Meeting Enforcement Branch 4-6 March 2008

National System Greece

Findings from National System Expert of the ERT

O JRG, UNFCCC

Paul Filliger

Part I

Questions on the National system formulated on 24 April 2007

during the in-country review 23 – 28 April 2007 in Athens

Situation

- The initial report describes the National System as it was until this week. The national institution with the technical responsibility for the compilation of the annual inventory was the National Observatory of Athens (NOA).
- During the discussion on 23 April 2007 Greece mentioned that the mandate with NOA has now finished and it is not yet decided how to proceed. It is unclear to the ERT how the national system is to be maintained in the future. Could Greece provide the following information.

Questions a) and b)

- Under Decision 19/CMP.1 each Party shall establish and maintain the institutional, legal and procedural arrangements necessary to perform the functions defined in the guidelines for national systems. What will be the nature of such arrangements in relation to the continuity of the inventory preparation process.
- In case of selection of a different institution responsible for technical inventory preparation, could Greece describe their detailed plan for the transfer of the knowledge from NOA to that organization.

Questions c) and d)

- How will Greece ensure that future inventories produced by a different organization will meet the guidelines for national system (which are currently in place for the inventory prepared by NOA) in terms of transparency, accuracy, completeness, consistency and comparability.
- Could the ERT meet during this week the personal with current technical responsibility for inventory preparation.

Part II

Abstract from presentation on National System held on 27 April 2007 during the in-country review 23 – 28 April 2007 in Athens

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Institutional Arrangements

Single national entity with overall responsibility for the inventory:

Ministry for the Environment, Physical Planning & Public Works

Responsibility is defined in the Law 3017/2002 with which Greece ratified the Kyoto-Protocol. This law empowers the Ministry for the Environment to co-ordinate all climate change issues all over the administration.

Institutional Arrangements

- Roles and responsibilities are defined and allocated:
 - National Institution with technical responsibility (currently: National Observatory of Athens, NOA)
 - Mandated through the Ministry for the Environment by a contract
 - · Estimation of GHG Emissions/removals
 - Compilation of the National Inventory reporting Format tables
 - · Improvement of the existing inventory system



NOA contract has finished and it is not yet decided how to proceed

- · National Center for the Environment
 - Responsible for National Registry
- Other governmental and private organizations
 - · Data providers for the greenhouse gas inventory

Procedures for official approval

 Process for official consideration and approval of the inventory is defined

It lies within the responsibility of the Ministry for the Environment

A Committee has been set up within the Ministry:

KEY Issue

Names and positions of this Committee not yet known

Inventory preparation process

The inventory preparation process is well defined

NOA has the central position in the preparation process



NOA contract has finished and it is not yet decided how to proceed

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National System of Greece

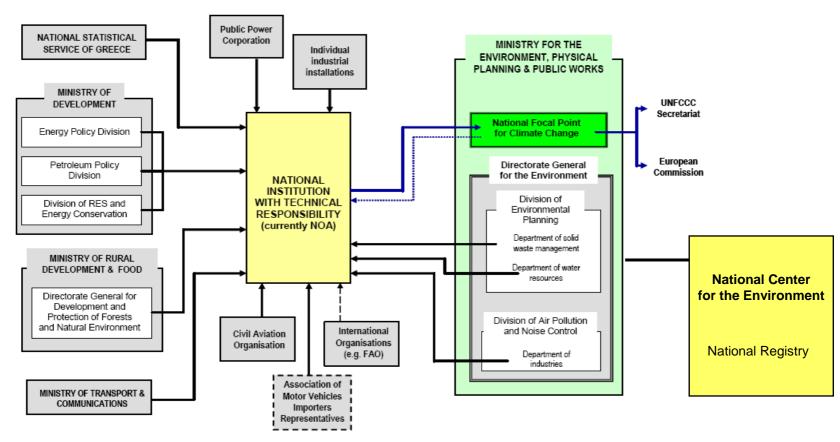


Figure 8 Current organizational structure of the national inventory system

Questions 1 and 2

- 1. Under Decision 19/CMP.1 each Party shall establish and maintain the institutional, legal and procedural arrangements necessary to perform the functions defined in the guidelines for national systems. What will be the nature of such arrangements in relation to the continuity of the inventory preparation process?
- 2. In case of selection of a different institution responsible for technical inventory preparation, could Greece describe its detailed plan for the transfer of the knowledge from NOA to that organization?

Questions 3 to 5

- 3. How will Greece ensure that future inventories produced by a different organization will meet the guidelines for national system (which are currently in place for the inventory prepared by NOA) in terms of transparency, accuracy, completeness, consistency and comparability?
- 4. Could the ERT meet during this week the personnel with current technical responsibility for inventory preparation?
- 5. The ERT would like to have a list of the members (name and position) of the Committee responsible for official consideration and approval of Greece's inventory?

Summary

- The ERT cannot yet decide whether Greece's national system meets or does not meet the requirements of Article 5.1 of the Kyoto Protocol. The answers on the questions formulated the 24 April 2007 by the ERT are a necessary pre-requisite for the decision
- Greece's greenhouse gas inventory is consistent with the UNFCCC reporting requirements and IPCC good practice

Answer by Greece 28 April 2007

- Overall responsibility by Ministry for the Environment
- 3-member committee of official approval named
- Technical responsibility lies within Division of Atmospheric Pollution Control
- No information on involved personnel, technical competence of personnel, arrangements for knowledge transfer from old to new team
- No possibility to meet the technical experts

 Answer not satisfactory for ERT (general answer, no details given)

Part III

Potential problems and further questions formulated 28 April 2007

at the end of the in-country review

Situation

- Mr. P. Zikos, Head of Atmospheric Pollution Control Division, on behalf of the Ministry for the Environment, Physical Planning and Public Works stated on 28 April 2007 that the national institution with the technical responsibility for the compilation of the annual inventory lies with the Division of Atmospheric Pollution Control within the Ministry for the Environment.
- Mr. P. Zikos also stated that an essential feature of the past contract with National Observatory of Athens was the transfer of knowledge to the Ministry and to build up the Ministry's capacity.

1. Potential problem

Figure 8 (p. 22) of initial report describing the National System does not reflect the current situation in Greece, regarding the planning, preparation and management of the GHG inventories.

Recommendation by the ERT:

Provide the revised organizational structure which replaces the structure on page 22 of the Initial Report and give a short description of the structure.

2. Potential problem

Responsibilities for the technical preparation of the inventory within the Division of Atmospheric Pollution Control were not clarified during the visit of the ERT. The ERT was not able to meet the personnel of the Division of Atmospheric Pollution Control responsible for technical preparation of GHG inventories during the review week, despite a specific request by the ERT.

Recommendation by the ERT:

Provide the organizational structure for the technical inventory preparation within the Division of Atmospheric Pollution Control and inform on arrangements for technical competence of the staff involved in the inventory preparation process, for example, the CRF Reporter Manager (named National Inventory Compiler), the experts for Energy, Industrial Processes, Agriculture, Waste, LULUCF, and the designated QA/QC Manager, and how the knowledge from NOA to the Division of Atmospheric Pollution Control has been transferred.

Answer Greece on 8 and 12 June 2007

New organisational structure presented (Ministry for the Environment, Physical Planning & Public Works replaces NOA)

General Structure of Directorate General for the Environment presented

Copy of text of 28 April 2007 delivered

Conclusion of ERT:

The ERT would welcome the information not contained in the 8 June response (technical competence of staff involved, division of responsibilities between staff, description of how knowledge from NOA was transferred to the Division of Atmospheric Pollution Control

Answer Greece on 13 November 2007

General statements about overall responisibility, statements on contract details with NOA, description of decision of establishment of emission trading schemes

Technical responsibility with Ministry for the Environment

Mentioning of transition period which coincided with the incountry review

Proposition: "review is needed to be conducted in conjunction with the next annual inventory review, to assess the maintenance of the national system after the end of the contract with NOA (2007)

Conclusion of ERT:

Still no detailed information available on the questions raised by the ERT.

The ERT is not the board to decide on the above mentioned proposition

Submission of Greece 26 February 2008

First detailed description of the new national system

The national Technical University of Athens / School of

Chemical Engineering has the technical and scientific

responsibility for the compilation of the annual inventory

Personal review of submission:
Very good and comprehensive description of the system.
Good basis for solving the problem
Answers most the questions.

But, I can nothing say about the capacity of the new team to do the job. This would be the task of a future review

Potential Follow-up

Additional in-country review after the new team has submitted an inventory. ERT must have the possibility to discuss with new team.

The review has to check the following important points:

- Does the new team has full information from the old team
- Assess the capacity of the team
- Check consistency of emission time series (most important point)
- Look for an inventory development plan as tool for continuous improvement
- Check documentation in the NIR (deficits / improvements compared to the old NIR)
- Check QA/QC processes implemented by the new team.