

New Zealand submission to the Subsidiary Body for Scientific and Technological Advice

Further views on the implications of the implementation of decisions 2/CMP.7 to 5/CMP.7 on the previous CMP decisions on methodological issues related to the Kyoto Protocol, including those relating to Articles 5, 7 and 8 of the Kyoto Protocol, and on how these implications should be addressed.

February 2013

Introduction

1. This submission responds to the CMP.8 invitation to Parties to submit their views on, and proposals or elements of proposals, to address the implications of the implementation of decisions 2/CMP.7 to 5/CMP.7 on the previous CMP decisions on methodological issues related to the Kyoto Protocol, including those relating to Articles 5, 7 and 8 of the Kyoto Protocol, (draft decision - / CMP.8, paragraph 9).

2. We note the CMP has requested the secretariat to make these submissions available on the UNFCCC website and compile them into a miscellaneous document before the first technical workshop scheduled to happen before the thirty-eighth session of SBSTA this year.

Context

3. New Zealand welcomes the progress Parties made at Doha in identifying and addressing the implications of the implementation of decisions 2/CMP.7 to 5/CMP.7 on previous CMP decisions on methodological issues related to the Kyoto Protocol, including those relating to Articles 5, 7 and 8 of the Kyoto Protocol.

4. This submission highlights issues not resolved in Doha and provides New Zealand's further views on issues raised in the technical paper, at the workshop in Bonn in October 2012 and in the negotiations at Doha. We look forward to discussing the technical details at future technical workshops in Bonn and at the thirty-eighth and thirty-ninth sessions of SBSTA.

5. This submission builds on our previous submission for this work that was prepared in time for the technical workshop held in Bonn in October 2012 (http://unfccc.int/documentation/submissions_from_parties/items/5901.php).

Relevant issues

Reporting and review

6. The SBSTA and CMP8 did not have sufficient time in Doha to address adequately the implications of decisions 2/CMP.7 to 5/CMP.7 on the previous CMP decisions related to review guidelines under the Kyoto Protocol. It is important this work is addressed this year to allow Parties sufficient time to understand the reporting and review requirements prior to the first inventory submission under the second commitment period which is due in April 2015.

7. The revision of relevant methodological decisions related to the Kyoto Protocol provides Parties with an opportunity to use their experiences from the first commitment period and to

streamline decisions where it makes sense to do so. Areas where this could apply are in national system and national registry requirements and the nature of reviews.

8. New Zealand notes the large review load for Annex I Parties, the Secretariat and reviewers that will occur over the 2014-2016 period with the final first commitment period inventory reviews, the true-up report and subsequent review and the 6th national communication and 1st biennial report reviews. There is justification for rationalising the overall review process and re-visiting the requirement for in-depth reviews of the initial reports.

9. In addition, New Zealand considers that the requirement for an in-depth review of the national system and national registry as part of the initial review for the second commitment period is not necessary. The national registry and national system were thoroughly reviewed during the initial review for the first commitment period and are regularly and comprehensively reviewed as part of the annual review process for national inventories. The resources that the Secretariat and Parties would need to expend to duplicate these processes are unlikely to result in any additional benefits.

Reporting requirements for Annex 1 Parties without a QELRC

10. In the second commitment period of the Kyoto Protocol there are now two groups of Annex I Parties that are party to the Kyoto Protocol: those with a QELRC and those without a QELRC but still with reporting requirements. There is a need to clarify which parts of the Kyoto Protocol reporting requirements are mandatory for Kyoto Protocol Parties without a QELRC and will thus be included in the review processes under the Kyoto Protocol during the second commitment period.

Registry

11. In relation to technical implication issues in decision 13/CMP.1, New Zealand welcomes the opportunity to review the requirements for publicly accessible information in light of Parties' experiences gained during the first commitment period.

12. New Zealand is a strong supporter of transparency but has some specific concerns with the amount of information related to individual accounts that is publicly available. A particular concern is information that could potentially present a security risk to the account-holder (e.g. phone numbers and email addresses), and information that may be commercially prejudicial to the account-holder (information relating to the types and amounts of units within an individual account). New Zealand supports a decision that addresses these concerns while ensuring sufficient public transparency.

Land-use, land-use change and forestry

Definition of 'reforestation' in the second commitment period

13. In relation to the definition of reforestation in the second commitment period (paragraph 59 of the technical paper (FCCC/TP/2012/6)), the UNFCCC Secretariat has previously advised that, based on decisions 16/CMP.1, 2/CMP.6 and 2/CMP.7, the definition of reforestation remains the same for the second commitment period. On that basis, the second sentence of decision 16/CMP.1, paragraph 1(c) should therefore read as "For the *second commitment period*, reforestation activities will be limited to reforestation occurring on those lands that did not contain forest on 31 December 1989".

14. Due to time constraints at Doha, however, the SBSTA was unable to complete its work on assessing and addressing the implications of the implementation of decisions 2/CMP.7 to 4/CMP.7 on the relevant decisions adopted for the first commitment period, including 16/CMP.1.

15. The definition of reforestation is an essential underpinning element for the completion of the current IPCC work to prepare the 2013 Revised Supplementary Methods and Good Practice Guidance Arising from the Kyoto Protocol, which will update Chapter 4 of the existing 2003 GPG-LULUCF to take account of decision 2/CMP.7, and it is unfortunate that this work was not completed in Doha.

16. To provide clarity, the definition of reforestation in decision 16/CMP.1 should be updated to ensure its continued application during the second commitment period. This should be addressed under the Article 5, 7 and 8 work programme as a matter of urgency, with a view to the SBSTA reaching an agreed conclusion at its thirty-eighth session in Bonn, for adoption at CMP.9 in Warsaw.

Common reporting format tables

17. New Zealand sees the agreement of the common reporting tables for land use, land-use change and forestry activities under Article 3, paragraphs 3 and 4 of the Kyoto Protocol as critical this year to enable the UNFCCC Secretariat sufficient time to integrate the tables into the current CRF Reporter upgrade and time for Parties to test the functionality of such tables.

18. New Zealand would strongly urge the SBSTA to address this work as soon as possible and suggests a work plan be agreed at the thirty-eighth SBSTA session that includes:

- A request the UNFCCC Secretariat to prepare draft CRF tables.
- The draft CRF tables to be input to the technical workshop.
- Confirm dates and venue for the technical workshop.
- Final CRF tables for adoption at CMP.9 in Warsaw.

19. New Zealand is of the view that the work on new CRF tables is crucial to enable Parties to report beginning in 2015, and that the LULUCF tables (Kyoto Protocol Article 3.3 and 3.4 activities) need to be integrated into the current CRF Reporter upgrade. New Zealand notes the current budget shortfall for completing the CRF Reporter upgrade. Budget needs for the LULUCF tables need to be identified early to enable the resources to be secured.

Conclusion

32. New Zealand looks forward to continuing to engage on these important issues with other Parties at the technical workshops and at thirty-eighth and thirty-ninth sessions of SBSTA this year.