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SUBSIDIARY BODY FOR IMPLEMENTATION
Fifteenth session
Marrakesh, 29 October – 6 November 2001
Item 6 (b) of the provisional agenda

NATIONAL COMMUNICATIONS FROM PARTIES NOT INCLUDED IN ANNEX I TO THE CONVENTION

REPORT OF THE CONSULTATIVE GROUP OF EXPERTS TO THE SUBSIDIARY BODIES

Addendum

Submissions from Parties

1. At its fourteenth session, the Subsidiary Body for Implementation took note of the information contained in the preliminary report of the Consultative Group of Experts (CGE) (FCCC/SBI/2001/8). The SBI invited Parties to submit their views to the secretariat by 15 September 2001 on the preliminary report and the current progress of the process aiming at the improvement of guidelines for subsequent national communications of Parties not included in Annex I, in accordance with decision 8/CP.5 (FCCC/SBI/2001/9, para. 22).

2. Eleven such submissions received earlier are contained in document FCCC/SBI/2001/MISC.2. Another submission, from Brazil, was received later. In accordance with the procedure for miscellaneous documents, this submission* is attached and reproduced in the language in which it was received and without formal editing.

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

Brazilian Submission on Document FCCC/SBI/2001/8

Mandate of CGE

Decision 8/CP. 5 decides, in its para. 3, "also to establish a consultative group of experts on national communications from Parties not included in Annex I to the Convention with the objective of improving national communications from non-Annex I Parties".

The term of reference (TOR) in the annex to the Decision did not mention that the CGE should improve the guidelines of national communications from Parties not included in Annex I to the Convention. The TOR states that the CGE assessment of the national communications from non-Annex I Parties should be made in the light of decision 10/CP.2; according to item (c) of the mentioned annex, the CGE shall "consider, as appropriate, information in national communications from non-Annex I Parties in accordance with the guidelines for the preparation of initial national communication by Parties not included in Annex I to the Convention contained in the annex to decision 10/CP.2."

Lack of Representativeness and Meaningfulness of non-Annex I Parties that presented their National Communications Decision 8/CP. 5 says, in its para. 1 (c), "that a process of reviewing the guidelines for the preparation of national communications shall be initiated with the aim of improving them by the seventh session of the Conference of the Parties, taking into account information on the use of the guidelines contained in the compilation and synthesis report comprising a representative and meaningful number of national communications from non-Annex I Parties;"

Brazil draws the attention to the fact that a representative and meaningful number of non-Annex I Parties did not submit their national communications. Thus far, only 51 non-Annex I Parties submitted their national communications, calling the attention to the fact that the majority of them are low emitter countries. There is no attempt in the document to quantify the representativeness of the emissions of the 51 non-Annex I countries in the universe of non-Annex I Parties (around 150 Parties), as well as to disaggregate the emissions by gases or sectors.

From the 51 non-Annex I Parties that submitted their national communications we can indicate that:

only 10 countries of the 49 LDCs submitted their NC, representing 20% of the group;

only 11 countries of the 53 African countries submitted their NC, representing 21% of the group;

only 12 countries of the 42 non-Annex I Asian countries submitted their NC, representing 29% of the group;

only 14 countries of the 39 AOSIS countries submitted their NC, representing 36% of the group;

only 9 countries of the 20 Latin America countries submitted their NC, representing 45% of the group;

only 7 countries of the 12 former Soviet Union countries submitted their NC, representing 58% of the group.

Thus, a process of reviewing the guidelines for the preparation of national communications is premature, considering the context above described.

National Circumstances
The description of Energy, Transport, Industry, Mining, Waste, Agriculture, Forest and Land-Use sectors should not be made in the national circumstances, as suggested in the recommendation 192, considering that they might be addressed in the national greenhouse gas inventories.
In addition, the description of Tourism, Health and Environment should not be made in the national circumstances, as suggested in the recommendation 192, considering that they might be addressed in the vulnerability and adaptation assessment section. Moreover, the description of education and research institutions might be made in the sectors "Research and Systematic Observation" and/or "Education, Public Awareness and Training" in Part III of the national communications.

National Greenhouse Gas Inventories
The document emphasizes the recommendations for improving the UNFCCC guidelines and makes a poor analysis of the inventory as presented by the countries in the national communications. The reader cannot distinguish suggestions that were made during the workshops from facts extracted from the submitted National Communications (NC). There is no analysis of the adequacy of the use of the UNFCCC guidelines or the level of coverage of the different sectors and greenhouse gases in the National Communications of the 51 non-Annex I Parties. For instance, only 3 Parties presented Table II as requested under the UNFCCC guidelines. Although requested by the IPCC methodology (the methodology used by the vast majority of non-Annex I Parties), 15 non-Annex I Parties did not present data for agricultural soil emissions, a sector that is contributing with a large share of total N2O emissions in the vast majority of non-Annex I countries that have estimated such emissions. The recommendations from the workshops are already presented in the reports of the workshops. The report of the CGE should present new recommendations based on the analysis of the National Communications.
2. In the recommendations more emphasis should be given to actions to improve country-specific activity data and emission factors than to revise the guidelines. In fact, most of the shortcomes of the inventories that have been submitted are not related to a possible inadequacy of the guidelines but to inadequate and uncertain activity data and inappropriate emission factors. Most of the non-Annex I Parties that submitted their inventories complained about the lack of activity data and appropriate emission factors for the country. It is repeatedly said that the use of IPCC default values compromises the quality of the estimation and increases the uncertainty related to the estimations. The recommendation on the use of the 1996 Revised IPCC Guidelines, which have already been used by most of the 51 non-Annex I countries that submitted their NC, gives the wrong impression that the revision of the UNFCCC guidelines will improve the quality of the estimations or the availability of information.

It is quite uncertain that updating the guidelines at this point would lead to an improvement of the quality of reporting as shortcomes of the inventories are a consequence of methodological inadequacy, unavailability of activity data and inappropriate emission factors.
Item 194 reinforces this wrong idea stating that “the CGE recommends updating the inventory section of the UNFCCC guidelines in order to enhance the quality and the transparency of reporting”. Furthermore, changing the reporting guidelines would not necessarily improve the quality of inventories at all.

3. As mentioned above, there is no attempt to quantify the representativeness of the emissions of the 51 non-Annex I countries in the universe of non-Annex I Parties (around 150 Parties), neither to disaggregate the emissions by gases or sectors.
4. Most of the recommendations tend to increase the costs of the preparation of the inventory without any guarantee that new funding will be made available for the new mandatory requirements.
5. IPCC guidelines are not the only source of methodology for the preparation of national GHG inventories. Paragraph 8 of Decision 10/CP.2 says that "The Guidelines for the National Greenhouse Gas Inventories and Technical Guidelines for Assessing Climate Change Impacts and Adaptation or the simplified default methodologies adopted by the IPCC should be used by non-Annex I Parties, as appropriate and to the extent possible, in the fulfillment of their commitments under the Convention". These words were carefully chosen, taking into consideration the lack of activity data and local emission factors and the inadequacy of IPCC default values for non-Annex I Parties. In this regard, recommendation 195 should read, similarly to recommendation 196, as "Non-Annex I Parties should be encouraged to use, as appropriate and to the extent possible the Revised 1996 IPCC Guidelines in the elaboration and in the reporting of the national GHG inventories."
6. Item 197. This paragraph is misleading as most of the formats submitted by Parties can be understood as a modification of Table 2 as well. Table II of the UNFCCC guidelines is a simplification of summary table 7A of the IPCC guidelines and as such, a modification of such a table. In fact, the majority of the countries did not use neither Table 7A nor Table 2. The fact that Table 2 does not explicitly require N2O from agricultural soils and CH4 from waste to be reported does not prevented them to be reported by Parties that had that information. In contrast, the existence of a space in Table 2 to provide information on some important sectors does not prevent many Parties from reporting them. Actually, taking into consideration the "pure" IPCC format, only 7 Parties used explicitly Table 7A (Cuba, Israel, Lebanon, Moldova, Turkmenistan, Uruguay and Uzbekistan). On the other hand, only 3 Parties (Jordan, Samoa, Sri Lanka) used the "pure" Table II format. The cases in-between cannot be attributed to IPCC - sometimes are closer to table 7A, other times are closer to table II - but are different anyway and very specific new formulations. The example given in item 197 is prejudging the use of the methodology and does not refer to the guideline itself - different facts could be equally stated "For example, summary table 7A explicitly requires the reporting of emissions from agricultural soils and 15 non-Annex I Parties that have used Revised 1996 IPCC Guidelines did not estimate it. On the other hand, most of non-Annex I Parties that report emissions using table II presented estimations for CH4 from waste."
7. Item 201. There is no need to encourage the report on HFC emissions, as mentioned in the recommendation 201, considering that such emissions are not occurring in the vast majority of non-Annex I Parties and most likely will not be key sources to any non-Annex I country.
8. Item 203. Non-Annex I Parties should not be encouraged to present their GHG emissions and removals in CO2 equivalents, using GWP. In fact, Parties should be advised not to do so. Inventories aim to be the most possible precise annual balance of net anthropogenic emissions from each GHG. As so it will be invariant and independent of any aggregating factor that would be fixed depending on a specific objective at a certain point in time. Furthermore, GWP values depend on the horizon selected for each specific analysis that could be required and will most certainly be corrected by the IPCC in the future. UNFCCC Guidelines refer to reporting under the Convention and not under the Kyoto Protocol or any other instrument. If information for each gas is clearly reported, the Secretariat can always apply any appropriate aggregation factor in any analysis that it should be required to conduct and report. Moreover, there is no value added in requesting Parties to present CO2 equivalents, which is not

requested under Article 12 of the Convention. As presented in the Brazilian Proposal (http://www.mct.gov.br/clima/ingles/negoc/proposta.htm#Global) the current calculation is oversimplified (the IPCC GWP(t) is a special case where the temperature increase adjustment time constant tends to infinity, obviously a very strong assumption). In addition, there is no physical meaning or relevance in presenting the equivalence in terms of CO2 for a fixed period of time (20, 100 or 500 years) arbitrarily chosen in terms of radioactive forcing. These arbitrary conversion factors have been changed in all IPCC reports (first, second and recently in the third) and there is no consensus in their use.

6. The CGE report points out that "many problems were identified by Parties in the use of the Revised 1996 IPCC Guidelines. Most of these problems were related to land-use change and forestry sector (LUCF). Many countries reported that local classification of forests is different from the classification system contained in the IPCC Guidelines.

The Land-use Change and Forestry sector is pointed out as the sector with a relatively large degree of uncertainty associated with activity data and default emission factors and coefficients provided in the IPCC, which do not reflect well the national circumstances of most non-Annex I Parties. In addition to these issues, it is apparent from the inventories that the IPCC methodology has been applied in different ways by several non-Annex I Parties. No recommendation is made for this particular sector, which represents the main emission sector for some non-Annex I Parties. This is another example that CGE did not assess the quality of the inventories.

Vulnerability and adaptation assessment

As mentioned above, only 51 Non-Annex I Parties have presented their National Communications so far. The majority of such countries are either small islands, LDCs and/or African countries - the most vulnerable and prone countries to the impacts of climate change - but as recognized in the three regional workshops, they have faced huge difficulties in developing quantitative studies on vulnerability and adaptation.

There are too many uncertainties still regarding vulnerability and adaptation assessment, considering that science related to these issues is not very solid, generally based on assumptions. There are few GMCs models in the world, and most of them do not analyse the South Hemisphere. Models represent a pre-condition to develop a more serious vulnerability and adaptation assessment in non-Annex I countries.

Vulnerability and adaptation assessment are not mandatory according to Decision 10/CP.2, due to the lack of capacity of data, methodological constraints and human, financial and administrative constraints. A separated chapter on vulnerability and adaptation assessment within the national communications, as suggested by recommendation 206, should not be mandatory.

Countries should be encouraged to do so, if additional financial support is provided.

A common format, as indicated in recommendations 206, 207 and 208, is not requested even for Annex I countries. According to Decision FCCC/CP/1999/7, Annex I "Parties are encouraged to use the Intergovernmental Panel on Climate Change (IPCC) Technical Guidelines for Assessing Climate Change Impacts and Adaptation and the United Nations Environment Programme (UNEP) Handbook on Methods for Climate Change Impacts Assessment and Adaptation Strategies. Parties may refer, inter alia, to integrated plans for coastal zone management, water resources and agriculture. Parties may also report on specific results of scientific research in the field of vulnerability assessment and adaptation." Thus, these are unbalanced recommendations, considering that even Annex I Parties, which have financing and human capacity, are asked to use a common format.

In the recommendations more emphasis should be given to capacity building and data collection actions, than to revising the guidelines and reporting issues. In fact, most of the difficulties pointed out in the national communications that have been submitted are not related to the lack of the vulnerability and adaptation guidelines but to inadequate and uncertain data and inappropriate financing and capacity building processes.
The recommendations should promote and develop tools and methods for using socioeconomic scenarios within vulnerability and adaptation assessments, as long as financial resources and training are provided, as well as training for the use of (computer) models for V&A studies, considering that the non-Annex I countries do not have access to the mentioned models and adequate computers.
The recommendation on the establishment of specific guidelines on vulnerability and adaptation assessment gives the wrong impression that this measure will improve the quality of the assessments or the availability of information. The CGE report states that one of the major constraints related to the issue is that "there are scientific and technical problems in attempts to dissociate potential impacts arising from climate change (as defined by the Convention) from those that are due to natural climatic variability." Furthermore, establishing vulnerability and adaptation assessment guidelines would not necessarily improve the quality of the assessment.
Moreover, recommendations with a special emphasis on research and systematic observation needs for vulnerability and adaptation tend to increase the costs of the preparation of the national communication without any guarantee that additional funding will be made available for the vulnerability and adaptation assessment.

Abatement Analysis
After the celebration of the agreement on the Kyoto Protocol in 1997, mitigation analysis and assessment of abatement options involving developing countries should take into account the Clean Development Mechanism. According to the principle of common but differentiated responsibility, Brazil, as a developing country in an early stage of industrialization, does not have any commitment to limit or reduce its GHG emissions under the United Nations Framework Convention on Climate Change or its Kyoto Protocol. Nevertheless, Brazil is convinced that global warming is one of the major global problems of our times and proposed, during the elaboration of the Kyoto Protocol, in 1997, the establishment of a fund, which was afterwards modified into the Clean Development Mechanism. In the light of the precautionary principle, it is important that all countries start a process of emissions reduction, which will only take place in developing countries with the transfer of resources and advanced technologies, which would allow such countries to achieve sustainable social and economic development in order not to repeat the consumption and production patterns of developed countries, which represent huge emissions of greenhouse gases.
The availability of additional technological and financial resources will allow the Brazilian participation in the abatement of greenhouse gases without preventing investment in the social economic development and in poverty eradication, which has had and will continue to have absolutely priority in the near future.
The idea of the Clean Development Mechanism is that the private sector will lead the process, through the implementation of projects that otherwise would not take place due to the lack of technical capacity or adequate economic incentives. Under this view, projects will only be implemented if they are committed to environmental integrity and economic feasibility. Such investments will be essential to shifting consumption and producing patterns, the turning point towards a less GHG emitting world concerned with the reduction of adverse impacts in the future.

The recommendations go in the opposite direction: recommending the governments to carry out studies on abatement when, in practice, the private sector is already leading the process because of the opportunities under the CDM.

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