

Switzerland's views on features of nationally determined contributions under Article 4

September 2017

Switzerland is pleased to hereby provide more detailed views on the guidance for features of nationally determined contributions under Article 4 of the Paris Agreement. Our views on the other two parts of the APA 3 agenda item (information necessary for clarity, transparency and understanding (CTU) and accounting) are reflected in the EIG submission of fall 2017.

General remark:

The broad structure contained in the co-facilitators informal note¹ forms the basis for the submission, to the extent to which we consider it useful.

Switzerland strives for substantive decisions by the end of 2018 on all three elements treated under APA agenda item 3 (features, information necessary for clarity, transparency and understanding (CTU) and accounting). We therefore foresee the guidance on mitigation to contain the following elements:

- Decision(s), adopting the technical annexes and containing general provisions and principles
- Three technical annexes to this decision, containing the guidance on features, CTU and accounting, respectively

Features of the nationally determined contributions:

Features are an essential part of the Paris Rule Book. They can be seen as the **characteristics** of NDCs, ensuring Parties understand each other's contributions from the onset irrespective of their specific form. Therefore, features act as a **general description** of NDCs and do not interfere with the details of how NDCs are defined. Also, they are not rules that prescribe how exactly NDCs shall look like, nor are they prejudging the level of ambition or a Party's mitigation actions. They are a general parameter or a boundary condition around an NDC and a way to promote a common form of presentation of NDCs. This does not include guidance on how to implement or demonstrate the implementation thereof. In our view, guidance on features is **common and applicable to all Parties and to all NDCs**, independent on their form.

The national determination of contributions has been repeatedly denoted the most important feature of a NDC and we agree with this. At the same time, it has been very clear since the introduction of the term NDC at COP19 that **pure national determination does not deliver a coherent international regime** and that national determination should be complemented by guiding elements. This is not only crucial for the exercise of assessing the collective progress towards the long-term goals, but also for the broader public: a similar way of framing contributions helps to provide up-front clarity on what to expect from NDCs communications.

In the co-facilitators informal note, different ways of approaching the mandate from 1/CP.21 have been identified: identification and listing of existing features, further elaboration of existing features and additional/new features. We see no value in renegotiating features that are already anchored in the Paris Agreement and therefore, we see not much value in simply listing existing features². In any case, listing existing features is not the mandate agreed to in 1/CP.21 para 26, namely to "develop further guidance on features". Another approach identified by the co-facilitators is to consider further guidance of existing features further clarifying the NDCs. However, it is important to be mindful that more guidance on the features reflected in Article 4 of the Paris Agreement can easily turn into a level of specificity that might become too prescriptive.

¹ http://unfccc.int/files/meetings/bonn_may_2017/in-session/application/pdf/informal_note_apa_3_for_publication_final.pdf

² For a list of existing features identified by the EIG, see our last submission (October, 2016):
http://www4.unfccc.int/Submissions/Lists/OSPSSubmissionUpload/201_279_131205657516977436-EIG%20submission%20on%20mitigation.pdf.

Switzerland is of the view, that there is value in continue discussing additional and new features and foresees guidance with the following elements:

- Nationally determined contributions are to be quantified in terms of CO₂eq.
- Parties to present clearly the share of the national GHG emission reduction capacity without support in their nationally determined contributions.
- The nationally determined contribution to cover all significant emission sectors and gases.
- The nationally determined contribution to reflect a link to a Parties' long-term low greenhouse gas emission development strategies, if available.
- The nationally determined contribution to be based on real and meaningful data and/or baselines.
- This guidance shall be applied for the NDCs relevant from 2026 (i.e. the NDCs communicated/updated 9-12 months prior to COP26 in 2020) and for NDCs communications pursuant to PA Art 4.11 (NDC adjustments at any time) or 1/CP.21 para. 22 (communication upon ratification).
- LDCs and SIDS, in the light of their special circumstances, are encouraged to apply the guidance to the extent possible.
- This guidance shall be revised based on experiences gained, starting in 2021, with a view to adopting the revised guidance by the CMA in 2023. Future revisions shall be undertaken every 5 years thereafter.