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REPORT OF THE INDIVIDUAL REVIEW OF THE GREENHOUSE GAS INVENTORY OF LUXEMBOURG SUBMITTED IN THE YEAR 2001^1

(Desk review)

I. OVERVIEW

A. Introduction

1. The Conference of the Parties (COP), at its fifth session, by its decision 6/CP.5, requested the secretariat to conduct, during the trial period, individual reviews of greenhouse gas (GHG) inventories for a limited number of Parties included in Annex I to the Convention (Annex I Parties), according to the UNFCCC guidelines for the technical review of GHG inventories from Annex I Parties, hereinafter referred to as the review guidelines.² The secretariat was requested to coordinate the technical reviews and to use different approaches to individual reviews, including desk reviews, centralized reviews and in-country reviews.

2. The review of Luxembourg took place from 8 October to 27 October 2001. The desk review was carried out by a team of nominated experts from the roster of experts, working in their own countries. Experts participating in the review were Mr. Klaus Radunsky (Generalist, Austria), Mr. Michael McGettigan (Energy, Ireland), Mr. John Sarafidis (Energy, Greece), Mr. Mauro Meirelles de Oliveira Santos (Industrial processes, Brazil), Mr. Alexander Nakhutin (Industrial processes, Russian Federation), Mr. Ayite-Lo Ajavon (Agriculture, Togo), Mr. Pascal Boeckx (Agriculture, Belgium), Mr. Tomás Hernández-Tejeda (Land-use change and forestry, Mexico), Mr. James Barton (Land-use change and forestry, New Zealand), Ms. Sirintornthep Towprayoon (Waste, Thailand) and Mr. Heinrich Widmer (Waste, Switzerland). The review was coordinated by Ms. Rocio Lichte (UNFCCC secretariat). Mr. Klaus Radunsky and Mr. Ayite-Lo Ajavon were lead-authors of this report.

3. In accordance with the UNFCCC review guidelines, a draft version of this report was communicated to the Government of Luxembourg.

B. Inventory submission and other sources of information

4. The expert review team (ERT) reviewed the common reporting format (CRF) tables for the year 1999 submitted on 13 April 2001. In addition, Luxembourg submitted a file containing some background material relating to carbon dioxide (CO₂) emissions providing information

¹ In the symbol for this document, 2001 refers to the year in which the inventory was submitted, and not to the year of publication. The number (1) indicates that for Luxembourg this is a desk review report.

² For the UNFCCC review guidelines and decision 6/CP.5, see document FCCC/CP/1999/7, pages 109 to 114 and 121 to 122, respectively.

about fuel sold to foreigners and electricity trade. A national inventory report (NIR) was not submitted.

5. The ERT also used for the review the status report 2001, the draft synthesis and assessment (S&A) report of the 2001 inventory submissions and the preliminary key source assessment prepared by the UNFCCC secretariat.³ Some emission data included in the Annex to the Topic report No. 6/2000 of the European Environment Agency have been included in table 1 of this report. Since Luxembourg did not submit an inventory in the year 2000, Luxembourg was not included in the S&A report 2000. For this reason, the inventory section from the in-depth review (IDR) report of the national communication of Luxembourg completed in 1997 was also used as a supporting source of information. This report gives some background information in relation to inventory compilation.

6. Other sources of information used during this review include the preliminary guidance for experts participating in the individual review of GHG inventories, the UNFCCC reporting guidelines⁴ and the review guidelines (FCCC/CP/1999/7).

7. During the review the Party was not contacted to request additional information.

C. Emission profile, trends and key sources

8. Luxembourg has a GHG emission profile broadly typical of Annex I Parties. The most important GHG is CO_2 , which in 1999 accounted for 90% of total emissions,⁵ followed by methane (CH₄), 8%, and nitrous oxide (N₂O), 1.5%. By source, energy accounted for 81% of total emissions; industrial processes 11%, agriculture 6%, and waste 1.5%.

9. The total emissions indicate a reduction of 50% on the 1990 level of 12.0 Gg CO_2 equivalents given in the IDR report (original 1990 inventory).

10. According to the key source level assessment undertaken by the secretariat, the following key sources have been identified for Luxembourg for the 1999 inventory:⁶

- (a) 1.A.2 Manufacturing industries and construction $-CO_2(29.7\%)$
- (b) 1.A.4 Other sectors $-CO_2$ (25.2%)
- (c) 1.A.3 Transport CO_2 (22.3%)

³ The UNFCCC secretariat had identified, for each individual Party, those source categories that are *key sources* in terms of their absolute level of emissions, applying the tier 1 level assessment as described in the IPCC good practice guidance. Key sources according to the tier 1 trend assessment were also identified for those Parties that provided a full CRF for the year 1990. The key sources presented in this report are based on the secretariat's preliminary key sources assessment. They might differ from the key sources identified by the Party itself.

⁴ 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 (FCCC/CP/1999/7) are referred to as the UNFCCC reporting guidelines in this report.

⁵ In this report the term "total emissions" refers to the aggregate national GHG emissions expressed in terms of CO_2 equivalents excluding land-use change and forestry (LUCF), unless specified otherwise.

⁶ As the data provided by Luxembourg in the CRF were not sufficiently disaggregated to allow for a key source determination according to the tier 1 level assessment of the IPCC good practice guidance using the recommended category disaggregation level, key sources have been identified at the level of category disaggregation as provided in table Summary 1.A of the CRF, instead of at the level of disaggregation recommended by the IPCC good practice guidance.

- (d) 2.A Mineral products CO₂ (8.7%)
- (e) 4.A Enteric fermentation $CH_4(5.5\%)$
- (f) 2.C Metal production CO₂ (2.4%).

Table 1. GHG emissions by gas in Luxembourg, 1990-1999

| GHG EMISSIONS | 1990 | 1991 | 1992 | 1993 | 1994 | 1995 | 1996 | 1997 | 1998 | 1999 |
|--|---------------------------------|------|------|------|------|------|------|------|------|---------|
| | CO ₂ equivalent (Gg) | | | | | | | | | |
| Net CO ₂ emissions/removals | NR ^(a) | NR | 5,136.8 |
| CO ₂ emissions (without LUCF) ^(b) | NR | NR | NR | NR | NR | NR | NR | NR | NR | 5,431.7 |
| | $13.3^{(c)}$ | 14.1 | 13.8 | 14.0 | 12.0 | 7.1 | 7.1 | 6.1 | 5.2 | |
| CH ₄ | NR | NR | NR | NR | NR | NR | NR | NR | NR | 482.6 |
| | 0.5 | 0.5 | 0.5 | 0.5 | 0.5 | 0.5 | 0.5 | 0.5 | 0.5 | |
| N ₂ O | NR | NR | NR | NR | NR | NR | NR | NR | NR | 89.9 |
| | 0.3 | 0.3 | 0.3 | 0.3 | 0.2 | 0.2 | 0.2 | 0.2 | 0.2 | |
| HFCs | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE |
| PFCs | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE |
| SF ₆ | NE | NE | NE | NE | NE | NE | NE | NE | NE | NE |
| Total (with net CO ₂ emissions/removals) | NR | NR | NR | NR | NR | NR | NR | NR | NR | 5,709.3 |
| Total (without CO ₂ from LUCF) ^(b) | NR | NR | NR | NR | NR | NR | NR | NR | NR | 6,004.2 |
| | 14.1 | 14.9 | 14.6 | 14.9 | 12.7 | 7.8 | 7.8 | 6.8 | 5.9 | |

^(a) NR (not reported): for emissions by sources and removals by sinks of GHGs that have not been reported in the 2001 submission.

^(b) In the CRF, the information in these rows is requested in order to facilitate the comparison of data, since Parties differ in the way they report CO_2 emissions and removals from LUCF.

^(c) Data in italics have been taken from the Annex of the European Environment Agency Topic report No. 6/2000 (European Community and Member States greenhouse gas emission trends 1990-1998) and are given in Tg CO₂ equivalents.

D. General assessment of the inventory

1. Completeness and transparency of reporting

Completeness

11. By 13 April 2001, Luxembourg submitted only inventory data for the year 1999 using tables 1.A(a) for energy and Summary 1.A of the CRF of the UNFCCC reporting guidelines. The ERT identified omissions in the national inventory relating to emissions of HFCs, PFCs and SF₆. HFC emissions from refrigeration and air conditioning, at least, are supposed by the ERT to exist in the country. With these exceptions, the inventory for the year 1999 covered all major sources and sinks as well as all direct and indirect gases included in the Revised 1996 IPCC Guidelines for National Greenhouse Gas Inventories, hereinafter referred to as the IPCC Guidelines.

12. The ERT noted that no data using the CRF have been provided for the years 1990 to 1998.

Transparency

13. Transparency of the inventory, as defined by the UNFCCC reporting guidelines, cannot be fully assessed in this review because essential support material is not available. This missing information includes a NIR and all CRF tables except the sectoral background data tables 1.A(a) for energy and Summary 1.A.

14. The ERT strongly recommends that Luxembourg provide more comprehensive information in the future by filling in the tables mentioned above and by supplying a NIR according to the UNFCCC reporting guidelines. Without this accompanying documentation the CRF submission for Luxembourg cannot be regarded as transparent for the purposes of external review.

2. Cross-cutting issues

Institutional arrangements

15. Institutional arrangements were not addressed by the desk review.

Record keeping

16. No assessment of record keeping was made during this desk review.

Verification and quality assurance/quality control (QA/QC) approaches

17. No information was available to determine whether Luxembourg undertook self-verification and QA/QC or independent review procedures on its 1999 inventory estimates. Verification is not possible on the basis of a comparison between national CO_2 emissions obtained from fuel combustion using the sectoral approach and those computed using the reference approach.

Recalculations

18. No information was available on whether the inventory data were subject to any recalculations. In the IDR report some recalculation by the review team is reported. Comparison of original data for the base year given in the IDR report and data included in a report prepared by the European Environment Agency (Topic report No. 6/2000) also indicates that some recalculations have apparently taken place.

Uncertainties

19. The ERT noted that no information in relation to estimates of uncertainty has been provided for any sector. Uncertainties have therefore not been addressed in most of the individual sector sections of this report.

Consistency

20. The ERT further noted that there may be some problems with consistency related to the total emissions in the base year. The figure given in the IDR report (original 1990 inventory as reported in the national communication) is 12.0 Tg CO₂ equivalent, the figure as estimated by the review team is 13.9 Tg CO₂ equivalent, and in July 2000 the European Environment Agency published a total of 14.1 Tg CO₂ equivalent (Topic report No. 6/2000: European Community and Member States greenhouse gas emissions trends 1990 to 1998).

Comparability

21. The ERT also noted that there may be some problems with comparability with respect to the emissions of CO_2 in the year 1999. The file containing some background material relating to CO_2 emissions in the year 1999 and informing about CO_2 emissions from fuel sold to foreigners and electricity trade shows total national emissions for CO_2 in the year 1999 of 8,145 Gg whereas table Summary 1.A s1 shows only 5,431 Gg for total national emissions for CO_2 .

3. Issues relating to previous reviews

22. The ERT noted that Luxembourg did not provide a response to the preliminary findings raised in the draft S&A report 2001. The latest information available regarding review of the GHG inventory of Luxembourg is that of the IDR report of the national communication.

4. Areas for further improvement

Planned or ongoing work by the Party

23. No information was provided with respect to plans by Luxembourg to introduce improvements in any sector of the national inventory.

Issues identified by the ERT

24. Clearly, much more information is needed from Luxembourg to facilitate the review process. The Party is encouraged to produce a full time series of inventories for the years 1990 to 1999 on the basis of completed CRF tables. This should be accompanied by a NIR in line with the requirements of the UNFCCC reporting guidelines.

25. The ERT encourages Luxembourg to implement fully the IPCC Good Practice Guidance and Uncertainty Management in National Greenhouse Gas Inventories (hereinafter referred to as the IPCC good practice guidance) which should be applied by Annex I Parties as far as possible for their inventory submissions 2001.⁷

26. *Verification:* The ERT encourages Luxembourg to consider implementing and reporting a formal system of verification for the whole national inventory, consistent with the IPCC Guidelines and the IPCC good practice guidance. In particular, the reference approach should be implemented to allow for comparison with the sectoral approach. This will help to overcome some existing inconsistencies in data and gaps in the current inventory.

27. *Methodologies:* Luxembourg is strongly encouraged to describe the methodologies chosen and the rationale behind these choices, and should consider developing, where appropriate, tier 2 approaches for key source categories.

28. *Calculation sheets:* Luxembourg may wish to provide calculation sheets in order to disclose in a transparent manner the actual calculations and how these calculations are linked with the data reported in the CRF.

⁷ According to the conclusions of the SBSTA at its twelfth session, the IPCC good practice guidance should be applied by Annex I Parties as far as possible for inventories due in 2001 and 2002, and should be used for inventories due in 2003 and beyond.

29. *Emission factors:* Luxembourg may wish to consider a review of some emission factors, particularly those obtained from the *Joint EMEP/CORINAIR Atmospheric Emission Inventory Guidebook*, to reflect recent research or technological developments as well as national circumstances.

30. *Reporting:* Luxembourg is strongly encouraged to submit a NIR consistent with the UNFCCC reporting guidelines, as well as the full time series of emissions data using the CRF from the year 1990 onwards.

31. *Completeness:* Luxembourg may wish to consider in its future inventories some sources missing in the current inventory. These sources include emissions of HFCs, PFCs and SF₆.

32. *Uncertainty:* Luxembourg may wish to quantify uncertainties according to the IPCC good practice guidance for the key source categories.

33. *Notation keys:* Luxembourg is encouraged to make use of the notation keys according to the UNFCCC reporting guidelines.

5. Consistency with the UNFCCC reporting guidelines and the IPCC Guidelines

34. Overall, the inventory submitted by Luxembourg does not follow the basic reporting requirements of the UNFCCC reporting guidelines, due to the lack of a completed CRF for all years and supporting documentation. A NIR and a complete CRF time series is needed to comply with the UNFCCC reporting guidelines.

35. The CORINAIR methodology is the basis for all emission inventories and as such it complies with the UNFCCC guidelines for compiling GHG inventories. It is not clear what methods have been used to estimate CO_2 sequestration by forest. Apparently the IPCC good practice guidance has not yet been implemented.

6. Conclusion

36. The ERT considers that Luxembourg has provided inadequate information to the COP on its GHG inventory and GHG emissions trends.

37. It should be noted that due to the very limited information in this inventory submission, a thorough review of the individual sectors could not be undertaken.

II. ENERGY

A. Sector overview

38. A very limited amount of information is available for conducting the review in respect of emissions from the energy sector in Luxembourg. No NIR was submitted in 2001 and the only CRF tables available are the sectoral background data tables 1.A(a) for energy and Summary 1.A. The IDR report of Luxembourg's national communication gives some background information in relation to inventory compilation.

39. A separate supplementary table was submitted in 2001 showing fuel consumption and CO₂ emissions in 1999 associated with electricity importation and transit traffic in Luxembourg.

40. Emissions of total GHGs (CO₂, CH₄ and N₂O) in Luxembourg amounted to 6,003 Gg in 1999 (without CO₂ from LUCF), of which 81% was due to the energy sector. The total emissions indicate a reduction of 50% on the 1990 level of 12,029 Gg given in the IDR report (original 1990 inventory). Emissions of CO₂ from energy sources accounted for 87% of all CO₂ emissions in 1999 and for 79% of total GHGs.

41. Three key source categories in the energy sector gave rise to 85% of all CO₂ emissions and 77% of total GHGs in 1999. The ERT noted that 1.A.1 Energy industries is not a key source category because almost all electricity is imported and emissions in this sector are consequently very small.

1. Completeness

42. The basic information on emissions of GHGs emanating from the energy sector is given by the CRF tables submitted by Luxembourg in 2001. The ERT is of the opinion that all sources are covered but further information (additional CRF tables and use of notation keys) is needed to confirm this view. Emissions of SO₂ and ozone precursor gases are given in the tables.

2. Methodologies, activity data and emission factors

43. The IDR report states that the CORINAIR approach is the basic methodology underlying emission inventories in Luxembourg. The ERT is aware that this methodology includes tier 1 (area source emissions) and tier 3 (CORINAIR point source emissions and road traffic) methods in respect of the energy sector. However, it is not known to what level of detail the CORINAIR methodology is applied in Luxembourg or to what extent country-specific emission factors are used in preference to CORINAIR and IPCC default values.

3. Verification and QA/QC approaches

44. Verification on the basis of a comparison of national CO_2 obtained from fuel combustion in the sectoral approach with those computed by the reference approach is not possible and there is no information on QA/QC activities.

4. Conformity with the UNFCCC reporting guidelines and the IPCC Guidelines

45. The CORINAIR methodology is the basis for all emission inventories in relation to the energy sector and as such it complies with the UNFCCC reporting guidelines for compiling GHG inventories. Overall, the inventory submission does not conform to the basic reporting requirements of the guidelines, resulting from the lack of a completed CRF for all years and the required supporting documentation.

B. <u>Reference and sectoral approach</u>

46. The tables relating to the reference approach are not included in the CRF and no comparison can be made with the results from the sectoral approach.

C. Key sources

47. Unlike most other reporting Parties, stationary combustion in energy industries is not a key source category in Luxembourg. The reason for this is that almost all electricity is imported and the emissions from 1.A.1 Energy industries are therefore very small. Analysis shows that

 CO_2 emissions from fuel combustion in1.A.2 Manufacturing industries and construction, 1.A.3 Transport and 1.A.4 Other sectors are the key sources in the energy sector. These key sources accounted for 85% of all CO_2 emissions and for 77% of total GHGs in Luxembourg in 1999.

48. The CORINAIR methodology is used to estimate emissions from key sources. There is no information regarding the level of detail with regard to the CORINAIR application or the activity data and emission factors used.

49. The bulk of CO_2 emissions emanating from source category 1.A.2 Manufacturing industries and construction occur in subsector 1.A.2(f) Other covering unspecified activities. The implied emission factor (IEF) for CO_2 for all fuel types here appear to be consistent with the default values.

50. The CO_2 emission factors for gasoline, diesel and other fuels, assumed to be LPG, used in road transport are similar to the IPCC default values and the values of other Parties in general.

51. A relatively high IEF of 152.16 t/TJ for CO_2 is noted for the combustion of solid fuels in 1.A.2(a) Iron and steel compared to other subsectors.

52. A relatively low IEF of 62 t/TJ for CO_2 is noted for the combustion of liquid fuels in 1.A.2(b) Non-ferrous metals as compared to other subsectors.

D. Non-key sources

53. There are no estimations of CH_4 and N_2O emissions from 1.A.1 Energy industries and 1.A.2 Manufacturing industries and construction (except 1.A.2(f)). However, this can be the result of rounding estimates.

54. The IEF for CH_4 for diesel in navigation seems to be very high (125 kg/TJ) compared with the default emission factor in the IPCC Guidelines (5 kg/TJ).

55. The IEF for CH_4 for gasoline in road transportation is relatively high (38.69 kg/TJ) compared with the default emission factor in the IPCC Guidelines (20 kg/TJ).

E. Areas for further improvement

Issues identified by the ERT

56. Recalculations resulting in quite large changes in total emissions in Luxembourg have evidently been undertaken but no information regarding this was provided in 2001. The Party is encouraged to provide details of the reasons for recalculations and of their effects in future submissions.

III. INDUSTRIAL PROCESSES

A. Sector overview

57. Emissions in industrial processes account for 11.2% of total CO₂ equivalent emissions or 12.3% of the CO₂ emissions in the country. In industrial processes, mineral products production account for 77.5% of total emissions.

58. No emission estimates for HFCs, PFCs and SF_6 in the industrial processes sector were submitted by Luxembourg in 2001.

1. Completeness

59. No detailed information for the industrial processes sector was submitted by Luxembourg in the 2001 inventory submission. Sectoral tables and background information were not provided.

60. There is a spreadsheet missing for updating the CRF: 99d.xls.

2. Transparency

61. The ERT came to the conclusion that transparency is lacking of for industrial processes because essential support material and background data are not available.

3. Methodology, emission factors and activity data

62. No information on methodologies and emission factors was submitted. Activity data are missing for the industrial processes sector.

4. Consistency and comparability

63. The ERT found no means of assessing consistency. Comparability is assessed by the ERT as being very limited.

5. Good practices

64. The ERT came to the conclusion that the IPCC good practice guidance was not applied by Luxembourg.

B. Key sources

65. CO_2 from mineral products (8.7%) and CO_2 from metal production (2.4%) are identified as key sources according to the level assessment.

66. No source categories of HFCs, PFCs and/or SF_6 emissions are identified as key sources (these gases are not reported). However, the ERT came to the conclusion that emissions of fluorinated gases possibly exist in Luxembourg, and the sources of these gases may be key sources. This conclusion is based on the rapid overall growth of emissions in most Annex I Parties.

67. HFC emissions from refrigeration and air conditioning are supposed by the ERT to exist in the country. Some other emissions of HFCs, PFCs and SF_6 may also occur in Luxembourg.

C. Areas for further improvement

Issues identified by the ERT

68. The ERT strongly recommends Luxembourg to develop estimates of emissions in the industrial processes sector in a way consistent with the UNFCCC reporting guidelines and the IPCC Guidelines, including complete time series.

IV. AGRICULTURE

A. Sector overview

69. Luxembourg submitted only inventory data for the year 1999. In this submission, no additional information related to the agriculture sector was included. Therefore, no information was available regarding methodologies, activity data and emission factors, completeness, transparency, verification and QA/QC approaches, recalculations or uncertainties.

V. LAND-USE CHANGE AND FORESTRY

A. Sector overview

70. The land-use change and forestry (LUCF) sector constitutes a net sink, which in absolute terms is equivalent to 5.4% of Luxembourg's total 1999 gross CO_2 emissions. Changes in forest and other woody biomass stocks constitutes a reported sink of CO_2 of 294.9 Gg in 1999.

1. Completeness

71. Within the LUCF sector, estimates of emissions/removals for changes in forest and other woody biomass stocks are reported only in CRF table Summary 1.A for 1999. Tables 5A, 5B, 5C and 5D were not utilized.

72. As a minimum, tables 5 and 5A could have been completed.

2. Transparency and use of indicators

73. These were not possible to determine from the information provided by Luxembourg.

3. Consistency with the UNFCCC reporting guidelines and the IPCC Guidelines

74. Luxembourg provided insufficient information on the LUCF sector to satisfy the UNFCCC reporting guidelines and the IPCC Guidelines.

B. Specific source and sink categories

1. 5.A Changes in forests and other woody biomass stocks

75. This category constitutes a sink of CO_2 equivalent to 5.4% of Luxembourg's total 1999 CO_2 emissions.

Methodology

76. No details were provided on the methodology used to reach the 1999 estimate of removals by the LUCF sector of 294.9 Gg of CO_2 .

Activity data

77. From the documentation provided it was not possible to state the source of the activity data for the LUCF sector.

Conversion and implied emission factors

78. Conversion and implied emission factors for the LUCF sector are not reported in the CRF.

2. 5.B Forest and grassland conversion

79. Net emissions from forest and grassland conversion are not reported.

3. 5.C Abandonment of managed lands

80. Net emissions from abandonment of managed lands are not reported.

4. 5.D CO₂ emissions and removals from soil

81. Net CO₂ emissions and removals from soil are not reported.

C. Areas for further improvement

Issues identified by the ERT

82. Luxembourg is strongly encouraged to supply a NIR with its CRF if the estimates of GHG emissions and removals for the LUCF sector are to be seen as in accordance with the UNFCCC reporting guidelines. The NIR should give specific details as to how the inventory has been undertaken, the quality control and quality assurance procedures undertaken, and any self-validation. Without this accompanying documentation the CRF submission for Luxembourg cannot be regarded as transparent for the purposes of external review.

83. Within the LUCF sector Luxembourg is encouraged to submit, as a minimum, table 5.A even though it uses a country-specific method. The NIR needs to give specific details as to how the estimates for this sector have been calculated.

VI. WASTE

A. Sector overview

84. A NIR was not submitted. The inventory from the waste sector was indicated only in table Summary 1.As2. Very limited data for the waste sector was mentioned in the IDR.B. Key sources

85. No key source has been identified at the IPCC level for the year 1999 in the 2001 inventory submission.

C. Non-key sources

86. Tables 6.B and 6.C are lacking in the CRF. No information is provided regarding CO_2 calculated from waste incineration.

D. Areas for further improvement

Issues identified by the ERT

87. From Interessengemeinschaft der Betreiber Thermischer Behandlungsanlagen in Deutschland (ITAD) for the year 1997 it is reported that 125 Gg/yr of waste is incinerated, corresponding to 95% of total waste. Activity data and additional information on this question should be provided by the Party.

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