



To: Members of the of the enforcement branch
UNFCCC Compliance Committee
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Your correspondence:
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Vaduz
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Comments of Liechtenstein to the preliminary findings of the Enforcement Branch of the Compliance Committee of the UNFCCC

Dear members and alternate members of the enforcement branch

In reference to the notice regarding the adoption of a decision on preliminary findings and the preliminary finding on questions of implementation, we would like to herewith share some comments.

We would like to address the matter concerning the non-retirement of emission units required to ensure compliance with the Kyoto Protocol annex to second commitment period, decision 27/CMP.1. We acknowledge this deviation and wish to provide an explanation of the circumstances leading to this issue, as well as the corrective measures we aim to implement to prevent a recurrence.

Explanation of the Issue

During the second commitment period 1 558 77 t CO₂ eq emission units were not retired as required. This oversight occurred due to unforeseen internal challenges and administrative gaps outlined below

Challenges

The primary challenges that prevented us from retiring the units on time include:

- **Leadership Transition and Knowledge Gap:** No handover from the previous position holder to the current. The position was vacant for over five months, causing a significant loss of critical operational knowledge, which is now being systematically rebuilt.
- **Capacity Challenges:** At the time, the team lacked the necessary capacity and awareness regarding the unit retirement. The current team was wrongly assuming that retirement steps had already been carried out.

- **National Registry Changes:** Adjustments in the national registry system, including access issues to the national registry created further complexity in the management and retirement process.
- **Information and Communication Disruptions:** Disturbances in the flow of information and communication channels delayed timely actions.
- **Administrative Oversight:** The identification of responsible personnel was unclear, and arrangements for oversight were not sufficiently robust.
- We would like to note that at the end of the true up period there were enough Kyoto Protocol units for retirement in the national registry. However, the actual retirement was not done for the reasons explained in the previous paragraphs. During the reporting period, 1 558 77 t CO₂ eq emission units were not retired as required, although at the end of the TUP KP units in excess of 1 558 77 units were available for retirement in the national registry.

Corrective Actions and Future Compliance Measures

To address these challenges and ensure future compliance, we are preparing to take or have already undertaken the following actions:

- **Capacity Building:** Comprehensive training programs and capacity-building exercises have been initiated for our team to ensure awareness and readiness.
- **Knowledge Transfer and Documentation:** Clear handover protocols and process documentation have been implemented to preserve knowledge and ensure continuity during transitions.
- **Decision-Making and Oversight:** We have established clear chains of decision-making and accountability to prevent administrative delays.
- **Collaboration with the EU and UNFCCC:** As part of the EU registry, we are taking measures to set up a test environment to verify that the retirement process would be possible when the ITL would allow such retirement to take place.
- **Additional Capacity:** More staff resources have already been allocated to climate action, ensuring that no disruptions in information flow will occur in future.
- **Continuous Training:** Ongoing training and participation in fora such as the Annual Registry Systems Administrators Forum under the Kyoto Protocol for to ensure continued improvement.
- **Ensure that enough KP units valid for the commitment period are available for retirement.** As indicated in the section “Challenges” above, enough units were and still are available for retirement.

Conclusion and Next Steps

We take full responsibility for this issue and remain committed to rectifying the situation. Our corrective measures will ensure that the retirement process adheres strictly to compliance requirements in the future. Additionally, we are ready to take immediate action to retire the outstanding units once the ITL allows such retirement to take place.

We kindly ask for your understanding and support as we finalize these improvements. Please do not hesitate to contact us for further clarifications or additional information regarding this matter.

Thank you for your attention and consideration.

Yours sincerely,

Karin Jehle
UNFCCC Focal Point Liechtenstein