Submission by the Republic of Maldives on behalf of the Alliance of Small Island States on *"Further guidance in relation to the adaptation communication, including, inter alia, as a component of nationally determined contributions, referred to in Article 7, paragraph 10 and 11, of the Paris Agreement"*.

14 September 2017

Title: Submission on APA Item 4

Submission Title: Item 4, "Further guidance in relation to the adaptation communication, including, inter alia, as a component of nationally determined contributions, referred to in Article 7, paragraph 10 and 11, of the Paris Agreement"

Issue: Agenda item 4: Adaptation Communication unfccc.int/resource/docs/2017/apa/eng/l02.pdf, 12 (a) "proposals for elements and 'skeleton' outlines as contained in the informal note on this agenda item", taking into account the discussions on this items at the Forty Sixth Subsidiary Bodies of the Convention and third part of the first session of the Ad hoc Working Group on Paris Agreement, APA 1-3 (Bonn, May 2017) captured in the conclusions proposed by the Co-Chairs.

CONTEXT

Article 7 of the Paris Agreement established a global goal on adaptation and along with it an encouragement for Parties to submit adaptation communications. The APA is currently developing further guidance in relation to Adaptation Communication. The guidance being developed should allow Small Island Developing Stated (SIDS) to easily reflect their listed priorities, implementation and support needs, plans and actions, while avoiding the creation of any additional reporting burdens. Succinctly, these potential guidelines should be developed with respect to the flexibility identified in the Paris Agreement Article 7 paragraph 10 and 11. The process of preparing these guidelines will assist SIDS in building capacity as they collaborate to achieve the global goal on adaptation.

Taking into account the discussion on this item at APA 1-3 (Bonn, May 2017) captured in the conclusions proposed by the Co-Chairs, AOSIS now presents proposals for elements of, and a 'skeleton' outline for the Adaptation Communication.

AOSIS wishes to reiterate the following:

- The Adaptation Communication is a new tool arising from the Paris Agreement. It is currently being developed and as such there are no existing guidelines;
- Based on the Paris Agreement, adaptation communications can be a component of or submitted in conjunction with other communications or documents, including a national adaptation plan, a Nationally Determined Contributions and/or a national communication. In the case of Nationally Determined Contributions, unlike for mitigation, no guidelines exist now for the inclusion of adaptation communications in Nationally Determined

Contributions for countries choosing to do so. There are guidelines for reporting on adaptation in the other adaptation reporting communications or documents, but no specific guidelines for what will be contained in an adaptation communication submitted as a component of or in conjunction with these communications or documents;

- The lack of relevant guidelines for an adaptation communication creates a level of uncertainty for developing countries in the process of developing national adaptation plans and preparing their next national adaptation related communications or documents;
- There is a lack of or limited funding for enhancing the existing reporting requirements of SIDS under the UNFCCC.

Also any further guidance should be based on the articles 7.10 and 7.11 of the Paris Agreement, which we interpret as follows:

- Adaptation communications are not mandatory
- The updating and submission of an adaptation communication is not to create any additional burden on developing countries
- If a Party chooses to make an adaptation communication there is flexibility in how it does so i.e. as a component of, or in conjunction with, other communications or documents.

Proposal for elements and 'skeleton' outline

On Elements: The Paris Agreement provides flexibility on the elements to be included in the adaptation communication, without creating any additional burden for developing country Parties, as per Article 7, paragraph 10. While AOSIS welcomes a non-exhaustive list of possible elements, AOSIS strongly believes that an agreed common set of elements that can be reflected across all possible reporting vehicles should be encouraged and would provide a good basis for developing the adaptation component of the global stocktake, as per Article 7, paragraph 14. Therefore, AOSIS reiterates its support for the following common elements that were put forward during the May session (APA 1-3) under this agenda item, with the following explanatory notes, based on prior AOSIS statements and submissions:

1. National circumstances, including legal framework and institutional arrangements
2. Impacts, vulnerabilities and risk assessments (including future scenarios), including assessments of capacity needs
3. Priorities, policies, plans, actions, strategies and/or programmes, as appropriate to the implementation of adaptation action
4. Adaptation efforts of developing countries (for recognition), including information on resilience-building activities / actions
5. Adaptation and implementation support needs of developing country Parties
6. Information on support received where information available and appropriate Biennial communication of indicative support by developed countries, including finance, technology and capacity building

AOSIS members are already communicating a plethora of information on adaptation mainly through the National Communications process, and are aware of current reporting burdens. In this regard, Adaptation Communication ought to be an effective tool providing additional value and addressing

the most important components of adaptation effort underway in SIDS.

AOSIS considers these elements to be a fair basis to discuss/propose what may be considered a common set of elements, which should be encouraged for inclusion irrespective of the reporting vehicle. It should be noted that much of this information is already being reported in National Communications, and to some extent is covered by the guidelines for preparing National Adaptation Plans for which only a few SIDS have already done so.

AOSIS is prepared to work further with others on the framing of these elements, including as regards how they are articulated and the level of flexibility applied in using them. In developing the elements, it is also important to ensure that the elements are fully aligned with the provisions of Article 7 of the Paris Agreement.

On Purpose: AOSIS is of the view that the purpose of the Adaptation Communication can be clustered into 3 broad areas, which emerged during the May session (Bonn, 2017):

I) Communicating progress in adaptation actions and plans;
II) Enhancing support for adaptation actions and plans and;
III) Contributing and informing progress towards GGA.

The purpose of the Adaptation Communication can be framed in a succinct way as follows: ***To communicate adaptation actions and plans, with a view to enhancing action and support and contributing to the global goal on adaptation.***

On Vehicle: Article 7.11 of the Paris Agreement allows flexibility in how a Party chooses to make an adaptation communication, i.e. as a component of, or in conjunction with, other communications or documents. For AOSIS freedom of choice in reporting vehicles is the only platform on which to proceed. However, in order to make possible aggregation at global level towards achieving the global adaptation goal, AOSIS is of the view that a common set of elements should be encouraged. Using innovative/internet-based tools is recommended to reduce the reporting burden.

The Adaptation Communication has the potential for bridging the gap with other existing reporting processes addressing climate change adaptation issues, such as the Sustainable Development Goals. It is prudent that such synergies be recognized, particularly for SIDS who have severe capacity constraints.

On Flexibilities: Guidelines for an Adaptation Communication should ensure consistency, irrespective of the choice of reporting vehicle, in line with Article 7, paragraph 11 of the Paris Agreement as a component of or in conjunction with other communications or documents, including a national adaptation plan, a nationally determined contribution and a national communication. The flexibility accorded to Parties for the choice of reporting vehicle under Article 7 of the Paris Agreement must be preserved. AOSIS is of the view that the development of Adaptation Communication guidelines under the Paris Agreement must be flexible enough to take SIDS, whose people are at the forefront of climate change impacts, into account. Different flexibilities could be considered in the context of each element, while retaining features that allow for the comparability of information, where required and appropriate.

Proposed Skeleton

Considering the discussions held during APA 1.3, AOSIS proposes the following outline for the Adaptation Communication:

- **Preamble / Introductory remarks**
  - Guiding principles
  - National context
- **Purpose**

  The Adaptation Communication should facilitate the ability of developing countries including SIDS to reflect their priorities, implementation and support needs, plans and actions, without creating any additional reporting burdens. Ideally, the process of preparing the Communication will help SIDS build and retain capacity as they contribute to achieving the global goal on adaptation. The Adaptation Communication could be instrumental in facilitating learning by sharing good practices, experiences and lessons learned. Informing future decisions under the Paris Agreement, including on the global stocktake. Based on the needs of developing countries identified, the adaptation communication should be central to catalyzing support for adaptation actions.

- **Elements**

  Possible common elements of the Adaptation Communication:

  a) Information on resilience-building activities/actions;
  b) Adaptation plans/strategies and priorities;
  c) Implementation and support needs (as appropriate);
- **Vehicles**

  The flexibility accorded to Parties for the choice of reporting vehicle under Article 7 of the Paris Agreement must be preserved. The Adaptation Communication should be viewed as an instrument that strengthens and/or highlights information on adaptation efforts, where relevant.. As such, the Adaptation Communication may be considered as an instrument that enhances and maintains the profile of adaptation in a manner that engenders actual adaptation support and implementation at the domestic level.

  The Adaptation Communication has the potential for bridging the gap with other existing processes addressing climate change adaptation issues such as the Sustainable Development Goals. It is prudent that such synergies be recognized, particularly for SIDS who have severe capacity constraints. SIDS are very interested in any available technological tools that may reduce/avoid reporting burdens. . In developing further guidance in relation to the Adaptation Communication, SIDS are of the view that Parties should take into account current guidelines for existing vehicles (e.g. guidelines for National Communications).

- **Linkages**

  AOSIS notes that discussions on the Adaptation Communication are also linked to the other APA negotiating tracks, including the enhanced transparency framework, the global stocktake and the registry to house adaptation communications. . Regarding the registry, AOSIS has taken the position that the mitigation and adaptation registries should be treated

separately. This is because mitigation and adaptation actions, while linked, are very different technologically, and have very different planning horizons and lifecycles. A single registry will likely link adaptation actions to the agreed cycle for mitigation, which not only may not represent reality in respect of the implementation of the two types of activities, but would also present an undue reporting burden for SIDS given well-documented experience of the challenges in meeting current reporting requirements under the Convention, e.g. NatComs and BURs, in terms of technology, capacity and timing.

- **Support**

  Support for developing country Parties (including in the preparation, submission and implementation of adaptation communications)

- **Other matters**

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