



March 25, 2013

Shanghai, China

To Whom It May Concern:

The Partnership on Sustainable, Low-Carbon Transport (SLoCaT) (www.slocat.net) and the Bridging the Gap (BtG) Initiative (www.transport2020.org) present this submission in response to the call of the Subsidiary Body for Scientific and Technology Advice (SBSTA) of the United Framework Convention on Climate Change for inputs on the Monitoring Reporting and Verification (MRV) of Domestic NAMAs. This submission was developed with active inputs from EMBARQ, the World Resources Institute Center for Sustainable Transport and the German Agency for International Cooperation.

The SLoCaT Partnership is a voluntary, multi-stakeholder initiative with 75 member organizations and is dedicated to improving knowledge and accelerating action on sustainable low-carbon transport. Bridging the Gap is a multi-stakeholder initiative, formed at COP14 to encourage international recognition that land transport should play a more important role addressing climate change in the post 2012 agreement and to bridge the gap between the land transport and climate change community. Both are independent and representative of the sustainable transport sector including leading organizations from public and private sectors, finance, research across all modes of land transport.¹

According to the IEA, the transportation sector currently accounts for a quarter of energy-related CO₂ emissions.² Emissions from transport are projected to rise 70% by 2050 from 2010 in a business-as-usual scenario making it the fastest growing source of GHGs.³ Nearly all of this growth will take place in emerging and developing economies. Already in Asia, CO₂ emissions from road transport grew at an annual rate of 10% in the period 2002–2010 vs. 9% annual growth in Gross Domestic Product.⁴ There is however growing evidence that the transport sector can make substantial contributions to the mitigation of transport.⁵

¹ See Annex 1 and 2 for an overview of the membership of the SLoCaT Partnership and the BtG Initiative

² IEA, *Energy Technology Perspectives 2012* (Paris: 2012)

³ *ibid*

⁴ Clean Air Asia. 2012. "Accessing Asia". Available at http://cleanairinitiative.org/portal/sites/default/files/Accessing_Asia_2012_Edition_MAIN_REPORT_0.pdf (last date of access: 31 January 2012).

⁵ See in this context the submission by the SLoCaT partnership and the Bridging the Gap initiative to the ADP: <http://unfccc.int/resource/docs/2013/smsn/ngo/294.pdf>

At the same time there is growing evidence of the significant mitigation potential in the transport sector if Business as Usual (BAU) policies were to be replaced by three linked strategies - **Avoid-Shift-Improve** (ASI) – to: (1) Increase access to jobs, goods and services while enabling users to **Avoid** motorized trips by smarter land use and logistics planning; (2) **Shift** the transport of goods and persons to the most efficient mode⁶; and (3) **Improve** the efficiency and environmental performance of transport systems by improved vehicle, fuel, and network operations and management technologies.⁷

Nationally appropriate mitigation actions (NAMAs) provide significant opportunities for land transport to make a more active contribution to climate change mitigation. However, there are still many outstanding questions on how to develop guidance on NAMAs as well as the requirements for Monitoring, Reporting and Verification (MRV) and financing for both domestic and supported NAMAs. MRV procedures have long been a barrier to greater participation of transport sector in UNFCCC provisions.^{8,9} The Clean Development Mechanism (CDM) Executive Board in its 72nd Meeting decided on the development of proposals for a standardized baseline for the transport sector in support of a larger number of transport CDM projects.¹⁰

Transport is the second-largest sector in terms of NAMAs proposals,¹¹ and therefore it is important that MRV guidelines for both domestic and supported NAMAs will be relevant to the specific nature of transport NAMAs. The failure of the CDM in the transport sector is due to the fact that it was not developed with transport in mind.¹² If a similar constraining framework as applied to CDM is transferred to NAMAs, there are significant risks that transport finds itself in a similar position as in the case of CDM.¹³

The sustainable transport community is aware that if it is of the opinion that there is a need for transport specific guidelines for the MRV of transport NAMAs that it will need to actively contribute to the generation of ideas, concepts, and tools for MRV to ensure that detailed rules and regulations will work for transport. In recent years BtG and SLoCaT have undertaken a number of efforts with respect to transport NAMAs. This includes amongst others:

- Climate Instruments for the Transport Sector (CITS), which was a joint project of the Asian Development Bank and the Inter-American Development Bank under a SLoCaT umbrella and which involved ECN, Ecofys, EMBARQ, TRL and the Wuppertal Institute. (<http://www.slocat.net/key-slocat-prog/355>). The outputs of the CITS project helped to inform BtG and SLoCaT inputs to the UNFCCC process especially in the years 2009-2011.
- Analytical work on transport NAMAs by BtG Initiative (e.g. http://www.transport2012.org/bridging/ressources/files/1/1771.Transport_NAMA_s

⁶ In the case of persons this is usually mass public transport, walking or cycling and in the case of freight to increase the share of rail or water transport

⁷ See for a more detailed overview of options for GHG mitigation in the transport sector can be found at <http://transferproject.org/index.php/hb/98-hb/110-factsheets>

⁸ Lefevre, B., 2012, Incorporating cities into the post 2012 climate change agreements, Environment and Urbanization, International Institute for Environment and Development (IIED). Vol 24(2): 1–21

⁹ S. Bakker and C. Huizenga (2010). Making Climate Instruments work for Sustainable Transport in Developing Countries. In: Natural Resources Forum, Vol 34, No. 4. November 2010

¹⁰ http://cdm.unfccc.int/filestorage/a/i/KVHFC31M0GEAQUW9TDRBY58J6XLNSI.pdf/eb72_report%20version%2001.1?t=NfH8bWp5b2w3fDCHut-aps-xvM9qvlFwHvom

¹¹ http://www.nama-database.org/index.php/By_sector

¹² OECD, 2010, Working Party on Global and Structural Policies, Cities & Carbon market finance: taking stock of cities experience with CDM and JI, JT03290002

¹³ Huizenga, C. and H. Allen, (2012) . NAMAs: A Fresh Start for the Transport Sector after the CDM Debacle. Mitigation Talks. Series on Nationally Appropriate Mitigation Actions. Volume 3 (4) and 4 (1). October – January 2013

[ubmissions to the U.pdf](#)) and efforts by Center for Clean Air (<http://ccap.org/issue/transportation-and-smart-growth/>) and GIZ (www.transferproject.org) on conceptual frameworks for transport NAMAs.

- Development of GHG impact assessment methodology for transport sector by Clean Air Asia and ITDP which already forms the basis for official GEF impact assessment methodology for transport projects (http://www.thegef.org/gef/sites/thegef.org/files/publication/GEF_CalculatingGHGbenefits_webCD.pdf)

All of these have contributed to the following recommendations of the BtG initiative and the SLoCaT partnership with respect to MRV for domestic NAMAs.

MRV guidelines can consist of different tiers of stringency, starting with a general emission quantification based on energy use and indicators that demonstrate implementation. In the case of the transport sector there is a growing number of methodologies with varying degrees of complexity that are ready for use.¹⁴

In some cases it will be possible to adopt more advanced approaches that include bottom-up methodologies that calculate effects based on vehicle km travelled and fleet composition data. In other cases a top down approach based on fuel sales might be the only possible approach.

A particular problem for transport NAMAs, especially for bottom-up modeling, is the requirement for data. In many cases, such data will not all be available at the start of a project and many assumptions will need to be made. To address the data problem, consideration could be given to the use of default values to describe the impacts of certain interventions. Lessons can be learned from the GEF GHG manual for transport, which includes default values. Some methodologies that are being pilot tested at the moment have adopted a hybrid approach combining top-down and bottom-up approaches to improve the accuracy of ex-ante hypotheses (an alternative to default values).

Given the complexity of GHG MRV, other options for indicators or metrics could be considered. This could also help to address the time lags that occur in several cases before measures are effective in reducing emissions. These alternative metrics would include output indicators — such as number of vehicles, share of biofuel in the mix, modal split, and quantity of infrastructure built — or process indicators — such as existence of transportation planning. For each type of action, suitable indicators could be developed that would together define the impact of the transport NAMAs.

This approach would require an internationally established consensus on the existence of causal linkages between specific indicators and possibly also on the expected quantified GHG emissions reductions in specific operational conditions. Especially during the introduction phase of NAMAs, such database would be most valuable for the transport sector, and over time assumptions could be updated and refined.¹⁵

Another problem experienced by the transport sector is that of setting boundaries as the classification of emissions in scope 1 (direct GHG emissions), 2 (indirect GHG emissions), 3 (other indirect GHG emissions) is not well suited to the transport sector because of the fact that

¹⁴ See <http://www.slocat.net/?q=content-stream/187/ghg-assessment-tools> for an overview of available tools to assess GHGs in the transport sector.

¹⁵ The new [Climate Technology Center and Network](#) could possibly play a role in the development and maintenance of such a database.

emissions originate from a large number of small sources. This is another area where further international consensus building will be required.

A challenge for all NAMAs is the integration of co-benefits (in the case of transport sector congestion reduction, energy security, and air pollution reduction or improved road safety). In the case of transport projects, these co-benefits drive the decision-making process for low-carbon transport in developing countries rather than climate change. Yet, so far there is no clarity and consensus whether and how these major drivers should be incorporated in MRV. By not incorporating these in the NAMA MRV, there is a danger that the MRV process becomes marginalized and that it mainly serves as a parallel reporting process to satisfy external stakeholders, and that it is not used for the adjustment of the strategy of the NAMA.

BtG and SLoCaT presently work on several levels to create a better understanding of the potential of land transport and the international climate change negotiations and also intend to organize a Transport Day at COP in 2013–2015. The transport day will take place on Sunday 17 November 2013 and its objectives are:

- To promote the integration of transport in policy making on climate change mitigation and adaptation under the UNFCCC;
- To inform and exchange information on progress in the sector with Parties and those interested in climate change and transport;
- To demonstrate the contribution that transport can make to mitigation and adaptation, specifically in the context of sustainable development; and
- To ensure that modalities for financing, capacity building, and technology transfer under the UNFCCC are appropriate for the transport sector.

It is the intention of BtG and the SLoCaT partnership to organize such a Transport Day at least for the next three years and in this manner provide a focus for the discussions on the integration of sustainable, low carbon transport in the UNFCCC process.

We in the BtG initiative and the SLoCaT Partnership are fully prepared to present and discuss these proposals at any time.

With best regards,

On behalf of the BtG initiative and SLoCaT Partnership

A handwritten signature in black ink, consisting of a series of overlapping loops and a long horizontal stroke extending to the right.

Cornie Huizenga
Joint Convener, SLoCaT Partnership

Annex 1: Members Partnership on Sustainable, Low Carbon Transport (SLoCaT)

1. African Development Bank
2. Alliance to Save Energy
3. Asian Development Bank
4. Believe Sustainability
5. Corporación Andina de Fomento
6. Cambridge Systematics
7. Center for Clean Air Policy
8. Centre for Environment Planning & Technology Ahmedabad
9. Center for Science and Environment
10. Center for Sustainable Transport Mexico
11. Center for Transportation and Logistics Studies, Gadjah Mada University
12. China Urban Transport Research Centre
13. Civic Exchange
14. Clean Air Asia
15. Clean Air Institute
16. CODATU
17. Despacio
18. Dutch Cycling Embassy
19. German International Cooperation
20. Ecofys
21. EMBARQ, The WRI Center for Sustainable Transport
22. Energy Research Center Netherlands
23. European Bank for Reconstruction and Development
24. European Institute for Sustainable Transport
25. European Cyclists' Federation
26. FIA Foundation
27. Fraunhofer- Institute for Systems and Innovation Research
28. Global Environmental Facility
29. Global Transport Knowledge Partnership
30. Global Urban Development
31. HealthBridge
32. Hong Kong Shanghai Bank
33. Innovation Center for Energy and Transportation
34. Inter-American Development Bank
35. International Association for Public Transport
36. International Energy Agency
37. International Road Federation
38. International Transport Forum
39. International Union for the Conservation of Nature
40. International Union of Railways
41. Institute for Global Environmental Strategies
42. The Institute for Transport Studies, University of Leeds, UK
43. Institute of Urban Transport India
44. Institute for Transport Policy Studies
45. Institute for Transportation and Development Policy
46. Institute of Transport Studies, University of California, Davis
47. Korean Transport Institute
48. Ministry of Land Infrastructure Transport and Tourism, Japan
49. Mobility Magazine
50. National Center for Transportation Studies, Philippines
51. Rockefeller Foundation
52. Society of Indian Automotive Manufacturers
53. Stockholm Environment Institute
54. Sub-Saharan Africa Transport Policy Program
55. Tehran Urban and Suburban Railway operation Company
56. The Energy and Resources Institute
57. Transport and Environment
58. Transport Research Laboratory
59. United Nations Development Program
60. United Nations Center for Regional Development
61. United Nations Economic Commission on Latin America and the Caribbean
62. United Nations Department for Economic and Social Affairs
63. United Nations Economic Commission for Europe
64. United Nations Economic and Social Commission for Asia and the Pacific
65. United Nations Environment Program
66. United Nations HABITAT
67. University College of London, Department of Civil, Environmental and Geomatic Engineering
68. University of Transport and Communication Hanoi
69. University of Twente-ITC
70. VEOLIA Transport/Transdev
71. Victoria Transport Policy Institute
72. Volvo Research and Education Foundations
73. World Health Organization
74. World Streets
75. Wuppertal Institute
76. WWF International

The Partnership on Sustainable, Low Carbon Transport (www.slocat.net) is a type II partnership registered with the United Nations Department for Economic and Social Affairs. For further information please contact Cornie Huizenga and Tom Hamlin, Joint conveners of the SLoCaT Partnership ([cornie.huizenga\[at\]slocatpartnership.org](mailto:cornie.huizenga[at]slocatpartnership.org) and [Hamlin\[at\]un.org](mailto:Hamlin[at]un.org))

Annex 2: Members Bridging the Gap Initiative

- Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH
- Institute for Transportation and Development Policy (ITDP)
- TRL - Transport Research Laboratory
- International Association of Public Transport (UITP)
- Veolia Transdev

The Bridging the Gap initiative is a multi-stakeholder partnership formed in 2009 at COP14 to encourage international recognition that land transport should play a more prominent role in addressing climate change in the Post-2012 agreement. The partners come from the public, private, association, research and NGO sectors and work together at 'bridging the gap' between the sustainable transport community and the climate change negotiations process. Partners actively follow the process and latest developments and frequently organise workshops and side events, publish reports, collecting relevant information on land transport and climate change and promoting sustainable solutions for developing countries.

www.transport2020.org