

**ҚАЗАҚСТАН РЕСПУБЛИКАСЫ
ЭКОЛОГИЯ
ЖӘНЕ ТАБИҒИ РЕСУРСТАР
МИНИСТРЛІГІ**



**МИНИСТЕРСТВО
ЭКОЛОГИИ И ПРИРОДНЫХ
РЕСУРСОВ
РЕСПУБЛИКИ КАЗАХСТАН**

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**Mr. Paulette Bynoe
Chairperson of the
Enforcement Branch
Compliance Committee of
the Kyoto Protocol**

Ref: Clarifications and additional information on the questions of implementation of the Doha amendment

Dear Mr. Paulette Bynoe,

Ministry of Ecology and Natural Resources of the Republic of Kazakhstan (hereinafter – the Ministry) in accordance with the letter of Compliance Committee of the Kyoto Protocol dated 24 March 2023, the Ministry of Ecology and Natural Resources of the Republic of Kazakhstan would inform the Compliance Committee about the decision of the Republic of Kazakhstan not to ratify the Doha Amendment.

The Ministry also sends the clarifications and additional information on implementation issues that are directly related to the adoption and implementation of the Doha Amendment and other measures within the framework of Plan to the Enforcement branch of the Compliance Committee of the Kyoto Protocol.

Attachment: on 7 pages.

Best regards,

Vice-Minister

 **M. Oshurbayev**

Information on the questions of implementation in the frame of the acceptance and implementation of the Doha amendment under the Plan to the Enforcement branch of the Compliance Committee of the Kyoto Protocol

Reference 1

The ERT concluded that Kazakhstan did not provide the Standard Electronic Forms (SEF) tables for 2013-2017 and other relevant information on accounting for Kyoto Protocol units required in accordance with paragraphs 12-18 of the annex to decision 15/CMP.1 in conjunction with decision 3/CMP.11 and in decision 3/CMP.11, with paragraph 13 in particular.

Comment of the Party:

Since there are no projects in Kazakhstan within the framework of these mechanisms, the SEF 2022 tables filled with “NO” notation keys.

The Party did not provide information on Kyoto units and other relevant information on accounting for Kyoto Protocol units in 2023 due to lack of the projects in Kazakhstan within the framework of these mechanisms on Kyoto units and decision of the Republic of Kazakhstan not to ratify the Doha Amendment.

In connection with the above information, the Party asks the Compliance Committee to accept this reference as resolved.

Reference 2

The National registry was not established at the time of submission of Kazakhstan report in order to facilitate the calculation of assigned amount under the Kyoto protocol or during review (verification), i.e. in 2017, regarding the existence of a national registry, the ERT also noted the mandatory requirement set out in paragraph 1 (m) of Annex I to decision 2/CMP.8 that Annex I Parties that do not have a target for the Quantitative Control and Reduction of Emissions in the First Credit Period, include a description of the inventory in the reporting, in accordance with the provisions of decision 15/CMP.1 in conjunction with decision 3/CMP.11 in their reports to facilitate the calculation of the assigned amount in accordance with the Kyoto Protocol.

Comment of the Party:

Currently, the internal State Register is in operation for the purposes of implementing and maintaining the national Emissions Trading System.

The functioning of the State Register of Carbon Units is carried out in

accordance with Article 300 of the Environmental Code of the Republic of Kazakhstan (<https://adilet.zan.kz/rus/docs/K2100000400>) and the order of the Minister of Ecology, Geology and Natural Resources of the Republic of Kazakhstan dated July 14, 2021 No. 251 “On approval of the Rules for the formation and maintenance of the state register of carbon units” (<https://adilet.zan.kz/rus/docs/V2100023555>).

At the same time, due to the expiration of the Kyoto Protocol and the decision of the Republic of Kazakhstan about non-ratification of the Doha Amendment, the question is about the feasibility of development a Registry which requires a certain number of financial resources.

In this regard, the Party kindly asks the Compliance Committee to accept this reference as a resolved

Reference 3

The ERT noted that Kazakhstan did not provide a chapter or section related to KP-LULUCF reporting.

Comment of the Party:

The Republic of Kazakhstan has not ratified the Doha Amendment, which entered into force on December 31, 2020.

In connection with the above, it is not planned to provide information on chapters or sections related to KP-LULUCF reporting.

In connection with the provided information, the Party asks the Compliance Committee to accept this reference as a resolved.

Reference 4

The ERT noted that, in accordance with paragraph 25 of the annex to decision 2/CMP.7, “National inventory systems established in accordance with Article 5, paragraph 1, ensure that land areas subject to land use, land-use change and forestry activities are in line with paragraphs 3 and 4 of Article 3 are identifiable and information on these areas must be provided by each Annex I Party to their national inventories in accordance with Article 7.

The ERT also noted that Kazakhstan considered the reporting of KP-LULUCF activities in relation to lands at the national level (with reference to the map with national land cover), and not at the level of geographical boundaries, including land units on which KP-LULUCF activities are carried out.

Comment of the Party:

The Republic of Kazakhstan has not ratified the Doha Amendment, for the second commitment period under the Kyoto Protocol, the Country will not submit additional reporting on land-use activities in accordance with paragraphs 3 and 4 of Article 3 of the Kyoto Protocol.

At the same time, in order to improve the quality of information on the functioning of the national inventory system for the LULUCF sector, we provided information at the level of individual administrative regions by key categories (Forest land (F), Cultivated Land (C) in the NIR 2023 and we planned to provide the information in the subsequent NIRs.

In connection with the provided information, the Party asks the Compliance Committee to accept this reference as resolved.

Implementation measures under the Plan to the Enforcement branch of the Compliance Committee of the Kyoto Protocol

| № | Reference of ERT | Implementation of measures | Comments of the Party |
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| 1 | 2 | 5 | 6 |
| <i>Implementation of measures to address the references in accordance with the final Decision of the Enforcement branch (CC-2020-1-4/</i> | | | |
| 1. | Making adjustments to inventories in accordance with paragraph 2 of Article 5 of the Kyoto Protocol and its annexes regarding the assessment of greenhouse gas emissions from coking coal for 2013, 2014 and 2015. Kazakhstan should accept the ERT adjustments in accordance with document SS-2019-1-7 / Kazakhstan / EB dated June 26, 2019. | NIR 2023 contains a description of the estimated consumption of coking coal from 1990, including the period 2013-2015. The information of the estimated consumption of coking coal from 1990, including the period 2013-2015 is planned to provide in the subsequent NIRs of RK | The Party asks the Compliance Committee to accept this reference as a resolved due to the implementation of adjustments related to coking coal |
| 2. | The NIR did not include an action plan and information on its implementation to address issues related to the functions of the national system, in particular milestones and expected timelines for: (1) conclusion of additional agreements and mechanisms for improving interagency cooperation and support; (2) defining roles and responsibilities for QA/QA and data verification; (3) implementation of mechanisms for review, approval and signing processes | The NIR 2023 includes information about the functions of the national system in accordance with the Order of the Minister of Ecology, Geology and Natural Resources of the Republic of Kazakhstan dated February 22, 2022 No. 46 “On Approval of the Rules for Controlling the Completeness, Transparency and Reliability of the State Inventory of Greenhouse Gas Emissions and Removals ¹ . The Order containing measures to address issues related to the functions of the national system, includes next measures: (1) mechanisms for improving interagency | The Party asks the Compliance Committee to accept this reference as a resolved due to the development and approval of the Order and description of functioning of national system in the NIR 2023 in accordance with Order #46 |

¹ <https://adilet.zan.kz/rus/docs/V2200026905>

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| | | <p>cooperation and support;</p> <p>(2) defining roles and responsibilities for QA/QA and data verification;</p> <p>(3) implementation of mechanisms for review, approval and signing processes</p> <p>The information about functions of the national system is planned to provide in the subsequent NIRs of RK</p> | |
| <i>Implementation of measures in the frame of references, as part of the issues of the implementation of subsequent Reviews</i> | | | |
| 1. | <p>The NIR does not include the information on planned capacity building activities and progress on capacity building activities or specific arrangements for data sharing and data transfer.</p> | <p>NIR 2023 contains information about number of training seminars and trainings were held aimed at increasing the capacity of national experts with international consultants to improve national reporting in problem sectors.</p> <p>The information on planned capacity building activities and progress on capacity building activities is planned to provide in the subsequent NIRs of RK</p> | <p>In connection with the provided information, the Party asks the Compliance Committee to accept this reference as a resolved due to the information on planned capacity building activities and progress on capacity building activities in the NIR2023 and providing the information in subsequent NIRs of RK</p> |
| 2. | <p>The ERT noted that while the NIR included uncertainty estimates for the last reporting year and trends between the base year and the last reporting year, it did not include uncertainty estimates for the base year. The ERT also noted that the NIR (Section 1.6, page 31) indicates that Kazakhstan has used a 95 percent interval for estimating emissions uncertainty and that the uncertainty table is presented in accordance with Table 3.2 of the 2006 IPCC Guidelines (Volume 1, page 3.3 1); however, in accordance with Decision 24/CP.19 Annex I, paragraph 42, this information should be presented using Table 3.3 of the 2006 IPCC</p> | <p>The NIR 2023 provides uncertainty estimates presented by using Table 3.3 of the 2006 IPCC Guidelines in accordance with Decision 24/CP.19 Annex I, paragraph 42</p> <p>The uncertainty estimates in the frame of using Table 3.3 of the 2006 IPCC Guidelines is planned to provide in subsequent NIRs of RK</p> | <p>In connection with the provided information, the Party asks the Compliance Committee to accept this reference as a resolved due providing uncertainty estimates presented by using Table 3.3 of the 2006 IPCC Guidelines in the NIR2023 and providing the information in subsequent NIRs of RK</p> |

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| | Guidelines (Vol. 1, p. 3.42). | | |
| 3. | The NIR did not include a chapter on recalculations and planned improvements to the proposed scheme and general structure of the NIR contained in decision 24/CP.19. | The NIR 2023 includes a chapter on recalculations and planned improvements to the proposed scheme and general structure of the NIR contained in decision 24/CP.19. The chapter on recalculations and planned improvements will provide in subsequent NIRs of RK. | In connection with the provided information, the Party asks the Compliance Committee to accept this reference as a resolved due to providing chapter on recalculations and planned improvements in the NIR 2023 and providing the information in subsequent NIRs of RK |
| 4. | The NIR does not contain any information on actions taken to improve the inventory archiving system, or does not explain what actions were taken to improve access to archived information located in Almaty from remote locations (for example, Nur-Sultan) for inventory personnel and ERT during the country review. | The section 1.3 of the NIR 2023 has detailed information of improving the inventory archiving system The information on the actions of the party in terms of improving the inventory archiving system will provide in subsequent NIRs of RK | The Party asks the Compliance Committee to accept this reference as a resolved in connection with the provided information in the NIR 2023 and providing the information in subsequent NIRs of RK |
| 5. | The ERT recommended that Kazakhstan provide a communications plan to ensure that (1) requests made by the ERT for clarification of inventory information are received and transmitted in a timely manner; (2) the approval mechanism for responses (if applicable) is clearly described, including the respective roles and responsibilities; and (3) the response schedule was agreed between the approving agencies and the involved organizations. | The communication plan developed and presented in the 3-th and 4-th Progress report of the Republic of Kazakhstan under the Plan to the enforcement Branch of the Compliance Committee of the Kyoto Protocol. The communication plan includes a mechanism for approving responses to the ERTs with a clear description of roles and responsibilities, the agreed timelines for responses between the approving agencies and organizations. | In connection with the provided information, the Party asks the Compliance Committee to accept this reference as a resolved due to developed communication plan presented in 3-th and 4-th Progress report of the Republic of Kazakhstan under the Plan to the enforcement Branch of the Compliance Committee of the Kyoto Protocol. |
| 6. | The NIR 2019 did not contain information on minimizing adverse impacts or changes to this information, which is a mandatory requirement under Article 3, paragraph 14, of | The NIR 2023 includes information on minimizing adverse impacts or changes to this information, in accordance with the requirements of Article 3, paragraph 14 of the Kyoto Protocol in accordance | In connection with the provided information, the Party the Compliance Committee to accept this reference as a resolved due to information on minimizing adverse impacts in the NIR 2023 |

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| the Kyoto Protocol in accordance with decision 15 /CMP.1 in conjunction with decision 3 / CMP.11. | with decision 15 /CMP.1 in conjunction with decision 3 / CMP.11. The information on minimizing adverse impacts or changes to this information is planned to provide in subsequent NIRs of RK | and providing the information in subsequent NIRs of RK |
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