lack of expertise and climate action reporting can be problematic to then correctly implement the rules and abide by the requirements. If the rules are not well apprehend by public and politicians stakeholders, they cannot work correctly. As well, networking can turn to be a technical challenge. To proceed to collective assessment of progress through the stocktake, the developing countries need expertise, data and relations with other representants. However, countries must be careful to differentiate the knowledge and understanding from the political buy-in, which means the fact that an idea proposed is accepted and supported. A lack of political buy-in can reflect a lack of will but also disbelief.

<sup>2</sup><https://www.wri.org/blog/2019/03/insider-building-capacity-implementation-paris-agreements-enhanced-transparency>

<sup>3</sup> *Ibid.*



### 🕒 Institutional challenges

The transparency requirements and MRV system under the UNFCCC encourages developing countries to report information on their climate mitigation and adaptation actions to highlight what they have achieved and what is left to be done, but most of them do not currently have the necessary institutional arrangements to produce good reports. Institutional arrangements and governance structures are playing an important role in ensuring data collection and communication, including through establishing ministerial coordination mechanisms and multi-stakeholder engagement, especially with the private sector to report on private finance for instance. The transparency can be genuine only if actors and institutions coordinate and if adequate legislative and policy support for climate change initiatives are implemented.

#### **Extract from the First Biennial Update Report of Indonesia, Submitted on 18 Mar 2016, P.13.**

“in terms of technical capacity in the development of GHG Inventory, there were gaps between national and local institutions, and among sectors. In most cases, provinces and districts had difficulties in calculating the emissions related to their development activities and also in defining the baseline emission as a reference for evaluating the effectiveness of mitigation actions in emissions reduction”

Developing countries have often raised their issues of lack of institutional structures and policies as a barrier to reporting and national monitoring. Relatively few countries have genuinely developed monitoring systems for adaptation but many more have indicated their intention to do so in the upcoming year in their NCs.

### 🕒 Human challenges

Most developing countries do not currently have the necessary human resources to be able to report and correctly comply with their requirements under the UNFCCC. Understaffing or lack of qualified workforce represent major obstacles for compliance with transparency requirements as reported in some of the BURs of developing countries.

#### **Extract from the Second Biennial Update Report of Namibia, Submitted on 10 Nov 2016, P.7.**

“The process of preparation of GHG inventories remained a very laborious exercise as resources and human capacities continued to be limiting factors. Implementation of the different steps of the inventory cycle was staged over less than a year instead of a longer period to fit the availability of funds for the compilation of this inventory. Due to this time constraint, it is obvious that there still exist shortcomings in this inventory, but the country is committed to strive to raise the quality of future GHG inventories through further strengthening of the GHG inventory system and human capacities.”

National experts must be trained not only to apply the 2006 IPCC Guidelines but also to use satellites data and control the quality of the GHG inventories, with final goal to reduce uncertainties in assessing emissions/removals in forestry or other land use for instance as it was explained in the Armenian BUR.<sup>4</sup>

It was reported in several cases, that external consultants are employed because the institutional arrangements and data collection from governmental and nongovernmental sources were not sufficient and had not established formal contracts to allow for a timely and efficient flow of

<sup>4</sup> Armenian First Biennial Update Report, submitted on 29 Apr 2016, p.53.

information. The training of internal consultants should be reinforced in order to better collect the information and allow the G77 countries to improve their reportings and inventories under the Convention.

#### ● *Technologies' constraints*

Tracking tools, technologies and platforms are crucial to be able to collect data, reduce greenhouse gas emissions and proceed to GHG inventories but also build resilience and abide by the transparency and MRV system requirements. Nonetheless, developing countries are struggling with obtaining those technologies which are crucial to increase countries' abilities to monitor the support received and the progresses toward their commitments. The simple figure of the GHG inventories is indicative of the difficulties faced in collecting and submitting inventories regularly: for 39 (out of 88) non-Annex I countries, the latest GHG inventories do not include data after 2010.<sup>5</sup>

As explained in the study conducted by Chisa Umemiya, Molly White, Aryanie Amellina and Norigo Shimizu and the Institute for Global Environmental Strategies<sup>6</sup>, the technologies' constraints are very observable in Asian developing countries. When focusing on 37 Asian developing countries and looking at their institutions and the evolution of their technology capacities reported in their submitted second NC different trends can be observed:

- Eleven countries amongst them did not improve their technological capacities between the submission of the NC1 and NC2

and remained with low capacity for their GHG inventories;

- Nineteen countries had relatively high technological capacities at the time of publication of their NC2, and amongst them some even had a relatively high capacity from the first GHG inventory e.g., China, Philippines, Tajikistan whilst some sufficiently improved between their first and second NC, e.g., Kyrgyzstan, Samoa, Yemen;
- Seven countries had the highest capacity and were ready for the communication of GHG inventories on a regular basis (including the Republic of Korea and Singapore).
- Additionally, around 20 more Asian developing countries have not submitted any reports beyond their NC1 and were not taken into account in that study.

The G77 countries mostly have more urgent priorities than developing the technologies to proceed to reporting of their adaptation and mitigation and most of national governments have limited or no experience in developing projections of GHG emissions.

#### ● *Financial challenges*

The financial challenges can be identified as the last and most burdensome challenge for the developing countries. Indeed, finance is linked to all the previous challenges: funds are required to implement new institutional arrangements as well as to train the human resources and develop technological solutions. In that sense, the Paris Agreement seeks to strengthen financial support provided by the developed to the developing

<sup>5</sup> Vaidyula and Rocha 2018

<sup>6</sup> Umemiya C., White M., Amellina A., Shimizu N. (2017) National Greenhouse Gas Inventory Capacity: An assessment of Asian

Developing Countries, *Environmental Science and Policy* 78, 66-73.

<https://www.wri.org/blog/2019/03/insider-building-capacity-implementation-paris-agreements-enhanced-transparency>

countries. Financial efforts are essential to enhance transparency and contribute to climate change mitigation actions.

**Extract from the First Biennial Update Report, of India Submitted On 22 Jan 2016, P.104.**

“Government of India has announced various policies and measures enhancing the ambition levels of climate change mitigation efforts that would require international financial support.”

### **The developing countries’ needs and expectations expressed during Paris negotiations**

Considering all their challenges, developing countries grouped in the G77+China, representing a total of 134 countries and more than 80% of the world's population and many the highly vulnerable regions, took advantage of the COP21 to call during the negotiations for *“Urgent action on the pre-2020 period [...] to build trust and create a platform for the post-2020 agreement.”*<sup>7</sup>

The G77 also required the acknowledgment of the common but differentiated responsibilities principle (CBDR - enshrined as a principle of the Rio Declaration in 1992) as a priority in the writing of the agreement. CBDR aims at taking the capabilities’ differences into account when goals and benchmarks are applied to global development agendas and ensuring that the expectations levied on countries are appropriate to their national capabilities. In this sense, the G77 insisted on the need to find different rules on transparency and compliance for the developing countries than the one used for the developed countries or better

adapted ones. Such a provision is crucial to ensure developing countries can act at their own level of capability and are not discouraged by their lack of means. In this sense, during the negotiations, the G77 requested to add a special provision referring to countries with “significant capacity constraints” in the text.

Lastly, in the November 30th’s speech the G77 emphasized that it was “important that progress is made on both transparency of action, as well as transparency of support, as an opportunity to improve our collective understanding of the different elements that encompass the response to climate change”.

The G77 thus formulated special considerations to be included in the final agreement of the COP21. They accentuated on their realities and accentuated on the fact that the response to climate change in developing countries cannot just be about mitigation, but also adaptation, addressing loss and damage, and receiving financial aid.

### **The Enhanced Transparency Framework and its Implementation Guidelines**

#### **The ETF, a new regime enforced by the Paris Agreement**

As already explained, transparency is assumed to be fundamental to ensure countries are meeting their climate obligations, enhancing trust, and engaging in ambitious climate action. The PA decided at the COP21 provides for enhanced transparency of action and support through a more robust transparency framework. This new framework and

<sup>7</sup> From the G77 statement by Ambassador Nozipho Mxakato-Diseko from South Africa on behalf of the Group of 77 and China, at the opening plenary of COP21 in Paris, France, 30 Nov. 2015.



obligations of reporting and reviewing of Parties' actions on a regular basis represents an important step forward for transparent climate change governance.

- *A new transparency framework to replace the MRV system*

The ETF is planned to replace the actual MRV system which has been decided in Bali's COP13 and finalised at COP19. The MRV was the first system

under the UNFCCC to (i) measure the efforts undertaken to address climate change and the impacts of these efforts, (ii) report results and activities through national reports and (iii) verify them through an international process in order to increase transparency as explained below.

**Figure 1: Objectives of the MRV Framework**



Source: Wartmann, S. & Salas, R. (2018). Deciphering MRV, accounting and transparency for the post-Paris era, Ricardo Energy & Environment , GIZ, p16.

If the new transparency framework of the ETF has been adopted, it is to create a tool for Parties, to provide them with more robust, clear, and effective guidelines as indicated in article 13-3.

**Extracts From Article 13 Of The Paris Agreement**

“3. The transparency framework shall build on and enhance the transparency arrangements under the Convention, recognizing the special circumstances of the least developed countries and small island developing States, and be implemented in a facilitative, non-intrusive, non-punitive manner, respectful of national sovereignty, and avoid placing undue burden on Parties.”

The main goal of the ETF is to help countries better collect, manage, and share more relevant and higher-quality data, in an uniform manner. Therefore, it helps track countries’ progress towards the implementation of their mitigation contributions by introducing a dramatic increase in the scale and complexity of review:

(i) requiring a comprehensive review of reporting by all 185 Parties (developed and developing countries) to the PA every two years with Biennial Transparency Report (BTR) and National Inventory Document (NID); in that sense, all

countries are becoming accountable, including Least Developed Countries;

(ii) Expanding the amount, types, and frequency of information that must be submitted by countries and reviewed, such as detailed data demonstrating the implementation of GHG mitigation policies;

(iii) Deepening the technical complexity of the information reported by Parties, (due to the lack of standardization of the national mitigation commitments);

(iv) Adding information that will be politically sensitive (e.g., progress of a country in achieving its emission reduction commitments).

**Figure 2: Current MRV System: Basis for BTR and NID**

Process	Current MRV		ETF (MPGs )
	Developed countries	Developing countries	All countries
National Communication (NC)	Yes	Yes	Biennial Transparency Report (BTR) and National Inventory Document (NID)
GHG Inventory (GHGI)	Yes (Annual standalone GHG Inventory submissions)	Yes (GHG inventory sections in NC and BUR)	
Biennial Report(BR)/ Biennial Update Report (BUR)	Yes	Yes	
Outline in decisions	<ul style="list-style-type: none"> <li>NC and GHGI – outlines provided</li> <li>BR – topics defined</li> </ul>	NC/BUR – topics defined	To be developed by SBSTA

Source: Presentation at special event on the transparency framework and relevant MRV experiences, UNFCCC Secretariat, 19 June 2019, Bonn, Germany.

The article 13 of the PA is the baseline of this transparency mechanism. Indeed, it :

- (i) Establishes the transparency framework for action and support;
- (ii) Identifies purposes and information to be provided;
- (iii) Sets up a technical expert review;
- (v) States that common Modalities, Procedures, and Guidelines (MPG) will be adopted by the COP and
- (vi) Concludes with the support that shall be provided to developing countries.

This article also recognises that flexibility has to be granted to developing countries that need it and advances the need of support to build transparency-related capacity in developing countries.

Additionally, to this article, the Article 4 whereof certain parts are reproduced as follow, states that it is the duty of Parties to provide the information necessary for clarity, transparency and understanding in communicating their Nationally Determined Contributions (NDC).

### Extracts From Article 4 Of The Paris Agreement

“2. Each Party shall prepare, communicate and maintain successive nationally determined contributions that it intends to achieve. Parties shall pursue domestic mitigation measures, with the aim of achieving the objectives of such contributions.

3. Each Party's successive nationally determined contribution will represent a progression beyond the Party's then current nationally determined contribution and reflect its highest possible ambition, reflecting its common but differentiated responsibilities and respective capabilities, in the light of different national circumstances. [...]

11. A Party may at any time adjust its existing nationally determined contribution with a view to enhancing its level of ambition, in accordance with guidance adopted by the Conference of the Parties serving as the meeting of the Parties to this Agreement.

These NDC are climate action plans setting out what a country intends to do as post 2020. NDCs embody efforts by each country to reduce national emissions and adapt to the impacts of climate change. They are key to achieve the long-term goals but are not legally binding and can be modified at any time according Article 4-11. These NDC are essential to compare the contributions and to assess progress towards collective ambition.

This framework is a new step in climate governance, it build on governance by disclosure and reinforces the measurability and the accountability of the practices relevant to the implementation of the UNFCCC. It also roughly took into account developing countries' needs.

- *An agreement taking the developing countries' need into account?*

If some compromises were needed to reach the final text version of the Paris Agreement, it appears that some of the considerations and demands raised by

developing countries were taken into account. Even if the final result on transparency is considered to be a compromise in line with the approach advocated by the developed countries, the G77 regretted that the transparency rules apply to all parties with very modest differentiation.

The PA's transparency framework consists of two information elements: (i) a national inventory report of GHGs and information necessary to track progress in implementing and (ii) achieving NDCs by a country. This framework will be equally applied to all countries while reflecting the circumstances of each country by building in flexibility that is to say all countries are bound by the same obligations but with possible flexibility as specified in article 13-2 and 13-3<sup>8</sup>.

#### **Extract From Article 13 Of The Paris Agreement**

“2. The transparency framework shall provide flexibility in the implementation of the provisions of this Article to those developing country Parties that need it in the light of their capacities. The modalities, procedures and guidelines referred to in paragraph 13 of this Article shall reflect such flexibility.

3. The transparency framework shall build on and enhance the transparency arrangements under the Convention, recognizing the special circumstances of the least developed countries and small island developing States, and be implemented in a facilitative, non-intrusive, non-punitive manner, respectful of national sovereignty, and avoid placing undue burden on Parties.”

Then, concerning the demand of progress on both transparency of action, as well as transparency of support, the ETF has taken into account developing countries' demands as it is readable in Article 13-1 and Article 13-5 and 13-6, respectively dealing with transparency of action and support.

#### **Extract From Article 13 Of The Paris Agreement**

“1. In order to build mutual trust and confidence and to promote effective implementation, an enhanced transparency framework for action and support, with built-in flexibility which takes into account Parties' different capacities and builds upon collective experience is hereby established. [...]

5. The purpose of the framework for transparency of action is to provide a clear understanding of climate change action in the light of the objective of the Convention as set out in its Article 2, including clarity and tracking of progress towards achieving Parties' individual nationally determined contributions under Article 4, and Parties' adaptation actions under Article 7, including good practices, priorities, needs and gaps, to inform the global stocktake under Article 14.

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 [...].”

8 Huggins, A., Saiful Karim, Md. (2016). Shifting Traction: Differential Treatment and Substantive and Procedural Regard

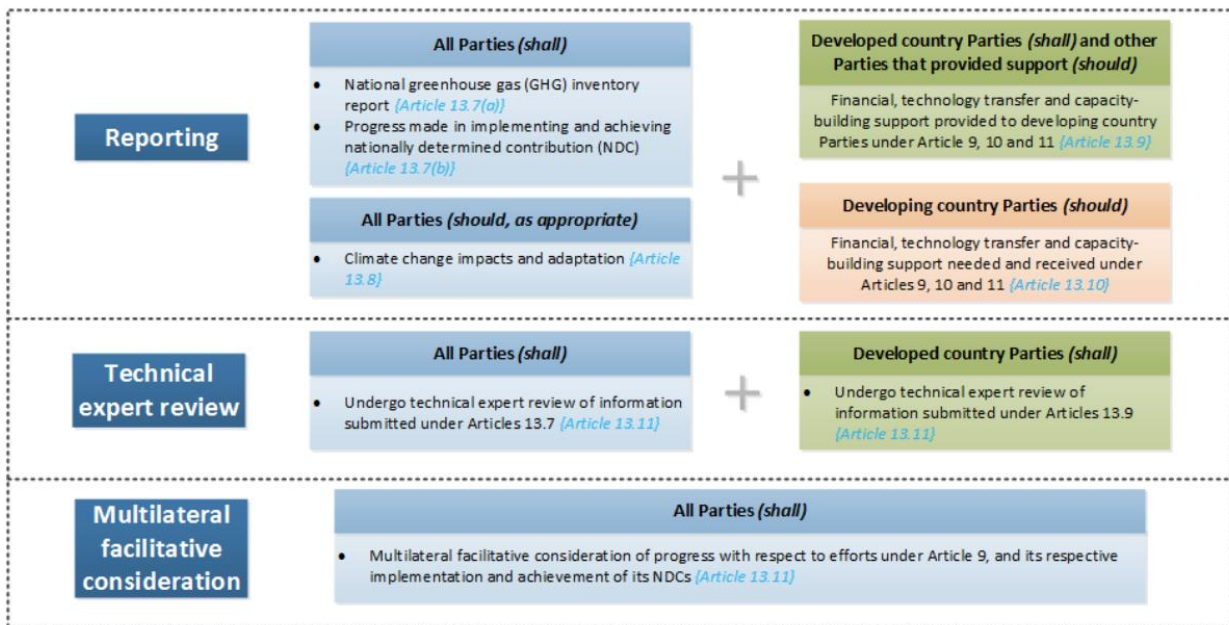
in the International Climate Change Regime in Transnational Environmental Law, 5:2 (2016), p.427.

In that sense, under the ETF, all developing countries parties should provide information on financial, technology transfer and capacity-building support provided, needed or received.

Additionally, if the G77 was disappointed by the final version of the PA as the language and structure are not fully satisfying to them because the binding provision requiring developed countries to give funding to help mitigate and adapt to climate change appears only in the preamble, they obtained an extension of developed countries commitment to mobilise USD 100bn a year in climate finance by 2020 through to 2025.

Consequently, the ETF is said to be comprehensive and have taken into account some of the demands of the G77. Indeed, the framework agreed in Paris explicitly deals with both action and support, this corresponds to what was asked by the G77. Secondly, action is understood broadly by including both adaptation and mitigation. Thirdly, the reference to support is to be understood in a broad sense as it can refer to finance, technology, and capacity building supports and it encompasses both provided and received support.

**Figure 3: Article 13 of the Paris Agreement: Transparency of Action and Support**



\* The transparency framework shall provide flexibility in the implementation of the provisions of this Article to those developing country Parties that need it in the light of their capacities *(Article 13.2)*;

\* The transparency framework shall recognize the special circumstances of the least developed countries and small island developing States *(Article 13.3)*.

Source : "What is transparency and reporting ?", UNFCCC, retrieved from : <https://unfccc.int/process-and-meetings/transparency-and-reporting/the-big-picture/what-is-transparency-and-reporting>.



## The Katowice Climate Package (KCP), a rulebook to the ETF

As the ETF framework decided at COP21 was quite vague in its wording and implementation guidance was missing, the Ad Hoc Working Group on the Paris Agreement was requested in decision 1/CP.21 paragraph 919, to develop recommendations for MPG for the transparency of action and support and other details for the implementation of the PA. It was decided at Katowice COP24, organised in December 2018, to deal with this issue by formulating guidelines, including procedures and mechanisms to operationalise the PA.

It took the format of the KCP which includes: (i) Provisions on what information needs to be communicated in the NDCs; (ii) How to operationalise the ETF; (iii) The process to establish new targets for climate finance; (iv) How to conduct the Global Stocktake; (v) How to assess progress on the development and transfer of technology; (vi) How to provide advance information on financial support to developing countries.<sup>10</sup>

This KCP also includes funding as a component part. It underscores the importance of the Green Climate Fund (GCF), and the Global Environment Facility (GEF) in supporting developing countries and makes provisions to ensure that financial flows are consistent with low-emission and climate-resilient development.

Relating to the operationalisation of the ETF, the Decision 18/CMA.1 “Modalities, procedures and guidelines for the transparency framework for

action and support referred to in Article 13 of the Paris Agreement”<sup>11</sup> has been adopted. This decision amongst other things:

- (i) Adopts in an annex the modalities, procedures and guidelines for the transparency framework for action and support;
- (ii) Fixes the deadline for Parties to submit their first BTR and NIR at the latest by 31 December 2024;
- (iii) Decides that the LDC Parties and SIDS may submit information referred to in Article 13 at their discretion;
- (iv) Recalls that, in accordance with Article 13, paragraphs 14 and 15 of the PA, support shall be provided to developing country Parties for the implementation of Article 13 and for the building of transparency-related capacity of developing country Parties on a continuous basis;
- (v) And urges the GEF, as an operating entity of the Financial Mechanism, throughout its replenishment cycles, to support developing country Parties in preparing their first and subsequent biennial transparency reports.

### ● *Guiding principles of the Modalities, Procedures & Guidelines (MPGs)*

This decision part of the KCP establishes the principles of the MPG of the PA. Amongst other things, the MPG,

- (i) Builds on and enhances the transparency arrangements under the Convention, recognizing the special circumstances of the LDCs and SIDS, and implementing the transparency framework in a

<sup>9</sup> “91. Requests the Ad Hoc Working Group on the Paris Agreement to develop recommendations for modalities, procedures and guidelines in accordance with Article 13, paragraph 13, of the Agreement, and to define the year of their first and subsequent review and update, as appropriate, at regular intervals, for consideration by the Conference of the Parties, at its twenty-fourth session, with a view to forwarding them to the Conference of the Parties serving as the meeting of

the Parties to the Paris Agreement for consideration and adoption at its first session;” Decision 1/CP.21, p. 13.

<sup>10</sup><https://unfccc.int/process-and-meetings/the-paris-agreement/katowice-climate-package>

<sup>11</sup> FCCC/PA/CMA/2018/3/Add.2 – pp.18-52 – Available at : [https://unfccc.int/sites/default/files/resource/cma2018\\_3\\_add2\\_new\\_advance.pdf#page=18](https://unfccc.int/sites/default/files/resource/cma2018_3_add2_new_advance.pdf#page=18)

facilitative, non-intrusive, non-punitive manner, respecting national sovereignty and avoiding placing undue burden on Parties;

(ii) Aims at promoting transparency, accuracy, completeness, consistency and comparability;

(iii) Ensures environmental integrity

(iv) Ensures that Parties maintain at least the frequency and quality of reporting in accordance with their respective obligations under the Convention.

Thus, important principles are reaffirmed and consecrated as principles of implementation of the PA.

#### ● *Reporting format*

The decision also fixes the reporting format of the documents that have to be submitted by the Parties. Concerning the BTRs, each Party will have to provide a national inventory report of anthropogenic emissions by sources and removals by sinks of GHGs, in accordance with the MPGs decided in this same decision. Each Party will also provide the information necessary to track progress in implementing and achieving its NDC under Article 4 of the PA, in accordance with the MPGs and information on climate change impacts and adaptation under Article 7 of the PA. The developing country Parties will be required to provide information on financial, technology transfer and capacity-building support needed and received under Articles 9, 10 and 11 of the PA, in accordance with the MPGs contained in the decision as well.

Concerning the National Inventory Document (NID), they may be submitted as a stand-alone report or as a component of a biennial transparency report according to this decision.

#### ● *Details about the flexibility to those developing country Parties that need it in the light of their capacities*

The ETF was quite vague about the flexibility that can be granted for the developing countries. In the decision, the meaning and condition for that flexibility is detailed as follow.

#### **Extract From Decision 18/Cma.1**

“ 4. In accordance with Article 13, paragraph 2, of the Paris Agreement, the enhanced transparency framework shall provide flexibility in the implementation of the provisions of Article 13 to those developing country Parties that need it in the light of their capacities, and these MPGs shall reflect such flexibility. FCCC/PA/CMA/2018/3/Add.2 21

5. These MPGs specify the flexibility that is available to those developing country Parties that need it in the light of their capacities pursuant to Article 13, paragraph 2, reflecting flexibility, including in the scope, frequency and level of detail of reporting, and in the scope of the review, as referred to decision 1/CP.21, paragraph 89.

6. The application of a flexibility provided for in the provisions of these MPGs for those developing country Parties that need it in the light of their capacities is to be self-determined. The developing country Party shall clearly indicate the provision to which flexibility is applied, concisely clarify capacity constraints, noting that some constraints may be relevant to several provisions, and provide self-determined estimated time frames for improvements in relation to those capacity constraints. When a developing country Party applies flexibility provided for in these MPGs, the technical expert review teams shall not review the Party's determination to apply such flexibility or whether the Party possesses the capacity to implement that specific provision without flexibility.”

With this decision, it is therefore specified that developing countries need to note the constraints they face and estimate a timeframe for improvements. This flexibility is very left to country self-determination.

### ● Information to report in the NDCs

The decision 18/CMA.1 also clarifies the information to be communicated in the NDCs under Article 4 of the PA. Indeed, it states that the Parties shall describe their national circumstances relevant to progress made in implementing and achieving their NDC including their government structure; Population profile; Geographical profile; Economic profile; Climate profile; Sector details. The Parties shall also provide information on how their national circumstances affect GHG emissions and on their institutional arrangements in place to track progress made in implementing and achieving their NDCs. Hence, comprehensive information are requested in those reports.

In summary, the KCP and its decisions are bringing clarity and details for implementation of the ETF and more globally the PA. But one may wonder if the developing countries will be able to comply with all those new requirements and if the capacity building support supposed to be given will be enough.

## Expected difficulties for the ETF compliance from the developing countries

Considering the challenges already existing for the developing countries to comply with the MRV and transparency requirements presented previously, it appears that operationalising the ETF will present challenges as well even if efforts to enhance transparency and international support is supposed to be provided.

As formulated in the second Indian BUR submitted on December 2018, after COP21 and the adoption

of the ETF, but also in other reports from other countries of the G77, countries will need capacity building support to be able to meet the Paris commitments and requirements.

### Extract Of Indian BUR2

“to meet its Paris commitments, in a timely manner, India requires enhanced new, additional and climate specific financial, technological and capacity building support”<sup>12</sup>.

Many developing countries in their submissions relating to the APA agenda item 5 (modalities, procedures and guidelines for the transparency framework for action and support referred to in Article 13 of the PA) urgently required the operationalisation of the Capacity Building Initiative for Transparency (CBIT) envisioned by the ETF. Such an initiative will play a key role to build capacity and long-term institutional knowledge in developing country Parties to enable enhanced reporting into the future.

Another expected difficulty for the ETF compliance from the developing countries could be the understanding of the framework and its exigencies. According to the following extract from the Chinese submission on APA items related to APA session 1 and 2, the ETF will represent a huge workload. Cooperation amongst Parties will be necessary to identify common key issues and produce better report outcomes.

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<sup>12</sup> Indian Second Biennial Update Report, submitted on 31 Dec 2018, p.4.

**Extract From China’s Submission On Modalities, Procedures And Guidelines For The Transparency Framework Under The Paris Agreement (30/09/2016)**

“10. Recognizing the importance and complicated nature of transparency framework of the Paris Agreement, as well as predictable huge workload ahead, the negotiation process should follow the principle of constructiveness, inclusiveness and pragmatism. COP22 could start with identifying key issues and making future work plans through candid and thorough exchange of views.”

The in-country reviews decided by the Decision 1/CP.21 paragraph 89 could also be problematic. Indeed, according to the Submission by Ethiopia on behalf of the LDC Group on agenda item 5: modalities, procedures and guidelines for the transparency framework for action and support referred to in Article 13 of the PA from November 4<sup>th</sup>, 2017, those reviews can be burdensome for LDCs and SIDS. This was also the reason why the group suggested<sup>13</sup> in that submission the possibility to conduct reviews on a group basis to enable adequate collection of data without imposing an undue burden on individual countries, suggestion that was accepted and incorporated in the MPGs in the decision 18/CMA.1.

Additionally, the training Programme for Technical Experts Participating in the Technical Expert review could be a source of difficulties. Indeed, the participation of experts from LDCs, if not helped by the Secretariat of the UNFCCC could be impossible. According to the Submission by Bhutan on behalf of the LDC Group on the work referred to in paragraph 12 of decision 18/CMA.1 MPGs for the

transparency framework for action and support referred to in Article 13 of the PA from May 6<sup>th</sup>, 2019, the participation of LDCs experts should also be facilitated. For instance “*by ensuring that, in the event of online trainings, the Secretariat provide other arrangements are available to trainees without easy or reliable access to the internet.*”

In summary, operationalising the ETF will probably present challenges for developing countries. Therefore, it is crucial to ensure that the capacity building support initiatives envisioned are implemented.

## **The capacity-building support initiatives**

As previously explained, many Parties are currently lack capacity to effectively track, report, and enhance their climate adaptation and mitigation actions. Like Chayes and Handler Chayes noted, developing countries’ are facing implementation and compliance issues with requirements under the UNFCCC generally attributable to “*a severe dearth of the requisite scientific, technical, bureaucratic, and financial wherewithal to build effective domestic enforcement systems*”<sup>14</sup>.

Consequently, in order to help the developing countries, the PA included special provisions concerning support and capacity building as follows.

<sup>13</sup> “In-country reviews should be optional for LDCs and SIDS (Decision 1/CP.21 paragraph 89). Where in-country reviews are burdensome, conducting reviews on a group basis, for example with a focus on LDCs, or Pacific Islands as a group, may enable adequate collection of data without imposing an undue burden on individual countries.” Submission by Ethiopia on behalf of the

LDC Group on agenda item 5: modalities, procedures and guidelines for the transparency framework for action and support referred to in Article 13 of the PA from 04/11/2017, p.3.

<sup>14</sup> Chayes, A. & Handler Chayes, A. (1998) *The New Sovereignty: Compliance with International Regulatory Agreements*, Harvard University Press, p14.

### Extracts From Paris Agreement

#### ARTICLE 3

The efforts of all Parties will represent a progression over time, while recognizing the need to support developing country Parties for the effective implementation of this Agreement.

#### ARTICLE 13

14. Support shall be provided to developing countries for the implementation of this Article.

15. Support shall also be provided for the building of transparency-related capacity of developing country Parties on a continuous basis.

Hence, the Article 13 therefore recognises the need for capacity building initiatives to support countries in their implementation of the ETF and to address climate change. Capacity building is crucial to ensure all countries are able to engage fully and effectively with the new requirements.

The GEF supported by some Non-Annex I Parties therefore requested in the Paris Agreement decision to support the establishment of the CBIT. Hence, in the COP decision adopting the Paris Agreement, the following provisions are made:

### Extracts From Decision 1/Cp.21 (Fccc/Cp/2015/10/Add.1)

#### Transparency of action and support

“84. Decides to establish a Capacity-building Initiative for Transparency in order to build institutional and technical capacity, both pre- and post-2020; this initiative will support developing country Parties, upon request, in meeting enhanced transparency requirements as defined in Article 13 of the Agreement in a timely manner;

85. Also decides that the Capacity-building Initiative for Transparency will aim:

(a) To strengthen national institutions for transparency-related activities in line with national priorities;

(b) To provide relevant tools, training and assistance for meeting the provisions stipulated in Article 13 of the Agreement;

(c) To assist in the improvement of transparency over time;

86. Urges and requests the Global Environment Facility to make arrangements to support the establishment and operation of the Capacity-building Initiative for Transparency as a priority reporting-related need, including through voluntary contributions to support developing country Parties in the sixth replenishment of the Global Environment Facility and future replenishment cycles, to complement existing support under the Global Environment Facility;”

With this decision, the CBIT is launched. The CBIT is a trust fund aiming at supporting developing country Parties upon request and to build institutional and technical capacity both pre and post 2020. The World Bank has been invited to act as Trustee and as of September 30, 2018, the trustee had received a total amount of \$61.6 million from fourteen donors: Australia, Belgium, Canada, Germany, Ireland, Italy, Japan, Netherlands, New Zealand, Norway, Sweden, Switzerland, the United Kingdom, and the United States. According to Naoko Ishii, GEF CEO and Chairperson: “*The CBIT will allow us to see early action on the ground, and help countries scale up their efforts to deliver their national climate plans, or NDCs.*”

The CBIT is already helping developing countries meeting the requirements of the ETF as the map below from the CBIT platform shows by highlighting the projects and concepts already approved around the world.

To illustrate the functioning of this CBIT, we can have a closer look at Kenya. The country presented with a project entitled “*Strengthening national capacity in Kenya to meet the transparency requirements of the Paris Agreement and*



supporting the coordination of transparency-related activities” which is under implementation since January 15<sup>th</sup>, 2018 and will continue until October 15<sup>th</sup>, 2019<sup>15</sup>. Implemented by Conservation International and executed by the Ministry of Environment and Forestry of Kenya, this project aims to build Kenya’s institutional and technical capacities to meet the requirements of the transparency framework under the PA.

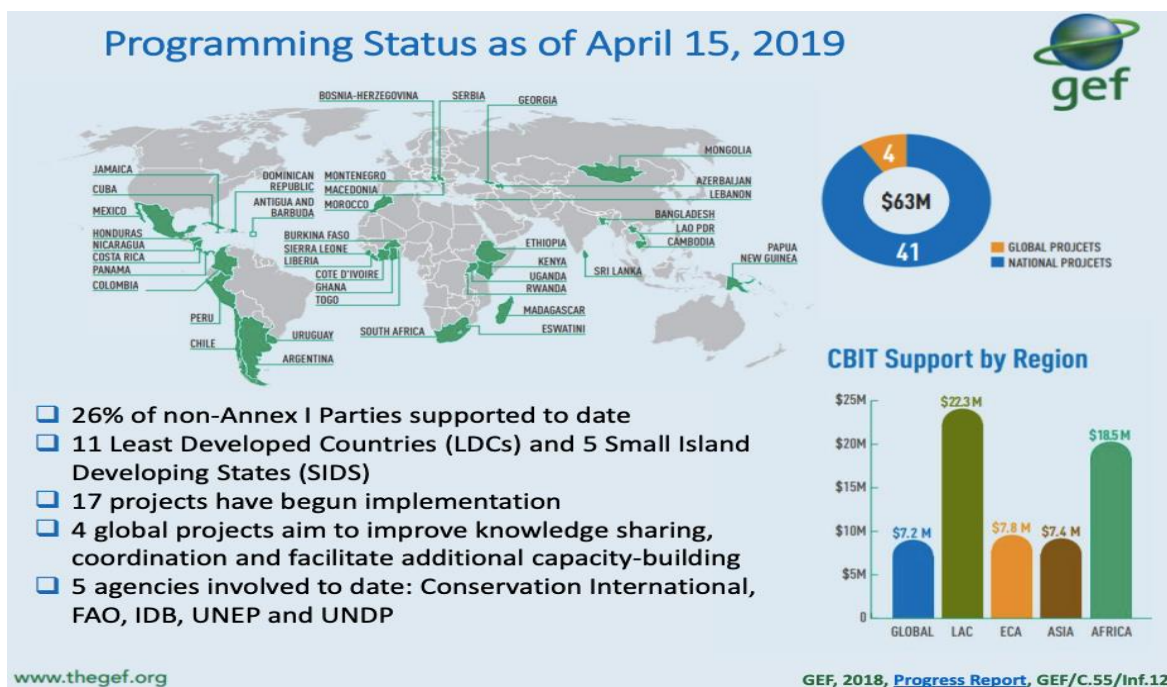
The expected project outcomes are :

- Institutional arrangements for data collection and sharing, quality control and assurance, analysis, and archiving strengthened in all emission sectors;
- Capacities of government institutions and staff to collect, document, and archive key data in all sectors on a regular basis for the GHG inventory process built;
- Functional GHG inventory and MRV systems established at Climate Change

Department, with climate data and analysis integrated into policy making, NDC tracking, and international reporting;

- Institutions and arrangements for data collection and sharing, quality control and assurance, analysis, and archiving strengthened for the land-based sector;
- A fully functional coordination platform for all transparency-related activities and other reporting.

Kenya is not the only country assisted at the moment, efforts to enhance transparency and other forms of international support for developing countries, including technology transfer and capacity-building support, are also ongoing. According to the GEF, 29% of Non-annex I Parties were supported by April 15<sup>th</sup> 2019 and four global projects and 41 national projects launched as visible on these map and graphs below.



<sup>15</sup> <https://www.cbitplatform.org/projects/strengthening-national-capacity-kenya-meet-transparency-requirements-paris-agreement-and>

As explained in the Progress Report of the GEF on the CBIT published in November 2018, the number of projects approved has increased steadily since the CBIT Trust Fund was established. Eleven projects were approved by the GEF Secretariat in fiscal year 2017 (from October 2016 to June 2017), while in fiscal year 2018 a total of 30 projects were approved<sup>16</sup>. Additionally, 30 interested developing countries are currently in the process of developing their CBIT initiatives. Plus, in order to facilitate knowledge exchange from CBIT projects, maximize learning opportunities, and enhance coordination amongst transparency practitioners, a special platform entitled the Global Coordination Platform of the CBIT was launched in April 2017. The overall goal of the Platform is to help building mutual trust and confidence.

Ultimately, the GEF engages and coordinates with other existing and emerging GHG transparency initiatives to help implement the CBIT, including the Initiative for Climate Action Transparency (ICAT); the Coalition on Paris Agreement Capacity Building; the Partnership on Transparency in the Paris Agreement (PATPA); the NDC Partnership; the Partnership to Strengthen Transparency for Co-Innovation (PaSTI), and other entities engaged in enhancing transparency.

The ICAT is another initiative aiming at strengthening capacities in developing countries

and to support greater transparency, effectiveness, ambition and trust in climate policies worldwide. This initiative is a multi-donor fund managed by the United Nations Office for Project Services (UNOPS), governed by a Donor Oversight Committee and supported by an Advisory Committee. With this initiative, leading experts in fields related to MRV with balanced representation of geographic regions, subject areas, organizations and genders are involved and are assessing the impacts of climate policies and actions in developing countries in order to improve the transparency.

Four principal organizations are working for the implementation of the initiative, the elaboration of useful tools for developing countries, peer-to-peer learning on transparency mechanisms and capacity building for policymakers and practitioners related to preparing required UNFCCC documents. Those organisations are the Italian National Institute for Environmental Protection and Research, the UN Environment Programme and the Technical University of Denmark (DTU) (UNEP-DTU) Partnership, Verra and the World Resources Institute.

Currently, more than thirty countries have been invited to participate in ICAT according to this map.

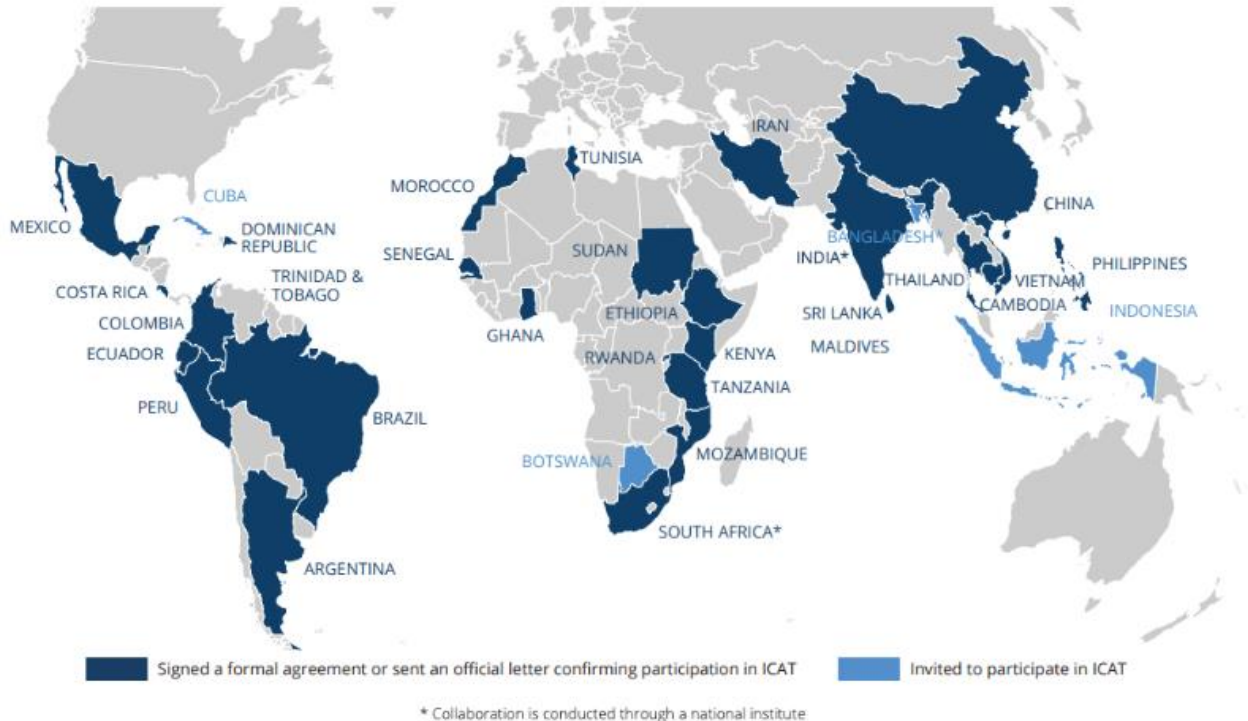
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<sup>16</sup> Global Environment Facility (2018). *Progress report on the Capacity-Building Initiative For Transparency*, prepared for the

55<sup>th</sup> GEF Council Meeting held on December 18 – 20, 2018 in Washington, D.C. GEF/C.55/Inf.12, November 30, 2018.

## PILOT COUNTRIES

More than thirty countries have been invited to participate in ICAT. Countries are selected based on existing MRV capacity and the ambition of their climate and sustainable development goals.



Source: Initiative for Climate Action Transparency

## Conclusion and Recommendations

As explained, the ETF agreed during the COP21 in Paris and forming part of the Paris Agreement, will replace and complement the MRV system. This new framework is challenging for the G77 countries as they mostly have other priorities and issues than resolving their technical, human, institutional, technological challenges of reporting on their efforts and climate action. Capacity building is crucial to help them abiding by the requirements and some initiatives are already implemented. Still, some improvements by the developing countries representatives and politicians as well as the international community are required. In that sense, this paper makes the following recommendations:

- Identifying and taking stock of the gaps and existing challenges for each developing country to comply with the ETF should become automatic to be able to better assist them.
- The governance systems cooperation should be reinforced to help countries meeting the specific information requirements and better collect their data.
- Developed countries and international/regional organisations should be encouraged to continue providing capacity building support and replenishing the funds and initiatives for climate transparency of the developing countries.
- International organisations and non-governmental organisations should multiply workshops, regular in-country training and

awareness programmes related to the application of the guidelines of the new transparency mechanisms.

- Tools and materials have to be adapted and developed to assist national experts and reviewers. A common comment is that the current review/technical analysis processes are not effectively using IT tools, hence new tools are needed to reduce the burden of the process on review teams.
- Experience sharing program should be proposed to enable experts to learn on transparency mechanisms and performances from their peers in the same field from other countries.
- Developing countries should foster new institutional arrangements to target an enhanced coordination between the different public bodies with assistance from the environment and climate specialists and national organisations, in order to produce better reports and strengthen the transparency of action and support.
- More qualified review experts are needed to support review under the PA. The presence of qualified experts who are willing and able to participate in GHG emissions and climate change mitigation actions' reviews is crucial.

## Annex 1 - Capacity-building needs of developing countries as expressed in their submissions to the UNFCCC.

Below is a table identifying the capacity-building needs of developing countries as expressed in their submissions to the UNFCCC. The aim of this table is to give an understanding of the deficiencies and issues developing countries are facing in reporting on their requirements or putting forward climate change mitigation actions.

Country	Report(s) considered	Information given on the challenges and difficulties
Armenia	BUR1 (2016)	The country needs further support to fulfil the obligations arising from the Conference of Parties decisions related to the submission of national communications and biennial update reports. Support is required to continue to <b>develop and consolidate existing technical and institutional capacities</b> and to continue the efforts of <b>integrating climate change into national policies, plans and programmes</b> . The available national capacities are not sufficient for making analytical work and assessments in compliance with IPCC.
Chile	BUR1 (2014) BUR3 (2018)	As a developing country, Chile faces diverse challenges. Firstly, the <b>public sector is not able to receive direct international funding</b> as part of its current annual budget because the Budget Law does not provide for such a mechanism. Secondly, some public services face challenges in allocating funding to climate change-related matters within their current annual budgets since climate change has not been explicitly identified as an area in their Organic Laws. Additionally, the country <b>lacks a permanent and reporting systems</b> for the National Communications, Biennial Update Reports and intended nationally determined contributions. Chile is <b>seeking international support</b> in the form of financial resources, capacity building, technical assistance and technology transfer, in order to implement its ambitious portfolio of projects and to fulfil its commitments under the UNFCCC. In recent years the country used its own resources to finance climate change actions locally and worked bilaterally and multilaterally with donor countries to promote South-South cooperation initiatives, while supporting other countries in the region by providing technical assistance and capacity building.
China	BUR1 (2017)	In China, a list of capacity building needs has been established by sectors : GHG Inventory Preparation, GHG Statistical Accounting System, Adaptation to Climate Change, Local Government Leadership on Climate Change Issues, Carbon Emission Trading, System and Education, Training and Talent Cultivation. The main needs expressed are the necessity to <b>educate and train</b> government officials; to <b>enhance international cooperation and exchanging experiences</b> on integrated climate change assessment and risk management and to establish; to improve the statistical and accounting systems for GHG emissions to improve authoritativeness and transparency of its national GHG inventory. To make it short, it is crucial to <b>strengthen management</b> and leadership, <b>improve institutional arrangements, scale up financial resources</b> and <b>reinforce capacity building</b> .

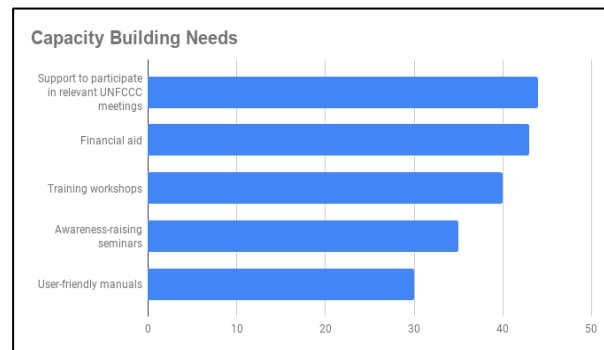
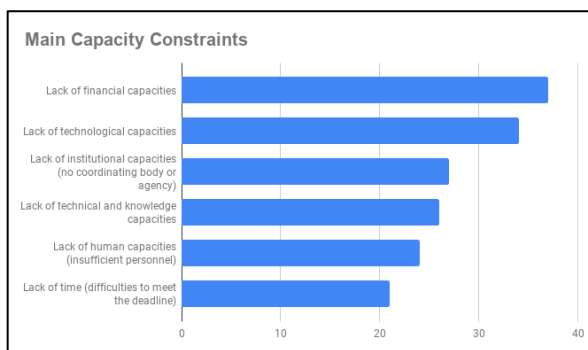
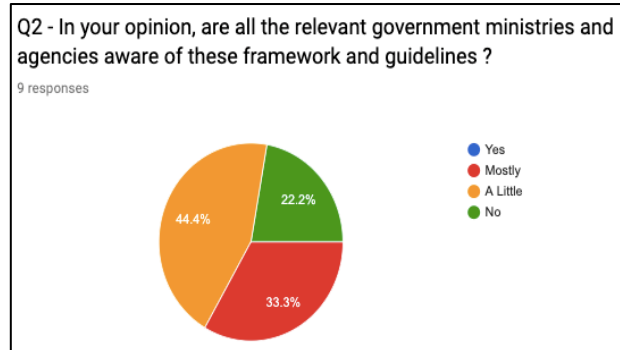
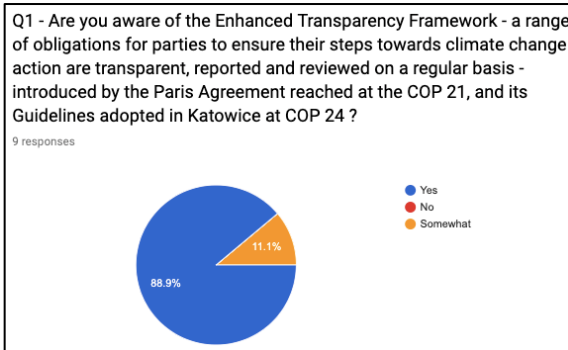


<b>Côte d'Ivoire</b>	BUR1 (2018)	In Côte d'Ivoire, several constraints and gaps were identified : <b>technical constraints</b> (difficulty in data collection, unreliable data); <b>financial gaps</b> (insufficient resources, high cost of management impacts and adaptability, as well as insufficient use of bilateral and multilateral funding opportunities); <b>institutional gaps</b> (difficulty of access to regulatory texts), cultural limitations, <b>methodological shortcomings for the reportings</b> .
<b>Ecuador</b>	BUR1 (2016)	Ecuador needs to develop a strategy for <b>raising financial resources</b> ; create a <b>platform to manage climate finance</b> ; Design a financial architecture to leverage national and international resources to support mitigation initiatives in Ecuador (incentives, loans, payment based on results, among others); create information systems and/or strengthen existing technological platforms to manage knowledge on climate change (initiatives implemented, research, videos, studies, scientific articles, and information in general) and promote the exchange of experiences among countries of the region (South-South Cooperation), which tend to the identification of common challenges or opportunities, the optimization of resources, the exchange of lessons learned, or the creation of synergies.
<b>Ghana</b>	BUR1 (2015)	The country was unable to submit its first BUR on time “due to <b>delays in securing the requisite funds</b> to support the preparation ahead of time”.
<b>India</b>	BUR1 (2016) BUR2 (2018)	India faces challenges in preparing GHG inventories and database on mitigation actions. Coordinating efforts and timely delivering the documents are also difficult things to do, due to the <b>limited availability of time and funds</b> . As well, in some sectors, there is a <b>lack of data</b> with desired level of precision and accuracy. To implement capacity building programmes both nationally and across the states to address climate change challenges, substantial resources are required. “to meet our Paris commitments and fully implement our NDCs in a timely manner, India requires enhanced new and additional financial, technological and capacity building support. New and additional financial and technological support to the developing countries is committed by the Paris Agreement which now needs to be operationalized.” (BUR 2, p1.) “The finance, technology and capacity-building constraints and gaps, as detailed in India’s SNC (2012) and BUR-1 (2016) still exist due to limited support received.” (BUR2, p15).
<b>Indonesia</b>	BUR1(2016)	To implement the mitigation actions, sectoral ministries, privates and communities requires capacity building. In Indonesia, capacity is needed not only to strengthen the skills for <b>implementation of the technologies</b> , but also to <b>monitor GHG emissions</b> , and to <b>measure the achievement in emission reduction</b> .
<b>Jamaica</b>	BUR1(2016)	In Jamaica, to prepare the reports, several constraints and gaps related to <b>financial, technical and capacity needs</b> were encountered. The main constraint was that of having the <b>right institutional arrangements</b> in place and in this direction, a Climate Change Division and a Network of Climate Change Focal Points in each of the key ministries, departments and agencies were established. The Climate Change Division however needs a <b>full complement of staff</b> so that it can fully achieve its mandate of the body that coordinate and facilitate all activities of Jamaica’s response to climate change.

<b>Lebanon</b>	BUR1 (2015)	In Lebanon, numerous constraints and gaps still exist to report to the required standards and frequency to the UNFCCC. The support to tackle remaining technical and institutional constraints is very limited. The UNDP Low Emission Capacity Building project has been supporting the Ministry of Environment to develop a national GHG inventory system and an MRV system, however, progress is slow and institutional arrangements take time given the unstable political situation of the country. Lebanon still <b>does not have a clearly defined system for data collection and processing, quality assurance and control, or a reporting and monitoring system</b> . Many initiatives have been established. There is an urgent need to increase the funds available for countries to prepare their BURs and encourage the initiation of new activities that aim at improving the quality of the report.
<b>Namibia</b>	BUR1(2014) BUR3 (2019)	Namibia met the December 2014 deadline for submission of its first BUR, but the time available for the preparation after accessing <b>funds</b> was only one year so it made it difficult to develop and implement successfully the institutional arrangements. Other constraints included <b>insufficient personnel</b> within the coordinating body to sustainably oversee all the processes under it, lack of staff in the other institutions to devote the required time for the technical tasks and to meet deadlines for activities under their responsibility, staff movement resulting in <b>loss of capacity</b> especially when succession cannot be planned and implemented due to staff shortage. Numerous constraints and gaps exist for Namibia to report to the required standards and frequency to the UNFCCC. For Namibia to meet its reporting obligations and implement the Convention requires substantial funding. The appropriate funding amounts and timing are important features to take into consideration when these actions, especially the implementation aspect, are aligned with the country's development strategy and agenda. Namibia as a developing country with its challenges to feed its population and provide the minimum requirements to it is not able to allocate the funding requirements to meet the climate change agenda.
<b>Nigeria</b>	BUR1 (2018)	The country faced several constraints and gaps during the preparation of its BUR, especially during <b>data collection</b> and estimation of GHG. These gaps and constraints consisted repeatedly of lack of reliable good quality activity data, inexistence of country specific emission factors, <b>inadequate institutional arrangements</b> and the lack of a fully operational inventory management system. There is need for substantial capacity building of the national experts.
<b>Togo</b>	BUR1 (2017)	Numerous constraints and deficiencies exist when it comes to reporting information at the frequency required by the Conferences of the Parties' decisions. The constraints exist at the <b>institutional, organisational and individual levels</b> . To mitigate deficiencies, review the GHG emission and calculate their reductions, human, institutional and methodological capacity building supports are indispensable.
<b>Yemen</b>	BUR1 (2018)	The <b>national research capacity</b> is inadequate to produce informative research on green energy. In Yemen there is an <b>absence of specialized designated research centre</b> . As well, a low financial capacity to transfer and promote know-how, practices and green technologies was highlighted.

## Annex 2 – Results of the survey carried out with CUTS’ partners

In order to get a better understanding of the perception and challenges related to the ETF, a survey was conducted amongst CUTS’ partners on the ground. They were asked a few questions about their awareness of the ETF and their capacity constraints and needs. Here below are the responses.



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<https://unfccc.int/BURs>
  - o Nationally Determined Contributions (NDCs) :  
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  - o The Katowice climate package: Making The Paris Agreement Work For All :  
<https://unfccc.int/process-and-meetings/the-paris-agreement/katowice-climate-package>



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