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**NATIONAL COMMUNICATIONS FROM PARTIES NOT INCLUDED
IN ANNEX I TO THE CONVENTION**

**REPORT OF THE CONSULTATIVE GROUP OF EXPERTS
TO THE SUBSIDIARY BODIES**

Submissions from Parties

1. At its fourteenth session, the Subsidiary Body for Implementation took note of the information contained in the preliminary report of the Consultative Group of Experts (CGE). It invited Parties to submit their views to the secretariat by 15 September 2001 on the preliminary report and the current progress of the process aiming at the improvement of guidelines for subsequent national communications of Parties not included in Annex I, in accordance with decision 8/CP.5 (FCCC/SBI/2001/9, para. 22).
2. Eleven such submissions have been received.* In accordance with the procedure for miscellaneous documents, these submissions are attached and reproduced in the language in which they were received and without formal editing.

* In order to make these submissions available on electronic systems, including the World Wide Web, these submissions have been electronically imported. The secretariat has made every effort to ensure the correct reproduction of the texts as submitted.

FCCC/SBI/2001/MISC.2

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PAPER NO. 1: AUSTRALIA

INTRODUCTION

Australia welcomes the opportunity to submit views on the preliminary report of the Consultative Group of Experts (CGE), and on the progress of the process of which the Group is a part. Australia acknowledges the comprehensive scope of the report, and notes the substantial progress made by the CGE since its inception.

Australia considers the preparation and lodgement of national communications to be a key obligation of all Convention Parties, and has been a strong supporter of work to improve the process of preparation of the national communications of Parties not included in Annex I of the Convention. As such, Australia commends the CGE and Secretariat for the significant time and effort they have committed to moving forward this challenging agenda.

**PRELIMINARY REPORT OF THE CONSULTATIVE GROUP OF EXPERTS
ON NATIONAL COMMUNICATIONS FROM PARTIES NOT INCLUDED IN
ANNEX I TO THE CONVENTION (CGE)**

Australia considers that the preliminary report of the CGE, while comprehensive and wide-ranging, needs further work. Australia encourages the CGE to utilise the time remaining to it under its mandate to exercise some judicious editing to improve the readability of its final report, re-examine the conclusions and recommendations, and further revise the report, taking into account the following.

Outcomes of COP6bis

Australia notes that the preliminary report of the CGE was drafted before COP6 bis. Australia considers that the CGE must now revise its recommendations and conclusions, particularly those pertaining to financial resources and technical support, in light of the COP6 bis outcomes.

The COP6 bis package includes the establishment of new funds to assist developing countries address climate change. It places emphasis on the needs of least developed countries and on adaptation. It also elaborates a comprehensive set of technology transfer and capacity building activities for both developing countries and economies in transition. The draft guidance to the GEF notes the extension of GEF funding through expedited procedures to address capacity building needs in developing countries and the preparation of their 2nd National Communications. It also calls for financial support for:

- pilot or demonstration projects to show how adaptation planning and assessment can translate into projects;
- continuation of the country-team approach which enhances the collection, management, archiving, analysis, interpretation and dissemination of data;
- enhancing the capacity of information networks;
- improving data collection;
- strengthening climate change databases and centres of excellence;

- developing and implementing prioritised projects identified in National Communications; and
- more in-depth public awareness and education activities.

As such, there is considerable overlap between the current recommendations of the CGE and the COP6 bis package, which the CGE should draw together.

Financial and Technical Support Programs

The report would benefit from better focusing of the material in relation to Financial and Technical Support Programs (Part Two, Section VIII). The information presented is a good first step in assembling data and information relating to support programs. However, there is a need to organise this material to better be able to draw conclusions from it. The preliminary report of the CGE Task Group on Support Programs [UNFCCC/SBI/2001/3 Annex II] gave a much clearer summary of the main issues, but these findings are not well reflected in corresponding part of the CGE report.

It was evident, for example, from the Task Group report, that of the 100 Non-Annex I Parties who had already received assistance from the National Communications Support Program, only 50 had submitted national communications by March 2001, and only 30 more were expected to be ready imminently. The report could provide some recommendations as to how this assistance could be made more effective. This could be aided, perhaps, by developing a matrix that compared the amount and type of support provided with progress made by Parties in submitting a national communication. The two recommendations contained in Part Three, Section H of the CGE report appear to be designed to address this point, but are not closely related to the discussion in the body of the report.

Recommendations and Conclusions

Australia believes that the report provides a sound analysis of barriers and difficulties encountered by non-Annex I Parties in preparing their national communications, and considers this a valuable first step in addressing these issues. We believe that this information should be further distilled into a set of concrete and practical priorities for action.

We suggest that the recommendations be reviewed, edited and ranked according to priority. Priority should be determined through an examination for each recommendation of the effectiveness, cost, and ease of its implementation. It would also be helpful to distinguish between implementation actions on the basis of the required resource and time allocation.

Finally, we suggest highlighting linkages between recommendations from different sections of the report (such as those addressing collaboration and networking in paragraphs 151, 164, 175(c) and (g), 176, 177, 178 etc, or the collection of activity data in paragraphs 147-150, 154, 171 etc), to highlight areas where multiple objectives can be pursued.

Recommendations for Financial and Technical Support

As noted above, a number of recommendations in this section require revision in the light of decisions at COP6-*bis* on the establishment of new funds to assist developing countries address climate change. This particularly applies to recommendations in the report calling for additional funding.

In light of the number of recommendations seeking technical and financial support, it may be useful to identify which areas are most in need of support to enable a targeted response. A discussion of the effectiveness of previous and current funding programs techniques would also provide an insight into what approach to take.

The recommendation that key materials be translated into all languages of the UN (paragraphs 153 and 165) is a useful suggestion. Careful selection of materials to be translated will be needed to ensure optimal use of finite translation resources.

Recommendations for improvement of the IPCC methodologies and other models

Australia supports the recommendation for future editions of the IPCC Guidelines for National Greenhouse Gas Inventories to better reflect the specific conditions and circumstances of non-Annex I Parties. We would in fact extend it to cover all Parties, as many of the default values have been developed based on studies in the northern hemisphere and European and North American countries, in particular. The development of the IPCC Emission Factor Database should go some way toward improving this. Australia also notes the intention of the IPCC to elaborate Good Practice Guidance and Uncertainty Management to meet the inventory reporting requirements of the Parties under the UNFCCC in relation to Land Use Change and Forestry. It will be important for the recommendations of the CGE to be transmitted in this context as well.

We also support the provision of easily understood methods, tools and technical guidelines for non-Annex I countries to conduct assessments and analyses.

The report recommends that abatement analysis should be evaluated in terms of sustainable development criteria (paragraph 189). Australia considers that this can be achieved while maintaining abatement potential as the primary criterion in the design, evaluation and implementation of abatement activities.

Recommendations for improvement of the UNFCCC Guidelines

Australia supports the recommendations in this section, which aim to bring the non-Annex I reporting guidelines into closer alignment with those for Annex I countries without placing significant additional burden on non-Annex I countries. This should significantly increase the accuracy of national reporting and better facilitate compliance among all Parties with Article 12.5 of the Convention.

Australia notes that caution must be taken when recommending solutions which are dependent on new technologies which may not be universally available in non-Annex I countries.

CURRENT PROGRESS OF THE PROCESS AIMING AT THE IMPROVEMENT OF GUIDELINES FOR SUBSEQUENT NATIONAL COMMUNICATIONS OF PARTIES NOT INCLUDED IN ANNEX I TO THE CONVENTION

Australia's view is that the CGE has produced a substantial body of work and achieved significant progress against its terms of reference, in a comparatively short period of time. We commend these efforts, which will constitute a major contribution to the process of improving the preparation of national communications under the UNFCCC. Australia recognises the important role the CGE has played in providing a forum for non-Annex I countries to share their experiences in the preparation of their national communications, and to build on these collectively. The CGE and its task groups have also contributed another key element to the process, that of the systematic assessment of experiences, and subsequent identification of needs, gaps and opportunities.

The Fifth Conference of the Parties (COP5) decided to "begin a process of reviewing the guidelines for the preparation of national communications with the aim of improving them by its seventh session..." (paragraph 1(c) of 8/CP.5). To achieve this, it would be necessary to have ready for the fourteenth subsidiary body meetings in October 2001 specific text proposing guideline revisions.

The CGE report, however, assumes that the process of revising the guidelines will only begin at the time of the seventh session (Part One Section IV: Possible Actions by the Subsidiary Bodies). Australia considers that the CGE has already gathered enough information to be able to move directly to a revision of the guidelines, and should use the remaining time before COP7 to prepare draft guideline amendments for consideration by the subsidiary bodies and COP7, in order to keep the process commenced at COP5 on track.

There is a further assumption in this part of the CGE report (paragraph 21) that the CGE will continue to have a future role in the process of improving the preparation of national communications. Australia would prefer to see future action on this issue to be progressed actively as a mainstream agenda through the COP, subsidiary bodies and, as appropriate, the financial mechanism.

PAPER NO. 2: BELGIUM
(on behalf of the European Community and its member States)

Introduction

Belgium, on behalf of the European Community and its Member States, welcomes the opportunity to submit views on the preliminary report of the Consultative Group of Experts (CGE) on National Communications from Parties not included in Annex I to the Convention and on current progress of the process aimed at the improvement of guidelines for subsequent national communications, in accordance with decision 8/CP.5.

The EU is of the opinion that national communications are of outstanding importance since they are a key source of information for all Parties. The EU noticed with interest that 56 countries so far submitted their national communications. However, the EU expects that those Non-Annex I countries which received financial support will submit their national communications in due course. The EU wants to engage in an open dialogue with the aim to improve the process of preparing the national communications and the guidelines for national communications of non-Annex I Parties and reconsidering the terms of reference of the Consultative Group of Experts (CGE) on National Communications.

A. Views on the preliminary report of the CGE (document FCCC/SBI/2001/8)

1. General:

The EU welcomes the results so far of the work of the CGE: it has made a significant contribution to improving the process of preparation of national communications of non-Annex 1 Parties. It has done so mainly in two ways:

- It has facilitated the useful exchange of experiences among experts responsible for drafting national communications;
- It has produced specific and detailed recommendations on improving the UN FCCC guidelines and the associated IPCC methodologies

2. On the recommendations for financial and technical support

The EU welcomes the recommendations as an input to our further discussions at COP7. We note that needs will vary according to national circumstances, and that support will need to be tailored accordingly. We also note that some of the needs identified are also addressed in the draft decisions on capacity building, technology transfer and Articles 4.8 and 4.9. A better understanding of the actual barriers in individual countries seems of utmost importance.

3. On the recommendations on IPCC methodologies.

We support the recommendations on use of IPCC guidelines by non-Annex I Parties and note the valuable contribution made by developing country experts in producing the current guidelines. The IPCC should take the recommendations into account in developing and prioritizing its future work plan.

4. On the recommendations on UNFCCC guidelines for subsequent national communications of non-Annex 1 Parties

The EU welcomes the different recommendations. We welcome in particular the proposal to include a separate chapter on vulnerability and adaptation assessment in revised guidelines, including identification of potential adaptation measures, prioritization and costing of such measures and integration of such measures into sustainable development plans.

B. Views on the current progress of the process aiming at the improvement of guidelines for subsequent national communications of non-Annex 1 Parties, in accordance with decision 8/CP.5.

1. On revision of the UNFCCC guidelines for 2nd and subsequent national communications of non-Annex 1 Parties.

At COP5 it was decided to start a process with the aim of adopting improved guidelines at COP7. In total 145 non-Annex 1 Parties are expected to prepare NCs, some 125 of which received support as enabling activity. At present 56 countries have submitted their NCs and some 30 have reported that completion is imminent. Given also the amount of preparatory work done by the CGE, in the assessment of the EU there is now a sound basis to initiate the elaboration of revised guidelines at SBI-15.

2. On the terms of reference for the CGE.

The EU wants to engage in a discussion on how best to continue the important work of improving national communications from non-Annex I Parties. In decision 8/CP.5 the CGE was established to serve this objective.

With regard to the terms of reference and the mandate of CGE, the EU view is that CGE has successfully completed its work in providing a good set of recommendations which can be forwarded for consideration by the Subsidiary Bodies. The EU would, however, be open to ideas to adapt and/or extend the mandate of the CGE to include the provision of technical advice on the preparation of national adaptation programmes of action (see para 3 below).

3. On the link between work on NAPAs and work of the CGE.

At COP6 it has been decided to consider at COP7 the establishment of a least developed country group of experts, including its terms of reference, taking into account the reconsideration of the terms of reference for the CGE. The EU recognizes the interest of setting-up a self-standing LDC group of experts but notes that this is not the only option. An alternative to explore further might be to extend the mandate of the CGE, to also include the provision of technical advice for the preparation of NAPAs. The composition of the CGE may also need to be amended accordingly to enhance the representation of LDCs. The advantages and disadvantages of both options (stand-alone, merger) need to be explored further, taking account (a) of the overlap between national communications and NAPAs (indeed, NAPAs may constitute the first step in the preparation of initial national communications), (b) the cost-effectiveness than of the arrangements (c) that LDC experts can learn a lot from the process of preparing national communications, and vice-versa, and (d) that the treatment of NAPA's requires a membership with specialist expertise in adaptation.

PAPER NO. 3 CHINA

**CHINA'S SUBMISSION ON THE PREPARATION OF
NON-ANNEX I NATIONAL COMMUNICATIONS**

China offers her views, in accordance with the invitation of SBI (Document FCCC/SBI/2001/L.1, para.24), on the Preliminary Report of the CGE and comments on the current progress of the process aiming at improvement of guideline for subsequent national communications from Parties not included in Annex I as following:

1. It must be recognized that developing country parties are fulfilling their commitments under Article 4 of the Convention, some non-Annex I countries have provided more information than required by the Convention and the decisions of the COPs. The Guidelines for the Preparation of Initial National Communications by Parties Not Included in Annex I to the Convention (hereinafter refers to Guidelines), which is annexed to Decision 10/CP. 2, has played a very positive and effective role in helping the developing country parties prepare their national communications. Therefore, there is no need at this stage to substantially revise the current Guidelines.

2. The substantial revision of the Guidelines will need adequate information. Up to now, 50 non-Annex I Parties have submitted their initial national communications, accounting for only one third of that of the total non-Annex I Parties. The majority is still in the process of drafting their initial national communications. The experience and information from non-Annex I Parties are still quite limited. Therefore, it is premature to substantially revise the Guidelines.

3. It should also be noted that the developing country parties have encountered various difficulties such as those identified in the Preliminary Report of the CGE and the reports from CGE regional meetings, including lack of activity data and appropriate emission factors, inadequate financial resources, in preparing their initial national communications while using the above mentioned Guidelines. One of the reasons is that some requirements of the Guidelines go beyond the capacity of non-Annex I Parties. The developing country parties have made every effort to overcome these difficulties. Some kind of technical modification may help parties to deal with these difficulties.

4. The objective of modifying the current Guidelines is to give non-Annex I Parties a clearer guideline, so that parties will be able to prepare high quality national communications. It is very important that such modification shall fully take into account non-Annex I Parties' circumstances and capability, and not create any new difficulties for them.

5. The guideline for preparing national communications is important for improving the quality of national communication. However, other important elements must not be overlooked. The key issue of improving national communications from non-Annex I Parties is to strengthen their capability. In this regard, the adequate and timely provision of financial resources is of equal, or perhaps more importance for non-Annex I Parties.

6. Taking into account the need for further information, the CGE shall continue its work and further opportunities shall be provided for non-Annex I Parties to exchange experience and relevant information of preparing national communications.

7. Some specific comments on CGE's recommendations for the improvement of the UNFCCC guidelines:

- It should be flexible for a non-Annex I Party to choose between the Revised 1996 IPCC Guidelines for National Greenhouse Gas Inventories and the Guidelines for the National Greenhouse Gas Inventories (IPCC 1995).
- It will be very difficult for many non-Annex I Parties to replace Table II of the UNFCCC Guidelines with the IPCC summary table 7A. The table 7A includes greenhouse gases such as NMVOC, PFCs, SF₆ with which few non-Annex I Parties have experience.
- It is necessary to develop a section on vulnerability and adaptation assessment in the guidelines for non-Annex I national communications, so that a non-Annex I Party will be able to incorporate V & A assessment into its national communication, if a Party hopes to do so. However, the scope of information to be provided needs further consideration.
- The revision of the Guidelines on the reporting of information on mitigation analysis and assessment of abatement options should not be perceived as obliging developing country parties to emission reductions within any specific time frame. A non-Annex I Party may conduct mitigation analysis and assessment of abatement options on a voluntary basis, and the objective of providing such information is to identify (a) projects which the party believes to contribute to mitigating climate change; (b) needs of financial resources, technologies, materials, equipment, etc. for implementing these projects.

PAPER NO. 4: GEORGIA

PRELIMINARY REPORT OF THE CGE

Reviewing the preliminary report of the CGE (FCCC/SBI/2000/8) and reports on inter-sessional activities (FCCC/SBI/2001/INF.1, FCCC/SBI/2001/2, FCCC/SBI/2001/3) we would like to express sincere gratitude to the CGE on National Communications from Parties not included in Annex I to the Convention, UNFCCC secretariat and non-Annex I countries National Communications Support Programmes for the work done in 2000-2001. At the same time Georgia regrets that like other non-Annex I countries from Eastern Europe and Asian countries with economy in transition it is not eligible to participate in the current processes.

Recognizing the good will of the GEF and Convention Secretariat present leaders, which are trying all their best to involve the above-mentioned countries in all activities, Georgia considers that **the equal participation** of these countries in the preparation of Guidelines to the second as well as consequent National Communications from non-Annex I countries and in adoption of technical and political documents and issues significant for them **should be legally guaranteed** through relevant official documents.

Georgia agrees to the recommendation of inter-sessional workshops initialized by CGE and UNFCCC Secretariat, that one of the priorities for non-Annex I countries are the climate change adaptation measures for vulnerable systems. Though, it must be noted that consideration of only the technical side of this issue out of the context of adaptation funds is unrealistic. Again we would remind the convention parties that according the Protocol and President's Proposal main sources of the adaptation fund are the CDM projects implemented on the territory of non-Annex I countries while eligible under this fund are developing countries (only).

Preliminary determination of the relevant financial sources for the implementation of concrete measures is necessary for further development of the adaptation projects on national and regional levels by the different Support Programmes. As one of the real Adaptation Fund will be filled from the projects implemented under the CDM, therefore at the first stage Georgia gives preference to the realization of GHGs reducing projects. Moreover as it was mentioned several times earlier the Caucasus region is still free of such demonstration projects.

Implementation of adaptation or environmentally friendly projects is highly important in order to recognize environmental protection and sustainable development as a priority by the governments of the countries with the grave economic conditions such as Georgia. Though GHGs emissions from the territory of the group of countries to which Georgia belongs are quite low because of well known events these countries are on the way of revival and if they develop in "business as usual" way, that easily attracts investments and investors, turning back will be as difficult as it is now in the industrial and industrializing countries.

PAPER NO. 5: KENYA

VIEWS ON PRELIMINARY REPORT OF THE CGE

Kenya welcomes the opportunity to make a submission on the preliminary report of the CGE.

Kenya would like to congratulate the CGE members for the splendid work they have done within such a short time frame and the UNFCCC Secretariat for the support it has provided. The report highlights several issues, which should be comprehensively addressed.

1. GHG INVENTORIES

The problems identified by the CGE are similar and in many respects, the same as the problems identified by GHG inventory experts who met in Accra, Ghana in August, 1999. This is almost two years ago.

Subsequently, the SBI requested that the proposed projects to address these problems related to activity date and emissions factors should be implemented with GEF support. To date, not much has been done. Most non-Annex 1 Parties are therefore going to embark on the preparation of second national communications without these problems being addressed.

2. VULNERABILITY AND ADAPTATION ASSESSMENT

Kenya is extremely vulnerable to the impacts of Climate Change. This was demonstrated by the impacts of the last (1997/1998) El Nino event on our economy. We are already experiencing strong climatic stresses notably drought.

Being a country of great diversity where we have mountains systems with snow, some rain forests, savanna grasslands, arid and semi arid areas constituting 80% of the country and coastal areas, the funds allocated in the enabling activities programme could not cover all sectors. Another constraint faced is lack of data to meet the demands of the methodologies that apply to the sort of assessments required. Recognising our vulnerability, we support the findings of the CGF that there is an urgent need to address lack of data for Vulnerability and Adaptation Assessments so as to generate reliable results, which can be incorporated into the national planning process.

3. EDUCATION, TRAINING AND PUBLIC AWARENESS

This is very important and was not adequately addressed in the enabling activity project.

The whole exercise provided very opportune time for awareness creation. This could have been through the various media and generation of easy to read and understand material that can be availed during the launch of project activities, videos to be shown heralding the launch and during the consensus building workshops and other fora e.g shows and exhibitions on other topics of national importance.

4. FINANCIAL AND TECHNICAL SUPPORT

Kenya notes table 1: Support Programmes on page 26 and paragraph 137 of the CGE's preliminary report. The total GEF support is under US\$80,000,000 and approximately half has gone directly to preparation of National Communications

About 140 countries have received funding from the GEF for preparation of National Communication – a simple calculation would show that the GEF has made available approximately US\$500,000 per country.

This is not sufficient and this is why problems still exist and have to be addressed. Paragraph 137 indicates that the amount represents only 7% of funds allocated to the GEF climate change focal areas for the period February 1995 to December 2000. GEF should consider increasing this percentage so as to avail more funding. This will be in addition to bilateral support so as to prepare better National Communications.

Kenya would like to reinforce what has been stated in Paragraph 145 that *“Analysis of funding and activities covered within existing support programmes seem to indicate that the level of funding and the number and scope of support programmes are not commensurate with the needs of non-Annex I Parties as identified in their national communications”*. Significant needs have also been identified by Parties that are currently in the process of preparing their national communications. These needs could only be met with additional financial resources and technical support.

**VIEWS ON THE CURRENT PROGRESS OF THE PROCESS AIMING
AT THE IMPROVEMENT OF GUIDELINES FOR SUBSEQUENT
NATIONAL COMMUNICATIONS OF NON-ANNEX 1 PARTIES
IN ACCORDANCE WITH DECISION 8/CP.5**

Kenya notes with appreciation the progress of the process aiming at the improvement of guidelines for subsequent national communications of non-Annex 1 Parties, in accordance with decision 8/CP.5.

While the decision calls for a review of the guidelines by COP-7, Kenya would like to point out that the decision went on further to say that the process of review should have information from "a representative and meaningful number of national communications from non-Annex 1 Parties".

What has not been made clear is whether the CGE have had at their disposal, this sort of information. If this has not been the case, then the CGE needs to have their term extended so as to come up with reviewed guidelines that non-Annex 1 Parties would be comfortable working with. These guidelines however, should not ask of non-Annex 1 what Annex 1 could not do in their national communications. While work is going on in the improvement of UNFCCC guidelines, GEF must continue to provide assistance to those non-Annex 1 Parties that wish to start the preparation of their second national communications.

PAPER NO. 6: LEBANON

VIEWS ON PRELIMINARY REPORT OF CGE

In reference to the document FCCC/SBI/2001/8 we would like to thank the secretariat for the excellent work in preparing this comprehensive document which comprises important issues for Non Annex I Parties.

Lebanon, supports the recommendations for improvement of the IPCC Methodologies in National GHG inventories particularly in LULULCF, Energy, Agriculture and Waste Sectors.

As all other Non Annex I Countries the main problem was Data Collection. We believe that improving systems for collection of activity data is very crucial and essential because it provides an important element in national economic and development planning. Strengthening national institutions should be facilitated and developed in order to improve data Collection and networking.

Within this context, we highly encourage development of regional or sub-regional projects aiming at improving national capacity for collecting, processing and archiving data, as well as updating inventory data on a continuous basis, either in the context of Enabling Activities for the second national Communication or as stand alone activities, and development of local and regional emission factors in all key sources.

Furthermore, Lebanon highly support the recommendations concerning the need for additional financial and technical support to improve the preparation of National Communications especially related to purchasing technical equipment hardware and software required to conduct Vulnerability and Adaptation Assessments.

We hope that the National Communication Support Programmes will continue its work since it played an important role in providing technical assistance to Non Annex I Parties through thematic sub-regional exchange workshops, technical reviews during preparations of national Communications.

We do believe that further work is needed on integrated assessments, socio-economic assessments, identification of adaptation options and costing implications in order to have impact models, human settlements, some terrestrial ecosystems and tourism.

Finally, we hope that the CGE continues its work to meet Non Annex I countries obligations to the UNFCCC.

PAPER NO. 7: REPUBLIC OF MOLDOVA

MOLDOVA'S VIEWS ON THE PRELIMINARY REPORT OF THE CONSULTATIVE GROUP OF EXPERTS ON NATIONAL COMMUNICATIONS FROM PARTIES NOT INCLUDED IN ANNEX I TO THE CONVENTION

1. *Concerning the request of SBI to non-Annex I Parties to submit views on the preliminary report of the Consultative Group of Experts on National Communications from Parties not included in Annex I to the Convention (see document FCCC/SBI/2001/L.1, para. 24 (a)), the position of the Republic of Moldova could be identified following the next views:*
 - The Republic of Moldova is a Party to the Convention as a developing country and as a non-Annex I country;
 - In accordance with Article 12.5 of the United Nations Framework Convention on Climate Change (UNFCCC) the Republic of Moldova undertook the commitment to fulfil its initial national communication and submitted it on November 13, 2000.
 - During the process of preparation of the first national communication (1997-2000), our country used the guidelines for the preparation of initial national communications by non-Annex I Parties contained in the annex to decision 10/CP.2 together with the guidance provided to the operating entity of the financial mechanisms given in decision 11/CP.2.
 - The Republic of Moldova welcomes the process of reviewing of the guidelines for the preparation of national communications started with the aim of improving them by the seventh session of the Conference of the Parties.
 - Concerning the information regarding analytical and methodological issues, and technical problems and constraints in the preparation of national communications by non-Annex I Parties, the Republic of Moldova agrees with the statements of the Chapter IV. "RECOMMENDATIONS RELATING TO THE IMPROVEMENT OF THE UNFCCC REPORTING GUIDELINES" (see document FCCC/ SBI/ 2001/ INF.1/ para. 146-163) from the Report of the inter-regional workshop of the Consultative Group of Experts on National Communications from Parties Not Included in Annex I to the Convention (CGE).

2. *Regards the request of SBI to non-Annex I Parties to submit views on the current progress of the process aiming at the improving of guidelines for subsequent national communications of non-Annex I Parties, in accordance with decision 8/CP.5 (see document FCCC/SBI/2001/L.1, para. 24 (b)), our position is the following:*
 - The Republic of Moldova has already submitted its initial national communication and is willingly to initiate the activities for preparation of its second national communication.
 - In order to perform the more fully work within the preparing of the second national communication we welcome the approval of the Revised UNFCCC Guidelines.
 - The Republic of Moldova welcomes also the decision to determine at the seventh session of Conference of Parties the timetable and the frequency of submission of national communications by non-Annex I Parties, in accordance with Article 12.5 of the Convention.

PAPER NO. 8: SAMOA
(on behalf of the Alliance of Small Island States)

**Views of Samoa on behalf the Alliance of Small Island States (AOSIS)
on the preliminary report of the Consultative Group of Experts (CGE)
on non-Annex 1 national communications**

Samoa, on behalf of the Alliance of Small Island States (AOSIS) welcomes the opportunity to submit its views on the preliminary report of the Consultative Group of Experts on non-Annex I national communications (CGE). AOSIS reserves the right to make further comments on the final report as well as on the progress of the process aiming at the improvement of the guidelines for subsequent national communications, given the preliminary nature of the report.

At the outset AOSIS extends its sincere thanks to the CGE for its extremely valuable and comprehensive work. The CGE should be congratulated for producing a preliminary report. As such, AOSIS will require further time to discuss the final report. This preliminary report is a valuable document that can be given continued attention until the final report is available. AOSIS would also like to thank the donors who generously contributed to the process and the UNFCCC Secretariat for its valuable support and encouragement. AOSIS is particularly impressed with the participation of the experts in the CGE, and extends its gratitude to the experts, in particular to those experts from the Small Island Developing States. We strongly support the CGE and its continued functioning.

It should be noted that AOSIS first national communications form a large part of the reports reviewed so far. While more work needs to be done, these national communications give a very clear overview of the specific national circumstances of AOSIS countries. All communications report that the greenhouse gas emissions from Small Island Developing States are low and well below world average. Notwithstanding their minuscule contributions to global GHG emissions, the initial National Communications from AOSIS Members also indicate that these countries are nevertheless attempting to reduce their emissions through measures that promote sustainable development in the energy, agriculture, forestry and waste management sectors. The CGE could encourage the development of common methodologies for sectors such as these, including for groups of non-Annex I Parties, so as to allow for comparability and experience sharing.

In contrast, the vulnerability of AOSIS countries has been shown to be high while adaptation options are limited. Consequently all AOSIS national communications stress the increased importance of vulnerability and adaptation assessments. Yet there is very a limited provision for these vulnerability and adaptation assessments in the current guidelines for national communications.

The CGE is correct in highlighting vulnerability and adaptation, and AOSIS is of the view that more work is needed in this field. In this regard AOSIS reiterates the decision of the Subsidiary Body on Implementation, which at its 14th session "took note of the proposed workshop on adaptation, to be held under the auspices of the Alliance of Small Island States (AOSIS), as well as the request of the Chairman of AOSIS for assistance from donors, the Global Environment Facility and the secretariat, to enable AOSIS to conduct the workshop in the last quarter of 2001 and report on its outcomes to future sessions of the SBI".

As stated above, AOSIS acknowledges that the current guidelines for national communications do not sufficiently address vulnerability and adaptation. The main reason for this is that methods for the assessment of vulnerability and adaptation were in their very first stages of development when the guidelines for national communications were adopted at COP2. Therefore the need for an evolving scientifically based and country driven approach is apparent, but with an equally important need to have in place a set of reporting elements that provide a basis for comparisons.

On the issue of reporting on national circumstances within the national communications, AOSIS agrees with the CGE outline of what should be reported. The information provided in this section of the national communications has great potential for usage under many aspects of the FCCC work. The Conference of the Parties should encourage Parties to use the opportunity to thoroughly explain the national situation and how climate change impacts upon the society, to the extent that national circumstances permit.

Even though the current guidelines for national communications show a number of shortcomings, AOSIS does not see the need for new guidelines at this stage. AOSIS feels that it is more prudent to wait until a more representative cross-section of first national communications is available before embarking on a full-scale review, which could become pre-emptive and pre-judgmental. AOSIS believes that the CGE and its report in itself can, however, provide important additional guidance to Parties as they develop their first and second national communications. The CGE report clarifies and expands on the relevant issues, and can be used to give additional direction to the national authorities. As a function for future discussion, it would be important to look at the CGE as a resource to assist non-Annex I Parties to grapple with the intricate work of developing their national communication.

One of the key findings to emerge from the work of the GCE is the need to further strengthen national climate change coordinating mechanisms in order to ensure continuity and consistency of efforts in such areas as GHG inventory preparation, and research and systematic observation. Such concerns are particularly relevant to AOSIS Members where the small size and limited technical and financial resources severely constrains efforts to respond to the challenges of climate change. This is an area in which practical opportunities for international cooperation would appear to exist, in particular amongst Small Island Developing States.

AOSIS would once again emphasize that funding for the national communications must continue. It is vital that funding for the CGE process be maintained, at least until a more representative cross-section of national communications is available. As has been noted before by AOSIS, continued funding for the national teams that have been created to prepare national communications is essential. These national teams play a crucial role in the full integration of climate change concerns into national policy. Furthermore, all the national communications and decisions of the Conference of the Parties reaffirm the need for, *inter alia*, further training, the need for revised, relevant and new emission factors and sector-specific data for transport, agriculture and energy systems. Regional and national systems for data archiving and retrieval will also be very important in the future. While financial and technical support has been very difficult to measure, AOSIS takes note of the apparent willingness of a number of donors to contribute to this work. We welcome their support and encourage other donors to contribute to the CGE process, and beyond.

In conclusion, AOSIS believes that the CGE, as a process under the FCCC, has shown itself to be a valuable tool and a good model for cooperation among Parties. There is a need for a full discussion of the CGE findings, and AOSIS stands ready to contribute further views at the appropriate time.

**Views of Samoa on behalf of the Alliance of Small Island States (AOSIS)
on the current progress of the process aiming at the improvement of the
guidelines for subsequent national communications**

Samoa, on behalf of the Alliance of Small Island States (AOSIS) welcomes the opportunity to submit its views on the progress of the process aiming at the improvement of the guidelines for subsequent national communications.

At the outset AOSIS would refer to its submission on the preliminary report of the Consultative Group of Experts (CGE). The work of the CGE should continue, and Parties be allowed an opportunity for a comprehensive debate at the Conference of the Parties. AOSIS would welcome such a debate, and would present views at that time. This submission should be considered in the context of the preliminary CGE report, without prejudice to the final report of the CGE.

AOSIS is of the view that the CGE's study of the national communications and its deliberation of the guidelines for national communications has been most valuable. It is clear that many countries do experience some difficulty with the current guidelines for national communications. Whether this is indicative of a faulty approach in the guidelines is difficult to state with any certainty since a variety of factors affect the process of the development of national communications. The preliminary findings and initial recommendations of the GCE demonstrate what AOSIS feels should be the preferred approach for dealing with these difficulties, namely a comprehensive and continuing system of support, information sharing and constructive discussion integrated in the process of developing the national communications. This is particularly the case for small developing countries with extremely limited technical and financial resources. Elaboration and explanation of the reasoning behind certain sections of the national communications may in some cases be helpful, as can learning for the examples of others. It is also likely that the perceived differences in style, presentation and content will be alleviated over time, as Parties get better experience with the process. This can be seen in other conventions where Parties have taken the opportunity to learn from each other's successes and failures.

The output of the work to date of the GCE, along with the synthesis of non-Annex I National Communications prepared by the Secretariat, provides an initial basis and starting point for the process of reviewing the guidelines. AOSIS sees that there is room for improvement in international cooperative arrangements and that guidelines need to evolve. Within the FCCC process the stage reached so far is only the submission of a limited number of first national communications. While it may be premature to take any drastic steps to change the guidelines or procedures for national communications, the recommendations and other output from the CGE can serve as important guidance towards the elaboration of any new guidelines. Furthermore, in areas where it is becoming clear that further support is needed by the non-Annex I Parties, such as vulnerability and adaptation assessments, the CGE can play an important role, building on the work done so far.

One of the significant findings to emerge from the CGE process is the important role that the various support programmes - bilateral and multilateral - have had in assisting non-Annex I Parties in meeting their obligations. This support has been particularly valuable for the GHG inventories and the vulnerability and adaptation assessments, which were seen by many Parties as

being difficult tasks. Such support is likely to continue to play an important and instrumental role in facilitating subsequent national communications, particularly in smaller countries, such as AOSIS Members, where technical, financial and institutional constraints continue to exist.

In conclusion, for these reasons AOSIS believes that the CGE, as a process under the FCCC, has shown itself to be a valuable tool and a good model for cooperation among Parties. There is a need for a full discussion of the CGE findings and their implications for the current guidelines for national communications. AOSIS stands ready to contribute further views at the appropriate time. This process is an invaluable element of the efforts to review the existing guidelines for preparation of non-Annex I national communications. It is therefore important that the work of the CGE be allowed to continue so as to provide guidance to those non-Annex I Parties that have not yet been able to complete their initial national communications, and provide guidance for subsequent national communications also. The current progress in the process aiming at improving the guidelines for national communications is therefore satisfactory.

PAPER NO. 9: SWITZERLAND

**NATIONAL COMMUNICATION FROM PARTIES NOT INCLUDED
IN ANNEX I TO THE CONVENTION**

At its fourteenth session (FCCC/SBI/2001/L.1, paragraph 24 (a) and (b)) the SBI invited Parties to submit views on: i) the preliminary report of the CGE (FCCC/SBI/2001/8); ii) the current progress of the process aiming at the improvement of guidelines for subsequent national communications of Parties not included in Annex I to the Convention in accordance with decision 8/CP.5. In response to this invitation, Switzerland presents the following views.

1. **Switzerland has encouraged the work of the CGE and has supported the workprogramme with financial and technical assistance** (Switzerland is one of the Annex I countries represented in the CGE).
2. **The workprogramme of the CGE implemented since 2000** comprising workshops held in Nairobi, Kenya (Africa), Bangkok, Thailand (Asia), Mexico City, Mexico (Latin America and the Caribbean) and the interregional workshop held in Panama City, Panama **allowed for appropriate consultations including exchange of experience and consideration of subregional information on the preparation of national communications**. With a total of 94 experts from 70 non-Annex I Parties nominated by their governments participating in these workshops the present state of the art in preparation of national communications and related problems could appropriately be covered. The CGE established task groups to examine specific elements of the 50 national communications already submitted to the secretariat. It is not expected that the analysis of another 20-30 initial national communications would yield a substantively different picture.
3. **The preliminary report of the CGE is comprehensive and covers all relevant aspects of national communications by Parties not included in Annex I. However the amount and breadth of information presented will make it difficult for SBSTA and SBI to make decisions and to take actions**. The document is partly repetitive and would win if e.g. all aspects related to capacity building would be summarised in one section. **A condensed version of the document would facilitate the process of setting priorities** with regards to action required from the Subsidiary Bodies.
4. The report highlights that a **substantive amount of resources of approximately US\$ 133 million has been provided to 137 non-Annex I Parties in the form of financial and technical support** for activities that directly support either: (a) the preparation and submission of national communications or (b) the preparation of various elements of national communications. **Approximately 60% of this amount was provided through a multilateral programme, the Global Environment Facility (GEF) Enabling Activities Programme, and approximately 40%, was provided through bilateral programmes**. The identified need for continued financial and technical support in areas such as data acquisition, information dissemination and institutional strengthening for preparation of national greenhouse gas inventories, vulnerability and adaptation assessment, systematic observation and the other fields is justified to maintain and enhance the level of expertise. With a view to the preparation of the second national communication **a continuous process**

of improving the quality of national communications through application of “good practice” principles shall be encouraged.

- 5. We support the draft recommendations for improving the FCCC Guidelines and particularly those related to the national greenhouse gas inventories. The revised 1996 IPCC Guidelines for National Greenhouse Gas Inventories are the appropriate basis to estimate and report on anthropogenic emissions. Encouraging the use of the IPCC Good Practice Guidance and related capacity building is seen as an important step with a view to enhancing the quality of GHG inventories in the second national communication. In light of the decisions taken at COP 6 *bis* the LULUCF sector deserves a special attention.**
- 6. Equally important seems the identified need to revise the annex to decision 10/CP.2 to give an appropriate framework for vulnerability and adaptation assessment, including guidelines for incorporating adaptation options into national planning processes**
- 7. Finally, Switzerland considers that the funding of the CGE should be done through the core budget of the Convention.**

PAPER NO. 10: THAILAND

VIEW ON THE PRELIMINARY REPORT OF THE CGE

- Given the limited resources and time, Thailand greatly appreciates the efforts of the CGE and the amount of information the report provides. The report provides good information related to methodological and reporting issues in preparing the national communications of Non-annex I Parties.
- The report clearly indicates the insufficient financial and technical support provided. Consideration and appropriate actions should be immediately undertaken on this aspect.
- An important shortcoming of the report is the limited numbers of national communications being review. There are about two-thirds of the Non-annex I Parties who have not submitted the Initial National Communications. It is very important to include such a large proportion of total Parties, particularly it covers large countries and many least developed countries. In our view, there is a need to further collect information on experiences, problems and constraints in preparing national communications of those Parties.
- The report does not sufficiently address the coordination among activities and programs supporting national communication preparation process. This issue is critical to ensure that repetition is minimized and use of resources is efficient. Thailand views that this issue should be adequately reviewed.

VIEW ON CURRENT PROGRESS OF THE PROCESS

The preliminary report of the CGE provides good information to be used in the process. Based on the review of the preliminary report and the results of the activities according to decision 8/CP5, Thailand has the following views:

- There is a good progress of the process
- However, the reviews and recommendations are from limited National Communications. More information is needed before SBI could make use of such information in the process
- The CGE should continue its consultation activities. For this particular phase, the CGE should emphasize the Parties undergoing or not yet start the National Communication preparation. This will fill the existing information gap and help address the issues more rigorously, especially on experiences, problems and constraints encountered in National Communication preparation
- The CGE should also further elaborate the issue of coordination among supporting programs/activities, in order to streamline the coordination and avoid repetition
- Certainly, areas of financial and technical support in National communication preparation could be taken up, regardless of other issues. This is because such problems would be even more serious for those who are not yet submitting the National Communications. Immediate actions will be helpful to them.
- Similarly, capacity buildings especially on methodological development could be further explored to enhance analytical capabilities of the Parties.

PAPER NO. 11: UNITED STATES OF AMERICA

**UNITED STATES VIEWS ON MATTERS RELATED TO
NATIONAL COMMUNICATIONS FROM PARTIES NOT
INCLUDED IN ANNEX I**

The United States appreciates the opportunity to submit views on the revision of guidelines for the 2nd national communications of non-Annex I Parties. The decision taken at COP-5 clearly anticipates that new guidelines for second national communications of non-Annex I Parties, as well as a schedule for submission of second national communications, will be adopted at COP-7. Given the already over-burdened negotiating schedule, we recognize that it will not be feasible to meet this deadline. However, given the importance of national communications, we believe that it is imperative that the negotiations of new guidelines begin at COP-7 for adoption by COP-8.

To this end, the United States recommends that the Subsidiary Body on Implementation request the Secretariat to prepare draft guidelines for second national communications of Parties not included in Annex I for consideration by the SBI. The draft should be based on the recommended improvements of the Consultative Group of Experts and cover all areas of the national communication. In addition, the inventory reporting guidelines should be drafted to be compatible with the Common Reporting Format of Annex I Parties to enable the consolidation and synthesis of aggregate greenhouse gas information. The draft should be the basis for negotiation of revised guidelines by SBI at its 16th session.

With respect to the timing of subsequent national communications from Parties not included in Annex I, the United States believes that non-Annex I Parties should submit national communications on a schedule that permits sufficient time for preparation of the national communication and which would usefully reflect changes in countries domestic efforts to address climate change. In this regard, we recommend that non-Annex I Parties submit national communications on three-year intervals, which is consistent with the schedule for Annex I Parties. In addition, non-Annex I Parties should be requested to provide greenhouse gas inventories annually. Such a request would enable continued GEF support for the maintenance and reporting of greenhouse gas inventory information, and would help to ensure that Parties maintain domestic capacity to prepare inventories.

The United States recalls that the COP also decided to reconsider the terms of reference of the Consultative Group of Experts at its 7th session. Given that the work of this group has been geared toward the improvement of national communications from Parties not included in Annex I, its mandate should be reconsidered at the same time that revised guidelines and a schedule for second national communications is adopted. Therefore, the United States recommends that reconsideration of the terms of reference of the CGE should also be postponed until COP-8.

Finally, we note that decision 8/CP.5 specifies that funding for second national communications of Parties not included in Annex I is to be provided on the basis of initial guidelines until COP-7, after which funding is to be provided on the basis of revised guidelines. The development of new guidelines must therefore begin as a matter of priority to enable the GEF to fund second national communications after COP-7.

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