

**Submission from Brazil on subparagraph 1.b.ii of the Bali Action Plan
(mitigation by non-Annex I countries)**

Non-Annex I countries will contribute to “enhanced national/international action on mitigation of climate change” (Bali Action Plan, paragraph 1.b) by means of nationally appropriate mitigation actions (NAMAs), in the context of sustainable development. These NAMAs would be voluntarily proposed by non-Annex I countries and supported, through financing and technology transfer, by Annex I countries. These NAMAs under 1.b.ii and the support they receive should both be measured, reported and verified, as indicated in the Bali Action Plan.

These NAMAs under 1.b.ii are distinct from the significant mitigation actions that non-Annex I countries have been implementing based on their own resources. Recognition of unilateral actions by non-Annex I countries is important, but it falls outside of the framework defined under subparagraph 1.b.ii.

A NAMA under 1.b.ii is clearly distinct from a quantified mitigation commitment. Therefore, what will be measured, reported and verified under 1.b.ii will be the result of the proposed action, nationally measured in terms of direct emission reductions. This result is not based on the definition of hypothetical emission baselines.

Brazil supports the proposal of a registry as a framework both for NAMAs under 1.b.ii and for the support they receive from developed countries. Non-Annex I countries would voluntarily propose actions for the registry, along with an estimate of the international support needed for such actions and their expected mitigation result. Information in the registry should allow for the confirmation that specific support has been channeled to a specific action. Once this channeling has been confirmed, both support and action would become “effective” within the registry simultaneously.

Mitigation in the registry should be balanced. The registry should include NAMAs that cover several different areas and should be open to the participation of all developing countries wishing to participate. One example of an area that should be included in the registry is that of forest activities. Brazil considers that forest activities

can offer an important contribution within the registry and that significant financing and technology from developed countries should be directed towards such activities.

The results of NAMAs under 1.b.ii should be measured, reported and verified according to national measuring and reporting procedures and UNFCCC verification. National measuring and reporting would present direct emission reductions produced by the NAMA, without consideration of hypothetical baselines.

The registry would not replicate CDM procedures. It would allow for large-scale mitigation programs, beyond projects. Financial support within the registry would not generate offsets, as the mitigation generated by NAMAs within the registry must be additional, in a context of enhanced action, to the mitigation generated by the CDM, the domestic effort of Annex I countries and the domestic unilateral actions of non-Annex I countries that decide to implement such actions.

As the registry proposal is developed, it is important to note that support from developed countries for mitigation, under the Bali Action Plan, should not be channeled solely to actions that generate direct emission reductions. In other words, such support must also be channeled outside of the registry structure, in order to enhance initiatives in areas such as capacity building and institutional strengthening. These initiatives must receive greater support, without associated efforts to calculate a direct emission reduction result.