

11 August 1995

ENGLISH ONLY

UNITED NATIONS FRAMEWORK CONVENTION ON CLIMATE CHANGE

Subsidiary Body for Scientific and Technological Advice  
Subsidiary Body for Implementation  
First sessions  
Geneva, 28 August - 1 September 1995

FIRST COMMUNICATIONS FROM PARTIES NOT INCLUDED IN  
ANNEX I TO THE CONVENTION

Comments from Parties

Note by the secretariat

The Conference of the Parties, at its first session, by its decision 8/CP.1, requested the interim secretariat to provide a compilation of any views on guidelines to be developed for the preparation of national communications received from Parties not included in Annex I to the Convention, as well as on the process to consider these communications in accordance with Article 10 of the Convention (FCCC/CP/1995/7/Add.1). Accordingly, and further to a meeting of the Bureau of the Conference of the Parties on 19 June 1995, the Executive Secretary, in his communication of 23 June 1995 to the permanent missions, advised Parties that the deadline for submission was set for 8 September 1995, although any contributions received by the secretariat by 4 August 1995 would be made available for information at the sessions of the relevant subsidiary bodies that month.

The secretariat has received a submission from the United Kingdom. This submission is attached and, in accordance with the procedure for miscellaneous documents, is reproduced in the language in which it was received and without formal editing. Any further submissions on this subject will be issued in an addendum to this note.

FCCC/SB/1995/Misc.1

GE.95- 63431

## UNITED KINGDOM

The approach paper by the Group of 77 and China (A/AC.237/Misc.40) has provided a useful basis for discussion of this issue. While there are points of detail in it on which we differ, we fully agree that there needs to be an approach to this question that recognises the wide diversity of capacities amongst developing countries relating to their ability to implement Article 12.1. This means that this issue should be approached with flexibility. However, there need to be clear guidelines to enable comparability of reports and consistency with the provisions of the Convention.

National reporting is an opportunity for developing countries to set out their proposals for meeting their obligations under the Convention and to indicate their capacities to do so, including any requirements for support. National reports and the national programmes required by the Convention will provide the basis for discussion and consideration of each country's needs for external support, from the donor community in general and from the financial mechanism in particular.

Article 12.5 requires the first national communications by developing countries to be made within three years of the coming into force of the Convention or of the availability of financial resources in accordance with Article 4.3. Both these conditions were met in March 1994, when the Convention entered into force and when the countries represented in the GEF concluded negotiations on its replenishment. The GEF has since adopted as a first priority the provision of funds in accordance with Article 4.3 of the Convention, including the full agreed costs to developing country Parties of complying with their obligations under Article 12.1. These arrangements are described in the joint paper by the interim Secretariat and the GEF Secretariat on Provision of Assistance for Enabling Activities and National Communications (A/AC.237/90/Add.3). This paper refers to the decision by the GEF Council to make available USD 80 millions - USD 100 millions for enabling activities and for national communications in 1995. This is a helpful response to the concerns expressed in the approach paper by the Group of 77 and China. It is encouraging that Argentina, Botswana, China, Jordan, the Maldives and Uruguay have all taken forward proposals for funding for such activities from the GEF.

We recognise that the Convention places no time limit on the first national communications by least developed countries. However, we hope that they too will take full advantage of the funding now available from the GEF to enable them to prepare their national communications. We also fully support the provision by the GEF of full agreed costs for capacity building related to Article 12.1. The two stages envisaged in section IV of the approach paper can be merged into one. The Convention provides that the full costs of national communications under Article 12.1 should be agreed with the operating entity. There is nothing to prevent any developing or least developed country from entering into such discussions with the GEF.

Concerning the format of national communications, while we generally support the proposals in section IV of the approach paper, it is essential that the requirements of Article 4 are covered in full, including the obligation to indicate measures to mitigate climate change set out in Article 4.1 (b). It is also essential that the guidelines should be clear and detailed enough to allow comparability of national reports. The guidelines adopted for the first communications by Annex 1 countries, and the lessons learnt in their application, should be taken fully into account. Consistent approaches will better enable the SBI to assess the overall aggregated effect of the steps taken by parties (Article 10.4).

In addition we have a number of particular comments on points made in the approach paper:

- i) Concerning section III (a) (iv), we do not agree that financial resources to implement policy measures are required before national communications can be prepared. Indeed, these communications are the means of indicating what those additional financial resources are estimated to be. Once proposed measures are set out in national communications, discussion can then take place with the GEF of the agreed full incremental costs of implementing policy measures.
- ii) Concerning the penultimate paragraph of the approach paper, there is a misconception here concerning Article 12.4. The Convention provides, in Article 4.3, for full agreed costs to be met only in relation to Article 12.1. Any provision of funds related to proposals under Article 12.4 would be incremental costs agreed with the GEF. However, there is no barrier to the preparation of proposals under Article 12.4. The GEF Council has agreed the Project Development Facility which enables Parties to obtain funding to develop project proposals.

In summary, the United Kingdom believes that an effective and transparent reporting system is at the heart of a convention which is based on global action through national programmes. We are sympathetic to the various concerns expressed in the approach paper by the Group of 77 and China. However, we feel that many of these concerns have been met by the rapid progress made by the GEF Council in making available funding related to Article 12.1. This leaves only the question of the format for the first national communications by non-Annex I Parties to be agreed in time for the preparation of those communications due by March 1997. We hope that the subsidiary body for implementation will quickly produce guidelines that fully reflect the requirements of the Convention while recognising the necessary flexibility.