



Experience and challenges on implementing the Enhanced Transparency Framework

Morocco welcomes the opportunity to share its views on its experience related to implementing Article 13 of the Paris Agreement.

Morocco submitted its first Biennial Transparency Report (BTR1) and its National Inventory Report (NIR) on 30 December 2024. This submission outlines Morocco's experience in preparing these reports to fulfill its commitment under Article 13. We look forward to the upcoming Technical Expert Review of Morocco's BTR1, including its insights into areas for future improvement in the implementation of the Article 13 and the Modalities, Procedures, and Guidelines (MPGs) outlined by the Decision 18 CMA.1.

This document provides an overview of the key challenges encountered during the preparation of the first BTR. It begins by highlighting overarching challenges related to the institutional framework, human and technical capacities, access to funding, and other general and cross-cutting issues that have impacted the overall transparency process.

Following this general assessment, the document delves into the specific challenges faced within each area of the BTR. It examines sectoral barriers, technical gaps, and reporting constraints encountered in different chapters of the BTR, including the national GHG inventory, tracking progress on Nationally Determined Contributions (NDCs), Impact and adaptation to climate change and the Support Needed and Received.

By presenting these challenges in a structured manner, this document aims to provide a clear understanding of the challenges faced and lay the groundwork for identifying solutions to enhance future reporting efforts.

Challenges Related to Institutional Arrangements

- The lack of the operationalization of all National GHG Inventory System et Greenhouse Gas Emissions (NIS-GHG) tasks has created difficulties in compiling inventories within the required timelines. As a result, the project had to organize several training sessions in collaboration with international institutions to strengthen the capacities of stakeholders. In addition, technical support was provided.
- The absence of an institutional framework covering NDC tracking, adaptation, financial support, capacity building, and technology transfer has represented significant challenges for data collection and stakeholders' engagement. This gap has led to insufficient development of some chapters due to a lack of available data. A comprehensive institutional framework addressing these aspects is currently being developed by the

ministry through its CBIT 1 project and is expected to help address these challenges. The introduction of a data archiving system will help to improve performance.

- The ongoing process of operationalizing the existing transparency platform, did not facilitate the preparation of Morocco's first BTR. Ensuring the availability of data in advance would have been beneficial. However, this barrier is expected to be resolved with the operationalization of the online transparency platform, which will play a crucial role in preparing Morocco's next BTRs.

Challenges Related to UNFCCC and GEF Requirements

- The GEF's submission and approval process for funding is highly complex and requires extensive documentation. Additionally, the lengthy approval process often delays the actual start of projects. As an example, the funding to support the preparation of the second BTR has not yet been received, while the BTR2 must be submitted in December 2026. Simplifying and accelerating these procedures would enable countries to access funding before project implementation, allowing sufficient time for report preparation while meeting UNFCCC deadlines.
- The deadline of December 31, 2024, was extremely tight, leaving the country little time to conduct the data collection process thoroughly. Since this stage is crucial for ensuring data quality and consistency, more flexible deadlines would be beneficial.
- The December 31 deadline was even more challenging given that the ETF Reporting Tools were only operationalized on June 30, 2024. This extremely short timeframe created significant difficulties and did not allow the country to fully familiarize itself with the tool before submitting its report.

Challenges Related to the Technical Capacities of Stakeholders and Partners

During the preparation of the first BTR, a significant lack of technical capacities was observed among stakeholders and ministries representatives to oversee and provide the required data. This challenge was particularly evident concerning the new requirements of the ETF and the MPGs.

To address this, several training sessions were organized. However, these efforts were insufficient and only allowed stakeholders to become familiar with the new requirements. Further capacity-building efforts will be necessary in the future to better prepare the next BTR, reduce reliance on flexibility provisions applied in the first BTR, and effectively address the areas of improvement identified in the report. Training and technical assistance should be organized on a regular basis throughout the year, even when inventories are not being prepared.

Experience and Challenges in Developing GHG Inventories

- Use of all IPCC Software functionalities: Morocco has gained a little experience in using the IPCC Software during the preparation of its first BTR. Thus, NIS-GHG representatives received a short training to enable the use of this tool and the extraction of JSON files. Some functionalities still require further exploration. For the LULUCF sector, the use of the IPCC Software posed several challenges, leading to the reliance on sector-specific internal files for emissions estimation.
- Bugs identified in the IPCC Software: Several bugs were encountered while using this tool, which delayed the preparation of the country's national inventory.

- Challenges in interoperability between the IPCC Software and the ETF Reporting Tool: Stakeholders reported inconsistencies between the inventory results obtained via the IPCC Software and those from the ETF Reporting Tool, especially when downloading JSON files and importing them in the ETF Reporting Tools. Some differences were observed, but their source has not been identified.
- Limited technical capacity of sectoral inventory compilers in using notation keys in the IPCC Software and the ETF Reporting Tool.
- Limited use of country-specific emission factors and reliance on generic emission factors. Efforts are underway to develop national emission factors for priority sectors.
- Capacity constraints, including insufficient technical expertise and limited human resources dedicated to inventory preparation, including the use of IPCC software and ETF Reporting Tools.

Challenges in Evaluating Progress in NDC Implementation

- Challenges in using the ETF Reporting Tool to input the required information, leading to manual reporting to meet submission deadlines.
- Lack of dedicated training for national teams involved in NDC mitigation actions on using the ETF Reporting Tools. So far, only one regional training session was provided for the MENA region, with one participant per country, resulting in limited technical capacities among the team responsible for entering data into the platform.
- Lack of annual monitoring of mitigation actions implementation due to the absence of sectoral monitoring system and stakeholder engagement
- Multiplicity of roles across several sectors in monitoring and implementing climate action, alongside other responsibilities such as emissions estimation, strategic document development, and sectoral policy planning, which hinders the availability of all stakeholders at the right time.
- Difficulties in estimating the cost-benefit related to adaptation and mitigation, whether for NDC actions or public policies.

Challenges related to Information on Support Provided and Received

Information on the support received and required has been collected, but this activity has faced several challenges, including:

- Challenges related to the dispersion of sectoral data across a wide range of stakeholders involved in support needed and received.
- Challenges regarding inter-institutional cooperation and coordination, given the large number of institutions, including private sector.
- The absence of sectoral mechanisms for collecting and compiling the required data on support received and required.
- On-going process for the operationalization of the transparency system for tracking financial flows, which would enable the creation of a comprehensive database of all climate-related support received by the country across public, private, and NGO sectors. Such a system would ensure data consistency and help prevent double counting, particularly when collecting information from sectoral stakeholders.

- Challenges in using the ETF Reporting Tools to input the required information, leading to manual reporting to meet submission deadlines.
- Lack of dedicated training for teams involved in support received and required on how to use the ETF Reporting Tools.
- The need to strengthen the monitoring system for support-related information, as well as to enhance capacities in analyzing, interpreting, and managing support implementation tracking data.

Experience and challenges on reporting on climate change impacts and adaptation

- Challenges related to the dispersion of sectoral data across a wide range of stakeholders necessary for analyzing the impact of climate change and the vulnerability of specific sectors.
- Lack of reliable data and specific indicators to measure the progress of adaptation actions.
- Challenges regarding the involvement of local communities in monitoring adaptation actions.
- Lack of technical and human capacities within ministries and relevant institutions for assessing vulnerabilities and risks, as well as monitoring the implementation of adaptation actions.
- Limited national expertise in areas such as transparency, vulnerability, adaptation and notably loss and damage.
- Uncertain and evolving climate data, which can complicate the assessment of the long-term effectiveness of adaptation actions.
- Lack of harmonized methodologies and international standards for monitoring adaptation actions which makes data comparisons and aggregation difficult.
- Lack of a clear methodologies and guidelines for tracking and reporting loss and damage linked to climate change.
- Challenges in operationalizing the monitoring and evaluation system dedicated to adaptation actions.