

Building an Effective Review Mechanism: Lessons for the HLPF

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Introduction

The High-Level Political Forum (HLPF) was established in 2012 (GA resolution 66/288 "The future we want") as a replacement for the Commission on Sustainable Development. In 2013 the General Assembly decided (67/290) that the HLPF should conduct regular reviews, starting in 2016, on the follow-up and implementation of sustainable development commitments and objectives, including those related to the means of implementation, within the context of the post-2015 development agenda. Our task in this background paper is to draw lessons from existing multilateral review mechanisms that might be useful to the designers of the review process.

The General Assembly resolution envisages three different configurations for the HLPF. The first, in paragraph 6, will involve Heads of State or Government every four years (under GA auspices). The second, in paragraph 7, will be an annual eight-day session including a three-day ministerial segment (under the auspices of ECOSOC). Paragraph 8, the focus of this paper states that the HLPF will conduct regular reviews during the 8 days, but the resolution is vague on the mechanism. The purpose of our comparative analysis is to suggest the questions that must be addressed in building an effective mechanism.

We use an analytic framework developed in our work on other mechanisms.² In order to ensure that all salient factors are considered, we think that analysts should ask:

- Who is being reviewed;
- by whom;
- · about what are they being reviewed;
- through what processes the review is to be conducted;
- by what standards the relevant policies and practices are to be assessed; and,
- what the potential effects are of finding that those standards have not been met.

Table 1 is based on what we know about the answers to these questions from the Resolution (in italics), and on a series of further questions that arise from our analysis of other review mechanisms.

² The six questions are suggested by Mashaw, Jerry L., (2005) 'Structuring a "Dense Complexity": Accountability and the Project of Administrative Law,' Issues in Legal Scholarship, <u>The Reformation of American Administrative Law Article</u> 4 (2005).

TABLE 1: QUESTIONS ABOUT THE HLPF MECHANISM

1. Who? (Agents)	developed and developing countries and relevant UN entities		
	- Collective or individual?		
2. By whom? (Principals)	a) Horizontal		
	- Each other?		
	(ministerial and other relevant high-level participants)		
	b) Vertical		
	- citizens?		
	- People in some way affected by (in)action?		
	- future generations?		
	(participation of major groups and other relevant stakeholders)		
3. About what?	sustainable development commitments and objectives including those related to the means of implementation, within the context of the post-2015 development agenda		
	- all commitments for each state, or a standard sub-set determined by level of development?		
	- specific commitments reviewed for all countries, or by region?		
	- the three dimensions of sustainable development?		
	- implementation, or outcomes?		
	- coherence within the UN system?		
4. Through what process?	a) Transparency		
	- What sources of information will the HLPF draw on? Will it be a mix of voluntary reporting and international organization data? Will these sources in themselves be publicly available?		
	- will the results of HLPF reviews be published, in detail or in summary? Will they be an input for the annual global sustainable development report?		
	b) Surveillance		
	- mutual assessment/peer review?		
	- ministers themselves		
	- ad hoc working groups of officials expert in a given area		
	- reports by Secretariat?		
	- role of stakeholders and NGOs?		
	- review of reviews conducted by other bodies?		
5. Criteria / standard of assessme	ent? - effort, or results?		
	- ad hoc, or rooted in codified commitments?		
6. With what effects on agents?	- Enhance capacity to learn and adapt		
-	- withdrawal of peer esteem?		
	- both leading to policy change?		
	- access to the means of implementation? (funds, technical support, etc.)		

We will not attempt to answer these questions in this paper. In the discussion that follows we will use these questions to review the intent of the creators of the HLPF on the basis of a set of case studies of international review mechanisms from multiple contexts, summarized in the annex (Table 2). We draw lessons from this analysis for each of the six questions in the framework, and try to suggest **options for consideration** by designers of the HLPF.

#1. Who is to be reviewed?

The answer to the first question is not entirely clear in the mandate resolution, but it seems that the HLPF will review both states and UN entities. But will it review them individually or collectively? If individual, would it be done every year, or every few years? To what extent do references to systemic coherence imply consideration of the essential global nature of the sustainable development challenge? Will the HLPF be used to review the processes and performance of 'institutions' – for example, environmental treaties – in achieving the targets and goals that they had been established to achieve?

#2. By whom?

The answer to this second question is especially ambiguous. The resolution states that the HLPF reviews:

...

- (b) Shall be State-led, involving ministerial and other relevant high-level participants;
- (c) Shall provide a platform for partnerships, including through the participation of major groups and other relevant stakeholders;

Is the focus to be a review by governments of the actions of other governments, which we would call horizontal review? Or will the focus also include review of state action by stakeholders and other groups, which we would call vertical review? Horizontal and vertical review mechanisms will be in tension, and it is unlikely that both can be simultaneously successful. The consistent and strong lesson that emerges on this question is that effective review processes tend to be country-owned, that the mandate to review states' performance should come from other states; and by way of reciprocity amongst peers.

#3. About what?

In any review process, considerable effort is needed to decide the basis upon which the parties should be reviewed. The resolution says that the HLPF:

shall conduct regular reviews, ... [on] sustainable development **commitments and objectives**, including those related to the **means of implementation**

We see two distinct types of measure identified in the resolution, "sustainable development commitments and objectives" and "means of implementation". Effort will be needed to decide what is covered in both cases with respect to the three dimensions of sustainable development—economic, social and environmental—and whether the answers to the questions about "who is to be reviewed" and "through what process" are dependent on the answer to this "for what" question. We observe differences between review mechanisms that consider a state's general practices



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in a given area, and those that look at treaty-based obligations. We think that it is straightforward to review explicit commitments, if a list can be agreed and if they are properly drafted, but assessing performance in meeting objectives is much harder.

Even assessing commitments is hard, as the G8 Leaders discovered when they decided to prepare an annual "accountability" report. They decided to look primarily at their development-related commitments since expanding the scope of the reports would have created an unmanageable agenda. In 2013 the Accountability Working Group (AWG) looked at 61 of the development-related commitments G8 Leaders (not ministers) have made since 2005. The vagueness of the commitments has complicated their work—the negotiating process for communiqué language means that commitments often lack a measurable goal or a concrete timeline, exacerbating the challenge of finding comparable data against which to assess progress in meeting the commitments. The HLPF is likely to face similar challenges since there are fairly few clearly defined objectives in international sustainable development agreements. The broad-brush ambiguity of the treaties themselves will necessarily impact the metrics of what is to be reviewed. Designers of the HLPF will also need to consider the 'common but differentiated responsibilities' principle that is a cornerstone of global sustainable development governance. Responsibility and obligations have been differentially allocated to countries, even as the common global goals are shared by all, which affects 'what' is reviewed (see paragraph 250 of the Rio +20 outcome), and the appropriate process.

More concretely, will the HLPF focus be the post-2015 Sustainable Development Goals? Will the list of SDGs need to be prioritized? And what else can be added? For example, UNISDR suggests in its "Proposed Elements for Consideration in the Post-2015 Framework for Disaster Risk Reduction" that review by the HLPF could ensure a synchronized and harmonized review process and deliberations, as well as cross-fertilization and learning from the implementation of the future sustainable development agenda and goals and the post-2015 framework for disaster risk reduction.

As for the "means of implementation", we assume that means "delivering on the global commitments in the areas of aid, trade, debt relief, and access to new technologies and affordable essential medicines." Presumably such reviews would have to be based on a frank self-assessment by a state of the resources they have mobilized to implement a commitment, along with assessments by relevant international organizations of the resources they have made available, or that other states have made available. Thus the scope of review would go far beyond reviewing a state's legislative framework. We wonder if the new Trade Facilitation agreement in the WTO offers an analogy. Least-developed countries implement the agreement only when they have the capacity, but they have to notify what assistance they need, and what they have received, and donors notify the assistance provided. All of this is subject to review by the new Trade Facilitation Committee. We also wonder if the results of monitoring in this new committee should in some way be used as an input for HLPF reviews of the means of implementation, given the importance for sustainable development of effective and fair participation in the trading system.

#4. Through what process?

We see two dimensions to the review process: generating information, and reviewing it. We treat these two dimensions separately.

a) Transparency

The foundation of any review is transparency, reflected first in the publication of all related international obligations at home; and notifications or voluntary reporting of new or changed national measures that reflect implementation of the agreements. The similarities in the mechanisms we reviewed are all related to the importance attached to the idea of transparency. Participants usually consider it vital that the information collected about various programs be made public through one forum or the other. The differences arise in terms of how this is achieved. While some mechanisms are concerned primarily with employing an information dissemination tool such as the internet, others take care in sharing and analyzing the information with multiple relevant stakeholders. It is common for these mechanisms to use standardized reporting and monitoring tools, not least to ensure data comparability; this practice is ensured through centralizing the information collection and dissemination process.

The resolution states that the HLPF reviews:

Shall be voluntary, while encouraging reporting, and shall include developed and developing **countries**, as well as **relevant United Nations entities**; ...

Considerable clarity will be needed on the focus of HLPF reporting. We note that the Secretary-General's report on the lessons learned from the Commission on Sustainable Development (A/67/757. 26 February 2013) concluded that the voluntary national reports under the Commission on Sustainable Development were uneven, over-burdened many developing countries, and had little impact. We also understand that reviews of the NVP process have identified a number of weaknesses in all stages: preparation, content, and follow-up to NVP findings. In particular, these have found that there is: limited national statistical and analytical capacities to conduct IADG/MDG-based national reviews; limited comparability of NVPs, as countries use different baseline data; and limited information on the impact of the NVPs on national development planning and results. The coverage of the NVPs also varies from country-to-country. Some address one MDG, others several and some give more attention to development cooperation than others. We have seen many suggestions that international organizations can play a supportive role both in helping states generate the needed data, and in helping to develop the capacity for states to do it themselves.

Whether or not voluntary, whether based on frequent notification or periodic reports, the information in most review mechanisms is more useful if it is submitted using a standard set of questions, or template, and if it is made available in a searchable online database. We wonder if HLPF reporting should be compatible with reporting for other (sectoral) reviews—for example, using the same kind of data on water, energy, or food security used for reviews by FAO, UNEP, UNDP, IEA/IRENA and so on. Can international monitoring be aligned with national data? We also wonder whether reports prepared by the HLPF review mechanism could be used in the preparation of the global sustainable development report (GSDR). Conversely, if as suggested by some experts, the GSDR is in part a regular assessment of the many national and international assessments available every year, then the GSDR might a valuable input to such reviews by the HLPF.

The second transparency principle groups together a set of practices on how international organizations report on their work and efforts to create an inclusive decision-making process so that everyone has access to, and can use, information. This dimension has greatest relevance for civil society, and for developing countries, which may not have the capacity to analyze the information generated by transparency mechanisms. Rather than producing information, then, this type of transparency is more about communicating information and listening to the views of stakeholders.

These efforts can be internal - focused on secretariats and member representatives administering an agreement - or external - focused on actors such as policymakers in capitals, economic actors, civil society organizations and citizens. Online databases and reports on websites have become a key medium for delivering such information. Engagement with civil society can be especially important where NGOs have access to information not available to governments, and can act on behalf of citizens.

b) Monitoring and surveillance

Information is useless if nothing is done with it, but paragraph 8 of the resolution is vague on the nature of the mechanism. We have found a difference between reviews conducted by high level commissions, those conducted by experts, and those conducted by peers. We also observe a difference between reviews that are only national, and those that involve multilateral discussion of the reports.

We use "monitoring and surveillance" to refer to any activity where states review each other's implementation of commitments. The danger of review mechanisms turning into finger pointing exercises is real, especially if they are seen as 'competitive evaluations,' but shining a light on state practice is essential. Equally real is the danger that the review process could become so great a burden that it begins to distract from actual implementation of responsibilities, especially in the case of developing countries. Review might focus on checking whether governments have created national plans, or legislation that incorporates an agreement into law, or on whether those laws and plans are appropriately implemented.

Such surveillance can be based solely on the data provided by the state being reviewed, perhaps supplemented with data provided by a third party, such as an international organization or an NGO, or it can be based on a synthesis report drafted by a Secretariat or a third party, which allows broader comparative analysis while adding to the expense. Some reviews use a specially designated 'panel' of experts for the review; others entrust this responsibility to a wellresourced secretariat, which poses a challenge of authority and independence.

We have found that robust mechanisms of review tend to involve other countries deeply and substantively in the review process, most commonly through some variant of 'peer review.' The OECD defines peer review as "each country's policy in a particular area is examined by fellow members on an equal basis" with a view to providing support for improving policy performance. In this cooperative process of mutual support in learning by doing, the notion of peers is very important: by this OECD means policy practitioners rather than consultants working in the same area. We also observe a difference between peer reviews, and "mutual accountability" reviews designed to test whether developing countries meet their commitments to donors.

Effective review mechanisms are expensive, time-consuming and require specific expertise. Even where they have significant portions of self-reporting exercises and when peer review mechanisms (by peer countries) are employed, they tend to require significant capacity investments by specialists and secretariats. The HLPF designers will want to

be careful to devise an implementable review mechanism whose ambition is matched by the resources allocated to it both in capitals and in Secretariats.

Given the large number of issues and even larger number of countries involved, the roster of review should be based on principles of fairness and balanced burdens, including both developed countries and developing countries. This implies that review obligations need to be proportional to a country's capacity as well as institutional responsibility. A key task is to be able to do this on enough issues in enough countries to get a sense of the global progress on sustainable development in particular areas. An innovative possibility to be considered here is to seek clusters of countries, rather than individual ones, to review.

#5. What are the criteria?

The standard of assessment ought to be obvious in any review, but the cases we studied provide varied exemplars and little clear guidance. The one lesson to be derived here is that, to the extent possible, criteria and standards should be as clear as possible before the review process starts. Clarity is also needed in defining commitments. For example, G20 Leaders committed in 2009 to phase out, in the medium term, inefficient fossil fuel subsidies that encourage wasteful consumption. Their Working Group on Energy and Commodity Markets, which is responsible for progress on the commitment, has not agreed on a definition of fossil fuel subsidies, which leaves G20 Members with discretion to use their own definition, with the not surprising result that many Members claim that they have no *inefficient* fossil fuel subsidies to report, yet the OECD database for the same countries reports a great many possibly relevant measures. These ambiguities may well have contributed to the difficulties the G20 has faced in establishing this mechanism.

Choosing criteria for a review is also delicate because of the attribution problem. It is one thing to ask if a government's actions are consistent with its obligations both at home and internationally, but it is something else to be able to make causal connections between an action and a desired outcome. The HLPF mandate is not explicit, but the aspirational structure of many sustainable development commitments, and even international environmental agreements, raises questions about how global goals and aspirations can be linked to state-based review mechanisms.

A lesson to be underscored is that a clear distinction needs to be made between 'effort' and 'impact.' Government policies are necessarily focused on effort. If the commitment in question is about specified policies, then criteria focused on effort are sufficient. But if the point of the HLPF is to consider sustainable development objectives, then some consideration of impact or outcomes seems essential. In the case of human rights, UNOHCR makes it clear that on some measures efforts matter as much as outcomes. Or take the analysis of Commitment 57 in the G8 accountability report, dating from the Heiligendamm summit of 2007, where Leaders committed to "Increase efforts for the protection and sustainable use of biological diversity to achieve the goal of significantly reducing the rate of loss of biodiversity by 2010." While G8 support for biodiversity showed an upward trend consistent with agreement to set out clear targets and commitments reached in the 2008 meeting of the Convention on Biological Diversity, the goal of significantly reducing the rate of loss of biodiversity by 2010 was not met, so the AWG assigned a collective score of "Below expectations." Perhaps the commitment was unrealistic, or perhaps the method of implementation needs to be reviewed, but if the point is ensuring sustainable development, it will not be enough to review what has been done; it is also important to gauge what impact it has had, if any. Therefore, devising separate but related measures of effort and of impact is necessary, just as it is necessary to find ways of converting national level effort into global level impacts.



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Finally, all of these questions are affected by time lags, that is, long separations between decisions and their effects. Should developed countries be accountable for the supposed effects of current policies on developing countries, or for the way new decisions might affect the life chances of people yet unborn? Should the African Peer Review Mechanism be seen as a contribution to long term policy learning promoting African development, or as too weak because real changes comes slowly? Is the assessment to be retrospective, continuous or episodic?

#6. With what effects on agents?

Perhaps the hardest question is about the "effects" on actor behavior: what is to be achieved by shining a light on official action? Review mechanisms work best where actors – whether states or international organizations – have a clear sense of how the review results will affect them. However, it is also clear from our case studies that international review mechanisms rarely have 'teeth' in the strict sense of sanctions and penalties. Voluntary participation is unlikely if the objective is sanction of some sort, but the effects on states in review mechanisms sometimes include both social pressure and learning about appropriate policy. That is, reviews are useful if they contribute to an understanding by individual governments of how they are doing, and collective understanding of how the system is doing. Participants in the African peer review process observe the acute need for resources to help peer-reviewed countries implement recommendations. If one focus of reviews is the "means of implementation", then presumably an incentive to participate might be conclusions by the HLPF about what is needed, and access to more resources or capacity development.

One of the questions in any international regime is the extent to which differing national laws and practices are functionally similar, or recognizably similar. Good faith implementation of international obligations need not and does not result in identical national law – indeed, both the norm of common but differentiated responsibility and recognition of national circumstances and priorities are essential principles for the review process. The purpose of review mechanisms is thus to allow consideration by other states of whether national law, policy, and implementation are consistent with each state's obligations and objectives. The meetings of peer review bodies are opportunities for states to learn more about the incidence of a particular policy, and to understand the rationale. As a result of questions and debate, a government may provide more information, or change policy. States do so not because they fear the consequences of failure to comply, although they might wish to avoid embarrassment for reasons of national pride, but because they have learned about appropriate behavior. In a different kind of example, meeting environmental goals can be tied to an economic benefit (in trade preference or in better terms of international credit, or in other help with the means of implementation). Review mechanisms commend themselves neither on their technical merits nor their democratic virtue but because of the purposes they serve both for those reviewing and for those being reviewed. Participants in the process on both sides have to see the benefit for themselves, otherwise review cannot work.

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Lessons for HLPF

Three important findings emerge from the discussion above:

- First, that the UN General Assembly's resolution on the structure of the HLPF Review Mechanism has given a reasonable sense of direction but has left the specific details of the emergent review mechanism flexible enough for innovative approaches to be sought and implemented.
- Second, that while there is a wide variety of approaches that can be applied to constructing international review mechanisms, our comparison of multiple cases suggests that there is also an emerging sense of what defines better practice in the field.
- Three, that any mechanism should be open for innovative approaches, and should be able to adjust its practices and standards to what emerges as better practice.

Applying this analysis to the context of governance for sustainable development this background paper seeks to highlight lessons on each of the six elements of our framework that can be useful for HLPF as it fleshes out its own review mechanism.

Annex: Case Comparisons

This paper is based in part on a review how different international review mechanisms are structured. This Annex summarizes our set of desk case studies. We apply the same framework and the same six questions to these cases that we have used in analyzing the HLPF mandate. The cases include new (G20 fossil fuel subsidies) as well as established processes (ECOSOC AMR); developed country (OECD) as well as developing country (NEPAD) focused processes; and highly defined (WTO Trade Policy Review) to fairly flexible (ECOSOC) processes. We also include an eminent persons' review (PIF). The cases demonstrate a range of approaches and a set of very different ways to address the key questions raised above for the HLPF.

TABLE 2: A COMPARATIVE ANALYSIS OF CASE STUDIES

WHO? (AGENTS)	TO WHOM? (PRINCIPALS)	ABOUT WHAT?	THROUGH WHAT PROCESS?	CRITERIA/STANDARD OF ASSESSMENT?	WITH WHAT EFFECTS ON AGENTS?
New Partnership	for Africa's Develo	pment (NEPAD)			
33 countries (as of 2012) in the African Union	Members meeting as the African Peer Review Mechanism Forum (APRM Forum)	Policies/practices related to eight priority areas: political, economic and corporate governance; agriculture; infrastructure; education; health; science and technology; market access and tourism; and environment.	Secretariat collects information from national and international sources; Review Team meets stakeholders then prepares report for review by the APR Panel before submission to the APR Forum. Periodic reviews every 2 to 4 years. Member countries can also initiate reviews upon request, and there is also a provision for reviews if a member country is expected to face a political or economic crisis.	Criteria are whether the government has taken the necessary steps to achieve the objective and attain the standards, and the effects or results of these actions. Indicators are used to determine whether the criteria have been met.	Foster adoption of policies that lead to political stability, economic growth, sustainable development and regional economic integration through experience sharing and reinforcement of best practices, including identifying deficiencies and requirements for capacity building.
OECD Environme	ental Performance	Review			
Individual OECD member countries	OECD members meeting as the Working Party on Environ-mental Performance	Progress toward sustainable development common for all countries. Includes key economic, social and environmental trends; policy making environment, and progress toward socially inclusive green growth. Two in-depth issues selected by reviewed country	Periodic reviews of each member, or roughly 4-6 each year at an approximate cost of €300,000 each. Review team includes experts from three reviewing countries, Secretariat and consultants. Information is collected from various parts of the OECD Secretariat and country under review. After stakeholder consultations, peer review takes place in the Working Party. Reports are subsequently published.	Reviews look at both policy frameworks and implementation, and at quantitative measures of the achievement of targets. Have policy objectives been achieved efficiently and (effectively? Are the policy objectives based on an assessment of benefits and costs? Performance: distinguish intentions, actions, results.	The aim is to - promote peer learning - enhance countries' accountability to each other and to the public - improve governments' environmental performance, individually and collectively
ECOSOC Annual	Ministerial Review	(AMR)			
Members of the UN collectively	Ministerial representatives of UN Members meeting as the Economic and Social Council (ECOSOC)	a) Focuses on a different MDG theme each year. b) National Voluntary Presentations track countries' progress towards the MDGs; 8,500 words (including statistical annex), highlights accomplishments and challenges in the implementation of national development strategies and policies, and the initiatives the country has undertaken.	a) Secretary-General's Report prepared with inputs from the national government and from organizations across the UN system. Regional meetings focus on topics of particular relevance in each region to allow review of regional progress and challenges; b) In the first 7 years, 58 National Voluntary Presentation (NVP) reports were prepared. After presentation to the AMR, including the comments of three country reviewers, the reports are posted to the ECOSOC website.	a) Both effort at meeting MDGs and degree of success b) The "reviewers" of each NVP at the AMR are asked inter alia to "Provide a critical and objective assessment of the strategies and policies presented in the national report, along with the means to achieve them"	Sharing of good practices Aims include: (i) accountability for commitments; (ii) national review and renewal of commitments; and (iii) mobilizing actions and stakeholders to support implementation.

WHO? (AGENTS)	TO WHOM? (PRINCIPALS)	ABOUT WHAT?	THROUGH WHAT PROCESS?	CRITERIA/ STANDARD OF ASSESSMENT?	WITH WHAT EFFECTS ON AGENTS?
WTO Trade Polic	y Review				
Members of WTO a) individual b) collective	Members of WTO meeting as the Trade Policy Review Body (TPRB)	a) General trade policies and practices of the Member under review, not compliance with WTO obligations. b) Annual review of the trading environment; periodic review of measures taken in response to the financial crisis	a) Major reports written by Secretariat and Member under review; both are published. Secretariat reports based on notifications by Members, other sources, and on a country visit. Plan is for 13 reports in 2014 at an approximate cost of ChF750,000 per report. b) Reports prepared by the Secretariat. All reports discussed by TPRB. Questions asked by other Members are available online.	Reports factual not evaluative. Criteria oriented to policies not effect on trade flows. Secretariat sometimes warns or expresses worries based on collective norms of the trading system, but neither criticizes Members, nor comments on their rights and obligations under WTO agreements.	Help Members understand a) all aspects of a country's trade policy regime, and b) the state of the trading system. Both a learning experience and an inducement to move in the direction of the WTO consensus on appropriate policy
PIF Pacific Plan R	eview (2013)				
The 16 member countries of the Pacific Forum that have adopted the Pacific Plan	An eminent person was appointed to conduct the review	Effectiveness and continued relevance of the Pacific Plan as the master strategy for regional integration and cooperation.	The review team held consultations with national governments, non-state stakeholders and also accepted public submissions. Drafts were discussed with the Pacific Plan Action Committee before the report was submitted to Heads of State and Government, and release on the web.	The impact of the Pacific Plan since 2005 and whether the Leaders intent for the Plan has been met, including implementation of initiatives under the Plan and the establishment of new partnership.	To guide the future directions of the Pacific Plan for the next decade
G20 Voluntary Pe	eer Review of Fossi	l Fuel Subsidy Reform			
To be decided whether each G20 member will be reviewed, and periodicity	Members of the G20, presumably meeting as the Working Group on Energy and Commodity Markets	2009 commitment to "To phase out and rationalize over the medium term inefficient fossil fuel subsidies while providing targeted support for the poorest." To be decided: review only subsidies that individual countries consider to be inefficient, or both efficient and inefficient subsidies granted to either producers or consumers.	Transparency: Voluntary reporting of fossil fuel subsidies and efforts to reform already exists, although reporting is inconsistent. Reviewers may choose to rely on published data from other sources, or additional inquiries, e.g. in meetings with the reviewed country officials. Surveillance: undecided. Three proposals: 1. Country Only Voluntary Peer Review (Groups of 2-4 countries agree to work with each other) 2. Third-Party Voluntary Peer	Undecided: merely exchange of lessons learned or progress in meeting the fossil fuel subsidy reform commitment.	Understanding and comparison of each country's fossil fuel policies; sharing reform experiences.
			Review by experts drawn from think tanks, academia, and international organizations 3. Hybrid		



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