

# **SUBMISSION BY SAUDI ARABIA**

*September 30, 2004*

## **Review of Methodological Work** **Under The Convention and the Kyoto Protocol**

*(Information on National Systems under Article 5, Paragraph 1, Of the Kyoto Protocol  
for the Preparation of National GHG Inventories)*

### **REFERENCE**

The Subsidiary Body for Scientific and Technological Advice (SBSTA) invited Parties to submit to the secretariat, by 30 September 2004, information on national systems under Article 5, paragraph 1, of the Kyoto Protocol for the preparation of national GHG inventories. SBSTA also requested the secretariat, subject to availability of resources, to organize a workshop in the first half of 2005 on this topic. It requested the secretariat to compile information on national systems for the preparation of national GHG inventories included in national inventory reports and inventory review reports as an input to this workshop, as part of its consideration of Articles 5, 7 and 8 of the Kyoto Protocol. (Draft conclusions proposed by the Chair, Document FCCC/SBSTA/2003/L.25 Paragraph 7)

### **INTRODUCTION**

Saudi Arabia welcomes the opportunity to submit its views on national systems under Article 5, paragraph 1, of the Kyoto Protocol for the preparation of national GHG inventories.

### **BACKGROUND**

Article 5, paragraph 1, of the Kyoto Protocol requires that each party included in Annex I shall have in place, no later than one year prior to the start of the first commitment period, a national system for the estimation of anthropogenic emissions by sources and removals by sinks of all greenhouse gases not controlled by the Montreal Protocol.

The Conference of the Parties (COP), by its decisions 3/CP.5 and 18/CP.8, adopted 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" (UNFCCC reporting guidelines). According to these guidelines, Annex I Parties are requested to use the 1996 IPCC Guidelines to estimate and report on anthropogenic emissions by sources and removals by sinks of GHGs not controlled by the Montreal Protocol.

## COMMENTS AND CONCERNS

1. Article 5, paragraph 1, of the Kyoto Protocol requires the establishment of national system for the estimation of anthropogenic emissions by sources and removals by sinks of all greenhouse gases not controlled by the Montreal Protocol. It should be clear however that this is a requirement for Parties included in Annex I only. Non-Annex I parties are not required to establish such national systems.
2. Annex I Parties' national systems and reports on emissions should be done on annual basis and it should be in accordance to the Revised 1996 IPCC Guidelines to estimate and report on anthropogenic emissions by sources and removals by sinks of greenhouse gases not controlled by the Montreal Protocol. Annex I Parties are also required to use the IPCC good practice guidance in order to improve transparency, consistency, comparability, completeness and accuracy of their GHG inventories. Non-annex I Parties are only required to submit greenhouse gas inventories as part of their National Communications, and using the Revised 1996 IPCC guidelines.
3. It should be noted that under the Revised 1996 IPCC Guidelines for National Greenhouse Gas Inventories, emissions based upon fuel sold to ships or aircraft engaged in international transport should not be included in national totals.
4. Every effort must be made to ensure the transfer of technology to developing countries to enable them to benefit from any tools used in estimating greenhouse gas inventories.
5. Resources should be allocated for capacity improvement of developing countries with regards to estimating greenhouse gas inventories.
6. Annex I Parties' national systems should include methodologies, to be developed in collaboration with Intergovernmental Organizations such as OPEC, to assess the impacts on developing countries of emissions related policies already implemented by Annex I parties. Emphasis should be given to the potential spillover effects due to response measures taken by Annex I Parties.

## **FUTURE METHODOLOGICAL WORK**

1. Methodologies are needed to guide Annex I countries in implementing win-win policies and measures, that have long been requested by developing countries, and that would meet both the need to reduce emissions and the need to minimize adverse social, environmental and economic impacts on developing country Parties, especially those identified in Article 4, paragraphs 8 and 9 of the Convention. This should be done by SBSTA within the framework of actions taken on policies and measures and should be of high priority since no methodological work is established under Article 4.8 on impacts of response measures.
2. The principle of common but differentiated responsibilities must be considered in developing any future methodologies related to greenhouse gas inventories.
3. It should be noted that the development of new guidelines by IPCC in 2006 should take into consideration the different obligations on both Annex I and non-Annex I Parties in terms of preparation of greenhouse gas inventories under the convention and Kyoto protocol.