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UNITED NATIONS FRAMEWORK CONVENTION ON CLIMATE CHANGE

Subsidiary Body for Scientific and Technological Advice

Subsidiary Body for Implementation

Second sessions

Geneva, 26 February - 1 March 1996

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

Comments from Parties

Note by the secretariat

The Subsidiary Body for Scientific and Technological Advice (SBSTA), at its first session, requested the secretariat to prepare for consideration by the SBSTA at its second session, recommendations on guidelines for the preparation of national communications from Parties not included in Annex I to the Convention, taking into account the views expressed by the Parties and the papers submitted by the Parties, including document A/AC.237/MISC.40 (FCCC/SBSTA/1995/3, para. 35 (a)). The issue of communications from non-Annex I Parties is also included in the work programme of the Subsidiary Body for Implementation (SBI) (FCCC/SBI/1995/2 and FCCC/SBI/1995/5).

In addition to a submission included in document FCCC/SB/1995/MISC.1, the secretariat has received a communication from Brazil. 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, for consideration at meetings of the SBSTA and/or the SBI in 1996, will be issued as an addendum to this note.

FCCC/SB/1996/MISC.1

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BRAZIL

The Brazilian Government has started the process of elaboration of the Brazilian National Communication, due to be presented in accordance with Articles 4.1 (a) and 12 of the Framework Convention on Climate Change (FCCC). The Conference of the Parties and its Subsidiary Bodies for Implementation (SBI) and for Scientific and Technological Advice (SBSTA) will have to address the issue of communications from Parties not included in Annex I to the Convention, in order to provide guidance to non-Annex I Parties for the accomplishment of their obligation under FCCC. This paper intends to present the Brazilian views and concerns on key issues related to the national communications from non-Annex I Parties, as an effort to enhance the understanding and contribute to the transparency and credibility of the process.

The key issues related to national communications from non-Annex I Parties that need to be well-clarified are: (1) format of the communication; (2) methodology; (3) financing; (4) timing; and (5) technical assistance and capacity building. Brazil endorses the comments on these issues presented by G-77 and China as a group's position and circulated during INC XI as document A/AC.237/Misc.40. The comments presented therein, while convergent to the G-77 and China paper, are complementary to them in the issues mentioned above.

(1) Format of communication

Article 12.1 of the Convention provides that national communications from all Parties shall include the following elements of information:

- a) A national inventory of anthropogenic emissions by sources and removals by sinks of all greenhouse gases not controlled by the Montreal Protocol, to the extent its capacities permit, using comparable methodologies to be promoted and agreed upon by the Conference of the Parties;
- b) A general description of steps taken or envisaged by the Party to implement the Convention; and
- c) Any other information that the Party considers relevant to the achievement of the objective of the Convention and suitable for inclusion in its communication, including, if feasible, material relevant for calculation of global emission trends.

The above provisions are in fact the only obligatory data to take part on the national communications from developing country Parties. Developing country Parties should not be demanded to include in their national communications other kind of data, such as national plans for mitigating GHG emissions or adapting to climate change. The Brazilian government has taken a series of initiatives in many sectors that are relevant to the objectives of the Convention, because of their indirect implications on the mitigation of GHG emissions. These measures, however, are not taken in order to fulfil any commitment of reducing emission, but rather to build and enhance national capabilities in fields like energy efficiency, which are consistent to the national priorities of sustainable development. Because of their indirect effects on the level of emissions, such measures may be included in the Brazilian national communication, not in a way as to consider them as a national strategy to mitigate climate change, but rather as efforts being taken by the Brazilian government to implement a national policy on sustainable development.

It is always important to stress that developing countries do not have mitigation targets under the Convention. The most important task for developing country Parties in preparing their national communications is to present the most accurate data on its effective emissions of GHG, which can only be accomplished by the careful consideration and use of the available methodology and data and, where necessary, the further development and research on such data and methodology, in order to obtain plausible and credible results to be presented to the international community.

The specificities of Brazil will require a tremendous effort in data researching, including the intensive use of satellite images to collect the necessary data to estimate the biomass of the forests and evaluate emissions from land use change. Taking as an example the forestry sector, Brazil has approximately 3.5 million Km² covered by the Amazon Forest (which corresponds to approximately 40% of the country's territory), over 2.5 million Km² of savanna, a remaining part of the original Atlantic Forest and a large swamp region called Pantanal. Besides the forestry sector, the Brazilian national inventory of GHG emissions will consider data from agriculture, livestock, energy and waste management sectors. The costs to present a comprehensive and credible inventory of GHG emissions are thus relatively high.

The description of the work that has to be done in the case of Brazil well exemplifies the need for a flexible approach in defining the format of national communications and the methodology for the elaboration of the national inventory of GHG emissions.

In defining the format that will guide the preparation of national communications, it is of extreme importance to consider the diversity of national specificities and realities among countries of the developing world. This recommends that a necessary degree of flexibility be contemplated in both the format and on the type of work that need to be carried out in each developing country, with direct consequences on financing as well.

(2) Methodology

In preparing its inventory of GHG emissions, Brazil will follow, to the extent possible, the existing IPCC guidelines. Brazil intends to address in its study emissions of carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), carbon monoxide (CO), nitrogen oxides (Nox), the PFCs and HFCs. Brazil will address emissions from energy, industry, agriculture and livestock, waste management, land use and forestry sectors.

The IPCC methodology for the inventory of emissions, especially regarding land use changes and the forestry sector, is still relatively vague. Whereas this methodology contemplates the use of default values and could, in principle, be invoked to justify a faster "behind the desk" approach in the elaboration of the national inventory, this is clearly not justifiable on technical, scientific and political basis in the case of Brazil.

The Brazilian project of national inventory will use and may contribute, to a certain extent, to the further development of the IPCC guidelines, methodologies and default factors for emissions coefficients by applying them in the whole range of areas, different type of forests and vegetation, agricultural practices and waste management. A thorough inventory in a country like Brazil may contribute to further development and evaluation of the IPCC methodology and default factors, which in many areas are still fairly inaccurate, especially with respect to land use and emissions of GHG other than CO₂. As a developing country covering a wide geographical area, having a broad field of economic activities and possessing technical capacity and institutional framework to undertake the research, Brazil is in a position to contribute, through the preparation of its national communication, to the overall effort of IPCC to produce more reliable estimates of sources and sinks of GHG and to the understanding of climate change.

(3) Financing

Article 4.3 of the Convention provides that Annex-II Parties shall provide new and additional financial resources to meet the agreed full costs incurred by developing country Parties in complying with their obligation of preparing a national communication in accordance with Article 12.

Due to the size of the country and insufficient or inaccurate data in many areas, the costs to produce a comparatively credible inventory of GHG emissions in Brazil are relatively high. The need for flexibility addressed on item (a) above has direct implications on the financial support for developing countries.

Brazil has about one-third of the world's tropical rainforests. The net emissions from tropical deforestation are a major source of uncertainty in the knowledge of carbon cycle. An accurate estimate of the deforestation rate will thus be an important accomplishment for both Brazil and the international community, with implications that go beyond the realm of climate change and address some major concerns in the fields of biodiversity and sustainable development, for instance.

Brazil thus believes that the "agreed full costs" to the enabling activities of developing countries to the preparation of their national communications, as mandated by the Convention, has to be applied in a manner that the national economic, geographical and environmental specificities are adequately considered.

(4) Timing

Article 12.5 of the Convention provides that each Party not included in Annex I shall make its initial communication within six months of the entry into force of the Convention for that Party, or of the availability of financial resources provided through the financial mechanisms of the Convention to meet the "agreed full costs" incurred by the developing country Party.

Brazil is at present preparing to submit to the Global Environmental Facility, for approval, the project for the elaboration of the national communication. Brazil is also participating at the III phase of the U.S. Government initiative of the "Country Studies Program".

Brazil is conscious of the need for careful consideration of the terms of the project, in order to define the incurred "agreed full costs" and to meet the formal and technical requirements within the operational guidelines and priorities of the GEF, as well as to define the exact participation of the "Country Studies Program" in the whole work. In meeting these needs, the actual availability of the required funds to start the substantive part of the process has been delayed. It is thus important to stress the provision of Article 12.5 mentioned above.

As this might be the case of many other developing countries, it is important to stress, in Article 12.5, the provision stated above by which the timeframe for the preparation of national communication does not start immediately after the entry into force of the Convention to each Party, but rather begins with the actual availability of the demanded funds from either bilateral initiatives or from the GEF.

(5) Technical assistance and capacity building

The need for technical assistance during the process of elaborating the national communication is an important issue that deserves adequate consideration. The preparation of national communication shall be seen as an essential exercise to enhance general awareness and knowledge of climate change related issues in developing countries, strengthen institutions and build capacity, so that the views and ideas related to climate change can be considered in the different sectors of economy.

The criteria of flexibility applies as well in this case. As far as Brazil is concerned, for example, the problem is not exactly the lack of national capacity to undertake the work, but rather the impossibility, in most areas, to divert the work of the few experts from projects of higher priority to the social and economic development of the country.