

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

Views on the work programme on the revision of the guidelines for the review of biennial reports and national communications, including national inventory reviews, for developed country Parties.

September 2012

Introduction

1. New Zealand notes that SBSTA 36 initiated its consideration of the work programme on the revision of the guidelines for the review of biennial reports and national communications, including national inventory reviews, for developed country Parties.

2. This submission responds to the SBSTA 36 invitation to Parties to submit their views on the elements of the above work programme and on the timeline of proposed activities, as well as on the key elements of the revision of the review guidelines for the review of biennial reports from developed country Parties and national communications, including national GHG inventories, from Annex I Parties, taking into consideration experience from current review practices. FCCC/SBSTA/2012/2, paragraph 73 refers.

Context

3. We note that the SBSTA has agreed that in revising the review guidelines, Parties should take into account experience with the reporting and review of information under the Convention and the need to have a cost-effective, efficient and practical review process that does not impose an excessive burden on Parties or the secretariat (FCCC/SBSTA/2012/2, paragraph 71 refers). In New Zealand's view designing a cost-effective, practical review process that does not impose an excessive burden on Parties or the secretariat should be the "guiding principle" for the work programme.

Relevant issues

4. The annual review process for Annex I greenhouse gas inventory reports has been in operation for over ten years, and as a result Annex I Party greenhouse gas inventories have undergone considerable improvement and most meet the quality standards required under the UNFCCC/Kyoto Protocol and IPCC good practice. Annual inventory review is no longer a necessity to maintain those standards and could be replaced with a review every two years (with half of the Annex I Parties reviewed each year). On an exceptional basis, if problems were to be identified, an inventory review could be scheduled for the next year as a follow up. New Zealand wants to stress that it is not suggesting any change to the frequency of reporting of greenhouse gas inventories – this would continue to be done annually – the suggested change is to the frequency of review. In addition, undertaking a review every second year would provide more of a practical timeframe in which to implement recommendations from previous reviews. The current system where many review reports are only finalised two or three months before the next national inventory report is submitted does not give the Party enough time to follow through on recommendations from the previous review.

5. Given that starting in 2014 Annex I Parties will be submitting biennial reports with the accompanying process of international assessment and review (IAR), and that national communications will now be submitted every four years, there is justification for rationalising the overall review process. In addition there will be a process of international consultation and analysis (ICA) for biennial update reports from non-Annex I Parties which needs to be factored into the work of the secretariat. Many Parties have suggested that experts to be involved in the

technical analysis part of the ICA process be drawn from the same pool of experts as that used for the current Annex I inventory and national communication review processes. These experts come from both developed and developing countries, but the size of the pool is limited. This also needs to be factored into the shape of the review guidelines that will result from the work programme on the revision of the guidelines.

6. In addition, the reviews under the Kyoto Protocol are focussing on smaller and smaller issues as time goes by. Rationalising the focus and intent of the reviews would also bring the reviews back to concentrating on the most important issues instead of pursuing minimal emission sources.

7. Revision of the review guidelines should take into account experiences with the current review guidelines (under both the Convention and the Kyoto Protocol) both from a Party and a secretariat perspective, as well as the perspectives of expert reviewers involved in both greenhouse gas inventory and national communication reviews.

8. In undertaking the revision of review guidelines under the Convention there is material that can be drawn from in the guidelines for review under Article 8 of the Kyoto Protocol (decision 22/CMP.1 refers), where applicable. In New Zealand's view, as a starting point the structure of the Article 8 guidelines is worth examining. Such an approach has a lot to recommend it. New Zealand can envisage a product from this work programme that is a single guidelines document that addresses common elements together with separate chapters on, for example, greenhouse gas inventory review, biennial report review, and national communication review. In our view this type of approach avoids unnecessary duplication.

9. Given that Parties have now agreed revised reporting guidelines for greenhouse gas inventories from Annex I Parties, the review guidelines will need to be aligned with the new reporting requirements. For example the reporting guidelines now contain a section on national inventory arrangements. Part IV of the Kyoto Protocol Article 8 guidelines that covers review of national systems could provide a useful starting point for drafting guidelines for the review of national inventory arrangements.

10. Similarly, Part VII of the Kyoto Protocol Article 8 guidelines on review of national communications together with the general procedures under the Convention for the review of national communications from Annex I Parties (decision 2/CP.1 refers) could also provide a useful starting point for revised national communication guidelines under the Convention.

11. Content of biennial reports and the process of IAR were agreed at COP 17 (Annex I and Annex II of decision 2/CP.17 refer). Part III of Annex II to decision 2/CP.17 outlines the technical review process for biennial reports. The paragraphs in this section of Annex II describe the relationship between the review of biennial reports and the review of greenhouse gas inventories and national communications. The content of these paragraphs (i.e. paragraphs 6 and 7 of Annex II to decision 2/CP.17) should be integrated into the new review guidelines. Such an approach to reviewing greenhouse gas inventories could sequence well with the technical review process for biennial reports

Process issues

12. We note that the work programme on the revision of the review guidelines is aiming to complete this work by COP 19. New Zealand suggests that in order to make good progress under the work programme, building on the work that the secretariat has been requested to do in advance of SBSTA 37, the secretariat be requested to prepare a "zero-order" draft of a single

guidelines document structured similarly to the Kyoto Protocol Article 8 guidelines (as described in paragraph 8 above), with text drawn from existing review guidelines where relevant, and with input from Parties' submissions. We see such a document being available to Parties in the first part of 2013 to become the focus of a technical workshop before SBSTA 38. We also suggest that it would be useful for SBSTA to actively seek input from the review experts involved in the reviews of Annex I Party greenhouse gas inventories and national communications. SBSTA 37 could request the secretariat to send out an invitation to all review experts in this regard and/or request that the topic be placed on the agenda for the annual lead reviewers meeting with a reasonable amount of time being set aside for such a discussion.

13. We note that there is relevant methodological work under the Kyoto Protocol happening in another work programme under SBSTA in parallel with the work programme under the Convention on revision of the review guidelines. The work programme under the Kyoto Protocol is dealing with the implications of decisions 2/CMP.7 to 5/CMP.7 on previous methodological issues related to the Kyoto Protocol, including those related to Articles 5, 7 and 8 of the Kyoto Protocol. The work programme under the Convention should be in tune with the work being done under the Kyoto Protocol as appropriate.

Conclusion

14. New Zealand looks forward to engaging on these issues with other Parties at SBSTA 37 and beyond.