

## **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.