Budget Estimates 2012-13, 21 May 2012

Answers to Questions on Notice

Climate Change and Energy Efficiency Portfolio

Outcome: 1 Question No: 113

Program: 1.4

Division: ID

Topic: REDD+ – Papua New Guinea

Hansard Page EC: EC102

Senator MILNE: Well, that is one way of dressing up a failure, I suppose. Can you tell me why the Australian REDD scheme in PNG was cancelled? Was that for the same reasons? Can you explain why there was no formal announcement when we pulled out of that? If the indigenous land tenure issues were not the main reason, what was? When did we pull out of the PNG project?

Mr Comley: I will have to take that on notice. I do not know off the top of my head.

Answer:

- 1. The Papua New Guinea-Australia Forest Carbon Partnership has not been cancelled.
- 2. Australia is working with the Papua New Guinea Government, other donors and non-government organisations to enhance coordination of REDD+ efforts in line with PNG's interim action plan on climate compatible development and the UN-REDD national programme.
- 3. Australia committed up to \$3 million in funding to the Papua New Guinea-Australia Forest Carbon Partnership. In 2011-12, \$1 million was spent to support a village-level REDD+ project in Manus Province that is developing REDD+ policies and mechanisms. The activity is implemented by the Wildlife Conservation Society and is endorsed by the Papua New Guinea Government.

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Answers to Questions on Notice

Climate Change and Energy Efficiency Portfolio

Outcome: 1 Question No: 114

Program: 1.4

Division: ID

Topic: REDD **Hansard Page EC:** EC103

Senator MILNE: I know that. What are the barriers that people are working on at the moment? What are the active areas of dispute in these international discussions on REDD? What are the obvious ones, or the most problematic ones?

Mr Owen-Jones: I am quite happy to come back with a more comprehensive answer to that, Senator.

Answer:

Australia is an active and constructive voice in efforts to see Reducing Emissions from Deforestation and Forest Degradation (REDD+) addressed as part of a comprehensive global climate change agreement that upholds the environmental integrity of REDD+. United Nations Framework Convention on Climate Change REDD+ negotiations are progressing well in both the ad-hoc working group on long-term cooperative action (AWG-LCA) and the scientific and technical body. There is broad agreement amongst Parties on the importance of developing a robust REDD+ mechanism. However, differing national circumstances mean Parties hold a variety of views on the details of the technical and implementation aspects of REDD+. In 2012, negotiations are focussed on coming to agreement on aspects of measurement, reporting and verification (MRV), safeguard mechanisms and on finance.

Robust MRV systems are vital to the integrity and credibility of REDD+. In 2012, Parties are working towards establishing guidelines for MRV, particularly on the frequency of reporting and the mechanism for verification, while balancing the need for flexibility in such systems to suit different countries' needs.

Safeguard information systems are also being discussed (for example, discrete and specific safeguard challenges, such as carbon rights, land tenure, benefit sharing mechanisms and biodiversity protection). Australia has long been a leading voice on the importance of effective monitoring and maintaining of all REDD+ safeguards and will continue to advocate for outcomes that effectively ensure these are promoted and adhered to in a future REDD+ mechanism.

Current estimates indicate that between \$17 and \$33 billion will be required annually for REDD+, which exceeds public sector finance capacity. Parties are working on approaches that will provide flexibility and access to a variety of financing options for REDD+. This work includes furthering the agreement reached in Durban on accessing market based mechanisms for REDD+.

Finance discussions are being held in the AWG-LCA. As the AWG-LCA reaches the end of its mandate this year, conclusions on finance from this body are expected to inform the discussions on finance for REDD+ that may be taken up in the Subsidiary Body for Implementation or the Durban platform, as appropriate.

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Answers to Questions on Notice

Climate Change and Energy Efficiency Portfolio

Outcome: 1 Question No: 115

Program: 1.4

Division: CSMD

Topic: East Timor

Hansard Page EC: EC103

Senator BIRMINGHAM: Has the department put an estimate on the potential revenue from the development area?

Mr Comley: We have had discussions with Foreign Affairs and we have certainly had conversations with the project proponent, but to my knowledge we have not publicly made available an estimate of the impact of the carbon price.

Senator BIRMINGHAM: Could you just take on notice and check for me? If you have made it available somewhere such that I have not seen it, perhaps you could provide those details to me. But was this an issue that the department was aware of prior to the finalisation of the clean energy future legislation?

Mr Comley: I will take that on notice. Just to be helpful, my recollection is this is an issue that has been known going back as far as the CPRS.

Answer:

- 1. As a result of regulations made in June 2012, emissions from facilities in the Joint Petroleum Development Area (JPDA) will not be covered by the carbon pricing mechanism for a period of three years from 1 July 2012. Estimates of potential revenue following this period are not publicly available.
- 2. The Department first examined carbon pricing coverage issues relating to the JPDA in 2008, when developing the Carbon Pollution Reduction Scheme.

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Answers to Questions on Notice

Climate Change and Energy Efficiency Portfolio

Outcome: 1 Question No: 116

Program: 1.4

Division: ID

Topic: China – Five year plans

Hansard Page EC: EC104-105

Senator FISHER: Do you talk about whether or not China achieves the targets that it puts in its five-year plans?

Dr Banerjee: I am not sure if the document that you are referring to does, Senator. But I can provide some information about whether or not China met the targets that it put in its 11th five-year plan.

Senator FISHER: Now?

Dr Banerjee: I can do so in general terms and then check on the exact figures offline.

•••

Senator FISHER: Is it true that China actually consumed in that period 2.3 billion tonnes of coal in the fifth year?

Dr Banerjee: I am not familiar with the specifics of the coal targets and projections that you are citing there, but I can certainly take that on notice.

Senator FISHER: If it were true, it would be the case that China consumed more than double its forecast estimate of coal in the fifth year of that particular five-year plan.

Dr Banerjee: I am not familiar with the figures, Senator.

Senator FISHER: Can you on notice confirm whether that is the case or not?

Dr Banerjee: Sure. I certainly can.

Senator FISHER: What about looking at the 2006-10 five-year plan where China forecast it would consume 2.5 billion tonnes of coal, again in the fifth year of the plan? Are you familiar with that goal?

Dr Banerjee: Again, I can check those on notice.

Senator FISHER: If in fact China consumed 3.5 billion tonnes of coal in the fifth year of that plan—so that is 3.5 instead of 2.5; not as bad as the previous fifth year of the five-year plan, but it is something like a billion more tonnes than it forecast—perhaps you can confirm on notice or otherwise whether that is the case.

Dr Banerjee: Sure. I would be happy to.

Senator FISHER: Thank you. Look at the decade to the end of 2010. Are you aware that China's five-year plan forecasts of coal were 3.6 billion tonnes but its actual use was 5.8 billion tonnes? So that is an overrun of 2.2 billion tonnes or nearly, as I understand it, seven times Australia's total coal output. That is just in the overrun.

Dr Banerjee: Sorry, Senator. Would you like me to confirm that on notice as well? **Senator FISHER:** Yes, I would. All of those figures have been drawn to my attention on good authority. Can the department explain how it is prudent or sensible to continue to publish with tones of approval China's five-year forecasts when it is obvious that it is not going to make the grade?

Dr Banerjee: Senator, perhaps I can make a couple of points about the metrics that are being discussed here without, as I say, being familiar with the specifics of the figures that you put. Firstly, there is the issue of what is projected to happen and what actually happens. As in any forecasting exercise, there is a projection and there is the actual and you compare one to the other. So, as you say, it is a matter of looking at what actually happened and seeing how close it was to the original projection. I am happy to check those on notice. Secondly— **Senator FISHER:** And could you also let me know whether the department undertakes a uniform evaluation of commitment versus achievement?

Dr Banerjee: Sure. I am happy to do that.

Answer:

According to the United States Energy Information Administration (EIA) China consumed 2.2 billion tonnes of coal in 2005 and 3.4 billion tonnes in 2010. China's total coal consumption from 2001 to 2010 was 21.9 billion tonnes.

China's 11th Five Year Plan on Sustainable Energy (2006-2010) set an energy consumption target of around 2.7 billion tonnes of coal equivalent by the end of 2010. Coal was forecast to account for 66 per cent of total energy consumption (1.8 billion tonnes of coal).

China experienced strong economic growth of 9 to 14 per cent per year between 2005 to 2010. While China reduced its energy intensity under the 11th Five Year Plan absolute energy consumption increased. Growing coal consumption was not incompatible with China's energy and carbon intensity targets.

During the 11th Five Year Plan period, China's energy consumption per unit of GDP fell by 19 per cent compared with 2005, falling just short of its 20 per cent target.³

China's Five Year Plans are a good indication of the Chinese Government's policy priorities with performance against the targets reported to the National People's Congress.

The Department monitors climate change policies in key countries. The Department also undertakes research and analysis into how countries are tracking towards their stated climate change and energy goals.

www.eia.gov/cfapps/ipdbproject/IEDIndex3.cfm?tid=1&pid=1&aid=2

www.eia.gov/cfapps/ipdbproject/IEDIndex3.cfm?tid=1&pid=1&aid=2

³ Report on the Work of the Government,

http://online.wsj.com/public/resources/documents/2011NPCWorkReportEng.pdf, accessed 29/06/11; China's 12th Five-year plan.

¹ International Energy Statistics, accessed 3/2/2012;

² International Energy Statistics, accessed 3/2/2012;

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Answers to Questions on Notice

Climate Change and Energy Efficiency Portfolio

Outcome: 1 Question No: 117

Program: 1.4

Division: ID

Topic: China targets

Hansard Page EC: EC106

Senator FISHER:

Perhaps on notice you could refer to the specific figures that I have suggested to you. Can you confirm whether they are right or not? Then explain why the department thinks that that still means in one way or another China is meeting an acceptable target, be it through energy intensity—what was the terminology you were using?

Answer:

According to the United States Energy Information Administration (EIA) China consumed 2.2 billion tonnes of coal in 2005 and 3.4 billion tonnes in 2010¹.

China's 2020 pledge under the United Nations to reduce the carbon intensity of its GDP by 40-45 per cent by 2020 relative to 2005. The pledges put forward by 90 countries, including China, demonstrate the level of global action to reduce emissions.

China's 12th Five Year Plan (2011-2015) includes an energy intensity reduction target of 16 per cent and a carbon intensity reduction target of 17 per cent by 2015 relative to 2010.

According to the Department's analysis, China's carbon intensity pledge for 2020 equates to an 11 to 17 per cent reduction of emissions in 2020 compared to what emissions would otherwise have been.

There are many national circumstances that influence how hard a particular target is to achieve, including stage of development, population growth and the capacity to act. In addition, considering pledges on a range of metrics gives a broad sense of how they measure up, for example, China averaged 5.5 tonnes of carbon dioxide equivalent (CO₂.e) per capita and \$4100 of GDP per capita in 2005², compared to Australia's average emissions per capita of 27.3 tonnes CO₂-e and GDP per capita of \$33,600.

 $\frac{www.imf.org/external/pubs/ft/weo/2012/01/weodata/weorept.aspx?sy=2005\&ey=2005\&escsm=1\&ssd=1\&sort=country\&ds=.\&br=1\&c=924\&s=PPPC\&grp=0\&a=\&pr.x=80\&pr.y=9; accessed 3/7/2012$

¹ International Energy Statistics, accessed 3/7/2012; www.eia.gov/cfapps/ipdbproject/IEDIndex3.cfm?tid=1&pid=1&aid=2

² GDP based on Purchasing Power Parity, in International Dollars, International Montery Fund, World Economic Outlook Database,

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Answers to Questions on Notice

Climate Change and Energy Efficiency Portfolio

Outcome: 1 Question No: 118

Program: 1.4

Division: ID

Topic: REDD+ Written

Senator Rhiannon asked:

- 1. Considering Australia's international obligations require all climate aid to be additional to development assistance have changes been made to how the REDD offset scheme is funded?
- 2. If so what changes have been made to ensure that climate aid is separate from development assistance?
- 3. If no change has been made does that mean that REDD projects continue to be funded from Aust's overseas development assistance program in full or in part?
- 4. Considering the Australian REDD program with Indonesia failed to guarantee indigenous rights as required under the UN Declaration on the Rights of Indigenous Peoples [signed by Aust in April 2009] what steps has Australia taken to recognise the rights of indigenous people in Indonesia and in other countries where REDD programs are being funded by Australia?
- 5. What involvement has the dept had in the implementation of the \$40m Aust funded project in Indonesia to build and create REDD schemes?
- 6. Considering it is widely recognised that forestry ministries in Indonesia and PNG are among the most corrupt institutions in these countries what measures are taken to ensure transparency and accountability and minimise corrupt practices being incorporated in the local projects?
- 7. Has the government reassessed the value of REDD projects; has consideration been given to Aust taking responsibility for our own carbon emissions?
- 8. Why was Aust's REDD scheme in PNG cancelled?
- 9. Why was no formal announcement made when AusAID decided to pull out?
- 10. What were the reasons for the pull out?

Answer:

- 1. Australia's support for reducing emissions from deforestation and forest degradation in developing countries (known as REDD+) is delivered through the \$273 million International Forest Carbon Initiative and is counted as Official Development Assistance. It was allocated and budgeted under Australia's growing aid budget and does not displace any existing aid measures.
- 2. Please refer to Part 1.
- 3. Please refer to Part 1.
- 4. Australia endorses and implements all the REDD+ safeguards agreed at the Cancun climate change negotiations in 2010, including:
 - respect for the knowledge and rights of Indigenous peoples and members of local communities by taking into account relevant international obligations, national circumstances and laws, and noting that the United Nations General Assembly has adopted the United Nations Declaration on the Rights of Indigenous Peoples; and
 - full and effective participation of relevant stakeholders, in particular Indigenous peoples and local communities.

Extensive on-ground consultation through the Kalimantan Forests and Climate Partnership (KFCP) has resulted in Village Agreements being signed with all villages in the project area. In addition, a regional environmental and social assessment (RESA) is in the final stages of review. This covers a broad range of social and environmental safeguards, including an Indigenous Peoples Plan, consistent with Indonesian and Australian laws.

Australia also supports REDD+ through the World Bank's Forest Carbon Partnership Facility and Forest Investment Program. Under these programs, recipient countries are required to conduct free, prior, and informed consultation to protect the dignity, human rights, economies, and cultures of Indigenous peoples. Financing is only provided once free, prior, and informed consultation has secured broad support from Indigenous peoples.

- 5. The Indonesia-Australia Forest Carbon Partnership (IAFCP) is jointly managed by the Department and AusAID. Day-to-day implementation of the IAFCP is managed by the IAFCP office in Jakarta, on behalf of both governments. The Department provides high-level policy and technical advice as required.
- 6. The Government has a zero tolerance policy towards fraud in the aid program. AusAID takes all possible steps to ensure that Government funds are protected from fraud and are used to improve the lives of people in developing countries. AusAID seeks to reduce the risk of fraud in the followings ways:
 - AusAID has a comprehensive Fraud Control Plan and Fraud Policy Statement with control policies and guidelines, which are regularly reviewed and updated.

- All of AusAID's overseas posts have Risk and Fraud Management Plans and update them annually.
- Fraud awareness training is compulsory for AusAID staff, both in Australia and overseas. AusAID also provides training to contractors and other government and non-government organisations (NGOs) funded under the Australian aid program.
- Due diligence checks are carried out on contractors, NGOs and others involved in the aid program and programs are designed to minimise the risk of fraud.
- AusAID's annual audit program examines compliance by major commercial contractors and NGOs with financial, contractual and activity management requirements, including fraud reporting and risk management.
- 7. The Government is committed to reducing Australia's carbon pollution. Australia's emissions reduction targets are equivalent to a reduction in every Australian's carbon footprint of one third to one half. The Government is developing and putting in place policies through the Clean Energy Future package to support Australian businesses and households reduce their carbon pollution.
 - The Government is committed to supporting REDD+. By creating a financial value for the carbon stored in forests, REDD+ can make a significant contribution to global mitigation efforts and help countries to achieve their sustainable development goals.
- 8. The Papua New Guinea-Australia Forest Carbon Partnership has not been cancelled. Australia committed up to \$3 million in funding to the Partnership. In 2011-12, \$1.3 million was allocated to support a village-level REDD+ project in Manus Province that is developing REDD+ policies and mechanisms. The activity is implemented by the Wildlife Conservation Society and is endorsed by the Papua New Guinea Government.
- 9. Please refer to Part 8.
- 10. Please refer to Part 8.

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Answers to Questions on Notice

Climate Change and Energy Efficiency Portfolio

Outcome: 1 Question No: 205

Program: 1.4

Division: ASCD

Topic: Projects funded through AusAID

Hansard Page EC: Written

Senator Kroger asked:

1. Approximately \$13 million was appropriated through AusAID for the Pacific Climate Change Science and Adaptation Planning Program (PACCSAP) in 2011-12. How much will be appropriated for PACCSAP for 2012-13?

2. When a project is funded by AusAID (e.g. PACCSAP) but managed by the Department of Climate Change, what is the formal process for reporting to AusAID how the funds have been spent and how effective the project has been?

Answer:

- 1. \$19 million is due to be appropriated to the Department of Climate Change and Energy Efficiency from AusAID in financial year 2012-13 for the Pacific-Australia Climate Change Science and Adaptation Planning Program.
- 2. The formal process for reporting on expenditure and project progress under the Pacific-Australia Climate Change Science and Adaptation Planning Program (PACCSAP) is outlined in an agreement between AusAID and the Department of Climate Change and Energy Efficiency (DCCEE).

Under the agreement for PACCSAP this includes an end of financial year acquittal and quarterly updates on project progress and outcomes to an inter-agency management committee that oversees the program. That committee comprises AusAID, DCCEE, the Commonwealth Scientific and Industrial Research Organisation and the Bureau of Meteorology.

In addition to these requirements all projects utilising Official Development Assistance (ODA) funds are subject to the reporting requirements outlined in the Government's Comprehensive Aid Policy Framework.

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Answers to Questions on Notice

Climate Change and Energy Efficiency Portfolio

Outcome: 1 Question No: 206

Program: 1.4

Division: ID

Topic: Ambassador for Climate Change

Hansard Page EC: Written

Senator Kroger asked:

- 1. Where is the ambassador's office located?
- 2. How many staff is the ambassador permitted? How many staff does the ambassador have?
- 3. Where have the former and current ambassadors travelled this financial year and at what cost?
- 4. How many staff accompany the ambassador on travel?
- 5. What forums have the former and current ambassador attended this financial year?
- 6. What outcomes has the ambassador (former and current) achieved this year?
- 7. Does the new ambassador have formal scientific training? Did his predecessor have formal scientific training?

Answer:

- 1. The office of Australia's Ambassador for Climate Change, Dr Justin Lee, is located in the International Division of the Department of Climate Change and Energy Efficiency, at 2 Constitution Avenue in Canberra.
- 2. The Ambassador is allocated one staff member, an executive assistant, which is filled at the APS5 level. Dr Lee works with the International Division of the Department of Climate Change and Energy Efficiency, as part of Australia's international engagement strategy. The International Division currently has 59 full time equivalent staff.

3. Since joining the Department in April 2012, Dr Lee has travelled to Kenya, Belgium, Germany (twice), and the United Kingdom. In the 2011-12 year, Australia's previous Ambassador for climate change, Ms Louise Hand travelled to Germany, Samoa, South Africa (twice), Indonesia and Panama.

The total estimated cost for this travel is \$109,052. Further information is provided at Attachment A. These estimates are based on the amount approved for expenditure for each trip.

4. The number of officials that accompany the Ambassador depends on the nature of the meeting and whether specialists are needed to cover Australia's interests. For formal negotiating sessions under the United Nations Framework Convention for Climate Change when the Minister is not present, the Ambassador leads Australia's delegation, which is capable of covering the multiple concurrent sessions and technical subject matter in each session. For meetings with a single track dealing with high level subject matter, the Ambassador may attend alone.

The number of officials at each of the meetings attended by the Ambassador in the 2011-12 financial year is listed at Attachment A.

- 5. Details of each forum attended are at Attachment A.
- 6. Ms Hand played a lead role in Australia's delegation to the United Nations climate change conference held in Durban in December 2011. The meeting delivered agreement to negotiate the Durban Platform for Enhanced Action. This agreement was a significant breakthrough. For the first time all countries agreed to negotiate a new global agreement with commitments for all economies.

Since joining the Department in April 2012, Dr Lee has led Australia's delegation at the United Nations climate change negotiations at Bonn in May 2012 where progress was achieved in establishing the Durban Platform negotiations, concluding the Ad Hoc Working Group on Long Term Collaborative Action, and moving forward the Ad Hoc Working Group on Further Commitments for Annex 1 Parties under the Kyoto Protocol.

7. Dr Lee holds a BA (Jur.) (Hons), a PhD in Development Geography from the University of Adelaide and a Graduate Diploma in Foreign Affairs and Trade from Monash University.

Ms Hand holds a Bachelor of Arts and Masters degree from the University of Queensland and a Master of Business Administration from Deakin University.

ATTACHMENT A

Summary of Travel by Ambassador for Climate Change in 2011/12 (As of 2 July 2012)

MEETING	LOCATION	DATE	DCCEE Officials Accompanying the Ambassador	Estimated Total Cost for Ambassador Travel
Ambassador Hand represented Australia at the Second meeting of the Petersburg Climate Dialogue, themed "Rising to the Climate Challenge" on 3 July 2011. The meeting was co-hosted by Germany and South Africa. South Africa was the incoming President of the Conference of the Parties (COP) to the United Nations Framework Convention on Climate Change, and hosted COP17 in Durban.	Berlin, Germany	3- 4 July, 2011	0	Approx \$12,800
Ambassador Hand led Australia's participation at the fifth meeting of the Cartagena Dialogue for Progressive Action. Australia's leadership of the Cartagena Dialogue is a key pillar of our engagement to shape international climate change negotiations to Australia's interests.	Apia, Samoa	27-28 July, 2011	4	Approx \$4,600
Ambassador Hand and officials supported Parliamentary Secretary Dreyfus' attendance at a Ministerial Workshop on climate change hosted by South Africa as the incoming COP Presidency.	Pretoria, South Africa	4-10 September, 2011	3	Approx \$12,700
Ambassador Hand and a senior official met with senior Indonesian and Norwegian Government officials on climate change issues. Ambassador Hand also spoke at a conference organised by the Centre for International Forestry Research.	Jakarta, Indonesia	25-28 September, 2011	1	Approx \$11,000
Ambassador Hand led Australia's delegation at the United Nations Framework Convention on Climate Change conference. The meeting included the: - Sixteenth session of the Ad-Hoc Working Group for the Kyoto Protocol. - Fourteenth session of the Ad-Hoc Working Group on Long Term Cooperative action.	Panama City, Panama	1 – 7 October, 2011	14	Approx \$14,925
Ambassador Hand played a lead role in Australia's delegation to the United Nations Framework Convention on Climate Change (UNFCCC) conference, which included the: - Seventeenth session of the Conference of the Parties to the UNFCCC. - Seventh session of the Conference of the Parties serving as the meeting of the Parties of the Kyoto Protocol.	Durban, South Africa	28 November – 9 December, 2011	20	Approx \$16,177

Cooperative Action.	TOTAL ESTIMATED TRAVEL COST FOR AMBASSADOR FOR 2011-12 FINANCIAL YEAR:			\$109,052
 Ambassador Lee led Australia's delegation to the United Nations Framework Convention on Climate Change conference which included the: First session of the Ad Hoc Working Group on the Durban Platform for Enhanced Action. Thirty sixth session of the Subsidiary Body for Implementation. Thirty sixth session of the Subsidiary Body for Scientific and Technological Advice. Seventeenth session of the Ad Hoc Working Group on Further Commitments for Annex I Parties under the Kyoto Protocol. Fifteenth session of the Ad Hoc Working Group on Long-term 	Bonn, Germany	14-25 May 2012	19	Approx \$4,000 (combined with trip costs from line directly above).
Ambassador Lee travelled to Europe with two other officials to: - Represent Australia at a Ministerial level session hosted by South Africa in Bonn, Germany, timed to occur ahead of the United Nations climate change negotiations in Bonn later that month. - Represent Australia at a meeting of countries with progressive views on tackling climate change, hosted by the European Union in Brussels; and - Meet with economists, think tanks and British Government officials to discuss key climate change issues in London, United Kingdom.	Bonn, Germany Brussels, Belgium London, United Kingdom	2-14 May 2012	2	Approx\$20,350
Ambassador Lee led Australia's participation the seventh meeting of the Cartagena Dialogue for Progressive Action.	Nairobi, Kenya	2-4 April 2012	3	Approx \$12,500
 Thirty-fifth session of the subsidiary body for Scientific and Technological Advice. Thirty-third session of the Subsidiary Body for Implementation. Sixteenth session of the Ad Hoc Working Group on Further Commitments for Annex I Parties under the Kyoto Protocol. Fourteenth session of the Ad Hoc Working Group on Long-term Cooperative Action. 				