Submission by Ethiopia on behalf of the Least Developed Countries Group on common timeframes for nationally determined contributions

The LDC Group welcomes the opportunity to submit its views on the topic of common timeframes for nationally determined contributions (NDCs) pursuant to the invitation at SBI 47 to Parties and observers to submit such views for consideration at SBI 48.

Introduction

The Paris Agreement is built on the fundamentals of trust and accountability through transparency. The comparability of efforts, the ability to aggregate efforts to assess global progress towards the overarching goals of the Paris Agreement and a common understanding that each Party is being as ambitious as possible and doing its fair share to address climate change are essential to ensure trust and accountability, and ultimately for effective action to avoid the worst impacts of climate change.

The Conference of the Parties serving as the Meeting of the Parties to the Paris Agreement (CMA) must consider common time frames for NDCs at its first session. As Parties continue to negotiate the set of implementation guidelines to fully operationalise the Paris Agreement, the question of common time frames for NDCs has a significant bearing on a number of operational and system design decisions being considered, including with respect to the guidance being developed for accounting for NDCs and accounting related to the use of Article 6 in achieving NDCs.

The need for common time frames

The LDC Group considers common time frames for the implementation of NDCs essential for ensuring the greatest overall ambition under the Paris Agreement.

Parties have submitted a great diversity of NDCs, in terms of type, scope and structure, among other aspects. Current NDCs also vary with respect to their time frame for implementation. While many use a 5-year time frame, others use a longer time frame or horizon to implement their NDCs.

It is important to recall that the current (first) communicated NDCs are based on the intended nationally determined contributions (iNDCs) that were communicated by most Parties before COP 21. In other words, they were conceived, designed and developed before the Paris Agreement itself was adopted, before there was final clarity around the ultimate structure of the Paris Agreement, and just as importantly, before Parties began to elaborate and design the various features and processes under the Paris Agreement in more detail. As such, there is little to no consistency in current NDCs with respect to the time frames for their respective implementation and this presents a number of obstacles and issues for the effective
implementation of the Paris Agreement as a whole and the achievement of its overarching objectives.

Without being exhaustive, the time frame of an NDC has an impact on, among other things:

- The ability of Parties to account for their NDCs in a transparent, comparable and aggregable way that can help achieve of the objectives of the Paris Agreement
- How Parties reflect their highest possible ambition and avoid locking-in low ambition
- How NDCs can be progressively more ambitious from one NDC cycle to the next
- How to ensure equity among Parties, for example with respect to NDCs being implemented over different time frames
- The ability to aggregate and assess the collective progress of efforts contained in NDCs, for example in relation to the effectiveness of the global stocktake process
- How Parties can give certainty and predictability to all stakeholders to promote the necessary transformational changes in society, business and industry

5-year time frames

The Paris Agreement architecture has a 5-year heartbeat with Parties required to communicate NDCs every 5 years and a global stocktake process held every 5 years. The key obligations, mechanisms and processes under the Paris Agreement are also structured around this 5-year rhythm.

The LDC Group, therefore, believes that NDCs should have a common 5-year time frame for implementation and that the implementation period of NDCs should eventually be aligned across Parties, since:

- This allows all Parties to reflect their greatest possible ambition every 5 years without locking in low ambition for long periods
- It allows all Parties to effectively account for their NDCs along the same time frame and track their progress in achieving their NDCs in a transparent, comparable and aggregable way
- It avoids a number of crucial accounting and double counting issues related to the transfer of outcomes/units among Parties using Article 6 to achieve their NDCs, which is already very complex due to the different types of NDCs and targets types
- It ensures equity by not prejudicing Parties who communicate NDCs with shorter time frames with regard to tracking progress in achieving NDCs and demonstrating a progression in ambition from one NDC cycle to the next

The LDC Group, however, appreciates the need for medium- and long-term clarity and predictability in planning climate efforts over longer horizons. In this context, it is essential that the NDC communication cycle encourages Parties to have the highest short-term ambition and yet allows the greatest medium- and long-term clarity and predictability.
Dynamic 5+5 contribution cycles

The LDC Group proposes a dynamic NDC cycle of 5+5 years in which Parties communicate a 5-year NDC for an upcoming 5-year implementation period and simultaneously provide a subsequent indicative NDC for the following 5-year implementation period.

At the next NDC communication cycle, a Party would communicate or update their previously indicative 5-year NDC for the upcoming implementation period as well as provide a new indicative 5-year NDC for the following 5-year implementation period.

In this way, Parties would be able to maximise short-term ambition by avoiding locking in low ambition for long periods while giving Parties an opportunity to effectively plan medium- and long-term climate efforts and provide needed certainty and direction of travel to key stakeholders in the public, private and civil society sectors.

While the LDC Group believes that it is possible to agree a common time frame for NDCs and make it effective from the next NDC communication cycle, the Group appreciates that a number of current NDCs have time frames up to 10 years. Therefore, the LDC Group is open to further discussing how common 5-year time frames with a dynamic contribution cycle can be operationalised by the implementation period beginning in 2030.

Flexibility for LDCs, as recognised in the Convention and the Paris Agreement, is also crucial to ensure the highest possible ambition by all Parties while allowing those with the least capacity and resources to meaningfully participate, for example by giving LDCs the flexibility to apply any guidance on common time frames for later implementation periods.

The LDC Group welcomes the opportunity to further discuss the topic of common time frames more generally at the upcoming APA 1-5 session in Bonn.