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**Poznan, 1–10 December 2008**

**Item 10 of the provisional agenda**

**Reporting and review of information submitted by Parties included in Annex I to the Convention that are also Parties to the Kyoto Protocol**

## **Experiences with and lessons learned from the review of initial reports under the Kyoto Protocol, including recommendations for improvements**

### **Submissions from Parties**

1. The Subsidiary Body for Implementation (SBI), at its twenty-eighth session, invited Parties to submit to the secretariat, by 19 September 2008, their views on their experiences with and lessons learned from the review of initial reports under the Kyoto Protocol, including recommendations for improvements. The SBI requested the secretariat to compile these submissions into a miscellaneous document, for consideration by the SBI at its twenty-ninth session with a view to providing guidance to the Parties and to the secretariat on the review process, as appropriate.
2. The secretariat has received four such submissions. In accordance with the procedure for miscellaneous documents, these submissions are attached and reproduced\* in the language in which they were received and without formal editing.

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\* These submissions have been electronically imported in order to make them available on electronic systems, including the World Wide Web. The secretariat has made every effort to ensure the correct reproduction of the texts as submitted.

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\*\* This submission is supported by Croatia, Bosnia and Herzegovina, the former Yugoslav Republic of Macedonia, Montenegro, Serbia and Turkey.

PAPER NO. 1: AUSTRALIA

**AUSTRALIA**

**Views on the reporting and review of information submitted by Parties included in Annex I to the Convention that are also Parties to the Kyoto Protocol**

**Submission to the SBI**

Australia welcomes the opportunity to submit its views on the reporting and review of information submitted by Parties included in Annex I to the Convention that are also Parties to the Kyoto Protocol, as invited by the SBI at its twenty-eighth session.

The reporting and review process is fundamental to achieving the objectives of the Convention and to the successful implementation of activities under the Protocol, including international emissions trading. Australia recognises the increasing importance of the review process in ensuring the overall effectiveness of Protocol, and thanks the secretariat, reviewers and Parties for their efforts in continuing to strengthen the review process.

Australia has actively contributed to efforts aimed at strengthening the review process. In June 2008, Australia provided USD30,000 in supplementary funding to support activities relating to training and lead reviewer meetings for 2008 and 2009. We are also providing four reviewers to this year's review cycle.

Australia considers that, as the international community moves towards more robust action in the future, issues of reporting will become even more significant. Parties will require confidence in the review of their inventories, as these activities play a fundamental role in supporting and informing their efforts to develop effective mitigation strategies, and are also central to measuring their success.

In relation to the second review of the Kyoto Protocol, Australia notes its continued support for the proposal by the European Union that the review address improvements that can be made to the review and reporting process, including the operation of the Expert Review Teams. The second review should address the procedures and guidelines governing the nomination of experts and their selection, training and discharge of duties. The conflict of interest procedures relating to the Expert Review Teams could be made consistent with those adopted for the Compliance Committee.

In addition to consideration by the second review, and given the underpinning role of reporting and review activities in a post-2012 framework, Australia considers that continued improvement and reform of these processes by the SBI will be critically important.

Issues requiring attention will include the need to ensure consistency between review teams, and overcoming issues that can affect the quality of reviews, such as availability of experts.

Australia acknowledges that managing the review process is placing considerable burdens on the secretariat. This will continue to grow as the complexity of reviews continues to increase. As the international community moves towards adopting more sophisticated inventory systems, expertise and knowledge of reviewers will need to keep pace. As noted by the SBI and lead reviewers, further support for resourcing the review process and training programmes is also required as a priority.

Australia considers that strengthening the role of the secretariat in the review process would facilitate a number of positive outcomes, including improving consistency, enhancing professional expertise and knowledge, and alleviating the burden on Parties and lead reviewers. This will require greater resourcing of the reporting and review process. Recognising the resourcing challenges faced by the secretariat in this

area to date, together with the central and growing importance of the review process to the objectives of the Convention, Australia is willing to consider the allocation of additional core budget funding for this purpose.

To further facilitate improvement of the review process, Australia proposes that a formal feedback mechanism be established, either through a meeting of inventory compilers or a submission process. This would enable Parties to learn from the experience of others, allow for any common issues emerging through the process to be promptly identified and addressed, and help to enhance transparency and consistency. Further, given the increasing complexity and importance of review processes, the introduction of a separate formal facilitation mechanism that facilitates dialogue on complex technical, legal and policy issues between Parties and reviewers may be useful in ensuring the overall robustness of the system.

Finally, Australia considers that the training and framework for the review of Parties' inventories does not adequately take into account the more complex and sophisticated aspects of some Parties' inventory systems, such as those that use Tier 3 process models. Reviewers and Parties would benefit from modification to training programs to address the complexities presented by such systems. We note the IPCC Good Practice Guidelines for LULUCF provides limited advice on QA/QC of process models. Australia considers that the complexity of such systems warrants additional guidance for review teams on specific preparation that could be undertaken ahead of reviews of Tier 3 systems.

We look forward to considering Parties' submissions on this issue, and to substantive discussion on strengthening the review process at the twenty-ninth session of the SBI.

PAPER NO. 2: FRANCE ON BEHALF OF THE EUROPEAN COMMUNITY  
AND ITS MEMBER STATES

**SUBMISSION BY FRANCE ON BEHALF OF THE EUROPEAN  
COMMUNITY AND ITS MEMBER STATES**

**This submission is supported by Croatia, Bosnia and Herzegovina, the Former Yugoslav Republic of Macedonia, Montenegro, Serbia and Turkey**

Paris, 1 October 2008

**Subject: Reporting and review of information submitted by Parties included in Annex I to the Convention that are also Parties to the Kyoto Protocol  
Information on their experiences with and lessons learned from the review process, including recommendations for improvements**

This submission is based on the general principles for the inventory review under the UNFCCC and the Kyoto Protocol which refer to “*a process for a thorough, objective and comprehensive technical assessment of all aspects of the implementation of the Kyoto Protocol*”, “*consistency and transparency in the review of information*” and the objective “*to assist Parties included in Annex I in improving their reporting of information under Article 7 and the implementation of their commitments under the Kyoto Protocol*”. The submission also addresses certain technical issues pertaining to the review process.

The EU would like to acknowledge that the UN review process has been instrumental in ensuring the integrity of the Kyoto Protocol and the Convention, and has contributed significantly in ensuring that continuous progress is made by Parties in fulfilling their commitments and in improving the quality of the information provided to the UN. The EU would also like to acknowledge the significant efforts and resources contributed to this process by both the secretariat and expert reviewers. The EU notes that reviews have been part of the Convention implementation for some years now and that Kyoto reviews have already begun. This has allowed both, Parties and the secretariat, to gain valuable experience and to identify the reviews’ strong points as well as areas where improvements may be required. In this submission, some of the areas for further improvement, in particular insufficient resources and expertise, and lack of consistency and comprehensiveness of the reviews, are highlighted and solutions are proposed. The goal is to ensure that the process will continue to improve and to adequately support the needs of the UNFCCC, especially in light of new or additional reporting requirements.

A number of issues related to the lack of resources for the review process have been discussed at recent SBI and SBSTA meetings and are therefore not repeated in this submission. Many of the suggestions that follow will require that further resources are allocated to the review process. Improved financing of all parts of the review process, including the development and implementation of training programmes, meetings of lead reviewers and the sharing of the reported information are important, if the integrity and the smooth functioning of the process is to be maintained. The support of the UNFCCC Secretariat as regards the review process is also essential and resources should be allocated accordingly. The EU envisages that given the

increasing requirements on reporting and verification and taken into consideration the discussions under the AWG LCA on MRV, in the long term a more systematic process will be developed for allocation of resources and planning of review activities. The EU also considers that some of these issues are of relevance to the review of the Kyoto Protocol pursuant to its Article 9, and looks forward to discuss them as appropriate in that forum.

## **Review principles**

### ***Thoroughness***

The thoroughness of the individual reviews varies according to the type of the review, i.e., centralized, in-country, desk. The periodic in-country reviews of Annex I inventories ensure a thorough assessment of the implementation of the reporting requirements and the number of experts participating per review is generally considered to be sufficient. However, the EU believes that there is merit in examining, on a case by case basis, whether there is a need to make additional experts available depending, for example, on Parties' national circumstances, on the share of a particular sector in overall emissions, as well as on a sector's level of complexity.

The energy sector could for instance require additional attention as it generally accounts for a large share of the total emissions of a Party and consists of diverse subsectors of varied complexity. There are Parties that in addition to fuel combustion activities, they also have, for example, significant emissions from fugitive sources as well as refineries, chemical production, and iron and steel production. In such cases, it could be useful to have two energy experts in the review team.

Another example, where more experts per review team may be required in the future, is the LULUCF sector. Reporting under article 3, paragraphs 3 and 4, is expected to be fairly complex and the level of complexity may vary from one Party to the other as some Parties have elected more than one activities under Article 3.4. The EU believes that in such cases it will be important to ensure that land activities are covered sufficiently by the expertise available in the review team.

### ***Objectiveness***

Although reviews are conducted in an objective manner, differences in the interpretation of the reporting and review requirements and guidelines among review experts and Parties, may occur. Currently, there is no process that addresses such differences in views, which can affect the achievement of concensus on particular issues during reviews. The EU believes that a formal early possibility for broader discussion among lead reviewers of different interpretations of guidelines and requirements is essential for the review process. To this end, it should also be explored how such exchange among lead reviewers could be organized as part of the inventory review without compromising the confidentiality of the review. The secretariat's role as a coordinator is limited, hence, it is important that improved ways of exchange of views among lead reviewers on such sensitive issues are devised. The EU also proposes to look into additional ways to resolve such issues, e.g., through additional consultations with other experienced experts during the review. Such requests could be triggered either by Parties or by the review team itself.

### *Comprehensiveness*

Current reviews are comprehensive covering all relevant sectors and aspects. To this end, the EU acknowledges the important role of the secretariat in supporting the technical review of national registries and of the related transactions. However, as there is an increasing number of issues to be reviewed (reporting under Article 3.3 and 3.4, reporting under Article 3.14, reporting on AAUs, ERUs, CERs, RMUs), it is unclear to Parties how these will be handled in the future and how the good balance between thoroughness and comprehensiveness will be guaranteed, especially when taking into account the additional scope of the review in the future. The EU would like to request that the secretariat provide additional information on the plans to incorporate these issues in the review process. Based on the experiences gained from the reviews so far, the EU would also propose that the option of separating the review of national registries from the review of the inventories is considered.

### *Consistency*

Each review is strongly dependent on the experts involved but the experts alone cannot guarantee the consistency of reviews across countries and years. Parties have been receiving, on occasion, contradictory recommendations from ERTs which shows the need for additional efforts to ensure consistency. Through the experience gained from the reviews, the EC believes that it is necessary that the implementation of the review guidelines under Article 8 and the adherence of the annual reviews to key principles such as consistency and comparability are independently assessed, for example, through the annual meetings of the lead reviewers. This would in essence establish a quality assurance procedure for the entire process. Such QA procedures could help identify areas where additional guidance may be necessary or where it would be useful to further improve and harmonize the review process. The consistency of the reviews has already been analysed and discussed at meetings of lead reviewers, however, this should be considered as a continuous task as new reviewers are being involved and new consistency issues keep arising.

The EU proposes that in the period between the finalization of a review report and the next round of reviews, further evaluations of the consistency of the review reports across countries and years are conducted. Although full consistency cannot be achieved, the EU proposes that a more streamlined process, through which, main review findings are documented in a concise manner across Parties and years, is developed. This will allow expert reviewers to track the history of a particular problem, or find similar cases and look into the solutions proposed. At the same time, it would enable the secretariat to support the ERT in treating Parties in a consistent, yet mindful of national circumstances, way, with regard to recommendations, encouragements, and in particular adjustments.

Similar to the inventory preparation, the review process would also benefit from the establishment of clear QA/QC procedures as well as from an annual analysis of the performance in relation to the objectives. A more formalized system of QA/QC procedures would be useful for the ERTs and the UNFCCC secretariat in relation to the consistency of recommendations provided by the ERTs.

### *Transparency*

The additional information provided by the ERT in relation to the Party's comments to the draft

review reports is very useful and should continue (explanations why comments from Parties have not been accepted or have been modified).

### *Adjustments*

As regards adjustments it is important to keep ensuring that they are applied in a consistent way and in accordance with the existing guidelines. To this end, the secretariat should keep ensuring that in case of a potential adjustment the ERT is informed of any similar cases that may have occurred in the past and of how they have been treated, before the final adjustment method is chosen. The EU stresses the importance of guidance from the ERT to the Party on how problems can be solved in order to avoid the adjustment.

The EU would also like to recall that Paragraph 43 of the Annex to decision 22/CMP.1 establishes the possibility to involve additional ad hoc experts:

“Ad hoc review experts shall be selected from those nominated by Parties or, exceptionally and only when the required expertise for the task is not available among them, from the relevant intergovernmental organizations belonging to the UNFCCC roster of experts for specific annual or periodic reviews by the secretariat. They shall perform individual review tasks in accordance with the duties set out in their nomination.” This option may be useful in reviews that may lead to adjustments.

### *Technical issues*

#### *Composition of the roster of experts*

Reviews are conducted by experts nominated by Parties to the roster of experts. The review guidelines under Article 8 request balanced participation between Annex I experts and non-Annex I experts. However, the current composition of the roster of experts, along with the availability of experts in practice, show that despite the dedication and commitment of both Annex I and non-Annex I experts it is difficult to achieve the necessary balance between Annex I experts and non-Annex I experts as well as the geographical balance among experts from non-Annex I Parties. The EC believes that the implementation of appropriate balance in the future should be tied to the availability of sufficient number of experts for the review process to avoid problems with the implementation of key requirements of the Convention and the Protocol.

#### *Nomination of experts*

One of the challenges of the review process is to maintain the roster of experts active and ensure the participation of the nominated and trained experts. The EU proposes that all Annex I Parties should commit to making a minimum number of national experts available to the review process in line with their respective capacities and commitments, or alternatively support the participation of experts nominated by other Parties or intergovernmental organisations.

#### *Training*

In the current process, Parties are required to nominate experts to the roster of experts; however, there are no set criteria as regards the expected qualifications and background of the experts. Given the importance of the reviews, it is necessary to ensure that the nominated experts have some basic qualifications before joining the process. The EU proposes that the Secretariat



provides some general guidance to Parties as to what are some of the qualifications that a review expert should have, with a view of facilitating Parties in selecting and nominating the most suitable experts for this task. Given the importance of the reviews it is also necessary to ensure that experts, who have not been involved in inventory preparation previously, go through comprehensive training.

The training material, as it currently stands, primarily addresses main COP/CMP decisions and basic reporting guidelines. Assuming that the nominated reviewers have the appropriate qualifications and experience in inventory preparation, it would be very useful if the training material was extended to include additional substantial information such as important conclusions from the lead reviewers meetings or interesting adjustment cases. The training should also cover methods that could facilitate reviewers in identifying the key issues during inventory reviews.

Training modules covering emerging review issues should also be developed so as to ensure that even experienced experts stay up-to-date with the latest developments as regards reporting and review activities.

The EU notes that, on occasion, experts' interpretations of certain issues differ. In order to minimize the effects of such differences in interpretation and foster a common understanding in the implementation of the reporting guidelines and COP/CMP decisions, the EU believes that such issues should be given further attention in the training of reviewers. Also reviewers could get more guidance and training on how to deal with inventories, parts of which, may be based on highly complex models.

The review guidelines (annex to decision 22/CMP.1) also establish the possibility for additional training for lead reviewers to enhance their skills, consistency of reviews should be an area where such additional training seems to be useful.

Overall, the EU believes that providing adequate training is essential for the review process and that training needs should be regularly reviewed.

### *Exams*

The current examination structure for expert reviewers primarily tests their knowledge and understanding of the main COP/CMP decisions and basic reporting principles without going into the substance of the material that a review usually entails. To this end it would be appropriate to a mock review an integral part of the training/examination process, in particular for experts with limited inventory experience, and to ensure that the necessary financial resources are made available. This mock review should be followed by a discussion with the instructors of main technical issues and difficulties that the nominated experts encountered during the exercise and ways that these can be dealt with.

### *Lead reviewers meetings*

The conclusions and recommendations from the lead reviewers meetings constitute important reference material for the review process. However, these conclusions are currently contained in separate meeting documents making them difficult to apply. An improved organization of the

conclusions of lead reviewers' meetings could further enhance the access to these important results. The conclusions, currently contained in different documents from each meeting, could be organized in one document, structured under different topics. The EU

further proposes that at the beginning of each review, (in particular at centralized reviews) lead reviewers advise the ERT to take note of the conclusions and recommendations from lead reviewers meetings and give advice on how this information can be used.

### ***Terms of service for lead reviewers***

Paragraph 42 of the Annex to decision 22/CMP.1 requires that:

*“Lead reviewers shall be assigned for a minimum period of two years and a maximum period of three years to ensure the continuity and consistency of the review process. Half of the lead reviewers shall be assigned initially for a term of two years and the other half for a term of three years. The terms of service of lead reviewers for a given period of service shall be designed and operationalized in accordance with relevant decisions of the COP and the COP/MOP.”*

Taking into account the current lack of review experts and the importance of further work on consistency of the reviews it may be difficult to implement the rotation of lead reviewers for future reviews under the Kyoto Protocol. The EU would like to request that the secretariat provides an assessment of whether these rotation rules could prove problematic for the planning of the required reviews under the Kyoto Protocol and of whether Parties should further consider this issue with a view of introducing any necessary amendments to the rules.

### ***Background review material (S&A, outlier tests)***

The synthesis and assessment (S&A) report and the review transcripts are important background material made available to ERTs in advance of every inventory review. Experience with their use has shown that, on occasion, these may list a series of outliers or other matters which are trivial or which do not require investigation. In addition, despite improvements introduced over time, these documents often still contain inquiries and issues that have been raised previously by ERTs and to which Parties have already provided satisfactory answers. In order to avoid such repetitions and ensure that the issues identified in these transcripts are indeed the most pertinent ones - especially given that these transcripts guide the reviewers in their work and can even determine the rigour of a review - the EU proposes that the automated outlier detection during the S&A preparation phase is complemented with expert judgement from review experts. In keeping with the continuous nature of the review and to facilitate awareness of chronological improvements for both ERT and Parties, it may also be more productive if Parties responded to the transcript rather than to the individual S&A reports.

### ***Organization of future reviews***

The experience gained with the review of the initial reports and the extraordinary workload during 2007 for both Parties and the secretariat indicates that review activities need to be carefully planned to avoid similar demanding working conditions in the future. This will especially need to be considered in view of the increased reporting/review requirements covering the first commitment period and the true-up period. The EU proposes that the secretariat communicates a review plan, in advance of these reviews, clearly detailing the required resources and timing with a view to having SB conclusions on the actions to be taken by Parties to ensure the smooth operation of the review.

PAPER NO. 3: JAPAN

## Japan's experiences with and lessons learned from the review process, including recommendations for improvements

The Subsidiary Body for Implementation (SBI), at its twenty-eighth session, invited Parties to submit to the secretariat, by 19 September 2008, "information on their experiences with and lessons learned from the review process, including recommendations for improvements." Japan would like to submit the following:

### 1. Ensuring consistency among reviews

Japan has continuously improved the greenhouse gas inventory, taking into consideration the Expert Review Team (ERT) recommendations, which are all included in our inventory improvement plan. As a result, Japan thinks that the quality of the inventory has improved to the point that we are concerned that recommendations by future ERTs may deal with minor issues of relatively low importance which may also be difficult and/or costly to resolve. Therefore, Japan encourages the secretariat to develop guidelines on the language of the review reports, allowing reviewers to make clear distinctions between important issues which must be resolved and issues of less importance. Japan further encourages Lead Reviewers to continue to achieve consistency of the level of recommendations among reviews and encourages the coordinating secretariat to play a stronger part to facilitate this effort. Japan also recommends that a method be considered to ensure consistency among ERTs to review inventories including adjustments.

### 2. Time constraints of reviews

Japan appreciates the secretariat for its flexibility shown in the review process, because inventory reviews of inventories can be time-consuming for both Parties and ERT members. Japan encourages the secretariat to continue to show this flexibility to reviews in order to ensure that Parties have sufficient time to respond to each process.

### 3. Synthesis and Assessment II document

Part II of the Synthesis and Assessment Report (S&A II) often reiterates issues identified and resolved in previous reviews and/or issues that are specifically dealt with in the Party's National Inventory Report (NIR). To eliminate unnecessary issues from the S&A II, Japan recommends the secretariat to review the chapter on recalculations in the Party's NIR when compiling the S&AII.

PAPER NO. 4: NEW ZEALAND

**New Zealand submission to the SBI on  
Reporting and review of information submitted by Parties included in Annex I to the Convention  
that are also Parties to the Kyoto Protocol: experiences with and lessons learned from the review  
process, including recommendations for improvements**

**September 2008**

New Zealand welcomes the opportunity to provide a submission on the review process and suggestions for improvements (FCCC/SBI/2008/8 paragraph 93 refers).

Measurement and reporting of greenhouse gas emissions, and the subsequent inventory review process, fundamentally underpin international action to reduce emissions, through assessing Parties' implementation of the Convention and its Kyoto Protocol, and understanding global emission trends.

The success of the inventory review process itself is dependant on the continued commitment by experts, Parties and the Secretariat. New Zealand especially acknowledges the efforts made by the Secretariat to ensure the review process is transparent, review reports are consistent and the review process is resourced with people and tools.

New Zealand has supported the inventory review process through training New Zealand experts and funding reviewers to participate in reviews. New Zealand provided 5 reviewers in the 2008 calendar year.

New Zealand acknowledges that the training of reviewers is crucial to the review process and would also emphasize that training is fundamental to improving Parties inventories. Training increases the Party's understanding of reporting requirements of the Conference of the Parties and the IPCC Good Practice. The on-line training materials for inventory reviewers are very useful in this regard. New Zealand encourages the Secretariat to allow access to the online training materials to any names nominated by the Party and not restrict it to experts currently on the roster of experts.

A crucial aspect of the review process is assuring consistency of review findings across Parties and the consistent interpretation by reviewers of the UNFCCC reporting guidelines and the IPCC reporting guidelines and Good Practice Guidance. The continued meeting of lead reviewers and publishing of the meeting decisions is a key tool to ensuring consistency of interpretation. These initiatives should be continued. New Zealand considers that further guidance could be provided to review teams to ensure the reviewers focus their review on a Party's consistency with the reporting guidelines and IPCC guidance, and not the underlying IPCC methodologies.

New Zealand encourages all Parties to contribute experts to the review process. To help address the issue of reviewer availability, we suggest that the review experience and process could be improved. Suggestions include, but are not limited to:

- The Secretariat acknowledging the importance of the reviewer role. This could be through awards or certificates.
- Ensuring there is information available on the time commitment necessary for involvement as a reviewer - both in-country and follow up work.
- Review whether the time commitment can be reduced through improving the efficiency of the review process.

- Encouraging Parties to prioritise providing reviewers, fully cognisant of the real time commitment involved.

We note the difficulty the Secretariat has had in assembling review teams in the 2008 year, notably with LULUCF reviewers, and acknowledge that the review process can be demanding on reviewers. Recognising the additional workload on reviewers, it is important to ensure continued access and commitment from reviewers after an in-country or centralised review. New Zealand considers it is now appropriate for Parties and the Secretariat to discuss further ways to streamline the annual review process, make reviews more attractive and ensure an ongoing commitment from reviewers.

We anticipate that concluding negotiations on Decision 1/CP.13 (The Bali Action Plan) will add further pressure on reviewers and the review process. The measurable, reportable and verifiable aspects of paragraphs 1(b)(i) and 1(b)(ii) of that decision will necessitate greater accountability as between parties and new reporting requirements. This should be factored into future timetables, budgets and training.

Finally, New Zealand understands the mandated timelines of the review process but suggests the process would be improved by further consideration on the scheduling of reviews. As an example, New Zealand suggests that southern-hemisphere Parties should not be scheduled for feedback over the month of January, as this often coincides with the summer holiday season. In New Zealand's case, the national inventory office will officially be closed for two weeks of the four weeks designated for feedback on the draft review report. This timeline does not promote the opportunity for good dialogue between the ERT and the Party.

We look forward to participating in discussions on strengthening the review process.

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