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UNITED NATIONS FRAMEWORK CONVENTION ON CLIMATE CHANGE

**AD HOC WORKING GROUP ON FURTHER COMMITMENTS  
FOR ANNEX I PARTIES UNDER THE KYOTO PROTOCOL**

**Eighth session**

**Bonn, 1–12 June 2009**

**Item 3 (b) of the provisional agenda**

**Consideration of further commitments for Annex I Parties under the Kyoto Protocol**

**Proposals by Parties on issues outlined in the work programme of the Ad Hoc**

**Working Group on Further Commitments for Annex I Parties under the Kyoto Protocol**

**Views on the coverage of greenhouse gases, sectors and source categories,  
common metrics, possible approaches targeting sectoral emissions and  
other issues**

**Submissions from Parties**

1. The Ad Hoc Working Group on Further Commitments for Annex I Parties under the Kyoto Protocol, at its seventh session, invited Parties to submit to the secretariat, by 24 April 2009, views on the coverage of greenhouse gases, sectors and source categories, common metrics to calculate the carbon dioxide equivalence of anthropogenic emissions by sources and removals by sinks, possible approaches for targeting sectoral emissions and other issues, for compilation into a miscellaneous document for consideration at its eighth session.<sup>1</sup>
2. The secretariat has received five such submissions. In accordance with the procedure for miscellaneous documents, the submissions are attached and reproduced\* in the languages in which they were received and without formal editing.

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<sup>1</sup> FCCC/KP/AWG/2009/5, chapter V F.

\* These submissions have been electronically imported in order to make them available on electronic systems, including the World Wide Web. The secretariat has made every effort to ensure the correct reproduction of the texts as submitted.

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\* This submission is supported by Croatia, the former Yugoslav Republic of Macedonia, Serbia and Turkey.

PAPER NO. 1: BRAZIL

Agenda items 5 (d), 5(e), 5(f) and 5(h)

Other issues arising from the implementation of the work programme of the Ad Hoc Working Group on Further Commitments for Annex I Parties under the Kyoto Protocol

The coverage of greenhouse gases, sectors and source categories

Common metrics to calculate the carbon dioxide equivalence of anthropogenic emissions by sources and removals by sinks

Possible approaches targeting sectoral emissions

Other issues

Brazil welcomes the opportunity to provide its views on other issues arising from the implementation of the work programme of the Ad Hoc Working Group on Further Commitments for Annex I Parties under the Kyoto Protocol, as indicated in paragraph 4 of document FCCC/KP/AWG/2009/L.7/Rev.1

The fundamental element of this Brazilian submission is the understanding that the work of the AWG-KP is restricted to the mandate established by paragraph 1 of Decision 1/CMP.1 where the COP/MOP decides “to initiate a process to consider further commitments for Parties included in Annex I for the period beyond 2012 in accordance with Article 3, paragraph 9, of the Protocol”.

Article 3, paragraph 9 of the Kyoto Protocol states that “commitments for subsequent periods for Parties included in Annex I shall be established in amendments to Annex B to this Protocol, which shall be adopted in accordance with the provisions of Article 21, paragraph 7”.

So, the work of the AWG-KP is restricted to the development of amendment to Annex B to the Protocol, with provision for a few required consequential amendments.

Coverage of sectors and sources categories

The coverage of sectors and sources categories shall be limited those already listed in Annex A of the Kyoto Protocol.

The inclusion of new sectors and sources categories under Annex A would require an amendment of Annex A. This would be outside of the mandate of the AWG-KP, as it cannot be regarded as a consequential amendment of the amendment of Annex B, in accordance with Article 3.9.

Coverage of greenhouse gases

The coverage of greenhouse gases shall be limited to those greenhouse gases and family of gases that are currently being listed under Annex A.

The inclusion of new greenhouse gases or families of greenhouse gases under Annex A would be outside of the mandate of the AWG-KP, as it would require an amendment of Annex A, which cannot be considered as a consequential amendment to the amendment of Annex B in accordance with Article 3.9.

Furthermore, from the technical point of view the inclusion of new gases in the current basket of gases needs a careful assessment.

There is no accepted procedure to assess the relevance of the “new” gases in a way to develop a triggering mechanism to the inclusion. Moreover it is likely that most of the “new” gases will not be relevant in the short term.

The inclusion of new gases will also be in close relation to the choice of a common metric. Many of these gases have a short lifetime (e.g. most of fluorinated ethers have lifetimes in the range from .33 to 12.1 years). So their GWP value will overestimate their contribution to climate change (see discussion of common metrics below).

The inclusion of new species of HFCs or PFCs do not require an amendment of Annex A, but may impact the problem of the choice of a common metric. All new HFCs have short lifetimes (0.3 to 13.6 years). As so, usage of GWP as a common metric will overestimate their contribution to climate change. In addition, there is no GWP for the new gases in the IPCC SAR that is the approved source of factors for the current metric.

#### Common metrics

Brazil is in favor of the adoption of the GTP as common metric for comparing the contribution of greenhouse gases to climate change in the second and subsequent commitment periods of the Kyoto Protocol. Moreover, is Brazil understanding that the adoption of the GTP as the global warming potential referred to in Article 5.3 of the Kyoto Protocol does not imply in an amendment of the Protocol.

The current use of GWP and the values provided in the IPCC SAR is a source of problems in several aspects of the implementation of Kyoto Protocol.

The GWP compares greenhouse gases by their contribution to the cumulative radiative forcing. This characteristic means that using GWP we stay short of the real contribution to climate change, better evaluated by the contribution to the mean average temperature increase, or even other damage measures as the rate of temperature increase or sea level rise. As so, the GWP underestimates the contribution to climate change of greenhouse gases with a very long time residence in the atmosphere and overestimates the contribution to climate change of greenhouse gases with a short time residence in the atmosphere. This feature implies that the use of GWP leads to the adoption of wrong mitigation strategies in the short and long term.

The Global Temperature Potential (GTP) aim to compare the greenhouse gases through their contribution to the global mean surface temperature change at a given future time horizon and, as so, to reflect better the real contribution of the different gases to climate change. Due to the inclusion of the response times for the climate system, the GTP values for pulse emissions of gases with shorter lifetimes than the reference gas will be lower than the corresponding GWP values (Methane  $GTP(100) = 5$ , while  $GWP(100) = 25$  (in the AR4) and 21 adopted in the Kyoto Protocol).

The adoption of the GWP leads to the wrong signal when establishing mitigation strategies. This is particularly important if when Parties converge to establishing temperature increase thresholds (e.g. 2° Celsius) as a goal.

The GWP shortcomings have been clearly identified in relation to CDM project activities that burn methane producing CO<sub>2</sub>. The real benefit for the climate change in terms of temperature increase would be four times less than the CERs it generates. It means that CDM project activities that are reducing methane emissions allow increases in CO<sub>2</sub> emissions in Annex I Parties from burning fossil fuels that will increase 4 times climate change in terms of temperature increase. So, the wrong message is given in these cases – making people believe that this type of project is mitigating climate change when actually is increasing global warming. This shortcoming will be even aggravated if we consider the updated GWP of the AR4 (=25). Instead of overestimating the benefit 4 times, will be overestimating it 5 times.

The adoption of the GTP does not require an amendment to the Kyoto Protocol. In accordance with Article 5.3 of the Kyoto Protocol “the global warming potentials used to calculate the carbon dioxide equivalence of anthropogenic emissions by sources and removals by sinks of greenhouse gases listed in Annex A shall be those accepted by the IPCC and agreed upon by the Conference of the Parties at its third session”. It is important to note that the reference is to generic “global warming potentials” in small letters. The actual factors adopted in the COP 3 were those adopted by the Decision 2/CP.3 that in paragraph 3 reaffirms that “global warming potentials used by Parties should be those provided by the IPCC in its SAR (“1995 IPCC GWP values”) based on the effects of the greenhouse gases over a 100-year time horizon, taking into account the inherent and complicated uncertainties involved in global warming potential estimates”.

It is clear that the adoption of “1995 IPCC GWP values” with capital letters was done by means of a Decision and not by amendment. Accordingly, the adoption of the GTP may also be done by means of a CMP Decision.

This is in line with Article 5.3 continues affirming that “Based on the work of, inter alia, the IPCC and advice provided by SBSTA, the CMP shall regularly review and, as appropriate, revise the global warming potential of each such greenhouse gas taking fully into account any relevant decisions by the COP”.

In line with the provisions of Article 5.3, the G77 and China has requested that a new agenda item on common metrics be placed on the agenda of the thirtieth session of the SBSTA (June 2009), given the conclusions of the AWG-KP at its sixth session held in Accra which had noted the need for work to be carried out by the SBSTA, drawing on the results of the work of the IPCC on the potential implications of applying alternative common metrics.

Brazil recognizes the work that has been done by the IPCC on common metrics in response to the request of the UNFCCC and looks forward to consider the full report of the expert meeting that has been organized by the IPCC.

However, it is clear that the choice of a given metric will depend on the primary policy goal and that the IPCC will not be policy prescriptive. The decision will have to be taken by Parties, at SBSTA, given the policy options, being informed by the IPCC scientific work.

PAPER NO. 2: CZECH REPUBLIC

**SUBMISSION BY THE CZECH REPUBLIC ON BEHALF OF THE EUROPEAN COMMUNITY AND ITS MEMBER STATES**

**This submission is supported by Croatia, the Former Yugoslav Republic of Macedonia, Serbia and Turkey**

Prague, 28 April 2009

**Subject: Coverage of greenhouse gases, sectors and source categories, common metrics, possible approaches for targeting sectoral emissions and other issues (AWG-KP). Views on coverage of greenhouse gases, sectors and source categories, common metrics, possible approaches for targeting sectoral emissions and other issues considered under agenda item 5(h)**

Before commenting on the text of possible amendments, the EU would like to stress that the AWG-KP agreed to take into account developments under the AWG-LCA and other bodies and processes under the Convention and its Kyoto Protocol. This is of particular importance with regard to the legal form of the Copenhagen agreed outcome, which could have implications for the final form and content of amendments to the Kyoto Protocol. The AWG-KP should seek coherence and maximise synergies in the work of different bodies and processes.

Coverage of sectors and sources:

- EU has proposed to include new gases. This may in some cases require amendments to Annex A and in some cases to the UNFCCC reporting guidelines.

Common metrics:

- EU proposes to continue to apply the current metrics of GWPs with 100 years' time horizon beyond 2012 and agree to use updated GWPs as presented in IPCC AR4.

Approaches to limit or reduce emissions from international aviation and maritime transport:

- May lead to changes to the KP, e.g. Art 2.2. This needs to be discussed in coherence with AWG LCA work on mitigation, e.g. if we would inscribe global sectoral targets for these sectors into the Copenhagen agreed outcome.

Analysis of efforts and achievements during the first commitment period, including analysis of possible surplus in AAUs

- Subject to the result of the consideration of this issue, there may be a need for changes to the Kyoto Protocol or the Marrakech Accords

## **Annex**

### **Text proposals**

#### **Approaches to limit or reduce emissions from international aviation and maritime transport:**

##### **Article 2**

1. Article 2, paragraphs 1, 3 and 4 of the Kyoto Protocol shall apply.
2. Parties shall take the necessary action to achieve a reduction of emissions of greenhouse gases not controlled by the Montreal Protocol from international aviation and maritime transport.
3. Global reduction targets for the emissions from international aviation shall be set equal to [X per cent] below 2005 levels in the commitment period [20XX to 20XX].

Supplemental to action on international aviation Parties may allow units from the mechanisms defined in Articles 6 and 12 [placeholder for new mechanisms] for the purposes of achieving the aforementioned targets.

4. Global reduction targets for the emissions from international maritime transport shall be set equal to [Y per cent] below XXXX levels in the commitment period [20XX to 20XX].

Supplemental to action on maritime transport Parties may allow units from the mechanisms defined in Articles 6, 12, and 17 [placeholder for new mechanisms] for the purposes of achieving the aforementioned targets.

5. Parties shall work through the International Civil Aviation Organization and the International Maritime Organization, to enable an effective international agreement to achieve international targets that do not lead to competitive distortions or carbon leakage to be approved by 2011 [or after 2 years from the entry into force of this Protocol]<sup>1</sup>. The Conference of the Parties serving as the meeting of the Parties to this Protocol shall assess progress of the implementation of this paragraph, and shall take action to advance the implementation, as appropriate

#### **Application of the 2006 Guidelines**

Starting with the period referred to in Article X.X [2<sup>nd</sup> commitment period] the methodologies for estimating anthropogenic emissions by sources and removals by sinks of all greenhouse gases not controlled by the Montreal Protocol shall be consistent with the 2006 Intergovernmental Panel on Climate Change guidelines for national greenhouse gas inventories. The Conference of the Parties serving as the meeting of the Parties shall review the use of the 2006 Intergovernmental Panel on Climate Change guidelines before the start of each subsequent commitment period. Time series of emissions by sources and removals by sinks including base year emissions shall be recalculated using the 2006 Intergovernmental Panel on Climate Change guidelines for national greenhouse gas inventories prior to the start of the period referred to in Article X.X [2<sup>nd</sup> commitment period] . The Conference of the Parties

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<sup>1</sup> It would be alternatively necessary either to adopt a decision at COP/MOP5 (in Copenhagen, with immediate entry into force) to mirror the timeframe of 2011 or to provide for a flexibility option in case the Copenhagen agreement is not entered into force before 2011.

serving as the meeting of the Parties shall revise the technical guidance for adjustments at its [...] session taking into account the 2006 IPCC Guidelines for national GHG inventories.

**\*Notes:**

1. Additional methodological guidance for the estimation of emissions from sources and removals from sinks might be required for Articles 3.3 and 3.4 depending on the results of the discussions on accounting under LULUCF. Methodologies for estimation of these activities are not available in the 2006 IPCC guidelines.
2. A decision text should further specify the process and timing for the needed recalculations due to the application of the new guidelines prior to the start of the 2<sup>nd</sup> commitment period.

**Common metrics to calculate carbon dioxide equivalents of emissions and removals**

For the purposes of this agreement, the global warming potentials used to calculate the carbon dioxide equivalence of anthropogenic emissions by sources and removals by sinks of greenhouse gases listed in Annex A shall be those provided by the Intergovernmental Panel on Climate Change in its Fourth Assessment Report based on the effects of the greenhouse gases over a 100-year time horizon. Any revision to a global warming potential by the Intergovernmental Panel on Climate Change subsequent to the Fourth Assessment Report or revisions of the approach to calculate carbon dioxide equivalence shall apply only to commitments under Article 3 in respect of any commitment period adopted subsequent to that revision.

**EU proposal for gases to be included in Annex A  
Gases**

Carbon dioxide (CO<sub>2</sub>)  
Methane (CH<sub>4</sub>)  
Nitrous oxide (N<sub>2</sub>O)  
Hydrofluorocarbons (HFCs)  
Perfluorocarbons (PFCs)  
Perfluorinated Compounds  
    Sulphur hexafluoride (SF<sub>6</sub>)  
    Nitrogen trifluoride (NF<sub>3</sub>)  
Hydrofluoroethers/ Fluorinated Ethers (HFEs)  
Perfluoropolyethers (PFPMIE)

**Changes to Article 3.8 of the KP reflecting base year considerations for the new gases**

Any Party included in Annex I may use 200x as its base year for nitrogen trifluoride, hydrofluoroethers and perfluoropolyethers for the purposes of the calculation referred to in paragraph x above.

**EU Proposal for Sectors/Source Categories to be included in Annex A**

The EU proposes to include the following sectors/source categories, additions to the Chair's **Annex Abis** (FCCC/KP/AWG/2009/4) text are underlined and deletions are strikethrough:

**Energy**

    Fuel combustion activities  
    Energy industries



- Manufacturing industries and construction
- Transport
- Other sectors
- Non-Specified

- Fugitive emissions from fuels
  - Solid fuels
  - Oil and natural gas
  - Other emissions from energy production

- Carbon Dioxide Transport and Storage
  - Transport of CO<sub>2</sub>
  - Injection and Storage
  - Other

- Industrial processes and product use
  - Mineral industry
  - Chemical industry
  - Metal industry
  - Non-energy products from fuels and solvent use
  - Electronics Industry
  - Fluorinated substitutes for ozone depleting substances
  - Other Product Manufacture and Use
  - Other

**[Agriculture, forestry and other land use and aggregate sources and non-CO<sub>2</sub> emissions sources on land]**

**\*Note:** The bracketed text reflects the main changes introduced for this sector in the 2006 IPCC guidelines (LULUCF vs. AFOLU). The main difficulty at this point in time as regards the bracketed text is the lack of agreement on LULUCF accounting. The unbracketed parts are those categories that reflect the agriculture categories currently included in Annex A with some small additions. Further work on this issue is necessary in the negotiating context.

- Livestock
  - Enteric fermentation
  - Manure management

- [Land
  - Forest land
  - Cropland
  - Grassland
  - Wetlands
  - Settlements
  - Other land]

- Aggregate sources and non-CO<sub>2</sub> emissions sources on land
  - Greenhouse gas emissions from biomass burning
  - Liming
  - Urea application
  - Direct N<sub>2</sub>O emissions from managed soils

Indirect N<sub>2</sub>O emissions from managed soils  
Indirect N<sub>2</sub>O emissions from manure management  
Rice cultivation  
Other

[Other

Harvested wood products  
Other]

**Waste**

Solid waste disposal  
Biological treatment of solid waste  
Wastewater treatment and discharge  
Incineration and open burning of waste  
Other

Other

Indirect N<sub>2</sub>O emissions from the Atmospheric deposition of nitrogen in NO<sub>x</sub> and NH<sub>3</sub>  
Other

PAPER NO. 3: JAPAN

**Japan's submission to the AWG-KP and AWG-LCA:  
Coverage of greenhouse gases**

**I. Views on the coverage of greenhouse gases in the framework beyond 2012**

**(1) Consideration of the coverage of greenhouse gases in the next framework**

- Inclusion of new greenhouse gases (GHGs) in the next framework will affect the amount of GHG emissions and measures for emission reductions not only in Annex I Parties which are Parties to the current Kyoto Protocol, but also in all participating countries in the framework beyond 2012, including developing and developed countries which are not Parties to the current Kyoto Protocol. It is also necessary for all these countries to take mitigation actions in order to achieve effective global emission reductions. Therefore, it is necessary that the outcome of the previous discussions in the AWG-KP and relevant information on the GHG coverage should be provided to the AWG-LCA, and that this issue should be discussed in both AWGs in a comprehensive and consistent manner, before the conclusion is drawn as a result of discussions only in the AWG-KP.
- It should be noted that mitigation actions in developing countries are particularly necessary regarding NF3 from a viewpoint of effective implementation of addressing global warming, because the technical information prepared by the secretariat suggests that a production and market of NF3 has extended to developing countries.
- Such new gases have relatively high GWPs. The experience of HFC-23 destruction projects under the CDM recalls us that, if emissions from those gases are regulated only in developed countries and sufficient emission reduction actions are not taken in developing countries, it might cause unnecessary emission increase of such gases in developing countries.

**(2) Technical information**

- In deciding inclusion of new GHGs, it is important to consider whether the technical information on these gases is available and whether inclusion of each gas is appropriate from a viewpoint of effective implementation.
- The UNFCCC secretariat has compiled and uploaded technical information on new GHGs<sup>1</sup> mentioned in the Fourth Assessment Report (AR4) of the Intergovernmental Panel on Climate Change (IPCC) at the request of the AWG-KP. Recalling the conclusion of the first part of the sixth session of the AWG-KP in Accra<sup>2</sup>, there are gases which have insufficient technical information in the following points.
  - methodologies to estimate emissions based on application of individual gases
  - application or sources of emissions of individual gas
  - available substitutes or alternative technologies
- Though the Government of Japan (GOJ) has contributed to Secretariat's work to collect technical information in response to the past conclusions of the AWG-KP meetings, there are limitations in collecting information in spite of the efforts by the secretariat and Parties. Further progress by international researches and work on the IPCC fifth assessment report are anticipated especially on the following gases.
  - Gases that are not currently expected to be commercialized (Influence on global warming is extremely small.)
  - Gases whose methodologies for estimating emissions, application, substitutes and alternative

<sup>1</sup> [http://unfccc.int/national\\_reports/annex\\_i\\_ghg\\_inventories/items/4624.php](http://unfccc.int/national_reports/annex_i_ghg_inventories/items/4624.php)

<sup>2</sup> FCCC/KP/AWG/2008/5, paragraph 35

technologies have not been identified (It is very difficult to estimate the amount of emissions and to consider mitigation measures.)

- On the other hand, as for the category "hydrocarbons and other compounds", the background of categorization of these gases by the AR4 is not clear.<sup>3</sup> Moreover, it is doubtful whether there is a certain influence of those gases on global warming. Therefore, further progress by international researches and work on the IPCC fifth assessment report are continued to be anticipated.
- As for so-called "Montreal gases" (CFCs and HCFCs) which are thought to have more influence on emissions and impact on climate change than those new GHGs listed in the AR4, information compiled by the UNFCCC secretariat and the outcome of the workshop to be held in July with participation of the UNFCCC secretariat and climate experts should be noted.<sup>4</sup>

## II. Legal issues on the coverage of GHGs in the next framework

### (1) Coverage of GHGs

- In case the next framework beyond 2012 is established in the form of a new single protocol under the Convention as Japan has proposed, all regulated gases and their GWPs are to be identified under the new single protocol.
- If the next framework is in the form of the amended Kyoto Protocol, the following measures will be necessary:
  - (a) Inclusion of new "HFCs" and "PFCs"
    - If Parties decide to add new GHGs to the category of "HFCs" and "PFCs" provided in Annex A of the Kyoto Protocol, a CMP decision pursuant to Article 5, paragraph 3, of the Kyoto Protocol will be necessary in order to set GWPs of those new gases.
    - In this case, the CMP decision should include such necessary information as GWPs and base years of new HFCs and PFCs which will come to be controlled as a result of consideration by Parties.
  - (b) Inclusion of NF3
    - In the case of including new gases or their categories which are not listed in current Annex A, such as NF3, it is necessary to amend Annex A first, and then adopt a CMP decision as is in the case of (a) above.

### (2) Base year of new GHGs

In general, possible new gases for inclusion in the next framework such as new gases of HFCs (HFC-245fa, HFC-365mfc) or NF3 are substitutes for ozone depleting substances (ODS) or GHGs controlled by the current Kyoto Protocol and such GHGs are being used as a result of production regulation under the Montreal Protocol. Considering that, in the time of adopting the Kyoto Protocol, Parties were allowed to choose not only 1990 but also 1995 as the base year of HFCs, PFCs and SF6, base years of alternative gases should be flexible. In this context, it should be noted that Japan proposes to use total volume of GHG emissions and reduction rates from the plural base years including the latest year for which data are available for expressing emission reduction commitments of developed countries

### (3) Detailed description of each GHG

New Zealand proposes to itemize individual gases of HFCs and PFCs in a similar manner as in the Montreal Protocol, replacing current prescription "HFCs" and "PFCs" in Annex A of the Protocol in the next framework.<sup>5</sup> Japan would like to consider the proposal, including with

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<sup>3</sup> For example, this category does not include the most major substances in "hydrocarbons" such as Isobutene (R600a) or Propane (R290) – these gases also have certain GWPs. On the other hand, substances that are controlled by the Montreal Protocol are listed in the category.

<sup>4</sup> FCCC/SBSTA/2008/13

<sup>5</sup> FCCC/KP/AWG/2009/MISC.6

regard to the procedures for amending Annex A, since it clarifies intended gases and improves transparency.

(4) Relationship with the Convention

In case substances controlled by the Montreal Protocol are newly regulated under the UNFCCC, it is necessary to consider seriously whether there are any problems with regard to the Article 4 of the Convention which excludes substances controlled under the Montreal Protocol (it may necessary to consider amendment to the Convention itself).

PAPER NO. 4: RUSSIAN FEDERATION

**Предложения Российской Федерации к заключению Председателя,  
7-я сессия СРГ-КП, Охват парниковых газов, секторов и категорий источников**

Российская Федерация поддерживает применение в течение второго периода действия обязательств Киотского протокола подход к парниковым газам на основе совокупного эквивалента диоксида углерода в соответствии со статьей 3 Киотского протокола. По нашему мнению сохранение используемого подхода позволит обеспечить преемственность, сопоставимость и прозрачность количественных оценок выбросов и абсорбции парниковых газов в странах Приложения В. Применение действующего подхода к парниковым газам обеспечит согласованность между Конвенцией и Киотским протоколом.

Российская Федерация рассмотрела информацию о новых типах гидрофторуглеродов, перфторуглеродов и других парниковых газов, перечисленных в п. 34 Доклада СРГ-КП (FCCC/КР/АВГ/2008/5), содержащуюся в Четвертом докладе об оценке МГЭИК, компиляциях Секретариата РКИК ООН и соответствующих публикациях Группы технологического и экономического анализа Монреальского протокола. По мнению Российской Федерации, существующая информация не содержит достаточных оснований для включения новых парниковых газов в перечень газов, регулируемых Киотским протоколом. Также вызывает озабоченность отсутствие данных о сопутствующих эффектах применения новых парниковых газов, в том числе экологических и социально-экономических последствиях использования новых газов, что придает представленной информации односторонний характер и не позволяет принять окончательного решения о целесообразности использования новых парниковых газов. Учитывая вышесказанное и принимая во внимание ограниченность производства и применения указанных парниковых газов, а также наметившуюся тенденцию к сокращению запасов и соответствующих потенциальных выбросов этих веществ к 2015 году, Российская Федерация считает нецелесообразным включение вышеуказанных парниковых газов.

**Общая система показателей для пересчета в эквивалент диоксида углерода антропогенных выбросов из источников и абсорбции поглотителями парниковых газов**

При рассмотрении соответствующих методологических вопросов Российская Федерация руководствовалась тем, что существующая система пересчета в эквивалент диоксида углерода антропогенных выбросов из источников и абсорбции поглотителями была разработана МГЭИК во Втором докладе об оценке (1995 год), то есть последовательно используется более 10 лет и обеспечивает полную сопоставимость и согласованность расчетных оценок. Признавая недостатки системы показателей, Российская Федерация, тем не менее, отмечает, что представленные в Четвертом докладе об оценке МГЭИК другие показатели пересчета антропогенных выбросов из источников и абсорбции поглотителями не имеют достаточного научного и методологического обоснования и основываются на весьма ограниченном количестве научных публикаций. Подтверждением этого вывода является заключение специальной встречи МГЭИК, которая высказалась за продолжение анализа альтернативных систем показателей пересчета. Учитывая вышесказанное, Российская Федерация считает нецелесообразным использование альтернативных подходов к пересчету в эквивалент диоксида углерода антропогенных выбросов из источников и абсорбции поглотителями.

[TRANSLATION AS SUBMITTED]

### **Coverage of greenhouse gases, sectors and source categories**

Russian Federation supports the aggregate carbon dioxide equivalent treatment of greenhouse gases for the second commitment period of the Kyoto Protocol as outlined in its Article 3. In a view of the Russian Federation, the carry-over of the present approach ensures consistency, comparability and transparency of the estimates of emissions by sources and removals by sinks of greenhouse gases in Annex B Parties. The present approach also provides for an agreement between the Convention and the Kyoto Protocol.

The Russian Federation has considered the information on new hydrofluorocarbons, perfluorocarbons and other greenhouse gases and their groups, paragraph 34 of the AWG-KP Report (FCCC/KP/AWG/2008/5), which was presented in the Fourth Assessment Report of the Intergovernmental Panel on Climate Change, UNFCCC Secretariat compilations and relevant publications of the Technology and Economic Assessment Panel of the Montreal Protocol. In a view of the Russian Federation, the available information does not provide sufficient justification for inclusion of the new greenhouse gases in the list of gases under the Kyoto Protocol. Additional concerns are associated with the lack of data on complementary effects of these gases including *inter alia* environmental and socio-economic consequences of their use. The latter limits provided information and does not allow for a final judgment on feasibility of application of the new greenhouse gases and their groups. Taking into account the above-said, as well as limited production, decreasing trends in consumption and projected reduction in associated potential emissions of these gases by 2015, Russian Federation considers that the inclusion of new greenhouse gases and their groups is needless.

### **Common metrics to calculate the carbon dioxide equivalence of anthropogenic emissions by sources and removals by sinks**

Within considering the relevant methodological issues Russian Federation was guided by the principle that the present system of common metrics to calculate carbon dioxide equivalence of anthropogenic emissions by sources and removals by sinks was elaborated by the Second Assessment Report of the Intergovernmental Panel on Climate Change (IPCC) in 1995, i.e. it has been consistently used for more than 10 years and ensures entire comparability and conformity of the estimates. Although Russia acknowledges weak points of common metrics, the Russian Federation nevertheless noted that alternative common metrics proposed in the Fourth Assessment Report of the IPCC lack of sufficient scientific and methodological justification, being based on fairly limited number of publications. This judgment has been supported by the special expert meeting of the IPCC, which proposed that the analysis of alternative common metrics should be continued. Thus, Russian Federation believes that the application of alternative common metrics to calculate carbon dioxide equivalence of anthropogenic emissions by sources and removals by sinks useless.

PAPER NO. 5: SAUDI ARABIA

Coverage of greenhouse gases, sectors and source categories, common metrics, possible approaches for targeting sectoral emissions and other issues (AWG-KP)

April 24, 2009

Saudi Arabia welcomes the opportunity to submit its views on Coverage of greenhouse gases, sectors and source categories, common metrics, possible approaches for targeting sectoral emissions and other issues (AWG-KP) by 24 April 2009 as included in the following document:

1. FCCC/KP/AWG/2009/L.7/Rev.1, paragraph 4
- **Green House Gases** – To ensure that spillover effects are minimized, the following are ways to enhance the effectiveness of the means and contribute to Sustainable Development:
  - Deal with all green house gases in a comprehensive manner,
  - Give priority to those gases that have the highest warming potentials,
  - Give priority to those gases that have the least spillover effects in developing countries (ie, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub>)
  - All gases that contribute to global warming should be include
- **Green house sectors and sources** – To ensure that spillover effects are minimized; the following are ways to enhance the effectiveness of the means and contribute to Sustainable Development, all sectors and sources are dealt with in a comprehensive manner.
- **Sectoral emissions** – We do not believe that sectoral approaches can contribute effectively to Sustainable Development to the following concerns:
  - **Distributional and Equity Aspects:** Policies and measures under this category, do not:
    - Balance burden across sectors,
    - Balance treatment of emission sources,
    - Minimize impacts on developing countries.
  - **Efficiency and Implementation Aspects:** Policy and measures under this category do not employ instruments and implementation mechanisms that encourage emissions reductions from sources having the least abatement costs.
  - **Technology Aspects:** Policies and measures under this category will:
    - Not avail a leveled playing field for innovation,
    - Create distorted market signals to investment in energy technologies,
    - Not encourage technologies with large emissions abatement potentials.

Another alternative approach is a uniform economy-wide approach. This will ensure fair treatment of all sectors.

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