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Facilitative, Multilateral Consideration of Progress

A compilation of questions to - and answers by - [Switzerland](#) exported on
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Question by United Kingdom of Great Britain and Northern Ireland at Wednesday, 10 September 2025

Category: Assumptions, conditions and methodologies related to the attainment of its quantified economy-wide emission reduction target

Type: Before 10 September

Title: Question to Switzerland on the use of AI

Thank you, **Switzerland** , for the opportunity to comment on your 1st Biennial Transparency Report. In your review report, you noted the use of a pilot study using Artificial Intelligence to classify support provided for technology development and transfer or capacity-building. Can you share some successes and challenges of using AI to produce part of your report?

Answer by Switzerland

In its pilot study, Switzerland explored how artificial intelligence (AI) could support the classification of activities related to technology transfer and capacity-building. One clear success was the simplicity of getting started: with modern coding aids and cloud services, the technical environment was set up quickly, and first results were available within hours. The pilot also demonstrated that AI can process large amounts of project descriptions rapidly, and that it is possible to apply the Swiss definitions for technology transfer and capacity building in a consistent way. This generated interest not only internally, but also externally when shared in international peer-learning settings.

The main challenges faced were threefold. First, manual labelling was indispensable to evaluate and validate the AI outputs. Here, Switzerland found that even expert reviewers sometimes differed in their assessment of the same project, which made it difficult to establish a single ‘true’ label against which to measure the AI results. Second, ‘prompt engineering’, how instructions and questions are formulated for the model, had a strong influence on results, and finding effective formulations took considerable iteration. Third, the underlying project data are not always available in the same quality and format: while some descriptions are structured and well-documented, others are embedded in PDFs or even scans, if even available, which complicates automated processing.

Finally, an important remaining challenge is institutionalisation. While the pilot produced promising results, embedding such approaches into the existing data infrastructure and workflows is essential. Moving from a proof-of-concept to a

thoroughly tested and sustainable tool requires integration with existing systems, as well as clear governance and quality-control processes.

Overall, the pilot confirmed the potential of AI to enhance reporting processes, while highlighting that human expertise and institutional embedding remain crucial.

Question by European Union at Wednesday, 10 September 2025

Category: Progress towards the achievement of its quantified economy-wide emission reduction target

Type: Before 10 September

Title: Domestic reduction targets

In section IID on tracking progress Switzerland reported that under the Third Act the share of domestic reduction will be around 70 per cent. Though the process is ongoing, could Switzerland elaborate on domestic reductions targets that will support the implementation of its NDC?

Answer by Switzerland

Based on the expected effect of policies and measures, the share of domestic emission reduction should be around 70 per cent (emissions excl. LULUCF), as stated in II.D.1.4. Meanwhile, the CO₂ ordinances, which entered into force on 1 May 2025 states in Article 2a (https://www.fedlex.admin.ch/eli/cc/2012/856/fr#art_2_a) that the domestic emission reduction must be at least two thirds of the total emissions excl. LULUCF

Question by European Union at Wednesday, 10 September 2025

Category: All emissions and removals related to its quantified economy-wide emission reduction target

Type: Before 10 September

Title: LULUCF Projections

Under the WAM scenario Switzerland's total greenhouse gas emissions including LULUCF are projected to decrease to 69.4 per cent of total emissions of 1990. And the

WEM scenario including LULUCF total emissions are expected to decrease to 68.6 per cent by 2030, which is a minor difference. Also, you reported in your BTR section II.D.6 on the LULUCF policies, highlighting the forest Act and measures within the forest policy focusing on long-term strategy and more harvesting for the short term due to the maturity of the forests.

1. Could Switzerland elaborate on the parameters selected for the projection and the assumptions retained for the LULUCF sector?

1. Could Switzerland elaborate on the concrete additional domestic measures implemented to redSave draft question uce GHG emissions?

Answer by Switzerland

2. For the LULUCF sector, only projections for Forest land were made. The scenarios are described in Table 29 in the BTR. From this it becomes clear that for the modelling the relevant parameter varying between the three scenarios corresponds to the harvesting rates influencing the carbon stocks and carbon stock changes.
3. The additional measures under the WAM scenario will reduce possible GHG emission in the long term but increase them in the short term. The idea behind this scenario is to reduce excessively high carbon stocks in Swiss forests and to manage the forest in such a way that it becomes adapted to climate change. In this way, high GHG emissions from possible natural disturbances in the future (related to climate change) can be avoided or decreased. For a detailed description of the WAM scenario see Table 29 in Switzerland's BTR1. In the WAM scenario, a steep decline in carbon stocks is established through increased harvesting rates, to create forest stands with optimal conditions for adaptation to climate change and improving the resilience through natural regeneration or planting.
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Question by European Union at Wednesday, 10 September 2025

Category: Progress towards the achievement of its quantified economy-wide emission reduction target

Type: Before 10 September

Title: Domestic measures

In your BTR we read that you will “partly” use ITMOs to achieve its NDC 2030 target (see e.g. table 5 p. 53 or the box p. 54). In the Article 6 Technical Expert Review of its initial report, under item 18.A/4.F, where the Party has to demonstrate how its participation in the cooperative approach contributes to the implementation of its NDC and LT-LEDS and the long-term goals of the Paris Agreement, Switzerland was asked to provide more information and indicated the following: “By engaging under Article 6, the Party will ensure that it exceeds the ambition of its NDC, thereby contributing to the goals set out in its national Long-Term Climate Strategy. Furthermore, its engagement under Article 6 contributes to enhanced ambition within the country as well as in its partner countries, which indirectly contributes to implementation of the long-term goals of the Paris Agreement.” While we noted that the Article 6 TER team acknowledged this additional information as relevant to address the inconsistency found, we would like to know:

4. How did/will you assess/ensure that you will exceed the ambition of your NDC through Article 6 engagement?
2. Can you provide additional up-to-date information on the respective efforts between domestic emission reductions and ITMOs acquisition (what does “partly” mean?), as well as the level of the “exceedance” envisaged?
1. When do you plan to report the use of those ITMOs in your BTR?

Answer by Switzerland

As communicated in Switzerland’s BTR, Switzerland will partly use Article 6 to achieve the NDC 2030 target. What Switzerland meant to express during the review process in responding to the Article 6 Technical Expert Review (A6TER) Team was that by engaging under Article 6, Switzerland can exceed the level of ambition in its NDC that would have been achievable solely through domestic measures in Switzerland. It should be noted however that Switzerland’s bilateral agreements under Article 6.2 also allow for the authorization towards other international mitigation purposes. In this special case, the

ITMOs are not counted towards NDCs and as such constitute mitigation beyond the ambition of NDCs.

Switzerland has reached out to the UNFCCC Secretariat team coordinating the A6TER process to correct the first sentence of the cited quote from the review report, since it does not correspond to the information provided by Switzerland during the review process and must have been a misunderstanding.

As specified in the CO₂ ordinance, at least two thirds of the reductions for the Swiss NDC of reducing emissions (excl. LULUCF) by at least 50 per cent below the 1990 levels must be achieved domestically in Switzerland, while up to one third may be achieved abroad.

ITMOs will be reported once they are used by Switzerland, as required by the guidance. The number of authorized and transferred ITMOs under Article 6 to Switzerland is for now very limited, which is why Switzerland has not yet communicated any use of these ITMOs to date. Switzerland communicated the use of a multi-year budget corresponding to an average reduction of at least 35 per cent below 1990 levels over the period 2021 to 2030. This implies that for accounting purposes it does not make a difference in which year of the NDC implementation period from 2021 to 2030 the ITMOs are used.

Question by Denmark at Wednesday, 10 September 2025

Category: Progress towards the achievement of its quantified economy-wide emission reduction target

Type: Before 10 September

Title: Inconsistencies

1. How/when do you plan to address the inconsistencies identified during the Article 6 TER of your Initial Report, in particular on the most substantive ones:

– 18.H.1: How the cooperative approach ensures environmental integrity, including that there is no net increase in global emissions within and between NDC implementation periods;

- 18.H.2: How the cooperative approach ensures environmental integrity through conservative baselines and robust governance (as well as leakage prevention);
- 18.I.1: How the cooperative approach will minimize and, where possible, avoid negative environmental, economic and social impacts;
- 18.I.2: How the assessment of the impact of mitigation activities on human rights is made.

2. Do you think the resolution of these inconsistencies could lead to substantial changes in the content of the cooperative approaches and therefore in future BTR reporting?

Answer by Switzerland

Switzerland thanks the Article 6 Technical Expert Review (A6TER) Team for an open and constructive exchange on its first initial report in 2024. The review experience was one of mutual learning and improvement over time, enhancing everyone's understanding of the reporting provisions and how to respond to them in the clearest and most transparent way.

Switzerland will address the inconsistencies identified by the A6TER Team as part of the next submission of its updated initial report. The key request by the A6TER Team was to add additional context and specific information relating to the provisions, which Switzerland had shared during the review process. Switzerland will be happy to include this additional information in the next version of the initial report to further enhance the transparency and comprehensiveness of the reporting.

This will lead to changes in the content of the reporting, including in future BTR submissions, making it more detailed and comprehensive, but is unlikely to lead to changes in the implementation details of the cooperative approaches as they have been authorized.

Question by Denmark at Wednesday, 10 September 2025

Category: Progress towards the achievement of its quantified economy-wide emission reduction target

Type: Before 10 September

Title: Article 6 activities - AEF submission

In section II.A.8.2 of the BTR on Switzerland's arrangements for tracking internationally transferred mitigation outcomes, we read: *Switzerland has already submitted its initial report²⁴ under Article 6 to the UNFCCC Centralized Accounting and Reporting Platform (CARP)²⁵ and will submit its agreed electronic format (AEF) and regular information on its cooperative approaches as mandated under decision 2/CMA.326 as soon as the format has been agreed by the conference of the Parties serving as the meeting of the Parties to the Paris Agreement.*

At COP29 in November 2024, the CMA has requested that parties use the *updated draft agreed electronic format* in their submission of annual information (paragraph 19 of decision XX/CMA.6).

The draft AEF will only be updated, and potentially adopted as a final version, in November 2028, on the basis of a technical paper to be prepared by the Secretariat.

1. Do you intend to wait until 2029 to submit an AEF, or do you plan to submit some AEF sooner, using the draft version adopted in Baku?

2. In this case, when do you plan to submit your AEF?

Answer by Switzerland

Switzerland intends to use the updated draft agreed electronic format referenced in paragraph 19 and annex 2 of the CMA 6 Baku decision on Article 6.2. The reason why Switzerland did not yet submit its AEF in 2025 was that we were unable to provide the ITMO unique identifier with relevant serial numbers as these are currently not yet publicly available inside the Swiss Emissions Trading Registry. We could not rely on the ITMO unique identifiers based on the international registry either, since it is not yet available. We plan to submit the AEF including the relevant information on the ITMO unique identifiers in 2026.

Question by Republic of Korea at Wednesday, 10 September 2025

Category: Progress towards the achievement of its quantified economy-wide emission reduction target

Type: Before 10 September

Title: Projections – LULUCF, p. 117

Switzerland's WEM and WAM scenarios indicate an increase in emissions from the

LULUCF sector, which the Party explains as linked to strengthening forest climate resilience. Are there additional measures or plans under consideration to further manage emissions in this sector?

Answer by Switzerland

Indeed, the additional measures under the WAM scenario will reduce possible GHG emissions in the long term but increase them in the short term. The idea of this scenario is to reduce excessively high carbon stocks in Swiss forests and to manage the forest in such a way that it becomes adapted to climate change. In this way, high greenhouse gas emissions from possible natural disturbances in the future (related to climate change) can be avoided or decreased.

The adaptation to climate change includes a change in tree species, where needed. This will be effectuated mostly by promoting the wanted trees species by forest management.

Concerning the forest area: Swiss forest is already highly protected by law (see table 12 of Switzerland's BTR1: Ban on clearcutting, no deforestation unless it is replaced by an equal area of afforested land or an equivalent measure to improve biodiversity).

The strengthening of carbon storage in wood products and substitution effects is ensured by the Wood Action Plan (see table 12 of Switzerland's BTR1). Currently, a project is going on which investigates how all three climate services of the forest sector (sequestration in forest biomass, carbon storage in wood products and substitution effects) can be strengthened and which political instruments should be developed.

Question by Republic of Korea at Wednesday, 10 September 2025

Category: Progress towards the achievement of its quantified economy-wide emission reduction target

Type: Before 10 September

Title: PaMs – National Buildings Refurbishment Programme, p. 68

According to Switzerland's projections, the "National Buildings Refurbishment Programme" is expected to deliver the largest mitigation effect among the policies and

measures by 2025 and 2030 compared with 2020. Does this programme also cover private sector buildings? Could Switzerland provide examples of how this programme has been implemented and how its mitigation impacts have been quantified?

Answer by Switzerland

In Switzerland, still over a million buildings have insufficient insulation and are therefore in urgent need of energy-efficient renovation. In addition, about two-thirds of buildings are still heated using fossil fuels or conventional electricity. Accordingly, the national buildings refurbishments programme (see section II.D.2.4 in Switzerland's BTR1) in particular focuses on private sector buildings. Depending on the canton, the national buildings refurbishments programme provides subsidies to private individuals who reduce the energy consumption or CO₂ emissions of their properties. Subsidies are available for structural measures such as thermal insulation of the building envelope, replacement of fossil fuel or conventional electric heating systems with renewable energy heating systems or connection to a heating network, comprehensive energy-efficient renovations, renovations in larger stages and new buildings that meet a very high standard (Minergie-P). As explained in section II.D.2.4 in Switzerland's BTR1, the calculation of the mitigation impact is based on a model that assigns a CO₂ effect to each measure implemented. The respective numbers are then scale up based on the available and expected funds disbursed.

Additionally, the 'Impulse programme for the replacement of heat generation systems and energy efficiency measures' (see section II.D.2.9 in Switzerland's BTR1), effective from 2025, supplements the existing buildings programme by focusing on larger properties and apartment buildings. It aims to replace inefficient heating systems and improve energy efficiency, particularly in cases where cantonal support is insufficient.

Question by Republic of Korea at Wednesday, 10 September 2025

Category: Progress towards the achievement of its quantified economy-wide emission reduction target

Type: Before 10 September

Title: Use of ITMOs, pp. 53, 55

Considering that Switzerland's GHG emissions in 2021 and 2022 were reported to be higher than initially projected, and noting that the Switzerland will partly use ITMOs from

cooperation under Article 6, could Switzerland indicate whether it has a planned volume of ITMOs to be used towards achieving its 2030 NDC target?

Answer by Switzerland

The transport sector needs to compensate a given percentage of its fossil CO₂ emissions (see II.D.3.4 on page 80 of Switzerland's BTR1). Based on Article 89 of the CO₂ ordinance (https://www.fedlex.admin.ch/eli/cc/2012/856/fr#art_89), which entered into force on 1 May 2025, a minimum of 12 percent need to be compensated domestically, while the rest will be implemented through cooperative approaches under Article 6 of the Paris Agreement. The percentage to be compensated in total (i.e. domestically and through cooperative approaches under Article 6 of the Paris Agreement) is 25 per cent in 2025, followed by an increase of five percentage point each year up to 2030 (and thus reaching 50 per cent in 2030). According to current estimates, this should contribute a total of 23 million tonnes of ITMOs. In total, the share of domestic emission reduction must be at least two thirds of the total emission reduction (excl. LULUCF), as stipulated in Article 2a of the CO₂ ordinance (https://www.fedlex.admin.ch/eli/cc/2012/856/fr#art_2_a).

Question by Japan at Wednesday, 10 September 2025

Category: Progress towards the achievement of its quantified economy-wide emission reduction target

Type: Before 10 September

Title: Utilization of the ITMOs

Switzerland shows its intention to partly use internationally transferred mitigation outcomes (ITMOs) from cooperation under Article 6. Does Switzerland recognize any technical challenges regarding the reporting of ITMOs or corresponding adjustments in the future BTR? If challenges exist, could Switzerland share these challenges and explain how it intends to address them?

Related pages : p53

<https://unfccc.int/documents/6444912>

Answer by Switzerland

As Switzerland has not yet used ITMOs, there is no reporting experience. However,

Switzerland currently assumes that reporting should be feasible and will explain its considerations in footnotes to the respective CTF tables, if necessary.

Question by Japan at Wednesday, 10 September 2025

Category: Progress towards the achievement of its quantified economy-wide emission reduction target

Type: Before 10 September

Title: Support for CCUS and NETs under the Climate and Innovation Act

According to BTR1 (p. 66), the Climate and Innovation Act states that companies that have developed a net-zero roadmap and are ready to implement decarbonization measures can apply for financial support for technologies such as CCUS and NETs. Within this framework, could you provide specific details on the technologies the Swiss government supports and the scale of such support? Could you also share your way of thinking behind selecting the technologies and the development stage of the technologies eligible for support?

Related pages : p66

<https://unfccc.int/documents/644912>

Answer by Switzerland

The Climate and Innovation Act was adopted by popular vote on 18 June 2023. It entered into force together with the associated ordinance on 1 January 2025. It provides incentives for innovative technologies and processes by supporting measures or programmes implemented by companies committed to decarbonisation. The measures and programmes must be innovative, lead to a reduction in greenhouse gas emissions and meet the required criteria. A total of about 1.0 billion Swiss francs is available for these measures over a period of six years.

Applications for support must be accompanied by a roadmap. This must include a carbon footprint, a reduction target and a concrete plan of measures enabling the company or industry to plan its decarbonisation and reduce emissions to net zero by 2050 at the latest.

Financial support for projects and programmes may be granted based on a direct application (bottom-up approach) or by means of thematic invitations to tender (top-down approach). For the direct application, there is no exhaustive list of technologies that are supported, but rather a list of criteria that must be fulfilled to be eligible for funding. The criteria include the development stage of the technology and a minimal amount of greenhouse gas emission reduction or negative emissions that must be achieved per year. For technologies that capture CO₂ from point sources or the atmosphere (CCUS and NET) there are requirements for the source of CO₂ (only hard-to-abate fossil sources or biogenic and atmospheric sources are eligible) as well as requirements for the storage. The Swiss Federal Office of Energy has issued a specific call for tender in early 2025 which aims to promote measures that capture CO₂ at point sources or remove it from the atmosphere. The call covers several areas of application for CO₂ capture and its use or storage. In particular, it addresses projects that create synergies by combining several point sources or combining several energy sectors in the spirit of sector coupling. Overall, a budget of 100 million Swiss francs is reserved for the call.

In summary, the subsidy program aims to enable early adopters of innovative technologies in pursuing their path for decarbonization and does not per se fund the development or research into novel technologies.

Question by New Zealand at Tuesday, 09 September 2025

Category: Progress towards the achievement of its quantified economy-wide emission reduction target

Type: Before 10 September

Title: Implementation and monitoring of measures in the Swiss Forest Policy

Switzerland reports that measures under the Swiss Forest Policy are expected to contribute reductions of 1,200 kt CO₂-eq in 2020, 2025 and 2030. Could Switzerland provide more detail on how these measures are being implemented and monitored?

Answer by Switzerland

The value of 1,200 thousand tonnes of CO₂ equivalents refers to reductions resulting from substitution of other materials or fossil fuels (see footnote d in table 12 of Switzerland's BTR1). These substitutions effects impact emissions outside the land use, land-use change and forestry sector. While these indirect reductions are not included in

the modelling of emissions (see section II.F.4.4 of Switzerland's BTR1), the value of 1,200 thousand tonnes of CO₂ equivalents only includes the substitution effect and does not reflect the corresponding reduction of carbon storage by the forest.

The strengthening of carbon storage in wood products and substitution effects is ensured by the Wood Action Plan (see table 12 of Switzerland's BTR1). This is a policy package implementing the Swiss Forest Policy in the area of better use of the wood harvest potential. Primary fields of action are 'Swiss wood value added' and 'climate-appropriate buildings'.

Currently, a project is going on which investigates how all three climate services of the forest sector (sequestration in forest biomass, carbon storage in wood products and substitution effects) can be strengthened and which political instruments should be developed.

Question by New Zealand at Tuesday, 09 September 2025

Category: Progress towards the achievement of its quantified economy-wide emission reduction target

Type: Before 10 September

Title: Interaction between emissions trading scheme and CO₂ levy

Switzerland reports that companies participating in the emissions trading scheme are exempt from the CO₂ levy. Could Switzerland share further details on the how these two instruments interact and/or complement each other?

Answer by Switzerland

The CO₂ levy primarily targets fossil fuels used for heating and small installations, whereas the emission trading scheme focuses on larger industrial sources. In this way, the two instruments cover different parts of the emission landscape. The CO₂ levy creates a price signal, while the emission trading scheme sets a cap and allows trading of emission allowances, enabling an efficient allocation of emission reduction efforts. By exempting participants of the emissions trading scheme from the CO₂ levy, companies are not subject to both the levy and emissions trading obligations at the same time. Energy-intensive companies could be disadvantaged in international competition by high levies. Exemptions (see also section II.D.1.8 'Negotiated reduction

commitments (for exemption from the CO₂ levy)' in Switzerland's BTR1) or participation in the emission trading scheme with free allocations or benchmark-based regulation help to mitigate competitive disadvantages.

Question by Canada at Wednesday, 03 September 2025

Category: All emissions and removals related to its quantified economy-wide emission reduction target

Type: Before 10 September

Title: New technologies in GHG Inventory development

How have you been able to leverage new technologies such as artificial intelligence to improve GHG inventory development?

Answer by Switzerland

Switzerland does currently not use artificial intelligence to prepare its greenhouse gas inventory. However, artificial intelligence supports the classification of activities related to technology transfer and capacity-building (see also Switzerland's answer to the question of the United Kingdom of Great Britain and Northern Ireland entitled 'Question to Switzerland on the use of AI').

Question by Canada at Wednesday, 03 September 2025

Category: All emissions and removals related to its quantified economy-wide emission reduction target

Type: Before 10 September

Title: GHG Inventory methodologies and mitigation measures

What processes do you have in place to ensure inventory methodologies effectively reflect changes in activities/practices resulting from mitigation measures?

Answer by Switzerland

Most mitigation measures in the energy sector will lead to changes in total fossil energy consumption. As Switzerland does not have domestic fossil fuel production, any changes to total fossil energy consumption will be reflected in the import statistics of

fossil fuels and thus in the energy statistics which are the foundation of the energy sector emissions. For mitigation actions in e.g. the IPPU sector, the largest emitters are covered by the emissions trading system, where strict monitoring protocols apply that are then used for the greenhouse gas inventory as well. For other emissions, Switzerland tries to align the inventory methodology with parameters used to monitor implementation of the mitigation measures. For example, the use of nitrification and urease inhibitors in agricultural fertilizers is monitored under the emission reduction projects used for the mandatory compensation of CO₂ emissions from motor fuel use (see also section II.D.3.4 of Switzerland's BTR1). The mitigation effects of emission reduction projects need to be substantiated by scientific evidence and sound quantification. If the requirements are met, the emission estimates in the GHG inventory are adjusted based on the validated monitoring protocols of the emission reduction projects.

Question by Canada at Wednesday, 03 September 2025

Category: All emissions and removals related to its quantified economy-wide emission reduction target

Type: Before 10 September

Title: Archiving system of GHG Inventory

Could you please give a brief overview of key processes part of your national GHG inventory archiving system that support its efficient maintenance?

Answer by Switzerland

Our national GHG inventory archiving system ensures transparency, consistency, and institutional memory by systematically storing all input data, methods, assumptions, and results in a secure and retrievable way. Key processes include standardized data collection and documentation, clear records of methodologies and revisions, and archiving of QA/QC procedures to ensure traceability. Efficient maintenance relies on user-friendly access, confidentiality management, and robust backup and preservation practices. Institutional arrangements, including defined roles and training, help sustain the system over time and ensure continuity despite staff changes, the latter being one of the major risks defined in our risk analysis performed under ISO 9001.

Question by Canada at Wednesday, 03 September 2025

Category: All emissions and removals related to its quantified economy-wide emission reduction target

Type: Before 10 September

Title: Quality management system of GHG Inventory

Could you please share some examples of good practices used to ensure that QA/QC checks are done thoroughly for all sectors as well as for cross-cutting areas of the GHG inventory?

Answer by Switzerland

Switzerland's quality management system is certified to comply with requirements defined in ISO 9001:2015. Here are some good practices we apply to ensure QA/QC checks are thorough across all sectors and cross-cutting areas in national GHG inventories:

- Clear timeline and communication, QA/QC schedules integrated into the inventory timeline; in person meetings of our core group, normally four times a year (timeliness)
- Using standardized checklists and IPCC methods, QA/QC officer sends reminders via email (comparability)
- Documenting QA/QC procedures and archiving records (transparency)
- Applying the same QA/QC checks across all sectors and over the full time series, e.g. visualisation of differences of latest versus previous submission's data (consistency)
- Run automated error detection, e.g. unit conversion errors (accuracy)