Centre for International
Governance Innovation

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# Shining the Light on Climate Action
## The Role of Non-party Institutions

Arunabha Ghosh
and Sumit S. Prasad

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Governance Innovation

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Centre for International Governance Innovation

67 Erb Street West
Waterloo, ON, Canada N2L 6C2
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# Table of Contents


vi About the Authors

vi About the Fixing Climate Governance Project

vii Acronyms and Abbreviations

1 Executive Summary

2 Introduction

2 The Growing Burden of Transparency

3 Everyone Wants Transparency (for Others)

4 Why Non-party Reporting?

5 Improving Data for Reporting

6 Conducting Independent Assessments for Reviews

7 Informing the Global Stocktake

8 Assessing Plurilateral Initiatives

9 Supporting Non-party Participation in Transparency

11 Conclusion

12 Works Cited

14 About CIGI

14 À propos du CIGI

## About the Authors

Arunabha Ghosh is the chief executive officer at the Council on Energy, Environment and Water (CEEW) (http://ceew.in), one of South Asia's leading policy research institutions and among the world's leading climate think tanks. He is a policy adviser, author, columnist and institutional builder. Arunabha is, most recently, co-author of *Energizing India: Towards a Resilient and Equitable Energy System* (SAGE, 2017); *Human Development and Global Institutions* (Routledge, 2016); and *Climate Change: A Risk Assessment* (2015). He is also co-editor of *The Palgrave Handbook of the International Political Economy of Energy* (2016). Arunabha has been actively involved in the design of the International Solar Alliance since its inception. He conceptualized and is founding board member of the Clean Energy Access Network. With experience in 42 countries, he previously worked at Princeton, Oxford, the United Nations Development Programme (New York) and the World Trade Organization (Geneva). Follow Arunabha on Twitter: @GhoshArunabha.

Sumit S. Prasad is a research analyst at CEEW and the lead author of CEEW's recent publications "Enhanced Transparency Framework in the Paris Agreement: Perspective of Parties" and "Shaping Global Stocktake Process under the Paris Agreement." His research areas include climate change monitoring, evaluation and governance; environmental, social and governance analysis; and energy efficiency. He previously worked at Evalueserve and the Center for Study of Science, Technology & Policy. Sumit has an M.B.A. in business sustainability from TERI University and a B.E. in electronics and communication from National Institute of Engineering. Follow Sumit on Twitter: @sumitprd.

## About the Fixing Climate Governance Project

Project Leaders: John Odell, CIGI Senior Fellow and David Runnalls, CIGI Distinguished Fellow

Climate scientists agree that human activity has been changing our planet's climate over the long term. Without serious policy changes, scientists expect devastating consequences in many regions: inundation of coastal cities; greater risks to food production and, hence, malnutrition; unprecedented heat waves; greater risk of high-intensity cyclones; many climate refugees; and irreversible loss of biodiversity. Some international relations scholars expect increased risk of violent conflicts over scarce resources due to state breakdown.

Environmentalists have been campaigning for effective policy changes for more than two decades. The world's governments have been negotiating since 1995 as parties to the United Nations Framework Convention on Climate Change (UNFCCC). Their 2015 Paris Agreement represents a historic new platform for international cooperation. It is the first UN climate agreement obliging all member states to make concrete contributions to address the problem. Yet important details of this new regime remain to be negotiated. The members' pledges still must be implemented. And it is widely agreed that, if implemented, their 2015 pledges alone will not be sufficient to meet the need identified by science or to achieve their own agreed goal of stopping global warming well below 2°C.

The Fixing Climate Governance project is designed to contribute fresh ideas to the global debate. High-level workshops have developed a set of policy briefs and short papers written by experts from multiple countries and disciplines. Publications began in 2015. Some offer original concrete recommendations for making the UNFCCC more effective. Some propose diverse other ways to improve climate governance. The ideas in two 2015 publications were implemented in Paris. New publications, taking stock of recent conditions and research and looking forward on multiple levels, appear as they are completed.

# Acronyms and Abbreviations

| | |
|---|---|
| BINGOs | business and industry NGOs |
| CBIT | Capacity Building Initiative for Transparency |
| CEEW | Council on Energy, Environment and Water |
| $CO_2e$ | carbon dioxide equivalent |
| COP | Conference of the Parties |
| GHG | greenhouse gas |
| ICAT | Initiative for Climate Action Transparency |
| IMF | International Monetary Fund |
| ISA | International Solar Alliance |
| LGMAs | local government and municipal authorities |
| MPGs | modalities, procedures and guidelines |
| MRV | measurement, reporting and verification |
| NAZCA | Non-State Actor Zone for Climate Action |
| NDCs | nationally determined contributions |
| NGOs | non-governmental organizations |
| OECD | Organisation for Economic Co-operation and Development |
| R&D | research and development |
| RINGOs | research and independent NGOs |
| RTAs | regional trade agreements |
| SEEG | Sistema de Estimativa de Emissões de Gases de Efeito Estufa (Greenhouse Gas Emissions Estimate System) |
| UNFCCC | United Nations Framework Convention on Climate Change |
| WTO | World Trade Organization |

# Executive Summary

Article 13 of the Paris Agreement (United Nations 2015), building on the United Nations Framework Convention on Climate Change (UNFCCC), establishes a transparency mechanism to enhance the parties' trust in the UN climate regime. But many states at present lack the institutional capacity to fully carry out their obligations under the Paris Agreement, to measure and report their greenhouse gas (GHG) emissions, or their steps to mitigate them; to perform technical reviews of all national reports; and to implement the planned "global stocktake" every five years.

The differences in their domestic capacities have influenced how parties have approached negotiations on transparency. Developed countries demand the same rules for everyone; many developing countries seek differential treatment in reporting, assessments and reviews.

Parties should encourage non-party stakeholders to supplement state efforts toward transparency and accountability. Non-governmental organizations (NGOs) could do so by: improving data for reporting; conducting independent assessments for reviews; informing the global stocktake; and assessing the collaborative platforms and initiatives, which were launched in parallel to the Paris Agreement. In some emerging economies, NGOs and the private sector already can supplement government work in emissions reporting, and their models should be spread to other developing countries.

States should make the participation of non-party stakeholders a more formal and legitimate part of the new transparency mechanism. To do so would mean investing in these stakeholders' capacity to report on emissions and financial flows, developing common standards for country assessments and giving the stakeholders a greater role in the review process.

There is wide discrepancy between the resources available to non-party stakeholders from developed countries versus those from developing countries. The parties' Capacity-building Initiative for Transparency (CBIT) Fund must invest in the capacity of independent, non-governmental institutions in developing countries to improve their technical capacities, so that they can contribute more meaningfully to the existing UNFCCC process for engaging with stakeholders.

A group of UNFCCC-accredited research and independent NGOs — RINGOs — should form a task force, with the mandate to share practices, develop common standards and support capacity building. Philanthropic foundations, the CBIT Fund and host governments should provide financial assistance for this exercise, with members from developed and developing countries.

Business groupings, RINGOs and local government and municipal authorities (LGMAs) should form another task force, along with the Organisation for Economic Co-operation and Development (OECD), to develop common protocols for defining, tracking and reporting on climate finance and related technology investments.

The development of common standards will follow a staged process. The first step is that the RINGOs would have to agree on the methodologies to follow for counting and reporting emissions. Second, these standards would need to be accepted by governments, which is why the task force should be invited to present its findings and recommendations to the Ad Hoc Working Group on the Paris Agreement. A third (potential) step is that private-sector actors in various jurisdictions, or subnational government entities (cities and provinces), would voluntarily adopt these common protocols.

States should also include non-party stakeholders as observers in technical reviews of national reports, as well as encourage their participation in domestic consultative processes, similar to the World Trade Organization's (WTO's) trade policy reviews. Experience from other regimes suggests that enhanced monitoring is acceptable to parties when it has no or only limited links to legal compliance procedures. Evidence shows that the countries that have been able to establish sound third-party capacity at home are the ones that have been active in the multilateral processes. A greater role for non-party stakeholders in climate reporting, developing national inventories and engaging in cross-country technical assessments would also create the conditions for their greater participation, as observers and advisers, during the review meetings.

## Introduction

The Paris Agreement on climate change (UN 2015) is, first and foremost, a statement of trust. It became possible, in part, because political leaders decided that each country had to contribute to the global effort and, in part, because the required effort was not legally binding. After more than two decades of climate negotiations, it had become clear that if countries were not given the flexibility to determine their own courses of action, many would not agree to sign on to a more binding treaty. In return for the flexibility and respect for national sovereignty, the expectation was that trust would form the bedrock of climate action in the future.

On the one hand, the hope is that once the nationally determined contributions (NDCs) have been tabled, compliance will follow because countries have pledged actions voluntarily. On the other hand, robust monitoring would increase confidence that members are indeed complying with their commitments. That trust, stemming from domestic policies and programs and collaborative initiatives and platforms, would create the environment for scaling ambitions and bringing the world gradually on to the pathway of climate stabilization.

In order to build and deepen the trust between parties, the Paris Agreement aspires to greater transparency based on a robust mechanism for measurement, reporting and verification (MRV) of GHG emissions and related actions. Designing the nuts and bolts of this mechanism will involve contentious negotiations. As with the negotiation of the agreement overall, countries continue to demand greater flexibility for themselves while seeking to impose more stringent requirements on others. Could non-party institutions (NGOs, research bodies and think tanks, the private sector) play a role in the evolving architecture for transparency under the climate regime? If so, why and how?

## The Growing Burden of Transparency

Transparency requirements in the climate regime have steadily grown, in particular for developing countries. In 2007, the Bali Action Plan (decision 1/CP.13) introduced the notion of an MRV process, to ensure transparency in mitigation commitments or actions undertaken by all parties (UNFCCC 2008). At the sixteenth session of the Conference of the Parties (COP16) in Cancun, 2010, parties decided that developing countries would submit a biennial update report to update their emissions inventory every two years and record mitigation actions taken, following from the most recent national communication (UNFCCC 2011, para. 16(c)). These reports would be subjected to an international consultation and analysis. COP17 (in Durban, 2011) and COP19 (in Warsaw, 2013) supplemented these decisions by adopting several decisions and guidelines on the elements of the MRV framework, including the composition, modalities and procedures to conduct technical analysis under the international consultation and analysis mechanism (UNFCCC 2012; 2014). Under the agreed provisions, developing countries could voluntarily establish domestic processes, arrangements or systems for MRV.

The Paris Agreement upgrades the ambitions for transparency. Article 13 (para. 5 and 6) sets out the objectives of the new (proposed) transparency framework: to provide a clear understanding of climate action, track progress toward NDCs, and inform the global stocktake; bring clarity on support offered and received by parties; and provide a full overview of the aggregate financial support provided to inform the global stocktake (UN 2015).

These objectives translate into three key design features. The first is reporting, with the agreement maintaining the periodicity of reporting as agreed in 2010. But with the higher level of ambition under the agreement, it was inevitable that countries would demand a greater level of accountability and transparency, not just for the mitigation actions taken but also for the financial support provided.

A second design feature is an independent technical review of national GHG inventories and of the implementation of NDCs (ibid., article 13, para. 12). This review is to be followed by a multilateral discussion (a peer review, of sorts, among parties) to review progress achieved. These are now hard obligations, and all parties need to go through an independent technical assessment for their submissions. Detailed technical reviews ought to be welcomed by parties, if the process would help them to build domestic capacity to monitor emissions. The international review, on the other hand, is meant to be in the spirit of being "non-intrusive, non-punitive and respectful of national sovereignty and avoid undue burden for Parties" (ibid., article 13, para. 3).

The third feature is the global stocktake — a periodic assessment of "the collective progress towards achieving the purpose of [the Paris] Agreement and its long-term goals" (ibid., article 14.1). Although the contributions are nationally determined, they would have to be fulfilled — and preferably ratcheted up — in order to keep global temperature rise on a sustainable pathway. In 2018, parties will take stock of their collective efforts against the effort needed to limit temperature rise (to "well below 2°C") as part of a "Facilitative Dialogue" at COP. The first stocktake under the agreement will be in 2023, and stocktakes will take place thereafter every five years. If the collective global achievements (as evinced from the stocktake exercise) were to fall short of the targets, more drastic measures would be needed.

In short, the enhanced transparency requirements are directly linked to the overall ambition of the Paris Agreement. The flexibility afforded to parties is a means to nudge them further in terms of mitigation actions and assistance provided, not an excuse to do just the bare minimum or even dilute their commitments. The transparency mechanism has to be the bulwark against any backsliding.

## Everyone Wants Transparency (for Others)

A well-designed transparency mechanism must help to identify good practices, put in place a learning process and create conditions conducive to international benchmarking. MRV helps to recognize mitigation actions, making them more visible, and thereby encourages countries to raise ambitions. It can also help to quantify impacts of policies and identify gaps. Moreover, a robust MRV system can improve access to international and private finance, as the impacts resulting from earlier rounds of investment become known. It also helps to identify national priorities on technology needs, capacity building and financial assistance.

Article 13 of the Paris Agreement directs parties to adopt common modalities, procedures and guidelines (MPGs), as appropriate, for the transparency of action and support. Further, decision 1/CP.21 states, "The modalities, procedures and guidelines of this transparency framework shall build upon and *eventually supersede* the measurement, reporting and verification system established by decision 1/CP.16, paragraphs 40–47 and 60–64, and decision 2/CP.17, paragraphs 12–62, immediately following the submission of the final biennial reports and biennial update reports" (UNFCCC 2016, para. 98; emphasis added).

The new transparency framework applies to all countries with provisions for regular reporting. Decision 1/CP21 also gives the Ad Hoc Working Group on the Paris Agreement the mandate to:

→ develop MPGs for the enhanced transparency arrangement;

→ provide guidance on features of NDCs; and

→ manage matters related to the global stocktake and adaptation communications. (Ibid., para. 91)

In 2016 in Marrakech, the COP22 parties decided that the common methodologies to account for NDCs would be decided by 2018 (the first session of the Conference of the Parties serving as the Meeting of the Parties to the Paris Agreement). The Ad Hoc Working Group is expected to work closely with parties and other bodies, such as the Subsidiary Body for Scientific and Technological Advice and the Standing Committee on Finance, to frame MPGs by 2018. So far, the working group has held three engagements with parties on these subject matters: in Bonn (May 16–26) and Marrakech (November 7–14) in 2016, and in Bonn in 2017 (May 8–18).

The challenge is to design an MRV system that satisfies all parties. At COP21, parties had their demands met only partially. The Paris Agreement comes with built-in flexibility, taking into account the different capacities of countries and their collective experiences. The United States was successful in its demand of avoiding double counting of emissions reductions. It was less clear, from the perspective of developing countries, how contributions to finance and technology would be counted. A case in point was the unseemly controversy, just weeks before COP21, over an OECD estimate of US$60 billion of climate financing, a value that developing countries strongly contested, especially when commitments under the Green Climate Fund were about US$10 billion (King 2015).

Under the earlier transparency provisions, developed countries had to include quantified emission limits and emission reduction objectives into their MRV process. Developing countries were to spell out their nationally appropriate mitigation actions, especially those supported and enabled by external technology financing, and capacity building, through an MRV arrangement.

Under the more complex transparency ambitions under the Paris Agreement, parties have interpreted the provisions in several ways (Prasad, Ganesan and Gupta 2017). Developed countries lay emphasis on *common* MPGs, that is, the same provisions from developed and developing parties. China, India and the like-minded developing countries coalition argue that *differentiation* in MPGs is fundamental to the transparency framework. China proposes minimum transparency (threshold) requirements for developing country parties, with a balanced approach toward transparency of action and transparency of support. Argentina, Brazil and Uruguay, along with the like-minded developing countries, believe that much more transparency of support is needed, considering the greater obligations already on parties for transparency of action.

In short, the call is for differentiation in how transparency is treated, as well as for greater balance between actions and support provided. The disagreements over how much flexibility developing countries can enjoy extend from reporting to review. Developed country parties have demanded that developing countries report on their plans to improve reporting, and that these also be discussed during the review process. Australia, for instance, demands that parties explain why they would need the flexibility to deviate from the common guidelines. China prefers reviews to be facilitative processes, conducted in a non-intrusive manner, and flexible as well, so that countries can choose how to report based on their national circumstances. The Independent Association of Latin America and the Caribbean has suggested that reviews be desk-based, centralized and in-country, with the peer review process used for parties with similar capabilities.

The responsibility for making reliable estimates of a country's national emissions and the impact of its mitigation measures falls squarely on the transparency and robustness of its *domestic* process for GHG accounting. But the quality of such reporting also has implications for the *multilateral* review process. Whereas the physical outputs and financial outlays for policies are documented at various levels, there are often no institutional mechanisms in place to monitor the associated emissions (and reductions of emissions). Without such procedures, many developing countries fear they would find themselves on the back foot during multilateral reviews. They would also struggle to demand appropriate financial and technological support for their low-carbon transitions (which was one of the stumbling blocks in the negotiations on a phase-down of hydrofluorocarbons). This is why they seek differentiation within the transparency rules.

## Why Non-party Reporting?

In international regimes, four assumptions underlie calls for strengthened monitoring:

- self-reporting combined with independent international reports makes information more credible;
- peer review imposes pressure on countries to implement commitments;
- transparency also increases pressure from domestic constituencies; and
- separating transparency from enforcement provisions induces greater participation.

Toward these ends, monitoring mechanisms are designed to provide different kinds of information (advance warning, impact analysis, compliance-oriented information); help increase monitoring capacity at home; and facilitate follow-up processes to induce improved compliance (Ghosh 2010).

One of the main challenges in designing the transparency mechanism under the Paris Agreement is that parties are at different starting points in terms of their capabilities. Hence, there are large uncertainties, not limited to the quality of reporting but also regarding the methodology and assumptions followed. With limited resources available, many parties would find it challenging to build their domestic systems in line with a robust transparency mechanism. The Paris Agreement established the CBIT to help developing countries meet their transparency obligations, a nod to developing countries' concerns about onerous reporting requirements. In late 2016, a US$50-million fund was created under the Global Environment Facility to support the CBIT (Global Environment Facility 2016). But transparency would mean *ex post* monitoring of disbursements from this fund as well, not just *ex ante* reporting of commitments.

An alternative is to boost the role of non-party stakeholders to fill some of the reporting gaps. There are two key reasons why they could aspire to a legitimate role. First, in many cases (as will be described below), non-party institutions have already got more capacity and resources to monitor and report on emissions, as well as on financial flows. Second, given that the Paris Agreement has been designed as a "bottom-up" instrument, the emphasis for climate action has greatly shifted toward domestic actions, not just national policies. Parties, in their NDCs, have also highlighted actions by their private-sector firms and civil society organizations.

The Paris Agreement, in fact, recognizes the importance of engaging with non-party stakeholders, such as civil society organizations, the private sector, financial institutions, city governments and other subnational authorities, local communities and Indigenous peoples — and welcomes their efforts. But the agreement is silent about the role non-party stakeholders could play within the transparency provisions.

Based on precedence and experience in other regimes, as well as on existing initiatives with regards to climate change, non-party constituents could have a role in all three design features of the enhanced transparency mechanism:

- → improving data for reporting;
- → conducting independent assessments for reviews; and
- → informing the global stocktake.

As well, non-party constituents could play a role in assessing the collaborative platforms and initiatives, which were launched in parallel to the Paris Agreement.

# Improving Data for Reporting

There are already examples of how non-party actors have been assisting to build the information base for in-country reporting or to develop multi-country scenarios.

## In-country Capacity Development

The Initiative for Climate Action Transparency (ICAT)[1] was founded in 2015 to respond to the critical need to support improved transparency and capacity building under the Paris Agreement.

As many developing countries lack the tools and well-designed institutional arrangements, ICAT aims to strengthen their capacity to assess climate actions (in the context of their NDCs) and report their progress in line with the Paris Agreement. So far, 20 countries have formally joined the initiative and are developing methodological frameworks based on their needs and national circumstances. These methodological frameworks are a series of guidelines, which focus on measuring the effects of policies and actions on reducing GHG emissions, responding to sustainable development needs and driving systemic change.

This initiative would improve the availability and quality of data and enable countries to promote efficient, cost-effective policies. It would also provide a platform for countries

1 ICAT implementing partners are UNEP DTU Partnership, Verified Carbon Standard and World Resources Institute. The Climate, Community & Biodiversity Alliance and Rainforest Alliance are supporting partners; see www.climateactiontransparency.org/about/.

to share lessons learned and build mutual confidence in their climate actions.

### In-country Assessments

In 2013, Climate Observatory (a Brazilian network of climate-related NGOs) began an initiative called SEEG[2] to present comprehensive GHG estimates for Brazil. The datasets of the first edition include emissions from 1970 to 2014, related to all segments of the national economy. These datasets are available online with free access to researchers, journalists, decision makers and the general public. With this successful experience, SEEG has started exporting the same methodology to other countries. In 2014, SEEG Global Network was developed during COP20 in Lima.

A similar initiative led to the creation, in 2015, of the GHG Platform India, a coalition of six local civil society organizations.[3] This platform complements the existing efforts of the Government of India by addressing data gaps and data accessibility issues, and thereby exceeds the scope of national inventories. India submitted its first biennial update report in December 2015, presenting an emission inventory of 2010. The estimates for the industrial sector were about 497 million tonnes of carbon dioxide equivalent ($CO_2e$) and had unclear methodology and assumptions. By undertaking a much more granular assessment (using data from more than 200,000 industrial units), one of the coalition member organizations, CEEW, estimated the emissions to be 490 million tonnes of $CO_2e$. The details of the data sources, methods and assumptions are outlined on the GHG Platform portal. Although at an aggregate level the differential is only about 1.4 percent, at a sectoral level the differences in emissions estimates vary from –257 percent to 157 percent (Gupta, Biswas and Ganesan 2017).

These examples indicate how independent data collection and analysis, combined with transparency about methods, could make national submissions more credible. They are also useful in designing or recalibrating domestic policies in order to have more incisive focus on sectors or sub-sectors, or even on specific industrial plants, that need attention.

### Multi-country Scenarios

Elsewhere, ClimateWorks Foundation launched a project called the Carbon Transparency Initiative.[4] The aim is to create development scenarios, which are both granular and transparent, drawing on the trajectory of current policies, trends toward decarbonization in various sectors within the economies, and energy-related investments. Under the initiative, independent researchers are developing models for China, the European Union, India, Mexico and the United States. Such efforts help to standardize methods for evaluating mitigation policies and comparing their impacts across countries. Such approaches could then feed into the review process.

## Conducting Independent Assessments for Reviews

Well-defined standards enhance the credibility of reporting and review. Further, independent assessments by different non-party stakeholders could help to identify good practices, establish a learning process and create conditions conducive to international benchmarking.

The Worldwide Fund for Nature and other international NGOs established the Gold Standard for the Global Goals, now considered the global benchmark for the highest integrity and greatest impact in climate and development initiatives. It sets the best-practice benchmark for energy projects under the Clean Development Mechanism, ensuring that they deliver long-term sustainable development objectives, along with emission reductions. Endorsed by more than 80 NGOs, 1,400 projects across 80 countries have adopted the Gold Standard certification since it was established in 2003 (Gold Standard Foundation 2015).

2 In full, Sistema de Estimativa de Emissões de Gases de Efeito Estufa (translated as Greenhouse Gas Emissions Estimate System); see http://seeg.eco.br/en/o-que-e-o-seeg/.

3 The coalition members were: Council on Energy, Environment and Water (CEEW) (http://ceew.in/); the Center for Study of Science, Technology and Policy (www.cstep.in/); ICLEI Local Governments for Sustainability (www.iclei.org/); Shakti Sustainable Energy Foundation (http://shaktifoundation.in/); Vasudha Foundation; and World Resources Institute India (http://wri-india.org/). See www.ghgplatform-india.org/.

4 See www.climate-transparency.org/about/partner.

In another example, Climate Action Tracker, a collaborative project of three research institutions,[5] conducts an independent assessment of the NDCs and actions of all countries. According to its November 2016 assessment, even if all of the NDCs were fully implemented, temperatures would rise by 2.8°C above pre-industrial levels by 2100 (Climate Transparency 2017).

Independent assessments are also useful for subnational reviews. The carbon*n* Climate Registry (an initiative of ICLEI Local Governments for Sustainability[6]) helps local and subnational governments by offering a clear framework for structuring their climate data. It facilitates GHG reduction commitments, the development of emissions inventories, and reporting on climate mitigation and adaptation actions. The registry serves as an important tool for advocacy and also as the global response of local and subnational governments toward MRV of their own climate actions.

The examples above demonstrate the role of non-party stakeholders in illustrating the status quo in terms of emissions profiles and trends, assessing policy ambitions and the scope of mitigation and adaptation projects, and highlighting on-the-ground achievements of various associated entities. These non-party stakeholders could facilitate an independent globally endorsed approach, based on data from credible sources, which could be comprehensive enough to compare climate actions across parties. Acting as a nodal bridge between the UNFCCC and parties, the reports and assessments from these bodies could become the foundation for an enhanced transparency regime. The data gaps, which emerge from these detailed exercises and assessments, could also inform needs assessments and help to allocate resources to build domestic capacities of developing country parties.

5 See its data portal at www.climateactiontracker.org/.

6 The carbon*n* Climate Registry was developed with support from ICLEI — Local Governments for Sustainability and the Government of Mexico City. The registry is operated by the Bonn Center for Local Climate Action and Reporting (carbon*n*® Center); see http://carbonn.org/data/.

## Informing the Global Stocktake

The global stocktake is the third design feature and premised on assessing the impact of the collective action of all parties to the Paris Agreement. Besides showcasing collective progress and the efforts of parties, the ultimate objective of the stocktake is to enhance international cooperation for climate action. Parties have indicated that they want the stocktake to be "comprehensive" so as to cover mitigation, adaptation and means of implementation and support (finance, technology and capacity building), and to ensure transparency in a balanced manner between actions and support (Ad Hoc Working Group on the Paris Agreement 2016).

Non-party stakeholders could play a vital role in facilitating this objective. Their data and inputs could inform political leaders and help decision making at higher levels. The work of other bodies, such as the periodic assessments and synthesis reports of the Intergovernmental Panel on Climate Change, are crucial to understanding trends in the climate system and the probabilistic impacts of a warming climate under various emissions pathways. In turn, they inform decisions on adaptation and mitigation actions. Moreover, initiatives such as the India GHG Platform, SEEG, the carbon*n* Climate Registry and other platforms would facilitate fact-finding and evidence-gathering, which would be at the core of the global stocktake.

Beyond country assessments, the stocktake could also take account of initiatives and actions within the private sector. In 2016, in his role as chair of the Financial Stability Board, Mark Carney asked Michael Bloomberg to lead a task force to examine how investors, lenders and insurers could better understand the threats and opportunities presented by climate change (Ralph 2016a). Known as the Task Force on Climate-related Financial Disclosures, it published its suggestions in December 2016 (Ralph 2016b). More than 30 organizations, including Aviva, Axa, BHP Billiton, JPMorgan and Daimler, have publicly supported the project. Such initiatives underscore that assessments of the direct and second-order impacts of climate change are not merely concerns for government negotiators but have implications for investor confidence as well. This is another reason why non-party stakeholders should and could have a role in the global stocktake.

# Assessing Plurilateral Initiatives

COP21 also created opportunities to establish plurilateral partnerships, particularly on technology. These emerged from growing frustration with the ineffectiveness of top-down technology and finance mechanisms (Ghosh, Vijayakumar and Ray 2015). One platform was the International Solar Alliance (ISA), promoted by India and France, which plans to aggregate demand to drive solar prices down, scale up technologies currently available and pool resources to invest in solar research and development (R&D) (Ghosh 2016; Ghosh and Chawla 2016). Another initiative was Mission Innovation, proposed by the United States, which would bring together 22 countries and the European Union to double their spending on energy-related R&D. A third idea was the Breakthrough Energy Coalition, which involved wealthy private individuals (led by Bill Gates) pooling resources to support clean technology innovation.

At one level, these initiatives demonstrated the need to develop action-oriented partnerships, centred on energy access or renewable energy-related technologies (Ghosh and Ray 2015). However, progress has been patchy. Thirty-one countries have so far signed the Framework Agreement of the ISA and three work programs on solar financing, applications in agriculture, and off-grid technologies have been launched. But Mission Innovation's future is uncertain with the US decision to withdraw from the Paris Agreement and proposed budget cuts to energy R&D (Irfan 2017). At the Second Mission Innovation Ministerial in Beijing in June 2017, an action plan was adopted amid lukewarm participation and commitments from the United States (Mission Innovation 2017). The Breakthrough Energy Coalition had not demonstrated much momentum until COP22 in Marrakech. In December 2016, Gates announced a US$1 billion Breakthrough Energy Ventures Fund, but there has been little news since about how it would be deployed (Dolan 2016).

These parallel initiatives are both outcomes of the positive political mood, which was created in the lead-up to the Paris Agreement, as well as by contributors to the trust in collaborative climate action, which the agreement seeks to engender. As designed, these initiatives are not obligated to report on their activities to the UNFCCC. The ISA's Interim Secretariat reports on progress at the meetings of ISA's International Steering Committee and via a quarterly journal. Mission Innovation's activities are discussed at the annual Clean Energy Ministerial meetings.

But the reporting on and reviewing of the progress achieved under these initiatives should be part of the global stocktake. They would serve as evidence of collective action rather than merely a review of any single party's performance. Given that many of these platforms actively involve the private sector, NGOs and research institutions within their ambit, the role of non-party actors in independently assessing and reporting on their performance again becomes salient.

Further, if there were a proliferation of bilateral or plurilateral agreements/partnerships in the climate regime, there could be potential inconsistencies and lack of coherence in their operation. Without periodic monitoring, these challenges would not become obvious.

Similar problems arose in the trade regime with the proliferation of regional trade agreements (RTAs). Although each country's trade policy review under the WTO examined its membership in various RTAs, there was no analysis of the impact of a regional trade bloc on the multilateral trading system as a whole. A committee on RTAs had been formed in 1996. But the WTO Secretariat had not been able to complete a single RTA examination report. After years of negotiations, in 2006 WTO members created a transparency mechanism for RTAs. The mechanism demanded early announcements when RTA negotiations commenced and concluded, as well as notifications of the RTA text, annexes and protocols *before* the agreement took effect, timely notification of amendments, and factual presentations from the WTO Secretariat. The presentations, in turn, would be discussed in review meetings. Further, third parties could also report any information they believed would be of relevance when examining the RTAs (Ghosh 2011).

The Paris Agreement's transparency mechanism should adopt dedicated procedures to monitor and review plurilateral initiatives, which have an impact on the global community's collective effort to mitigate or adapt to climate change. The procedures could be similar to the WTO's mechanism for RTAs, but would also need to include an explicit role for the private sector and civil society, since many of the climate-related initiatives have a direct role for the non-party stakeholders. In addition to submissions from these initiatives, the UNFCCC Secretariat should prepare its own assessment of their impact, in terms of mitigation actions, financial flows or technological development. Dedicated review meetings for plurilateral initiatives should be held annually, open to parties and non-party participants in the programs.

# Supporting Non-party Participation in Transparency

States should make the participation of non-party stakeholders a more formal and legitimate part of the new transparency mechanism. This move would mean investing in their capacity to report on emissions and financial flows, developing common standards for country assessments, and giving them a greater role in the review process.

Despite several examples of non-party involvement in transparency-related activities, their role is not formalized under the Paris Agreement or in discussions for an enhanced transparency mechanism. What could be counted as "formal" is open to interpretation, as parties seek to carve out flexibility for themselves while applying greater pressure on others. One particular challenge is deciding which non-party institutions should have a role in transparency activities. Whereas all parties to the agreement and the UNFCCC have a voice in the negotiations, rule making and implementation (albeit with different degrees of influence), there are no criteria for non-party participation. Their role, in principle, might be critical to a robust transparency mechanism, but who are "they"?

## Building the Capacity to Report

The first step toward leveraging the capacity of non-party institutions is to use existing platforms and channels. In order to streamline the exchange of information between NGOs and the UNFCCC, the UNFCCC Secretariat has a long-running process of engaging with constituencies with diverse but broadly clustered interests or perspectives. So far, there are nine constituencies (UNFCCC, n.d.) — RINGOs, LGMAs, business and industry NGOs (BINGOs), environmental NGOs, farmers' NGOs, Indigenous peoples organizations, trade union NGOs, women and gender NGOs, and youth NGOs — as well as non-affiliated organizations.[7] These constituencies have traditionally had access to the plenary floor, received periodic updates on negotiations and been involved in bilateral meetings with officials of the convention bodies. Given their active engagement with the UNFCCC process, they could potentially step into a more specific transparency-oriented role.

For instance, paragraph 133 of decision 1/CP.21 calls for non-party stakeholders to share their experiences and suggestions to strengthen the existing technical examination process for mitigation activities (UNFCCC 2016). Also, non-party stakeholders are encouraged to demonstrate their efforts and supporting actions via the Non-State Actor Zone for Climate Action (NAZCA) Platform. Since the 2014 Lima Paris Action Agenda was announced, NAZCA has played a vital role in providing visibility and tracking climate actions of the more than 12,500 commitments registered so far. NAZCA's role provides a precedent for how non-party constituents could have a role even under the new transparency mechanism.

However, there is wide discrepancy between the resources available to non-party stakeholders from developed countries versus those from developing countries. The CBIT Fund must invest in the capacity of independent, non-governmental institutions in developing countries. The examples illustrated above already demonstrate that, given the resources, emerging economies have the in-country capacity to build significantly sophisticated inventories of GHG emissions for their economies. But these cases are more the exception than the rule. Much greater resources must be directed (from the CBIT Fund) for non-government institutions in emerging and least-developed countries. In the process, independent third parties can make incremental progress toward in-country inventories and assessments, which can build confidence for domestic policy making as well as international negotiations.

7 For more on observer NGOs, see http://unfccc.int/parties_and_observers/observer_organizations/items/9545.php.

## Developing Common Standards for Assessments

A new transparency mechanism would eventually need common standards and protocols for the methodologies for estimating and reporting on emissions. These protocols cannot be imposed up front or automatically adopted based on practices in developed countries. In certain cases, in fact, the processes that have been developed, peer reviewed and refined within these countries might have more resonance and relevance for others. These could include emissions from small and medium enterprises, or from the informal sector (which constitutes a large share of the economies of many developing countries). In order to learn from each other's experiences, and adopt common standards over time, research institutions in rich and poor countries need to come together.

A group of RINGOs should form a task force with the mandate to share practices, develop common standards and support capacity building. The RINGOs involved should have demonstrated capacity or interest in the climate regime's transparency requirements. The task force should ideally have equal representation from developed and developing country institutions. Meetings of the task force should be held in developing countries as well, not merely in developed country capitals, so as to enable greater participation of local institutions. Philanthropic foundations, the CBIT Fund and host governments should provide financial assistance for this exercise.

The development of common standards will likely follow a two-step process. First, RINGOs would have to agree on the methodologies to follow for counting and reporting emissions. Differences in the methods, say for the differential treatment of particular sectors, should be clearly justified and understood. Second, these standards would need to be accepted by governments, an outcome that is not predetermined. This is why the task force should be invited to present its findings and recommendations to the Ad Hoc Working Group on the Paris Agreement. A potential third step is that private-sector actors in various jurisdictions or subnational government entities (cities and provinces) voluntarily adopt these common protocols.

The definitions and standards for measuring and reporting on climate finance are likely to be even more contested, even if non-party institutions were to be involved. Parties already disagree on the pledges, contributions and disbursements of climate finance. Further, the plurilateral platforms and initiatives described earlier could have different implications for finance and technology cooperation. On the one hand, they could add to existing bilateral aid programs, and build trust for collective action. On the other hand, developing country parties, which are not participants in these parallel initiatives, would likely contest if investments in such initiatives were counted toward contributions under the multilateral transparency framework. Another complication arises when considering investments and collaborations between business groups and subnational actors.

Another multi-institutional initiative is needed to develop the common protocols for defining, tracking and reporting on climate finance and related technology investments. This endeavour should include BINGOs, RINGOs and LGMAs (again from both developed and developing countries). The OECD would also have to be part of the initiative, given its own established definitions of development assistance and its own but contested estimates of climate finance.

## Making the Review Process More Inclusive

Many UNFCCC member states will probably reject the idea that non-party stakeholders should participate formally in reviewing their reports and assessing their efforts. But parties should allow NGOs to participate as observers in the review process.

Instituting peer review mechanisms is contentious. Members fear that information revealed through transparency procedures could be used against them in enforcement procedures. In practice, the effectiveness of peer pressure depends on participation. Historically, participation levels in review meetings were low in the multilateral trade regime, because many developing countries did not believe they could influence the policies of their richer counterparts. In fact, peer pressure has been largely directed against developing countries (Ghosh 2010). Even in the International Monetary Fund (IMF), peer pressure worked either because (developing country) debtors had obligations to fulfil, or for countries that voluntarily adopted the IMF's standards and codes (Lombardi and Woods 2008).

The choice of words matters. Measurement and reporting is primarily a technical process; reviews and consultations are essentially political. In the IMF's case, terms like "management" or "regulation" were rejected in favour of "surveillance." It was considered a more neutral term, even if in practice surveillance extended to giving policy recommendations (Pauly 2008). The WTO adopted "review" for the Trade Policy Review Mechanism but recent monitoring initiatives in the trade regime use more neutral terms such as "transparency."

The Paris Agreement adopts the term "review" and directs (via article 13, para. 12) the review process to identify areas of improvement for the parties. Would real and perceived asymmetries in peer pressure make parties less likely to participate in the review procedures under the Paris Agreement? Experience from other regimes suggests that enhanced monitoring is acceptable to parties when it has no or limited links to legal compliance procedures.

In parallel negotiations under way for market-based mechanisms under the agreement (article 6), parties have disagreed on whether to allow observers or not. Developed countries and some developing country parties call for greater inclusion of non-state actors, including permitting them to participate and contribute to the discussions. In fact, the Independent Association of Latin America and the Caribbean argued that non-state actors already engaging in market activities would have "valuable, real-life experience to share" (Third World Network 2017). Another Latin American coalition (the Bolivarian Alliance for the Peoples of Our America) has, however, opposed the inclusion of observers, arguing about the lack of transparency about their role, sources of funds and conflicts of interest (ibid.).

Given the precedence of non-party stakeholders developing their capacity to monitor and report, it is likely that again some parties would call for their inclusion in the review process, while others would oppose. In the minimum, parties could encourage non-party institutions to participate in institutionalized domestic processes in the lead-up to the multilateral review meetings. This approach is how businesses and (to an extent) civil society institutions have given their inputs to their government representatives prior to the WTO's Trade Policy Review Mechanism review meetings. As well, evidence shows that the countries that have been able to establish sound third-party capacity at home are the ones that have been active in the multilateral processes. These lessons would be equally applicable to interested stakeholders in the climate regime. A greater role for non-party stakeholders in climate reporting, developing national inventories and cross-country technical assessments would also create the conditions for their greater participation, as observers and advisers, during the review meetings.

# Conclusion

A robust framework for transparency needs the participation of stakeholders from key sectors of the economy — and support from international institutions. Open, democratic societies must welcome transparency and ensure that there is no conflict of interest among institutions that report emissions information and those that vet and verify them. The Paris Agreement offers that joint vision for all signatories. However, to make it operational in a credible manner, parties would need national legal arrangements, appropriate coordinating bodies, inclusive mechanisms for stakeholder engagement and a process to learn the lessons of monitoring and transparency from other international regimes.

Non-party stakeholders could play a vital role by bridging the challenges of building national capacity, monitoring both emissions and financial flows, evaluating inter-country initiatives, and contributing to overall assessments of the effectiveness of global collective action. Their efforts could enhance transparency under the Paris Agreement's reporting obligations (article 13, para. 7) but also contribute to recommending priorities for financial support for climate action. These responsibilities of non-party stakeholders would strengthen the transparency framework, and could build trust and confidence, which are at the bedrock of the new climate architecture.

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67 Erb Street West
Waterloo, ON, Canada N2L 6C2
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