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**Subsidiary Body for Scientific and Technological Advice**

**Thirty-seventh session**

**Doha, 26 November to 1 December 2012**

Item 11(b) of the provisional agenda

**Methodological issues under the Convention**

**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**

**Views from Parties on the elements of the 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 greenhouse gas inventories, from Parties included in Annex I to the Convention**

**Submissions from Parties**

1. The Subsidiary Body for Scientific and Technological Advice (SBSTA), at its thirty-sixth session, 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 (hereinafter referred to as the review guidelines), with a view to completing this work by the nineteenth session of the Conference of the Parties.<sup>1</sup>

2. The SBSTA invited Parties to submit their views, by 15 September 2012, on the elements of the 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 greenhouse gas inventories, from Parties included in Annex I to the Convention, and requested the secretariat to compile these submissions into a miscellaneous document.<sup>2</sup>

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<sup>1</sup> FCCC/SBSTA/2012/2, paragraph 68.

<sup>2</sup> FCCC/SBSTA/2012/2, paragraph 73.

**FCCC/SBSTA/2012/MISC.17**

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3. The secretariat has received five such submissions from Parties.<sup>3</sup> 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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<sup>3</sup> Also available at <[http://unfccc.int/documentation/submissions\\_from\\_parties/items/5901.php](http://unfccc.int/documentation/submissions_from_parties/items/5901.php)>.

\* 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 Albania, Bosnia and Herzegovina, Croatia, Montenegro, Serbia and the former Yugoslav Republic of Macedonia.

## **Submission under FCCC/SBSTA/2012/2 | September 2012**

### **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| SBSTA**

#### **I. Overview**

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This submission contains the views of the Australian Government on a 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 (hereafter the review work programme), as invited under FCCC/SBSTA/2012/2 in accordance with decision 1/CP.16 (paragraph 46(b)).

Australia considers that achieving transparency of all countries' mitigation efforts and, where applicable, of support provided to developing countries is the overarching purpose of the Measurement, Reporting and Verification (MRV) framework agreed in Decision 1/CP.16. The review processes are a cornerstone of MRV. Coupled with regular reporting, they provide visibility of what countries are doing and generate confidence that all countries are playing their part in overall mitigation efforts.

Review processes also provide an important learning opportunity. They can facilitate improved policy making by encouraging Parties to collaborate and adopt best practice. Australia has benefited significantly from the review processes it has been involved in, and learnings from reviews have improved our national systems and processes.

Australia supports a coherent review system that streamlines existing processes and guidelines to ensure transparency and optimise the effectiveness of the review process. Such a system will benefit all Parties, experts who perform reviews and the Secretariat as coordinator of review processes. The review work programme should be designed with this goal in mind.

#### **II. Key elements of the revision of the guidelines for the review**

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Australia has identified the following principles that should underpin our approach to the review work program:

- Any reporting should be subject to only one form of review
- Avoid duplication with other processes;
- Ensure a cost effective, efficient and practical process; and
- Take into account experience with reporting and review under the Convention.

Australia considers that it will be important to build on and learn from the existing processes and guidelines under the Convention, including the guidance in decisions 2/CP.1, 9/CP.2, 6/CP.3, 33/CP.7 and 2/CP.17. Our aim should be to enhance and consolidate these existing processes and guidelines, and to ensure a coherent approach across them. This will help to aid understanding and avoid duplication.

In order to allow for better management and allocation of the time and resources of both the Secretariat and expert reviewers, including financial experts where appropriate, streamlining of review processes needs to occur. This could include coordination of reviews on biennial reports and national communications with in-country reviews of national

inventories. There are timing and resourcing issues to be resolved if this approach is adopted, given the current requirements for a review of biennial reports to commence two months after the submission of the first round of biennial reports compared to national communications which should be subject to an in-depth review as soon as possible, but within one year of receipt by the secretariat in accordance with decision 2/CP.1.

Centralised reviews would occur in all other years as appropriate. Such an approach may help ensure that all Parties have access to quality reviewers and experts, including financial experts, in a regular and predictable way.

Common rules, procedures and standards for reporting by reviewers would help simplify and increase the efficiency, effectiveness and comparability of the outcomes of review processes. The development of templates for reviewers, such as a 'tick box' form to assess if all elements of reporting guidelines have been addressed, could enable easier interpretation and comparison of outcomes. The guidelines for review should clearly identify the depth of review that is to be undertaken for each review type (centralised versus in-country) and component of the biennial report.

### **III. Elements of a work programme and timeline of proposed activities**

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It is important that this work programme is completed in a timely manner so that the revised review guidelines can be used for the 2015 national inventory review process.

With this timeframe in mind, and to ensure an effective and efficient work programme, Australia proposes a number of additional activities, building upon those already agreed by the SBSTA (FCCC/SBSTA/2012/2). The SBSTA has already requested the Secretariat to prepare a synthesis paper of Parties' submissions and a technical paper summarising the current review processes under the Convention and the Secretariat's experience with coordinating reviews, for consideration by the SBSTA at its thirty-seventh session.

In addition, Australia proposes:

- Technical workshop 1 on opportunities and methods to streamline existing review guidelines, including identify overlaps and gaps in the processes.
  - This workshop would be informed by the Secretariat technical paper referred to above.
  - Could be held in the first quarter of 2013 to enable outcomes of the workshop to be considered by the SBSTA at its thirty-eighth session.
- Submissions from Parties after Technical Workshop 1, with Parties' further views on the framework for reviews, including common rules, procedures and standards for reporting by expert reviewers.
- Technical workshop 2 on common rules, procedures and standards for reporting by expert reviewers.
  - This workshop would be informed by a submissions process referred to above.
  - Could be held in the third quarter of 2013 to enable outcomes of the workshop to be considered by the SBSTA at its thirty-ninth session and for a decision at COP 19.

Paper no. 2: Cyprus and the European Commission on behalf of the European Union and its member States

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

**Nicosia, 14 September 2012**

**Subject: The work programme on the revision of the guidelines for the review of the biennial reports and national guidelines, including national inventory reviews, for developed country Parties  
*SBSTA agenda item 10(b)***

*Background/Introduction*

The work programme on the revision of the guidelines for the review of the biennial reports and national guidelines, including national inventory reviews, for developed country Parties, was established at the Conference of the Parties, at its 17<sup>th</sup> session (Decision 2/CP.17), with a view to concluding the revision of the review guidelines no later than at the 19<sup>th</sup> session of the Conference of Parties (COP 19).

At its 36<sup>th</sup> session, the SBSTA (SBSTA 36) invited Parties to submit their views, by 15 September 2012, on the elements of the work programme on revision of the guidelines for the review of the biennial reports and national guidelines, including national inventory reviews, for developed country Parties.<sup>4</sup> The secretariat was requested to prepare a synthesis of the submissions for discussion at SBSTA 37.

At SBSTA 36 Parties requested also the secretariat to prepare a technical paper summarizing the current review process and the secretariat's experience in co-ordinating the reviews of national communications and national inventory reports for SBSTA 37.

The EU welcomes the opportunity to submit its views on the elements and timeline of activities of the work programme, and on the key elements of the revision of the review guidelines. The submission is structured so that general views and views on the review of the specific reporting elements are given separately. At the end of the submission a summary of the work programme with suggested timelines for actions is given.

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<sup>4</sup> As this submission addresses only reviews of developed country Parties, this is not specified later on in the submission text unless needed for reasons of clarity

## *General*

Parties have gained experience from the review of national communications and greenhouse gas inventory submissions from a period of more than ten years. During this period, the submission quality and timeliness of the submission have improved significantly. The reviews have been an important factor contributing to this improvement. The EU believes that robust, comparable and comprehensive reviews should continue to ensure the quality of information submitted. At the same time, the EU believes that there is a need and room to enhance the cost-efficiency and effectiveness of the reviews by analysing alternative ways of conducting the reviews including the frequency of in-depth review of information. Streamlining and enhancement of the efficiency of the review processes should be reflected in the revised review guidelines.

- Reviews should be consistent and comparable across all developed country Parties.
- The reviews should focus on key issues not on insignificant details.
- Responses and additional information provided by Parties during reviews should be considered at subsequent reviews (repetitive questions should be avoided).
- The review reports should be made more concise and contents more standardised, to the extent possible.
- The timeliness of the reviews should be improved.
- The QA/QC procedures conducted to achieve consistent review reports and a comparable treatment of Parties in the review process should be better reflected in the review guidelines.
- The burden imposed by the reviews on the secretariat and the Parties should be reduced where possible.
- The frequency of the reviews should be reconsidered and evaluated taking into account a larger number of reports that need to be reviewed in the future and the experiences with regard to timeliness and work load of the secretariat and reviewers.

The availability of skilled and qualified reviewers is key to successful and timely reviews, and has been a problem in the past reviews.

- Optional ways of conducting the reviews should be explored as the existing problems with the availability of experts may further aggravate with a larger scope and a higher number of reports to be reviewed in the coming years.

The contents of the national communications (NCs) and biennial reports are addressing the implementation of policy-related commitments under the UNFCCC, whereas the national greenhouse gas inventories provide technical estimates of emissions and removals. The expertise and nature of the reviews of national greenhouse gas inventories differ from the review of the national communications and the biennial reports.

- The guidelines for the review of NC's and Guidelines for the review of greenhouse gas inventories under the UNFCCC should be developed as separate guidelines from those of the BRs and guidelines for BR should draw on the review processes for NCs and GHG inventories where appropriate.

## *International assessment and review of biennial reports*

### *Elements and timing of actions of the work programme*

According to decision 2/CP.17, developed country Parties shall submit biennial reports (BR reports) to the UNFCCC starting on 1<sup>st</sup> January 2014. In the years where national communications (NCs) are submitted, biennial reports may be included as an annex to the NC's or as a separate report.

Modalities and procedures for International Analysis and Review (IAR) for biennial reports were agreed in Durban (decision 2/CP.17). The IAR process includes the technical review of the information submitted. Parties have already agreed that the modalities and procedures of the IAR process will be revised no later than 2016 (COP 22), after experience from the first round reviews. The EU believes that any revision of the review guidelines for biennial reports as included in decision 2/CP.17 should follow this timetable as agreed.

#### *Review of national communications*

##### *Elements and timing of actions of the work programme*

According to the decision 2/CP.17, developed country Parties shall submit their national communications to the UNFCCC every four years starting on 1<sup>st</sup> of January 2014. According to previous decisions, in particular 2/CP.1, 9/CP.2, 6/CP.3, 11/CP.4, 33/CP.7, 7/CP.11 and 9/CP.16, each national communication is subject to an in-depth review to be conducted as an in-country review within two years after the due date of submissions. The contents of the reviews of NC's are currently based on the guidance from several COP decisions, but no self-standing document of review guidelines for NCs was elaborated in the past.

Decision 2/CP.17 includes two requests to the SBI on revision of the reporting guidelines for information included in national communications by COP 20 (2014):

- the revision of the "Guidelines for the preparation of national communications by Parties included in Annex I to the Convention, Part II: UNFCCC reporting guidelines on national communications", based on the experiences gained in preparing the first biennial reports and other information, to begin at SBI's 40<sup>th</sup> session
- the development of methodologies for reporting financial information.

The EU is of the view that the result of these work streams should be taken into account in the development of review guidelines for national communications and that it would be more efficient to adopt a longer-term timeline for the elaboration of review guidelines for national communications than by COP 19. This would mean that the 6<sup>th</sup> national communications would be reviewed based on current procedures for review. The 7<sup>th</sup> national communication (due 1 January 2018) would be reviewed based on new review guidelines.

The EU believes also that the new guidelines for the review of national communications should follow the review guidelines for national communications established under the Kyoto Protocol except for those areas that cover supplementary information related only to the requirements under the Protocol.

##### *Element of the revision of the review guidelines*

The review guidelines for national communications should consider the linkages to the IAR and inventory reviews. Duplication of work across reviews should be minimised or removed to streamline resources.

- The greenhouse gas inventory including the national inventory arrangements should not be part of the review of national communications, but should be reviewed as part of the inventory review.
- The review of mitigation actions and information on finance in reviews of biennial reports should build on the review of national communications<sup>5</sup>.

The elaboration of review guidelines for NCs should take into account the recent COP decisions to provide the secretariat more flexibility in organising the reviews taking into account the availability of reviewers or resources at the secretariat, e.g. organising NC reviews as centralized reviews for

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<sup>5</sup> In the short-term time horizon for the first biennial report, this may be different, but this should be the objective in the longer term-perspective



- all Parties where no significant recommendations to improve the reporting were made in the previous review, or small Parties.

#### *Review of greenhouse gas inventories*

##### *Elements and timing of actions of the work programme*

Annex I parties need to submit greenhouse gas inventories to the UNFCCC annually. Inventories are prepared and reviewed annually according to the decisions 18/CP.8, 19/CP.8 and 14/CP.11. Decision 15/CP.17 revised the annual inventory reporting guidelines to incorporate the 2006 IPCC guidelines. The UNFCCC reporting guidelines for preparing and reporting annual greenhouse gas inventories will be revised after a trial period for their use with a view to adopt a final decision by COP 19. This means, revised review guidelines for GHG inventories under the Convention should not be finally adopted prior to COP 19, and these guidelines could be completed at COP 19 in parallel with the reporting guidelines or at COP 20.

##### *Elements to consider in the revision*

The need for revision of guidelines for inventory review arises on the one hand from the adoption of the revised reporting guidelines under the UNFCCC, which include the implementation of the use of the methodological guidance in the 2006 IPCC Guidelines national inventory in the preparation of national greenhouse gas inventories and also the national inventory arrangements as a new element in greenhouse gas inventory reporting.

The EU is of the view that the revision of the inventory review guidelines under the Convention should ensure comparability of reported emission data across all developed country Parties. The EU believes that a procedure for technical corrections of inventory estimates by ERTs in the review reports under the Convention should be established. Such corrections would be calculated by the ERTs and would quantify the change in emissions or removal estimates resulting from a correction of the problems identified by the ERT (related to lack of estimates, lack of transparency, underestimation, methodologies not in line with IPCC guidelines) that are not corrected by the Party itself. If a technical correction would need to be calculated by an ERT, the views of the Party relating to the correction should also be included in the review report.

The aim of the revision of the review guidelines should also be to resolve the current problems with the implementation of the inventory review, in particular to increase the timeliness, efficiency and functionality as well as the consistency of the reviews. The focus of the review should be on key issues, not on small details. The experience gained from the reviews should be utilised in the revision. In addition, the professional skills of review teams should be given more consideration and emphasis. This could involve consideration of issues such as the use of voluntary vs. professional experts, the role of the secretariat, need for more comprehensive training and demanding exams.

The EU is also of the view that Parties should consider whether the in-depth part of the annual reviews could be performed biennially with annual reviews comprising the initial checks and a follow-up on how recommendations from the previous review are implemented.

The procedures to increase the efficiency and functionality should be developed in parallel in the review guidelines under the Convention and under the Kyoto Protocol.

*Summary of the elements and timing of actions of the work programme and elements of the revision of the review guidelines*

The EU is of the view that the work programme on review of biennial reports and national communications, including national inventory reviews should focus on analysing and exploring ways to make the reviews more cost-effective, efficient and functional. The work programme should build on the experience on past reviews of national communications and greenhouse gas inventories. The EU believes that the numerous processes to update reporting and review guidelines should be implemented in a way that avoids that the same guidelines are revised and updated several times in the upcoming 4 to 5 years and that allows that the revision processes can build on each other.

- The guidelines for IAR for biennial reports for developed country parties include guidelines for the review of these reports and a process for to revise the guidelines is established in the decision 2/CP.17.
- The reporting guidelines for greenhouse gas inventories and national communications should be revised by COP 19 (2013) and COP 20 (2014), respectively. The EU believes that the revised reporting guidelines should be taken into (account when revising or elaborating any review guidelines for these reports.

The revised guidelines for the review of national greenhouse gas inventories should be adopted at COP 19 or COP 20. Revised guidelines for review of national communications and revised modalities and procedures for IAR biennial reports should be adopted at COP 21 (2015) or COP 22 (2016). To achieve this, the work of the revision of the guidelines for reporting and review would need to be partly done in parallel during 2013 and 2014.

## Paper no. 3: Liechtenstein on behalf of the Environmental Integrity Group

### **Submissions from Liechtenstein on behalf of the Environmental Integrity Group, comprising Liechtenstein, Mexico, Monaco, South Korea and Switzerland**

#### **SBSTA Work Programme on the revision of the guidelines for the review of biennial report and national communication, including the national inventory, submitted by developed country Parties.**

In accordance with Paragraph 6 of FCCC/SBSTA/2012/L.13<sup>6</sup>, Liechtenstein, on behalf of the Environmental Integrity Group (EIG), would like to take the opportunity to submit its views with respect to the key elements of the revision of the guidelines for the review of biennial reports and national communications, including the national inventory, from developed country parties. The Environmental Integrity Group acknowledges the importance of national communications and biennial reports as well as the necessity of objective, efficient and coherent review procedures and guidelines.

According to several CP and CMP decisions<sup>7</sup>, each National Communication (NC) of an Annex I Party is subject to an "in-depth" review. Under the Kyoto Protocol<sup>8</sup> each NC shall be subject to an in-country review.

Regarding the review of biennial reports ("International Assessment and Review", IAR), Parties decided in Durban (2/CP.17) that IAR should commence two months after the submission of the biennial reports<sup>9</sup> and that IAR will be conducted every two years, whether independently or in conjunction with a NC.

Review reports of biennial reports and national communications should be available in time to be considered fully for the next submission, i.e. approx. 6 months before the next submission date. Furthermore, the reviews should be scheduled and the dates communicated well in advance (6 months). This particularly applies for in-country reviews.

The current system for reviewing national communications requires considerable resources, but the outcome based on the review seems limited. While it is helpful to have in-country reviews to fully understand national circumstances, the number of experts could potentially be reduced.

In-depth review of the GHG Inventory is crucial. It should normally be a centralized review (maybe occasionally an in-country review). Effort for review is considerable, but required to make sure inventories comply with guidelines. The delays between submission, review and the finalization of the review report can be rather long (i.e. the subsequent submission is provided before completion of the previous review). The system of Saturday papers with the request to recalculate parts of the inventory in October/November for reconsideration by the review team adds considerable delays. Such requests should only be made for correction of substantial errors in the inventory that are too fundamental to be left until the next submission. Small corrections to be "considered insignificant", as per the revised inventory reporting guidelines<sup>10</sup>, would not trigger a re-submission of the CRF tables but will be included in the next CRF tables submitted.

Elements of reporting that are provided in different reports should only be reviewed once, i.e. the GHG inventory should be reviewed annually. The GHG inventory summary provided in biennial reports and national communications should be identical to the latest inventory submission and therefore needs not be reviewed again. Similarly, elements that are both in biennial reports and the national communications should not undergo double-review.

Review guidelines should cover reviews of all types of reports (GHG inventory, biennial reports, national communications) and also point out the synergies between the individual review processes.

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<sup>6</sup> [www.unfccc.int/resource/docs/2012/sbsta/eng/113.pdf](http://www.unfccc.int/resource/docs/2012/sbsta/eng/113.pdf)

<sup>7</sup> 2/CP.1, 9/CP.2, 6/CP.3 11/CP.4, 33/CP.7, 7/CP.11, 9/CP.16, 22/CMP.1 and 26/CMP.1

<sup>8</sup> paragraph 19 of 22/CMP.1

<sup>9</sup> see 2/CP.17 [www.unfccc.int/resource/docs/2011/cop17/eng/09a01.pdf](http://www.unfccc.int/resource/docs/2011/cop17/eng/09a01.pdf)

<sup>10</sup> para 37(b) of Decision 15/CP.17 (FCCC/CP/2011/9/Add.2): "an emission should only be considered insignificant if the likely level of emissions is below 0.05 per cent of the national total GHG emissions, and does not exceed 500 kt CO<sub>2</sub> eq".

As developed country Parties have to submit their first biennial reports to the secretariat by 1. January 2014, the review of the first biennial reports will most likely be conducted in-country, in conjunction with the review of the sixth NC during 2014-2015. Whether subsequent reviews of biennial reports, especially those that will not be reviewed in conjunction with national communications, will also include an in-country review has not yet been decided.

The Environmental Integrity Group acknowledges that the respective review approaches are necessary to fully ensure the purpose of national communications and biennial reports of developed country Parties. However, the current review processes do not differ with respect to a party's contribution relevance regarding GHG emissions as well as the quantum of relevant information to be reviewed.

Considering the fact that a successful first round of the enhanced reporting obligations for developed country Parties as well as their respective review processes will be subject to the availability of resources, especially on the Secretariat's side, the Environmental Integrity Group proposes the incorporation of the adjusted review approach as it was defined in Paragraphs 3 and 4 of FCCC/SBI/2010/L.36/Add.2 into the general guidelines for the review of biennial reports (as applicable) and national communications.

The EIG proposal annexed to this submission reflects SBSTA's request to take into consideration experiences from current review practices and addresses the implications of the growing reviewing tasks to be performed by the Secretariat. Hence, it is its aim to contribute to the establishment of a cost-effective, efficient and practical review process without setting an excessive burden on Parties and the Secretariat.

Finally, and more generally, it may be worth evaluating to what extent the secretariat can contribute to the reviews. At least in terms of a standardized examination, the secretariat would be in a good position to do so.

The EIG would also recommend the use of new information and communication technologies in view to enhance efficiency and reduce the burden on the Secretariat.

**Annex: Proposal by the Environmental Integrity Group to be considered under the work program on the revision of the guidelines for the review of biennial reports and national communications for developed country Parties:**

1. For Parties with total greenhouse gas emissions of less than 50 million tons of carbon dioxide equivalent (excluding land use, land-use change and forestry) in accordance with their most recent greenhouse gas inventory submission, the Secretariat will conduct centralized reviews of their respective sixth National Communications and first Biennial Report (if applicable), with the exception of Parties included in Annex II to the Convention, for which the secretariat will organize in-country reviews.
2. The Secretariat conducts an in-country review for those Parties referred in Paragraph 1 above that requested one.
3. The Subsidiary Body for Implementation will consider applying the procedure foreseen in paragraph 1 and 2 above to the review of subsequent national communications and biennial reports, with a view to recommending a decision on this matter to the Conference of the Parties at its twentieth session.

## Paper no. 4: Japan

### **Submission by the Government of Japan regarding the work programme under the SBSTA on the revision of the guidelines for the review of biennial reports and national communications, including national inventory reviews for developed country Parties**

The Government of Japan welcomes the opportunity to submit its 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 (hereinafter “review guidelines”), in response to the request by FCCC/SBSTA/2012/2, paragraph 73.

#### **1. Comments on the key elements of the revision of the review guidelines**

##### **(1) Overall structure of the review guidelines**

- There are three review processes for developed country Parties, i.e. an annual review on greenhouse gas (GHG) inventories, a technical review of biennial reports every two years, and a review of national communications every four years. These three review processes need to be well coordinated and streamlined each other, avoiding duplication, so that they can be conducted in an effective and efficient manner.
- The revision of the review guidelines consists of three work streams as follows. The review guidelines should consist of an overarching section to streamline the three review processes and a compilation of outcomes of these three parts of work.
  - 1) To revise existing guidelines related to technical review of GHG inventories such as the decision 19/CP.8 “UNFCCC guidelines for the technical review of greenhouse gas inventories from Parties included in Annex I to the Convention” and the annex to the decision 19/CP.8 (FCCC/CP/2002/8).
  - 2) To revise existing guidelines for review of national communications such as the decision 2/CP.1 “Review of first communications from the Parties included in Annex I to the Convention”
  - 3) To develop guidelines for review of biennial reports which are consistent with, and complement to, the Annex II of the decision 2/CP.17 “Modalities and procedures for international assessment and review”

##### **(2) Comments on each element**

- The review guidelines of GHG inventories should be revised so that these review guidelines can be consistent with the revised reporting guidelines described by the decision 15/CP.17 “Revision of the UNFCCC reporting guidelines on annual inventories for Parties included in Annex I to the Convention”.
- Since the decision 2/CP.1 (Review of first communications from the Parties included in Annex I to the Convention) for the review of national communications does not describe the detailed procedures of the in-depth review, the major elements of the in-depth review process such as procedures, timing and composition of the expert review teams should be described in the revised review guidelines for practical and cost-effective review process.
- The review guidelines for biennial reports should focus on the technical review of the IAR process.
- Despite the difference of scopes and purposes between reviews under the Convention and under the Kyoto Protocol, the review process under Article 8 of the Kyoto Protocol of GHG inventory and national communication based on the decision 22/CMP.1 “Guidelines for review under Article 8 of the Kyoto Protocol” could be used as a reference for developing the revised review guidelines.

- Furthermore, it is important for the reviews to be designed, taking into consideration the challenges that the current review framework faces such as the lack of human and financial resources and heavy workload of each expert (See FCCC/SBI/2010/INF.8, paragraph 7, FCCC/SBSTA/2011/INF.13, paragraph 9-11 and 57), given the fact that the number of reviews will increase.

## **2. Comments on the elements of the work programme**

- It is important to set up the priority of work in order to complete the revision work by COP19. The detailed work programme with timelines, overall structure and key elements of the revised review guidelines should be approved at SBSTA37 so that detailed technical issues should be discussed in 2013 to be completed at COP19.
- Enough sharing of experiences of current annual GHG inventory review, in-depth review for national communications and reviews under the Article 8 of the Kyoto Protocol is essential for proceeding effective work.
- The revision of the review guidelines for biennial reports and national communications should be carried out together, and GHG inventory carried out separately because there are some differences of scope and purpose between the review of GHG inventories and those of biennial reports and national communications.
- The work should begin with compiling the guidance provided by different COP/CMP decisions. Then, the Parties should consider the challenges and issues that the current review processes under the Convention and the Kyoto Protocol face, to design a more cost-effective, efficient, and practical review process that does not impose an excessive burden on expert review team, Parties and the secretariat.
- During the revision process, the secretariat should make an assessment of the financial and human resource implications as an additional input to the discussion so that Parties can design a practical and cost-effective review process.
- Given the technical nature of the review processes, the review guidelines should be discussed and drafted through technical workshop(s) in which reviewers for GHG inventories and national communications, as well as other relevant experts, participate.

## **3. Timeline of activities**

In order to complete the work at COP 19 as required by Decision 2/CP.17 paragraph 28, the work should be done in following timelines:

- Parties approve the work programme with timelines at SBSTA 37 in the end of 2012;
- Technical experts' workshop is organized in the first half of 2013 to discuss the revision of review guidelines from technical viewpoints. The secretariat should prepare a summary report of the technical workshop for the discussion at SBSTA 38;
- Parties are requested to submit their views on the review guidelines after SBSTA 38 and the secretariat is requested to prepare a synthesis paper of Parties' submissions. If necessary, 2<sup>nd</sup> technical experts' workshop is organized before COP19 to discuss technical issues which should be solved in order to elaborate the draft revised review guidelines; and
- Parties finally discuss and approve the review guidelines at COP 19.

## Paper no. 5: New Zealand

### 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.
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