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Item 10(c) of the provisional agenda Methodological issues under the Convention Revision of the UNFCCC reporting guidelines on annual inventories for Parties included in Annex I to the Convention

Views on the experience with the revision of the UNFCCC reporting guidelines on annual inventories for Parties included in Annex I to the Convention and with the updated CRF Reporter

Submissions from Parties

1. The Conference of the Parties (COP), by decision 15/CP.17, invited Parties included in Annex I to the Convention (Annex I Parties), in addition to the inventory submitted in line with the "Guidelines for the preparation of national communications by Parties included in Annex I to the Convention, Part I: UNFCCC reporting guidelines on annual inventories" adopted by decision 14/CP.11, to use the revised "Guidelines for the preparation of national communications by Parties included in Annex I to the Convention, Part I: UNFCCC reporting guidelines on annual greenhouse gas inventories" (hereinafter referred to as the UNFCCC Annex I inventory reporting guidelines), including the new common reporting format (CRF) tables contained in annex II to the decision, during a trial period from October 2012 to May 2013.

2. The COP requested the secretariat to enable the use of the UNFCCC Annex I inventory reporting guidelines for the trial period by the provision of an upgraded or new version of the CRF Reporter software. It invited Annex I Parties to submit to the secretariat, by 3 May 2013, their views on their experience of using the revised UNFCCC Annex I inventory reporting guidelines and the upgraded CRF Reporter during the trial period.

FCCC/SBSTA/2013/MISC.14

GE.13-61046



3. The secretariat has received five such submissions¹. In accordance with the procedure for miscellaneous documents, these submissions are attached and reproduced^{*} in the languages in which they were received and without formal editing.

¹ Also available at <http://unfccc.int/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 endure the correct reproduction of the texts as submitted.

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^{*} This submission is supported by Albania, Croatia, Serbia and the former Yugoslav Republic of Macedonia.

Paper no. 1: Ireland and the European Commission on behalf of the European Union and its member States

SUBMISSION BY IRELAND AND THE EUROPEAN COMMISSION ON BEHALF OF THE EUROPEAN UNION AND ITS MEMBER STATES

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

Dublin, 15 May 2013

Subject: Revision of the UNFCCC reporting guidelines on annual inventories for Parties included in Annex I to the Convention (SBSTA)

Decision 15/CP.17 invited Parties included in Annex I to the convention, to use the UNFCCC Annex I inventory reporting guidelines voluntarily during a trial period from October 2012 to May 2013 and to submit their views on the experience of using these revised guidelines and the new CRF Reporter application.

The EU and several Member States used the guidelines agreed in decision 15/CP.17 and the new CRF Reporter application and provide experiences with this trial use in this submission.

The submission is structured in the following way with a general section related to overall views of the EU on the reporting guidelines, a more specific section related to the EU's views on the CRF tables, from Annex II to decision 15/CP.17 and experiences with the new CRF Reporter application.

1. General views on the experiences with using the UNFCCC Annex I inventory reporting guidelines adopted by decision 15/CP.17 and the CRF software applcation

In general the EU believes that the inventory reporting guidelines agreed in decision 15/CP.17 are well designed and incorporate many improvements and useful clarifications, e.g. the inclusion of requirements related to national inventory arrangements. The agreed CRF tables also generally incorporate all important changes arising from the implementation of 2006 IPCC Guidelines. The outstanding issues that arise from the trial period and which the EU would like to address in the negotiations in 2013 are few and concern a number of specific issues in the guidelines or the CRF tables which should be further improved in some aspects.

CRF reporter application

The EU considers that the trial version of the CRF Reporter web application has a clear structure and functionality but the EU is concerned that the revised CRF reporter application was not fully functional during the trial period. The reporter application version released is lacking some of the important elements currently developed within the software based CRF Reporter v3.6.2 for reporting under the first commitment period of the Kyoto Protocol including; the generation of submissions, generate CRF tables, completeness checks, consistency checks, recalculation checks, importation of xml (simple, inter reporter or Party specific), export xml and time series viewing (data and bar chart). The EU is looking forward to testing the next release version later in 2013 which we hope includes these crucial elements for reporting of annual GHG inventories. The functioning of the CRF reporter application is crucial for a timely delivery of the first submission under the revised guidelines in 2015.

• A fully functional version of the CRF reporter application has to be available at the latest by June 2014, otherwise the 2015 submission will need to be delayed.

The EU is fully committed to providing a complete submission on time for the first year of 2nd Commitment Period of the Kyoto Protocol. It would be regretable if this was not possible due to a technical issue.

Supplementary IPCC guidance on Wetlands and LULUCF

The EU recognizes that additional work related to the CRF reporter application will be necessary to address potential changes arising from the IPCC methodological supplement on wetlands and on KP-LULUCF. However, this work needs to await the final adoption of the respective report of the IPCC at the end of October 2013.

The EU also recognizes that Parties need some time to consider the full impact of the supplementary guidance on wetlands on the inventory reporting and to implement any supplementary guidance. Therefore Parties should consider the IPCC methodological supplement on wetlands at the SBSTA session at COP 19, however it is possible that more time is needed after COP 19 for this discussion.

Allocation of emissions from ammonia production

The 2006 IPCC Guidelines changed the reporting practice concerning the allocation of CO_2 emissions from ammonia production/urea. In the current IPCC methodology urea production based on CO_2 emissions from ammonia production was considered short term storage and hence should not be subtracted and the full CO_2 emissions were to be reported under ammonia production. In the 2006 IPCC Guidelines this has been changed so that the CO_2 emissions recovered from ammonia production are no longer reported in the IP sector. Instead the CO_2 emissions from the use of urea in agriculture and from catalysts are to be estimated and reported.

A significant weakness of the proposed new approach is that the 2006 IPCC Guidelines only considers two uses of urea, which are fertilizer in agriculture and for catalysts in road transportation. According to the literature the agricultural use of urea accounts for around 75 % of the global use (Glibert et al., 2006), this means that up to 25 % of the urea has different end-uses. These include many very different processes, either by direct application on lands or in manufactured products:

- feed additive for ruminants (about 10% of non-fertilzer usage according to Glibert et al. 2006);
- urea-based herbicides or pesticides;
- in aquaculture;
- de-icing agents at airports and for other de-icing purposes;
- Urea may also be spread on coastal oil spills, to stimulate the growth of natural bacteria populations which break down the oil;
- manufacture of a wide range of common materials such as urea formaldehyde and plastics; in melamine production, as an ingredient in the manufacture of resins, plastics, adhesives, coatings, textile anti-shrink agents, and ion-exchange resins;
- urea is an additive in fire retardant paints, tobacco products, and in some wines;
- Urea is also used as ingredient in moisturizing creams;
- numerous uses of urea in holistic medicine therapies;
- reductant in catalytic and non-catalytic reduction of combustion products in vehicles;

During the testing of the revised reporting guidelines, it has proven impossible to get the detailed activity data for all of the relevant uses of urea. The 2006 IPCC Guidelines also do not contain guidance on estimating emissions for other uses than as fertilizers and as ureabased catalysts. Therefore, the EU considers that changing of the reporting will lead to fewer emissions being reported than with the current reporting guidelines and hence a lower degree of completeness in reported anthropogenic emissions and a loss of environmental integrity.

The 2006 IPCC Guidelines include a warning about potential double counting of recovered emissions and the reported emissions from the urea use, but no adequate guidance on the completeness of emissions from all relevant urea uses. Whereas the 2006 IPCC guidelines recommend that "all quantity of CO_2 recovered for downstream use in urea production <u>must</u> <u>be</u> subtracted from the total quantity of CO_2 generated", the guidelines only recommend that "emissions of CO_2 from urea use <u>should</u> be accounted for in the corresponding sectors"¹. Apart from the lack of completeness, the switch of the allocation principle of emissions towards urea use, also potentially implies a shift of emissions to Non-Annex I Parties which are net importers of urea fertilizers.

Clarification of mandatory requirements related to the CRF tables

Paragraph 55 (a) of the Annex to decision 15/CP.17 requires that Parties Annex I Parties should provide a full set of CRF tables for the base year and all years from 1990 up to the most recent inventory year. The EU believes that for this requirement should be mandatory and the 'should' should be replaced by 'shall'.

¹See Box 3.2 on page 3.16 in Chapter 3: Chemical Industry Emissions of Volume 3.

Global warming potentials – Annex III of decision 15/CP.17

The EU believes that there are two mistakes in Annex III with the Global warming potential values:

The errata of the IPCC 4th assessment reports lists an additional PFC which is perfluorocyclopropane (c-C3F6) which is not included in Annex III of the reporting guidelines. The GWP of this PFC for a 100-year time horizon is indicated as > 17,340 in the IPCC AR4. The list of substances under the UNFCCC was based on the GWPs listed in the column entitled "Global warming potential for given time horizon" in table 2.14 of the errata to the contribution of Working Group I to the Fourth Assessment Report of the IPCC, based on the effects of greenhouse gases over a 100-year time horizon. It is not clear why this PFC was not included in the list in Annex III of the reporting guidelines, even taking into account that for reporting purposes it may be necessary that the > 17,340 should be read as = 17,340. The scientific knowledge that the GWP may even be higher should not lead to the exclusion of this substance from the reporting.

The GWP of HFC 152a for the 100-year time horizon is indicated with 124 in the Errata of the IPCC and with 38 in Annex III of the UNFCCC reporting guidelines. Thus the value 38 should be replaced by 124.

Harvested Wood Products reporting

The EU prefers to use a single approach to report and account for emissions and removals from harvested wood products (HWP) under the Convention to achieve a comparable reporting of emissions and removals in this area taking into account the agreement achieved under the Kyoto Protocol. In a long term perspective, a common and comparable reporting framework on LULUCF reporting under the Convention is important and the implementation of different principles and approaches as foreseen for HWPs undermines the general objective of the reporting guidelines to achieve GHG inventories that are comparable across Parties.

2. CRF Reporter application and CRF tables

This section outlines the experiences of users within the EU in trialling the UNFCCC CRF Reporter application and the CRF tables in Annex II to Decision 15/CP.17 (FCCC/CP/2011/9/Add.2). The comments are presented below. The section under "General" relates to the practical use and functionality of the CRF Reporter web application.

CRF Reporter application

Some Member States within the EU had different experiences using the export function (Export Grid and Export Subtree). This functionality seems to be erratic and doesn't seem to be working at the time of preparing this submission but did work for a time after the release date. When the function worked the experiences were generally positive with no substantive issues.

EU comments/issues related to the CRF Reporter application:

1. Additional Functions that should be implemented

- It is important to maintain the current functionality of the CRF Reporter software of simple, internal xml import/export in the new web application (IMPORTANT)
- It is not clear how multiple users from the same Party can edit data at the same time which is important for control over the generation of the official submision process. This could be implemented by providing different permissions for a National inventory Compiler (NIC) and Sectoral Experts (SE) and it would be useful for the NIC to be able to lock specific sectors at different points in time (IMPORTANT)
- Implement the checks in the current CRF software into the web application (IMPORTANT)
- Automate the key category analysis (KCA, tier 1) in the web application
- Concerns over the lack of control of data storage using a web based application before the submission deadlines. There needs to be an option for Parties to store/save a copy of what is on the web application at any point in time (IMPORTANT)
- Provide additional information in the user manual regarding "bulk" import formats, both xml and excel
- It is important for the EU that when its Member States generate an official submission, that an offical xml file is also gernerated to enable the EU to aggregate Member States submissions (IMPORTANT)
- The GWPs used in the application should be visible and a list of GWPs should be accessible (IMPORTANT)
- The CRF Reporter application should allow for downloading and saving of different versions of Parties' annual GHG inventories e.g. generating CRF tables without official submission process (IMPORTANT)

2. Improved display of information and data

- Allow users to change font size/resolution (increase/decrease to assist visually impaired users) and allow viewing of more years in the grid for users with larger screens
- Allow data time series functionality under the "data review" mode by CRF code not just in the "data entry" mode
- Consider the use of the current "traffic light" functionality in the CRF software in the next release of the web application
- Allow of "refreshing" of child nodes so the nodes are in the correct order and not the order of input; 1.A.4.a.i before 1.A.4.a.ii etc.
- Display the same number of decimal places (user defined) in all adjacent cells in the grid regardless of the number entered
- Allow for expanding/collapsing of the navigation tree so the full CRF category name can be viewed and allow automated grid cell column widths
- It should be clear within the application how shaded "green" cells are estimated (show formula)

3. Handling procedures for users

- The application is now web based which means that Parties will no longer have to keep updating the software
- It is possible to enter a "zero" value in this web application but not in the current CRF Reporter software. Only non-zero entries or notation key entries should be allowed
- Develop a roll-back undo function to correct erroneous inputs
- No backward compatibility with previous xml procedures
- Automate recalculation explanations (when implemented) to show if a change is due to AD of EF or both and avoid multiple entries of explanations for all disaggregated sub-categories
- Provide a grid import function for recalculation explanations and for provision of explanations for the notation keys "IE" and "NE"
- Allow a simple copy/paste function in the web application if possible
- Some users had difficulty adding "child nodes" as it was not obvious when the category was selected (no highlighting) before allowing the "right click" function to add a child node or select from the drop-down list
- Keep the CRF category highlighted in the navigation tree that is "live" when editing data in the grid cells relating to AD, EF, emissions or year

CRF Tables in Annex II, decision 15/CP.17

Energy (1.A Combustion)

1.A.1.a Public Electricity and Heat Production

During the testing of the revised reporting guidelines, many EU Member States encountered significant difficulties in collecting the data necessary for the further disaggregation of sector 1.A.1.a. into the sub-categories; electricity generation (1.A.1.a.i), combined heat and power (1.A.1.a.ii) and generation of heat plants (1.A.1.a.iii), especially, considering that data should be collected back to 1990, which will be impossible for many Parties. Also there is not much added value in providing the further disaggregation, the emission characteristics are identical for e.g. a coal fired boiler regardless of whether it is used for power only, CHP of heat or boiler only. Also, the default EFs in the 2006 IPCC Guidelines due not distinguish between the different sub-categories.

Therefore, the EU would prefer that the 3 current sub-categories under 1.A.1.a were available for election in a drop down list to enable disaggregated reporting where data is available. Parties should be able to report at the aggregated higher level if no data is available. Parties should be able to avoid reporting of notation keys for the whole time series for several new sub-categories.

1.A.1.c Manufacture of Solid Fuels and Other Energy Industries

The same issue of data collection as described for 1.A.1.a has been identified for this category. The EU would therefore prefer that the 3 current sub-categories under 1.A.1.c were available to elect in a drop down list to enable disaggregated reporting where data is available. Parties should be able to report at the aggregated higher level if no data is available. Parties should be able to avoid reporting of notation keys for the whole time series for several new sub-categories.

1.A.2.a-g Manufacturing Industries and Construction

CRF category 1.A.2.g contains a drop down menu for including other categories (please specify) for stationary (1.A.2.g.i to 1.A.2.g.vii). There should also be a subcategory to report off road mobile machinery emissions from industry.

1.A.3.b Road Transportation

The EU considers that emissions from urea-based catalysts do not belong in the Energy Sector and should be reported in the IPPU Sector (see reasoning above). Since this is different from the approach taken in the 2006 IPCC Guidelines, a footnote should be added in the CRF table.

Energy (1.B Fugitive)

TABLE 1.B.2 SECTORAL BACKGROUND DATA FOR ENERGY

The EU would like to propose a footnote to CRF Table 1.B.2 that clarifies the reporting of emissions from flaring and other fugitive emissions.

The footnote could read: "In this table fugitive CH_4 emissions should also be reported for the transmission/distribution of biogas. Emissions associated with the biogas production without energy production should be included in the waste sector under biological treatment of waste (CRF Table 5.B). For emissions from flaring, this table should only be used for reporting of flaring emissions associated with oil/gas extraction and refining."

Energy (Reference Approach)

The CRF Reporter application does not follow the CRF tables (table 1.A(b) and table 1.A(d)). Fuels are not listed in the application by fuel group (Liquid fossil-primary fuels, secondary fuels).

The fuel "Waste (non-biomass fraction)", cell for "production" is shaded grey in th draft CRF Tables in Annex II of decision 15/CP.17. This cell should be shaded white to allow entering of data. The CRF Reporter application correctly allows data entry for this fuel under the column for "production".

Industrial Processes and Product Use

General

- The EU is of the view that all emissions from all urea-based products should be reported in the IPPU Sector and a related footnote should be included in the relevant CRF Tables.
- For CRF Table 2(II), NF₃ needs to be added to the title

2.G Other Product Manufacture and Use

The following subcategories are missing from the CRF Reporter application drop-down list 2.G.3.c Other and 2.G.4 Other

2.H Other (please specify)

The following subcategories are missing from the CRF Reporter application, 2.H.3 Other.

Agriculture

General

The EU proposes to allow for more detailed and transparent reporting by facilitating in the CRF Reporter application the option to add sub-categories to the following livestock categories; 3.A.1.ii Other Cattle, 3.A.2 Sheep, 3.A.3 Swine and Poultry under 3.A.4 Other Livestock (drop-down menu). Also the same disaggregated breakdown should be provided in Manure Management (3.B) for completion of sectoral CRF tables 3.A and 3.B (a) and 3.B(b).

The pre-defined animal categories under 3A and 3B should be identical. This will facilitate the comparability between Parties.

3.B Manure Management (Methane CH₄)

The CRF Reporter application should allow for additional information (for Tier 2) to complete CRF Table 3.B (a) for more AWMS including digesters, deep bedding etc.

3.B Manure Management (Nitrous Oxide N₂O)

The CRF Reporter application does not have a drop-down list for the following subcategories under 3.B.2.4 Other Livestock; Fox and Raccoon, Mink and Polecat.

In general orange shaded cells in the CRF-tables cannot be filled out by the Party itself. These cells are automatically calculated.

In CRF Table 3.B(b), row 41 ("IEF Direct N₂O (kg N₂O-N/kg N handled") and 42 ("Direct N₂O emissions per AWMS (Gg[kt] N₂O)" cannot be filled automatically since the required information is missing in the CRF-table (in white cells). The SUM of direct emissions from each individual AWMS is required to generate an IEF based on nitrogen excreted in each AWMS. One of these two rows has to be filled out by the Party before the other row can be filled automatically.

The EU considers that the column "Total N excreted" in CRF Table 3.B(b) can be filled automatically from the SUM of nitrogen excreted in each AWMS by animal type. (L15 in CRF Reporter application should sum L5 to L14 for each animal category).

3.H Urea application (CO₂)

Emissions from urea application should be reported in IPPU as per comments above under energy and IPPU.

Land Use, Land-Use Change and Forestry

General

The documentation boxes should be edited to reference chapter 6 instead of chapter 7 of the NIR.

Land Transition Matrix (CRF Table 4.1)

Remove the word "managed" after Cropland.

4.A Forest Land, 4.B Cropland and 4.C Grassland

Delete the reference to footnote 2 in the cell for "Area of organic soil" since it is confusing to refer to total when the area of organic soils is a sub group of the total area. One option could be to include a new footnote for "Area of organic soil" reading "The part of the total area assessed as organic soils".

4.D Wetlands

The addition of child nodes should be allowed in this category under "wetlands remaining wetlands" as there may be additional wetlands other than peatland extraction and flooded land remaining flooded land.

The EU considers that additional changes may be required to this table after the supplementary IPCC guidance on Wetlands will be completed.

Footnote 8 states that "There is no default methodology for estimating methane (CH4) emissions and information for the methods is provided in appendix 3, volume 4 of the 2006 IPCC Guidelines". The method in the appendix only relates to Flooded land so the footnote should read: "There is no default methodology for estimating methane (CH4) emissions. Information for the methods for Flooded land is provided in appendix 3, volume 4 of the 2006 IPCC Guidelines".

4.E Settlements

There is a footnote (8) in the cell for Settlements remaining Settlements that should not be there.

CRF Table 4(II) Non-CO₂ emissions from management and drainage of organic soils

The EU has had some difficulties to understand why Wetlands are included here since N_2O emissions from Peat extraction areas and Flooded land are already covered in table 4.D. If there are adequate reasons for keeping the emissions related to management and drainage apart from the emissions reported in table 4.D then add a footnote with information that the N_2O emissions reported for Wetlands in this table are the emissions due to the drainage of land to distinguish the emissions reported here from the emissions reported in CRF Table 4.D Wetlands. In this table only the emissions associated with management and drainage should

be reported (section 11.2.1 in the IPCC 2006 GL). All other emissions/removals for Wetlands should be reported in table 4.D.

Footnotes 5 and 6 are not consistent. Footnote 5 requests to report Non-CO₂ emissions from forest land in the remaining-category, whereas footnote 6 requests to report Non-CO₂ emissions from peatland and flooded lands in the conversion-category. This should be corrected for consistency reasons, although these requests will not have any implication for the results nor the estimation The emissions should be added to the emissions at the level of respective category (forest land, wetlands).

CRF Table 4(III) Direct N2O emissions from nitrogen (N) mineralization/immobilization associated with loss/gain of soil organic matter

Footnote 1 refers to equations 11.1 and 11.18 2006 IPCC Guidelines. The correct reference should be to equations 11.1, 11.2 and 11.8.

Add a footnote clarifying what area is to be reported in the Activity data column. Proposed text: "The total area of the subcategories, in accordance with the subdivision used, should be entered here. For converted lands the cumulative area remaining in the category in the reporting year should be reported here".

CRF Table 4(IV) Indirect N2O emissions from managed soils

Include a footnote referring to the relevant equations: "Methodologies for indirect N_2O emissions are based on equations 11.9, 11.10 and 11.11 of the 2006 IPCC Guidelines."

Redraft footnote 1: "If the sources of nitrogen (N) cannot be separated other than between cropland and grasslands, they should be included in the agriculture sector and reported in table 3.D (b). This should be explicitly indicated in the documentation box."

CRF Table 4.G Harvested wood Products

The EU will give further consideration to this issue after the finalisation of the IPCC Revised Supplementary Methods and Good Practice Guidance Arising from the Kyoto Protocol.

The EU would like to streamline the possible reporting approaches for HWP, with the goal of having one consolidated reporting approach in order to ensure comparability between Parties and facilitate the review process.

Waste

5.C Waste Incineration

In category 5C 'Incineration and open burning of waste', the CRF Tables first level of disaggregation is 'Biogenic' and 'Non-Biogenic'. Nevertheless, in the CRF Reporter application the first level of disaggregation is 'Waste incineration' and 'Open burning of waste' and only the second level is 'Biogenic' and 'Non-biogenic'. In fact, CRF Tables are not clear on this issue, as there is no codification for 'Biogenic' and 'Non-biogenic'. Respective clarification should be introduced in the CRF tables.

5.F Memo Item

Information items: Long-term storage of carbon in waste disposal sites; Annual change in total long-term storage of carbon stored and Annual change in long-term storage of carbon in HWP waste are to be reported as mass of carbon, but only CO_2 can be entered. The EU proposes to insert a footnote specifying that the values should be entered as carbon dioxide (CO_2) .

Cross sectoral CRF Tables

Summary Table 1.A

Some of the footnotes should be attached to the main category instead of the cells for NET CO2 (footnote 4 and 5).

CRF Tables 8 and 10 (Recalculations and Trends)

Include the same footnote as in table 1 and 2 related to Memo items.

CRF Table 9 (Completeness)

The explanation is to be included on category level. However in the LULUCF sector a single pool of a category could be reported using the notation key NE or IE. A problem with the current CRF tables and the CRF Reporter software is that it is not possible to make a proper reference to the specific pool. Hence, reporting of one pool as IE or NE results in the whole category appearing in CRF Table 9. So for LULUCF categories rather than just specifying carbon as GHG, the table could include the pool, e.g. above ground biomass, below ground biomass, etc.

Paper no. 2: Japan

Submission by the Government of Japan

"Guidelines for the preparation of national communications by Parties included in Annex I to the Convention, Part I: UNFCCC reporting guidelines on annual greenhouse gas inventories" and the new common reporting format tables contained in annex I and II to decision 15/CP.17, and the upgraded CRF Reporter (April 2013)

The Government of Japan welcomes the opportunity to submit its views on the new "Guidelines for the preparation of national communications by Parties included in Annex I to the Convention, Part I: UNFCCC reporting guidelines on annual greenhouse gas inventories" (hereinafter referred to as "the UNFCCC Annex I inventory reporting guidelines") and the new common reporting format tables contained in annex I and II to decision 15/CP.17, and the upgraded CRF Reporter. The submission consists of comments on main points of concern, and comments on more technical points or minor error corrections.

1. Main issues

I. General comments

The Government of Japan recognizes that the UNFCCC Annex I inventory reporting guidelines, especially the CRF Tables, and the CRF reporter, needs to be practical and accurate enough to develop appropriate inventories for the reporting. We look forward to refining the reporting guidelines through discussions already scheduled up to COP19, however, would propose that necessary technical improvements such as those spelled out in the "Features not implemented" section of the CRF reporter User Manual, and other issues raised through the Party's submissions will be continuously carried out after COP19, so that each Party can start reporting appropriately from April 2015.

II. CRF Tables

Energy

#	CRF Sheet	Modification needed	Rationale
1	Table1.A(a) (s4/4)	Of the column for EMISSIONS/CO2/Amount captured in this Table, all mobile related rows should be colored grey. (Those rows in 1.A.c.ii, 1.A.c.iii should be grey.)	The Table lacks consistency.

IPPU

#	CRF Sheet	Modification needed	Rationale
1	Table 2(I)	This is a sub-category called SF6 and PFCs from other product use, therefore all cells for gases other than SF6 and PFCs should be colored grey.	It is probably a mistake during preparation of the draft.
2	Table2(II)	The terms Unspecified mix of listed HFCs, and Unspecified mix of listed PFCs should be modified to Unspecified mix of HFCs, and Unspecified mix of PFCs	In order to be consistent with the terms in other sections
3	General	The GWP for PFC-9-1-18 is shown as	This issue has not been discussed.

>7500 in Annex III, therefore decision	
needs to be taken on how to calculate for	
this gas.	

Agriculture

#	CRF Sheet	Modification needed	Rationale	
1	Table 3.D	Footnote (4) reads ", including NOx associated with the burning of savannas and crop residues," but this should be modified to be ", <u>not</u> including NOx associated with the burning of savannas and crop residues."	It is probably a mistake during preparation of the draft	

LULUCF

#	LUCF CRF Sheet	Modification needed	Rationale
1	Table 4D	As a general principle, Table 4D needs to be modified in line with the content of the Wetlands Guidelines.	The treatment of the Wetlands Guidelines will be determined at COP19.
2	Table 4D	Under the above premise, a subcategory "1.3 Other wetlands remaining other wetlands" will be needed under 4.D.1 Wetlands remaining wetlands.	The Wetlands Guidelines takes up wetlands that do not fall under peat extraction, or flooded land. Additionally, there are already rows in place for conversion to other wetlands in 2.3.
3	Table 4D	Columns for IEFs and Emissions of CH4 and N2O can be deleted from Table 4D.	There is an overlap with Table 4(II).
4	Table 4(II)	The emissions columns for 4D Wetlands overlap with the CH4 and N2O emissions cells in Table 4D.	See comment 3.
5	Table 4(II)	A sub-category "Other wetlands" is needed below Wetlands.	See comment 2.
6	Table 4(III)	The description in the 2006 Guidelines is ambiguous regarding whether or not N immobilization can be reported for carbon gain. A footnote is necessary. Additionally, this issue should be clarified with the IPCC.	The description in vol.4 page 11.15-16 of the 2006 Guidelines seems as if it targets emissions during losses, however the title in the CRF Table seems as if gains are also targeted. In order to avoid any confusion during review, it is better to clarify it in the CRF sheet.
7	Table 4(IV)	Footnote (3) should be modified as follows: N mineralization associated with loss of soil organic matter resulting from change of land use or management on mineral soils in all land use categories.	It can be read that N emissions from organic soils are not the target for reporting here.

Wa	Waste			
#	CRF Sheet	Modification needed	Rationale	
		The grey coloring on the IEF and	There is possibility of CH4 and	
1	Table 5.C	emissions cells of CH4 and N2O for	N2O emissions from incineration	
		Fossil liquid waste should be taken off.	of fossil liquid waste	

III. CRF Reporter

General

#	Sub-category	Modification needed	Rationale
1	General	Copy-and-pasting should be enabled for more than one cell.	Copy-and-pasting can only be done per cell.
2	General	Any modifications to the CRF Reporter from now on should be done by confirming that each modification made at the lower level of the CRF Reporter is reflected in the aggregation at higher levels.	In order to minimize mistakes in the final version of the CRF Reporter.

Energy

#	Sub-category	Modification needed	Rationale
		There is now a new dropdown list under	If the Reporter does not suit the
		1.A.2.g Other, however these	realities of the Parties, reporting
		classifications do not necessarily fit the	for Other probably will not be
1	1.A.2.g	realities of the Parties. In order to report	separated as classified in the
1	1.11.2.5	by using detailed classifications as	dropdown list, but will be clustered
		currently done, we would like to be able	together and reported under
		to freely add classifications to the	1.A.2.g.vii 'Non-specified
		dropdown list.	industry.'
			When exported, the names on the
2	1.A.2.g.iii	The sheet tabs in the exported excel	sheet tabs for Liquid fuels, Solid
2		sheets should be modified to be correct.	fuels, Gaseous fuels, Other fossil
			fuels, Peat, and Biomass are false.
	1.AD	The formula in row L13 in fuel	"L13=(((L10*1000)/L1)/44)/12" is
3		consumption should be modified to be	a mistake.
		"L13=(((L10*1000)/L1)/44)*12."	
		Modification of the units for activity	The units can only be chosen from
		data for Oil – Exploration, Natural Gas –	PJ, 10 ⁶ m ³ , 10 ⁶ bbl/yr, and the
4	1.B.2	Exploration, Transmission and storage,	example such as number of wells
-	1.0.2	Venting - Gas, is needed so that units	drilled, and other units of choice
		such as number of wells drilled, and km	cannot be entered.
		can be used.	
5	1.D.1.b	The cell for Other liquid fuels in	It says "Please specify," however
3	1.D.1.0	International navigation needs to be	nothing can be entered. We would

		allowed for entering. It would be further useful if several different fuels could be added.	also like to add Kerosene, Fuel oil A, Fuel oil B, and Fuel oil C, but this cannot be done.
6	1.D.1.b	It should be modified so that the ratio of domestic and international activity of International aviation and International navigation is automatically calculated.	These activity data are already entered in other cells, therefore in order to avoid duplication of effort and mistakes, data entry can be avoided here.
7	General	It should be made possible that NOx, CO, NMVOC, and SO2 emissions be reported at the sub-category level (1A1a, 1A1b)	The CRF Reporter requires that these emissions be reported by fuel type, however the CRF Tables only require reporting at the level of 1A1a, 1A1b.
8	General (e.g. 1A1)	It should be possible for all sub- categories (e.g. 1A1, 30 worksheets) to be imported at once.	An error occurs when we try to import the whole of 1A1.
9	General (e.g. 1A1ai)	It should be possible for all sub- categories (e.g. 1A1ai, 6 worksheets) to be imported at once.	An error occurs when we try to import the whole of 1A1ai.

IPPU

	PPU			
#	Sub-category	Modification needed	Rationale	
1	2B	Directly entering total emission data at the category level should be allowed. (The 'disable aggregation' function should be maintained.)	Similar to the current CRF Reporter, and in order to maintain the confidentiality of the sub- category level emissions when needed.	
2	2F	Entry cells for manufacturing, stocks, and disposal should be added.	It is probably a mistake during preparation of the draft	
3	2F1, 2F5	It should be possible to import data into the cells for emissions.	Importing is currently not possible.	
4	2G1, 2G2	Entry cells for manufacturing, stocks, and disposal should be added.	It is probably a mistake during preparation of the draft	
5	2G (e.g. 2G1)	It should be possible to import data into the cells for emissions.	Importing is currently not possible.	
6	General (e.g. 2A, 2B3, 2B5, 2B8, 2C1 (but excluding 2B9))	It should be possible to import data into the cells for activity data.	Importing is currently not possible.	
7	General (e.g. 2D)	It should be possible to enter data into the cells for description of activity data.	Entering is currently not possible.	
8	General	It should be possible to import data into at the category level (e.g. sector 2) and the sector level (e.g. 2A).	Importing data can only be done at the sub-category level (e.g. 2A1).	

LUI	LUCF		
#	Sub-category	Modification needed	Rationale
1	4A	It should be possible to enter data into the cells for Net CO2 emissions/removals in the 4A1 and 4A2 Carbon stock change sheets.	In order to be consistent with footnote (8) in CRF Table 4A.
2	4A1, 4A2	It should be possible to import activity data (N input from organic N fertilizers to land) from the excel files to the 4.A.1 Inorganic N Fertilizers, 4.A.1 Organic N Fertilizers, 4.A.2 Inorganic N Fertilizers, and 4.A.2 Organic N Fertilizers sheets.	When we enter data into the Excel sheets and import them back, the activity data is not reflected in the CRF Reporter. (It is reflected when done by direct entering or copy- and-pasting.)
3	4A1, 4A2	The results of automatic calculation should appear in the 4.A.1 Direct N2O Emissions, and 4.A.2 Direct N2O Emissions sheets of the CRF Reporter.	The data are entered into the sheets, however the automatic calculation results do not appear.
4	4B	It should be possible to enter data into the cells for Net CO2 emissions/removals in the 4B1 and 4B2 Carbon stock change sheets.	In order to be consistent with footnote (10) in CRF Table 4B.
5	4C	It should be possible to enter data into the cells for Net CO2 emissions/removals in the 4C1 and 4C2 Carbon stock change sheets.	In order to be consistent with footnote (10) in CRF Table 4C.
6	4D	It should be possible to enter data into the cells for Net CO2 emissions/removals in the 4D1 and 4D2 Carbon stock change sheets.	In order to be consistent with footnote (6) in CRF Table 4D.
7	4E	It should be possible to enter data into the cells for Net CO2 emissions/removals in the 4E1 and 4E2 Carbon stock change sheets.	In order to be consistent with footnote (7) in CRF Table 4E.
8	4F	It should be possible to enter data into the cells for Net CO2 emissions/removals in the 4F1 and 4F2 Carbon stock change sheets.	In order to be consistent with footnote (6) in CRF Table 4F.
9	4H 4(III)	It should be possible to freely name the new entry sheets when they have been added.	New sheets can be added by the function "add new child node," but the titles are to be added from a dropdown list, and cannot be freely named. Additionally, the choices in the dropdown are 4E2.1 to 4, which is not appropriate here.
10	4F	The node title "4F3" should be modified to be "4(III)," similar to other categories.	It is currently difficult to recognize the titles.

11	4F	The node title "4F4" should be modified	It is currently difficult to recognize
	11	to be "4(V)," similar to other categories.	the titles.
10	477	A sheet for 4H 4(V) should show up on	Nothing currently shows up on the
12	4H	the screen.	screen, even when the sheet has been selected.
			Nothing can be selected with
13	4A-4F	The activity data cells need to be	"please specify," nor can data entry
		allowed for entry.	be done.
		Although it is possible to add sheets to	A dropdown list does not show up.
14	4G	"Solid wood" under Approach A, B, and	Choices only show up when you
		C, it is necessary to be able to choose	type in S or W or O, and with other
		titles from a dropdown list.	letters an error occurs.
15	4G	It is necessary to modify the summary	The aggregated value of CO2 does
15	UT	sheet for CO2 so that the aggregation of the values in the lower levels shows up.	not show up.
		the values in the lower levels shows up.	Aggregation results do not show
			up for "Approach B", "Approach
		For Approach B, the aggregation results should show up for the lower levels.	B1," "Total HWP from Domestic
16	4G		Harvest," "Approach B2," "Total
10			HWP from Domestic Harvest,"
			"HWP Produced and Consumed
			Domestically," and "HWP
			Produced and Exported."
			The CRF Tables only show rows for 1961 and onward, however the
		It should be possible to enter activity	CRF Reporter only allows data
		data for years before 1990 in the CRF	entry for 1990 and onward.
17	4G	Reporter so to be consistent with	Footnote (3) of the CRF Table
		footnote (3) of CRF Table 4G Sheet 2/2.	reads "Provide activity data from
			the first year for which they are
			available."
		The lower levels (Dropdown list) of	
10	10	"Solid wood" and "Paper and	Nothing can be specified with
18	4G	paperboard," of the Additional	"Please specify," nor can data be
		information for Activity data need to be	entered.
		allowed entry. The entry sheet should be brought	
19	4(IV) below	directly below 4, in line with the CRF	The CRF Tables do not require
17	4A and 4D	Tables.	separate reporting by category.
L		100100.	I

Technical issues/Minor error correctionsI.CRF Tables

Energy

#	CRF Sheet	Modification needed	Rationale
1	Table1(s2/2)	The N2O cell in the B.2.a Oil row should be an automatic reference, and should be colored green.	It is probably a mistake during preparation of the draft
2	Table1.A(a) (s1/4)	The sentence "are considered, Parties should provide information on the allocation of these derived gases under the above fuel categories (liquid, solid, gaseous, biomass and other fuels) in the NIR (see also documentation box at the end of sheet 4 of this table)." needs to be legible at the end of the second Note below the Table in PDF format.	Letters cannot be seen when put into PDF format.
3	Table1.A(a) (s4/4)	The emissions columns for each fuel row in 1.A.4.b Residential should be colored orange.	These cells should show automatic calculation results of aggregation.
4	Table1.A(a) (s4/4)	The "Other liquid fuels" and "Other fossil fuels" of 1.A.4.cii "Off-road vehicles and other machinery" and ciii "Fishing" should be colored orange. (A total of four rows)	Each row already has an entry row below it.
5	Table1.A(a) (s4/4)	The sentence "i.e. CO2 emissions + amount captured" needs to be legible at the end of footnote (1) below the Table in PDF format.	Letters cannot be seen when put into PDF format.
6	Table1.B.1	The sentence "+ amounts of CH4 flared/recovered] / activity data." needs to be legible at the end of footnote (1) below the Table in PDF format.	Letters cannot be seen when put into PDF format.
7	Table1.B.2	The sentence "i.e. CO2 emissions + amount captured" needs to be legible at the end of footnote (2) below the Table in PDF format.	Letters cannot be seen when put into PDF format.
8	Table1.B.2	The Emissions columns of 1.B.2.c Venting and flaring, Venting, and Flaring rows should be colored orange.	These cells should show automatic calculation results of aggregation.
9	Table1.C	The white cells in the Implied Emission Factors column need to be colored orange.	These cells should show automatic calculation results of the IEFs.
10	Table1.D	The sentence "where further information is provided." needs to be legible at the end of footnote (1) below the Table in PDF format.	Letters cannot be seen when put into PDF format.

Agriculture

#	CRF Sheet	Modification needed	Rationale
1	Table 3.B(b)	A footnote that clarifies whether "Pit storage, deep bedding, poultry manure with and without litter, aerobic treatment" is included in "Other" should be added.	The relationship between "Other" and "Pit storage, deep bedding, poultry manure with and without litter, aerobic treatment" is ambiguous.
2	Table 3.B(b)	The footnote on Dairy Cattle reads "(3)" but it should be modified to be "(4)."	Typographical error.

LULUCF

#	CRF Sheet	Modification needed	Rationale
1	Table 4	The cells "4E1 N2O," "4E2 N2O," "4F2 N2O," "4H CO2, CH4, N2O" should be colored green.	Since this is a sheet that shows automatic calculation results.
2	Table 4	The cells for 4G HWP CH4, N2O, NOx, CO, NMVOC should be colored grey.	Reporting of off-site non-CO2 emissions from incineration would be duplication in reporting with the Waste sector.
3	Table 4.1	Footnotes (2), (4), (5), (6), (7), (8) should be deleted, and references should be made to the definitions of land use categories shown in the 2006 Guidelines Volume 4 chapter 3 section 3.2. Or another option would be to add the second sentence from the description on Other land in the same section of the Guidelines, to footnote (8).	In order to avoid using terminology different from the 2006 Guidelines in the CRF Tables. Additionally, these footnotes are a simple repetition of definitions in the 2006 Guidelines, therefore lack in necessity.
4	Table 4.1	It is necessary to add a sentence at the end of footnote (3) indicating that Parties should use NA in the relative cells, in cases where they decide not to use the classification unmanaged land.	There is no reporting guidance given when the classification unmanaged land does not exist.
5	Table 4B	5B1 in footnote (6) and (7) should be modified to be 4B1.	Typographical error.
6	Table 4C	5C1 in footnote (6) and (7) should be modified to be 4C1.	Typographical error.
7	Table 4C	Footnote (6) should be deleted.	2006 Guidelines Vol.4 chp.6 6.2.1 also touches on estimation for herbaceous biomass, which causes contradictions with the footnote.
8	Table 4D	The row that reads "Drop down list" should be colored orange.	It is not a row for data entry.

9	Table 4E	Footnote (5) should be deleted.	The formula in the 2006 Guidelines Vol.4 chp.8 8.2.1.1 is described in a way that could include changes in herbaceous biomass, which causes contradictions with the footnote.
10	Table 4F	The column "Carbon Stock Change in living biomass – Net Change" should be colored orange.	Since it is a column that shows automatic calculation results.
11	Table 4(I)	It may be necessary to add wetlands categories in the Land-use category column.	The second order draft of the Wetlands Guidelines includes such a Table.
12	Table 4(II)	The cells for "Subdivision" and "Area" in the row directly above H. Other should be colored orange.	It is not a row for data entry.
13	Table 4(III)	In footnote (1), equation number 11.18 should be modified to be 11.8.	Equation number 11.18 does not exist in the 2006 Guidelines.
14	Table 4G	The row that reads "Drop down list" should be colored orange.	It is not a row for data entry.

Waste

#	CRF Sheet	Modification needed	Rationale
1	Table 5.B	The term Annual waste should be modified to be Annual municipal waste (or Municipal solid waste)	The term and definition of Annual waste is ambiguous.
2	Table 5.C	The term Annual waste should be modified to be Annual municipal waste (or Municipal solid waste)	The term and definition of Annual waste is ambiguous.

II. CRF Reporter

General

#	Sub-category	Modification needed	Rationale
1	General	For Methods and Emission factor information, alternative choices such as NA and OTH should be added.	In cases where notation keys are used for reporting of emissions, it is unclear what to choose, since there does not exist the option of NA.
2	General	It should be possible to adjust the width of the navigation tree so that the title of the tree can be seen.	There are cases where the tree title cannot be seen.

Energ	Energy				
#	Sub-category	Modification needed	Rationale		
1	General	When items need to be added to the Navigation tree on the left side of the Reporter, we are to use the right click and choose from Delete child node, Select row, Add new child node, Collapse children, however, Select row could be deleted.	Of the options Delete child node, Select row, Add new child node, and Collapse children, Select row is not functioning.		

IPPU	IPPU				
#	Sub-category	Modification needed	Rationale		
1	2E	The cells for gas consumption by species could be grouped in to gases (HFCs, PFCs).	In order to make it easier to see on the screen.		
2	2F1, 2F5	Cells needed to be added for activity data, methods, and emission factor information	There are no cells for entry.		
3	2F1	It should be possible to completely import into the recovery cells.	Importing is only partly possible.		
4	2F5	It should be possible to completely import into the recovery cells.	Importing is only partly possible.		
5	2G (e.g. 2G1)	It should be possible to import into the recovery cells.	Importing is not possible.		
6	General	It should be possible to expand the interface of the CRF Reporter so that all years can be seen, if one's computer screen width allows it.	In order to make data entry easier.		

LULUCF

#	Sub-category	Modification needed	Rationale
1	General	It should be possible to export the Excel file for the whole sector (sub-tree), and after entering the data, import it back all at once, for all data. It seems as though importing is only possible at the below levels, and 4A seems to have the most problems: 4A1, 4A2 CF, 4A2 GF, 4A2 WF, 4A2 SF, 4A2 OF, 4A2 4(I), 4A2 (III), 4A2 (V), 4B, 4C, 4D, 4E, 4F.	Minimization of data entry time is necessary, since there is a time-lag before the Reporter shows the data entry screen again.
2	4A1	Of the categories listed in pages 21 to 24 of the User Manual, for the ones that are not from the dropdown list, data entry sheets should be prepared in advance.	Data entry sheets do not exist for the mentioned categories at present. It is possible to add them at the Party's choice, but it is better if they are prepared in advance.
3	4A2, 4D2	The sheet for 4(IV) should be brought directly below 4, in line with the CRF	To be consistent with the CRF Tables. Additionally, 4(IV)

	Tables.	includes lands other than
		Forest land and Wetlands for
		estimation, therefore the
		current positioning of the
		sheets are inappropriate.

Paper no. 3: New Zealand

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

Revision of the UNFCCC reporting guidelines on annual inventories for Parties included in Annex I to the Convention

May 2013

Introduction

1. This submission responds to the CP.17 invitation to Parties to submit their experiences in using the UNFCCC Annex I inventory reporting guidelines and the upgraded or new CRF Reporter software (15/CP.17, paragraph 3).

2. We note the COP has invited the Subsidiary Body for Scientific and Technological Advice (SBSTA) to consider this information submitted by Annex I Parties at its thirty-eighth session.

Context

3. New Zealand welcomes the progress Parties made at Durban in adopting the revised UNFCCC Annex I inventory reporting guidelines and new common reporting format tables for trial use by Parties.

4. The UNFCCC Secretariat provided Parties with a new version of the CRF reporter software to trial between November 2012 and May 2013. This submission highlights issues found during this trial period.

Relevant issues

CRF reporter software

5. New Zealand notes with concern the serious underfunding for this project. The version of the CRF reporter software made available to Parties for testing had very limited functionality. New Zealand provided some additional funding to support the development of the software but feels strongly that such an essential tool for reporting national greenhouse gas inventory estimates should be funded out of the core budget rather than relying on supplementary funding.

6. Because of the severe lack of funding, the CRF reporter software version sent to Parties for testing was not able to support key category analysis, recalculations, unit conversions, use of documentation and commenting boxes were not enabled. The user and submission management functions also did not work and the display of the CRF tables in their final format prior to submission was not possible.

7. With these limitations New Zealand tested the CRF reporter software and our findings are summarised below.

Importing and exporting data

8. Several New Zealand experts tested the software and all experienced difficulties in exporting data, including at the sub tree and grid level. These difficulties were communicated to the UNFCCC helpdesk and we are currently working with them on possible solutions.

9. The ability to import data using MS Excel format was mixed with some success for some sectors (for example sub categories in the agriculture sector) and not for others (for example the cement sub category in the industrial processes sector). The successful import message was displayed for the industrial processes data from a MS excel workbook but the data did not appear in the appropriate rows in the software.

10. The ability to import data using the xml format was not successful using data from various sectors (energy, agriculture and industrial processes). New Zealand recognises the different xml architecture requirements between the current reporting requirements and the updated requirements may be causing these current difficulties.

Manual data entry

11. Data was able to be entered manually for all sectors except in the industrial processes sector. In the industrial processes sector data was able to be entered in the emissions rows but not for activity data for all categories. The cells for the activity data rows were a light grey colour and were un-editable. For the category "2.F Product Uses as Substitutes for ODS" category all of the cells were showing up as light blue cells. The CRF reporter user manual says this means the data is automatically copied from elsewhere but it is not clear where this data is copied from.

General functionality

12. The web interface was clearly laid out in a logical navigation tree format. It is very helpful having links to the user guide, reporting guidelines and IPCC guidelines within the interface.

13. Moving from different nodes on the navigation tree and waiting for files to load was quite slow but we expect this may be the result of an early version of the software and would expect performance to improve with later versions of the software.

14. Testing in the agriculture sector revealed difficulties in inserting additional nodes under specific sub categories, e.g. "3F3 Tubers and Roots". Additional nodes could be added under the "other" category but not under the specific categories.

15. It is not clear how the new CRF reporter software will be backed up. It would be good in the next version of the manual accompanying the software to explain how the backup procedures will work.

Incorporating Kyoto Protocol activities

16. New Zealand notes there will need to be additional functionality added to the CRF reporter software once agreement on the common reporting tables for land use, land-use change and forestry activities under Article 3, paragraphs 3 and 4 of the Kyoto Protocol are made.

17. New Zealand is of the view that the work on integrating these additional tables into the new CRF reporter software is crucial to enable Annex I Parties to report beginning in 2015. New Zealand notes the current budget shortfall for completing the CRF Reporter upgrade. Budget needs for the additional LULUCF tables need to be identified early to enable the resources to be secured.

Conclusion

18. New Zealand appreciates the work by the developers of the CRF reporter software to produce the new CRF reporter with such limited funding. The new web based interface and the proposed functionality has great potential but there is still a good deal of work needed for the CRF reporter to be fully functional in time for the inventory submissions in 2015.

19. New Zealand strongly encourages future development of the new CRF reporter software to be funded from the core budget.

20. New Zealand looks forward to the further development of the CRF reporter software and the chance to provide further input into future testing to ensure the software is fully functional and ready for the 2015 inventory submission.

Paper no. 4: Norway

SUBMISSION BY NORWAY ON THE EXPERIENCE OF USING THE REVISED UNFCCC REPORTING

GUIDELINES ON ANNUAL INVENTORIES FOR PARTIES INCLUDED IN ANNEX I TO THE CONVENTION AND THE UPGRADED CRF REPORTER.

Decision 15/CP.17 adopted the UNFCCC Annex I inventory reporting guidelines and new common reporting format tables for trial use. Norway appreciates the opportunity to submit views on the experience of using these revised guidelines and the upgraded CRF Reporter.

Upgraded CRF Reporter

Norway has to some extent tested the upgraded CRF Reporter, but there were few functionalities to test. We were for instance unable to import a xml file and the software did not produce any CRF tables. Section 2.2 in the user manual (for CRF Reporter v. 1.2.2) reflects that there are many other functionalities that have not yet been implemented.

Some specific comments, observations and questions on the upgraded CRF Reporter:

We note that emissions of precursor gases now should be reported at the most detailed level. In previous versions these gases were reported at aggregated nodes.

We would like the view to be enlarged so that more than 6 years may be seen at a time.

On direct data entering into CRF-web. When copying cells from Excel, only single cells can currently be pasted into CRF-Web. This should be improved so that ranges can be pasted. The current CRF version accepts rows of cells, but not two-dimensional ranges.

On import of Excel. Currently, the only Excel files that can be imported into the system are those that have been exported from the system. Will this limitation also exist in the final version?

On import of xml files:

- This has been the preferred method for entering data in Norway. Currently, CRF-Web does not allow xml import for all nodes. Only nodes listed in appendix 3 will be accepted. Will this be improved in the final version, so that all data can be entered by xml?
- The manual states that "It is also important to note that this functionality could make the system very slow for other users." Does this mean that parties are encouraged to avoid using xml import, and that Excel import is preferred?
- The current version (3.6.2) allows export and import of several types of xml files: "InterReporter" and "Simple", and the latter may use "editable cells only". Will these options become available in the new CRF-Web? Norway has used the "simple" option extensively to import data from the national inventory system.
- The manual states that "The new CRF Reporter enables import of data from the XML file generated by the current CRF Reporter software." Does this mean that xml files generated by our current version (3.6.2) can be imported into the web version? The xml files look very different, and a simple trial with node 1A3D was not succesful. However, this problem might be due to issues with *submission* vs *InterReporter* xml files. The manual for version 4 states that "user roles management" is not implented. Our trial used InterReporter xml files while logged in as "national inventory compiler".

• What kind of documentation is available for the structure of xml files? (Cf annex 1 in the old manual.)

We did not see anything related to the reporting of KP-LULUCF.

For LULUCF:

- For the carbon stock change estimates it appears that it is necessary to make own definitions for all child nodes for land conversion (e.g. forest land converted to cropland). This should be possible, but not mandatory to make child nodes for the land conversion categories, e.g. forest land converted to cropland.
- For other land conversion categories (e.g. 4.D.2.1 Land being converted for peat extraction) there are pre-defined names for child nodes and it is necessary to determine from where the land that has been converted to peat extraction) come from. If data is not available for this differentiation, these child nodes will not be useful. The default should be that it is not necessary to define from where the land conversion is.
- The current structure adds some confusion since some of the non-CO2 estimates are both under specific area categories (e.g. Forest land) and under 4.H Other. For instance, 4(I) Direct N2O emission from N inputs/inorganic fertilizer is found both under 4.A.1 Forest Land Remaining Forest Land][4(I) Direct N2O Emissions from N Inputs][Inorganic N Fertilizers] and 4(I) Direct N2O Emissions from N Inputs][Inorganic N Fertilizers]
 The same goes for 4(II) Direct N2O emission from N mineralization/immobilization that is both under Cropland and Other. We suggest that all non-CO2 gases are placed under Other, or that they are deleted from Other if they fit under a land use category.

The manual states that "User role management" is not yet implemented. We have some questions relating to user roles. The manual should provide clear guidance on this.

- Will each user (with unique login ID) work with a separate version of the database? This would be akin to the current version (3.6.2) which is installed on individual PCs.
- It is not clear to us if it be difficult for persons to store data in the same database at the same time. Will it be necessary to upload data for different sectors?
- Is it possible for several simultaneous logins using the same login ID? If so, how will possible conflicts between different data entered be resolved?

Norway is concerned for the time that is left to develop the final version of the upgraded CRF Reporter. Parties will need to test versions that are more developed and will also need sufficient time with the final version before it is used for reporting in April 2015. The shortfall of funding for finalizing the upgraded CRF Reporter is worrying.

SBSTA will in 2013 initiate its consideration of any supplementary reporting tables required for the reporting of LULUCF activities under Articles 3.3 and 3.4 of the Kyoto Protocol for the second commitment period. The supplementary reporting tables will be one module of the CRF reporting software. It would therefore be beneficial if this work is seen in conjunction and are adopted at the same time, to allow the Secretariat to make only one final version of the software.

Paper no. 5: Russian Federation

30.04.2013 №...../.....

Facsimile

Ms. Christina Figueres Executive Secretary UNFCCC Bonn, Germany

Fax: (49-228) 815-1999

Уважаемая Г-жа Фигерес,

В соответствии с п. 3 решения 15/СР.17 Российская Федерация представляет мнение по опыту тестового использования обновленных «Руководящих указаний по подготовке национальных сообщений Сторон, включенных в Приложение I Конвенции, Часть I: Руководящие указания РКИК ООН по ежегодным кадастрам парниковых газов» и усовершенствованного программного обеспечения CRF Reporter.

Приложение: на 1 л.

С уважением,

А.В. Фролов Руководитель Росгидромета, Национальный координатор по РКИК ООН и Киотскому протоколу

Мнение Российской Федерации по опыту тестового использования обновленных «Руководящих указаний по подготовке национальных сообщений Сторон, включенных в Приложение I Конвенции, Часть I: Руководящие указания РКИК ООН по ежегодным кадастрам парниковых газов» и усовершенствованного программного обеспечения CRF Reporter

Российская Федерация приветствует прогресс, достигнутый в разработке обновленных «Руководящих указаний по подготовке национальных сообщений Сторон, включенных в Приложение I Конвенции, Часть I: Руководящие указания РКИК ООН по ежегодным кадастрам парниковых газов» и усовершенствованного программного обеспечения CRF Reporter.

Российская Федерация подтверждает, что указания по использованию условных обозначений в таблицах Общего формата данных (параграф 37 «Руководящих указаний по подготовке национальных сообщений Сторон, включенных в Приложение I Конвенции, Часть I: Руководящие указания РКИК ООН по ежегодным кадастрам парниковых газов») являются полезными. Необходимо отметить, что использование условного обозначения NE для незначительных категорий источников/стоков парниковых газов позволяет оптимизировать распределение ресурсов в процессе подготовки кадастров.

Российская Федерация подчеркивает необходимость соблюдения конфиденциальности данных в таблицах ОФД на удаленном портале Секретариата РКИК ООН до их окончательного утверждения соответствующей Стороной и официального представления в РКИК ООН.

Принимая во внимание относительно короткий период тестового использования усовершенствованного программного обеспечения CRF Reporter, может быть полезным возобновление тестового использования CRF Reporter после внесения в него изменений согласно замечаниям, представленным Сторонами.

[Translation as submitted]

Ms. Christina Figueres Executive Secretary UNFCCC Bonn, Germany Fax: (49-228) 815-1999

Dear Ms. Figueres,

According to para. 3 of Decision 15/CP.17 the Russian Federation submits its views on the experience of trial using new "Guidelines for the preparation of national communications by Parties included in Annex I to the Convention, Part I: UNFCCC reporting guidelines on annual greenhouse gas inventories" and the upgraded CRF Reporter.

Annex: 1 page.

Dr. Alexander Frolov, Head of Roshydromet, National Focal Point

Annex

Views by the Russian Federation on the experience of trial using new "Guidelines for the preparation of national communications by Parties included in Annex I to the Convention, Part I: UNFCCC reporting guidelines on annual greenhouse gas inventories" and the upgraded CRF Reporter

The Russian Federation welcomes the progress achieved in development the new "Guidelines for the preparation of national communications by Parties included in Annex I to the Convention, Part I: UNFCCC reporting guidelines on annual greenhouse gas inventories" and the upgraded CRF Reporter.

The Russian Federation confirms helpfulness of provisions for using the notation keys in the CRF tables (paragraph 37 "Guidelines for the preparation of national communications by Parties included in Annex I to the Convention, Part I: UNFCCC reporting guidelines on annual greenhouse gas inventories"). It should be mentioned that using the NE notation key for insignificant GHG emissions/removals categories allows to optimize allocation resources in the process of inventory preparation.

The Russian Federation emphasizes the need to maintain confidentiality of the data in the CRF tables contained at the remote portal of the UNFCCC Secretariat prior to their final approval by the Party concerned and official submission to the UNFCCC. Taking into account that the trial period for using the upgraded CRF Reporter was relatively short it can be helpful to resume the trial use of the CRF Reporter after it's refinement in response to comments submitted by the Parties.
