

16 April 2013

English only

UNITED NATIONS FRAMEWORK CONVENTION ON CLIMATE CHANGE

Subsidiary Body for Scientific and Technological Advice

Thirty-eighth session

Bonn, 3–14 June 2013

Item X of the provisional agenda

Views on and proposals or elements of proposals to address the implications of the implementation of decisions 2/CMP.7 to 4/CMP.7 and 1/CMP.8 on the relevant decisions adopted for the first commitment period and on any supplementary reporting tables required for the reporting of land use, land-use change and forestry activities under Article 3, paragraphs 3 and 4, of the Kyoto Protocol for the second commitment period

Submissions from Parties

1. The Subsidiary Body for Scientific and Technological Advice, at its thirty-seventh session, continued its consideration of the implications of the implementation of decisions 2/CMP.7 to 5/CMP.7 on the previous decisions on methodological issues related to the Kyoto Protocol, including those relating to Articles 5, 7 and 8 of the Kyoto Protocol.
2. The Conference of the Parties serving as the meeting of the Parties to the Kyoto Protocol, at its eighth session, invited Parties to submit to the secretariat, by 15 February 2013, their views on and proposals or elements of proposals to address the implications of the implementation of decisions 2/CMP.7 to 4/CMP.7, as well as those of decision 1/CMP.8, on the relevant decisions adopted for the first commitment period and on any supplementary reporting tables required for the reporting of land use, land-use change and forestry activities under Article 3, paragraphs 3 and 4, of the Kyoto Protocol for the second commitment period,¹ and it requested the secretariat to compile those submissions into a miscellaneous document.²

¹ Decision 2/CMP.8, paragraph 9.

² Decision 2/CMP.8, paragraph 10(e).

FCCC/SBSTA/2013/MISC.1

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3. The secretariat has received five such submissions from Parties. In accordance with the procedure for miscellaneous documents, these submissions are attached and reproduced* in the language in which they were received and without formal editing.³

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

³ Also available at <http://unfccc.int/documentation/submissions_from_parties/items/5901.php>.

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* This submission is supported by Albania, Croatia, Iceland, Montenegro, Serbia and the former Yugoslav Republic of Macedonia.

Submission under 2/CMP.8 paragraph 8 | March 2012

Implications of the implementation of decisions 2/CMP.7 to 4/CMP.7 as well as those of decision 1/CMP.8 on the relevant decisions adopted for the first commitment period and consideration of any supplementary reporting tables required for the reporting of land use, land-use change and forestry activities under Article 3, paragraphs 3 and 4 | SBSTA

I. Overview

This submission contains the views of the Australian Government on the implications of the implementation of decisions 2/CMP.7 to 4/CMP.7, as well as those of decision 1/CMP.8 on the relevant decisions adopted for the first commitment period and on supplementary reporting tables required for the reporting of land use, land-use change and forestry (LULUCF) activities required under Article 3, paragraphs 3 and 4 of the Kyoto Protocol for the second commitment period. Australia welcomes the progress made at the eighth Conference of the Parties serving as the meeting of the Parties to the Kyoto Protocol (CMP) in Doha on this agenda item.

Australia emphasises that there are a number of outstanding and new issues under this agenda item which require resolution for the continued smooth operations of Kyoto Protocol mechanisms and rules in the second commitment period.

Australia encourages Parties to focus on:

- identifying and implementing updates to relevant decisions adopted for the first commitment period, including new updates arising from decision 1/CMP.8;
- developing, in parallel with, and informed by, the work of the Intergovernmental Panel on Climate Change (IPCC), supplementary reporting tables for LULUCF; and
- agreeing to the form that updates to decisions will take.

II. Updating rules for a second commitment period in accordance with 2/CMP.8, paragraph 6

Australia's key priority is ensuring that the Protocol rules and mechanisms operate smoothly for the second commitment period.

Decision 1/CMP.8 gives considerable certainty to the obligations of Parties with commitments under a second commitment period. Parties must now consider what consequential changes are required to implement this decision, including ensuring the continuance of functions that will assist Parties that did not have a first commitment period obligation.

Australia considers that a number of issues should be given particular attention under this item, including the clarification of the operation of the previous period surplus reserve account to ensure consistent operation of this account for second commitment period Parties.

In addition to issues arising directly from 1/CMP.8, there are outstanding issues relating to decisions 2/CMP.7 to 4/CMP.7 to be addressed. In particular, Australia draws Parties' attention to issues raised in the Secretariat's technical paper provided in advance of the October 2012 workshop.¹ These include updates to decisions relating to reporting, review and adjustment.

In making changes, Parties should draw upon experience from the first commitment period to improve, to the extent possible, the efficiency and operability of the rules and mechanisms of the Protocol.

One area that will require an update, due to the IPCC updates to Supplementary Methodologies,² are the conservativeness factors as contained in Appendix III to decision 20/CMP.1. Based on experience from the first commitment period, Australia encourages Parties to implement a compliance regime which treats all sectors consistently. One approach to achieve this may be to remove the differentiation based upon uncertainty ranges and sectors, and apply a single conservativeness factor for all adjustments. This approach would remove the perverse situation whereby Parties are penalised disproportionately for errors in calculations that are recognised as less certain compared with those where the calculation is more certain (and where an error therefore would be more difficult to make).

III. Supplementary Reporting Table for LULUCF in accordance with paragraph 8 of 2/CMP.8

Parties have now agreed to updated rules for land sector accounting for the second commitment period of the Protocol.³ These rules must be reflected in updates to supplementary reporting tables for LULUCF activities under Article 3, paragraphs 3 and 4 of the Protocol for the second commitment period. The supplementary reporting tables should be informed by the IPCC revision and updates to Supplementary Methodologies, which is currently underway and scheduled for completion in 2013.

The IPCC revision and updates to Supplementary Methodologies are an essential input to the supplementary reporting tables. However, as Parties recognised in previous SBSTA sessions, in order to ensure the timely adoption of tables at CMP9, the development of reporting tables must occur in parallel to the IPCC consideration of Supplementary Methodologies.

Australia considers that progress on this work item may be facilitated through requesting the Secretariat to develop draft supplementary tables for consideration by Parties at the workshop referred to in paragraph 10(c) of decision 2/CMP.8.

In considering supplementary reporting tables, Australia urges Parties to consider formats which accurately capture the information required by decision 2/CMP.8. Tables for the second commitment period should

¹ FCCC/TP/2012/6

² 2/CMP.7

³ 2/CMP.7

maintain, to the extent possible, continuity with reporting formats used for the first commitment period, and seek a balance between transparency and cost-effectiveness.

IV. Approach

In Doha, Parties began the process of updating relevant rules adopted for the first commitment period for application in the second commitment period. These updates were made through the adoption of a new decision which annexed updated excerpts of text from first commitment period decisions.⁴

Australia considers it a matter of priority to agree to remaining changes arising from decisions 2/CMP.7 to 4/CMP.7, and new changes arising from 1/CMP.8. The required changes comprise two basic categories: mechanistic – for example, update references to ‘first commitment period’ with ‘second commitment period’ – and technical – for example, reflect the operation of the forest management reference level.

For mechanistic changes, Australia considers that an overarching paragraph will provide the most administratively simple format for updating first commitment period decisions. In other cases, where more complex or technical updates are required, changes are best made through annexing updated text from first commitment period decisions. Australia considers that the adoption of a new decision, which contains overarching updates combined with annexes containing updated text, is the most administratively simple approach to ensuring the smooth transition of all rules for the second commitment period.

V. Conclusion

Australia welcomes the progress made in Doha on this critical agenda item.

Australia notes the limited time available to resolve the outstanding issues, and the imperative to have rules in place in time for Parties to meet their reporting obligations and certainty regarding their obligations under the second commitment period.

Australia looks forward to working constructively with Parties throughout this year on the development of a comprehensive package of updated decisions to be agreed at CMP9.

⁴ Decision 2/CMP.8 Implications of the implementation of decisions 2/CMP.7 to 5/CMP.7 on the previous decisions on methodological issues related to the Kyoto Protocol, including those relating to Articles 5, 7 and 8 of the Kyoto Protocol

Paper no. 2: Ireland and the European Commission on behalf of the European Union and its member States

SUBMISSION BY IRELAND AND THE EUROPEAN COMMISSION ON BEHALF OF THE EUROPEAN UNION AND ITS MEMBER STATES

This submission is supported by Albania, Croatia, the Former Yugoslav Republic of Macedonia, Iceland, Montenegro and Serbia.

Dublin, 18 February 2013

Subject : Addressing the Implications of the implementation of decisions 2/CMP.7 to 4/CMP.7 and 1/CMP.8 on the relevant decisions adopted for the first commitment period

1. Introduction

CMP 8 invited Parties to submit views on and proposals or elements of proposals to address the implications of the implementation of decisions 2/CMP.7 to 4/CMP.7, as well as those of decision 1/CMP.8, on the relevant decisions adopted for the first commitment period, with the aim of finalizing its consideration and proposing for consideration and adoption by the Conference of the Parties serving as the meeting of the Parties to the Kyoto Protocol at its ninth session any changes to such decisions.

The CMP 8 on the *Implications of the implementation of decisions 2/CMP.7 to 5/CMP.7 on the previous decisions on methodological issues related to the Kyoto Protocol, including those relating to Articles 5, 7 and 8 of the Kyoto Protocol* addressed two key implications, namely:

- The submission date and contents of the report to facilitate the calculation of its assigned amount pursuant to Article 3, paragraphs 7bis, 8 and 8bis, of the Kyoto Protocol for the second commitment period which addresses related changes in relation to decision 13/CMP.1;
- The reporting requirements related to LULUCF activities under Article 3.3 and 3.4 of the Kyoto Protocol for the second commitment period which addresses related changes in relation to decision 15/CMP.1.

The CMP 8 decision also included an agreement that Decision 5/CMP.7 had no implication for the relevant decisions under this agenda item.

The outcome achieved in Doha was part of a work programme on these matters agreed at SBSTA 36 (Bonn, 2012), which included:

- A technical paper by the secretariat (available by 1 September 2012)
- A technical workshop (held in October 2012).

The SBSTA 36 work programme also included provisions for the continuation of work under this agenda item in 2013, with a view to adopting a decision on this matter at CMP 9. The detailed work programme for 2013 was specified in the decision taken in Doha and includes:

- submissions by Parties, by 15 February 2013 with views on and proposals or elements of proposals to address the implications;
- a workshop, to be held prior to SBSTA 38;
- a report on the workshop for consideration by the SBSTA 38;
- a 2nd workshop, prior to SBSTA 39 with the aim of facilitating the work on the common reporting format tables for land use, land-use change and forestry activities under Article 3, paragraphs 3 and 4, of the Kyoto Protocol;
- a report on the workshop for consideration by the SBSTA 39;

The EU has submitted detailed views on the implications of decisions 2/CMP.7 to 5/CMP.7 and on how to address such implications, in particular specific text proposals addressing implications for decisions 13/CMP.1, 15/CMP.1 and 22/CMP.1 which remain valid for the work ahead in 2013.

2. Approach

As highlighted in the report of the workshop held in October, the work should address on the one hand the essential changes arising from decisions taken at CMP 7 and CMP 8, but also improvements arising from the experiences with the implementation of the methodological decisions in the first commitment period.

The EU also highlights the large amount of technical implications that were already identified in the work in 2012 that have not yet been addressed – these implications are documented in the technical paper prepared by the secretariat in 2012, the report of the workshop held in 2012 and Parties' submissions.

The EU believes that the outcome of the work under this agenda item must be comprehensive, clear and user-friendly for those experts involved in the implementation of reporting at the national level as well as for the review experts. The EU still believes that for those methodological decisions for which substantial and material changes are required for the application in the second commitment period, new decisions with all necessary changes and amendments should be adopted for the second commitment period, while decisions adopted at the first session of the CMP should remain in place for the ongoing implementation of the first commitment period until the end of the additional period for fulfilling commitments (true-up period). This approach – the preparation of new decisions for the second commitment period - should be applied for example to the annexes to decision 14/CMP.1 (SEF tables), decision 20/CMP.1 (guidance for adjustments under Article 5.2, decision 22/CMP.1 (guidelines for review), and decision 6/CMP.3 (CRF for LULUCF).

These revised annexes should be attached to an overarching decision, addressing cross-cutting changes such as changes in references.

For those methodological decisions adopted at the first session of the CMP or any relevant COP decisions for which only references need to be updated (either references to the new amendments or references to new decisions for the second commitment period), an overarching decision could be adopted that specifies all changed references in all paragraphs of the respective decisions for the second commitment period.

For those decisions, for which implications were partly addressed in decisions adopted at CMP.8 and for which other changes are still outstanding (decisions 13/CMP.1 and 15/CMP.1), the EU would like to see consolidated documents that integrate all changes into one single guidance document after all necessary changes are adopted to achieve user-friendly documents for those experts that have to implement the accounting, reporting and review requirements.

For all decisions, it should also be clarified when the new decisions start to apply and when the decisions for the first commitment period will cease to be applicable (after the final compliance assessment for the first commitment period is completed).

In the EU's view in the first half of 2013, the work should focus on the outstanding technical issues for all decisions whereas the second half of 2013 should focus more on the GPG for LULUCF and CRF tables for LULUCF activities.

3. Decision 13/CMP.1 – accounting modalities

3.1. Implications previously identified¹ and not yet addressed in the CMP.8 decision:

The following issues have been raised in the technical paper and the EU submission in 2012:

- Modifications of references to Articles of the Kyoto Protocol consistent with the adopted amendments of these Articles agreed at CMP 8 (e.g. references to the assigned amount pursuant to Article 3, paragraphs 7 and 8, references to commitments inscribed in Annex B);
- Modifications to references to the Revised 1996 IPCC Guidelines for National Greenhouse Gas Inventories need to be updated with references to 2006 IPCC Guidelines, references to the IPCC work on the “2013 Revised Supplementary Methods and Good Practice Guidance Arising from the Kyoto Protocol”, the IPCC Guidance on wetlands and with references to Revised UNFCCC reporting guidelines on annual GHG inventories;
- Modifications to references to CMP or COP decisions;
- In paragraphs addressing the assigned amount calculation, the multiplication by 5 needs to be replaced with 8;
- The assigned amount calculation in paragraph 5 of the annex to decision 13/CMP.1 should include NF₃;
- Eligible LULUCF activities for the second commitment period do no longer comprise forest management that is a mandatory activity since 1st January 2013;

¹ These implications were identified by the technical paper of the UNFCCC secretariat or in the EU submission.

- The specification of all existing and necessary account types under paragraph 21 of the annex to decision 13/CMP.1;
- References related to the first commitment period need to be replaced where relevant (e.g. paragraph 25 of the annex to decision 13/CMP.1);
- Publicly accessible information and the recording and publication of serial numbers and transaction records should be modified slightly to achieve requirements that can be implemented.

For these implications, the EU already provided proposals for draft legal text in its submission in 2012.

3.2. Additional implications arising from decision 1/CMP.8:

The following implications arise from the CMP.8 decisions agreed in Doha:

Units from market-based mechanisms

According to Article 12bis, any units from market-based mechanisms to be established under the Convention or its instruments may be used by Annex I Parties to assist them in achieving compliance with their quantified emission limitation and reduction commitments under Article 3. In its submission in 2012, the EU already made specific text proposals for the implications of this provision in decision 13/CMP.1 (paragraphs 11, 12, 47, 51, 59, 62 of the annex to decision 13/CMP.1).

Increase of ambition

Paragraph 8 of decision 1/CMP.8 includes two provisions to enable an increase of ambition during the second commitment period:

1. The adjustment of the calculation of the assigned amount
2. Cancelling of a number of AAUs equivalent to the increase

Implementation of both options would need technical level changes in decision 13/CMP.1 and 14/CMP.1, e.g. in relation to the cancellation accounts.

Continued issuance of ERUs

Decision 1/CMP.8 requests SBI to consider modalities for expediting the continued issuance, transfer and acquisition of ERUs under Article 6 for the second commitment period. The EU is willing to engage in further work under SBI to ensure that the application of this recommendation secures integrity of the KP accounting and MRV system and provides sufficient incentive for Parties to ratify a second commitment period. As this mandate relates to SBI, the EU believes that the SBI should conduct this work and inform SBSTA about any additional technical implications of these discussions on the methodological decisions under Articles 5, 7 and 8, in particular on the accounting modalities.

Previous period surplus reserve

The establishment of a previous period surplus reserve in the national registry needs to be addressed in the accounting modalities of decision 13/CMP.1 and the data exchange standards for registries². This concerns inter alia

- Paragraph 11 and 12 on additions and subtractions from assigned amount;
- Paragraph 15 of the Annex to decision 13/CMP.1 on carry-over where the transfer to the previous period surplus reserve should be mentioned,
- the creation of a Previous Period Surplus Reserve Account in paragraph 21 specifying the account types;
- paragraph 47 related to the reported information;
- paragraph 62 related to the final compilation and accounting report

The EU submission in 2012 already addressed this issue and made specific draft proposals for legal text, which are still relevant. The EU submission in 2012 also clarified the relationship between additional provisions related to the previous period surplus reserve and the rules of the existing decision 13/CMP.1.

4. Decision 14/CMP.1 – SEF tables

Decision 14/CMP.1 on SEF tables should be revised in its entirety. A *mutatis mutandis* approach does not seem appropriate for reporting tables.

4.1. Implications previously identified and not yet addressed in the CMP.8 decision:

This decision has not yet been discussed and the implications raised in the EU submission in 2012 remain valid:

- The addition of a line for ‘wetland drainage and rewetting’ in the tables.
- Tables 1 and Tables 2(a): The EU would propose to add lines for all types of cancellation accounts (as specified in the proposal for a revised decision 13/CMP.1, paragraph 12)
- Table 3: the introduction of ‘replacement’ and ‘cancellation’ columns in this table

4.2. Additional implications arising from decision 1/CMP.8:

The following implications arise from the CMP.8 decisions agreed in Doha:

- The introduction of the previous period surplus account in the tables (paragraphs 23 to 25 of decision 1/CMP.1);
- The introduction of a cancellation account for cancelling AAUs equivalent to the decrease of a Party’s QELRC inscribed in the third column of Annex B in the SEF tables (paragraph 8 of decision 1/CMP.8) as well as in relation to Article 3, paragraph 7ter;

² In the view of the EU the revision of the data exchange standards is a task to be performed by registry administrator’s forum and is not part of this agenda item.

- Issuance, transfer or acquisitions of ERUs under Article 6 based on outcomes of the SBI agenda item addressed in paragraph 16 of decision 1/CMP.8.

These implications of CMP decisions adopted in Doha will also need to be addressed in the technical standards for registries. In the view of the EU this is a task to be performed by registry administrator's forum and is not part of this agenda item.

Additional technical work is necessary to revise the SEF reporting tables and the EU aims to provide input for such technical work for the first Workshop under this work programme in 2013.

5. Decision 15/CMP.1 – Reporting Guidelines

5.1. Implications previously identified and not yet addressed in the CMP.8 decision:

Reporting requirements related to LULUCF activities under the Kyoto Protocol were already agreed in Doha. In addition, the EU provided proposals for draft legal text in its submission in 2012 on other reporting areas. Additional changes compared to those already agreed in Doha are particularly necessary in relation to the following issues:

- In the decision and in its annex the references to the IPCC methodological guidance need to be updated to take into account the 2006 IPCC Guidelines, the IPCC work on the “2013 Revised Supplementary Methods and Good Practice Guidance Arising from the Kyoto Protocol” and the IPCC Guidance on wetlands.
- Updating of references to the assigned amount;
- Reporting of serial numbers;
- Reporting on national registries and national systems in annual inventories instead of the national communication.

For these implications, the EU already provided proposals for draft legal text in its submission in 2012.

In the 2nd half of 2013, the work on reporting tables for LULUCF activities under Articles 3.3 and 3.4 should be initiated and revised tables should be developed in parallel with the IPCC work on the “2013 Revised Supplementary Methods and Good Practice Guidance Arising from the Kyoto Protocol” to ensure that reporting tables and CRF reporter software are available for the first submission for the second commitment period. The EU will provide more specific views and proposals on the CRF tables for LULUCF activities later this year when the IPCC work on the “2013 Revised Supplementary Methods and Good Practice Guidance Arising from the Kyoto Protocol” and on wetlands will be more advanced.

5.2. Additional implications arising from decision 1/CMP.8:

The following implications arise from the CMP 8 decisions agreed in Doha:

- Reporting on other units from market-based mechanisms established under the Convention.

- The reporting on units from flexible mechanisms needs to take into account any changes in the accounting modalities in the annex to decision 13/CMP.1 that addresses the implications of the decisions taken in Doha.

6. Decision 20/CMP.1 – Good practice guidance and adjustments under Article 5, paragraph 2

This decision has not yet been discussed so far and the issues raised in the EU submission in 2012 remain valid:

- A revised decision related to adjustments taking into account the revised source categories and sectors agreed as part of the revision of guidelines for annual GHG inventories for Annex I Parties.
- There is also a need to revise the conservativeness factors in the Annex in order to make those consistent with the revised uncertainty estimates in the 2006 IPCC Guidelines.
- The decision should also be reassessed in line with existing experiences with adjustments.
- Updating of references to the 2006 IPCC Guidelines, “2013 Revised Supplementary Methods and Good Practice Guidance Arising from the Kyoto Protocol” and the IPCC Guidance on wetlands.
- Reflection of the use of reference levels for forest management in the second commitment period and technical corrections thereof and of provisions for natural disturbances and carbon equivalent forests, the inclusion of wetland drainage and rewetting, and the HWP pool.

Additional technical work is necessary to revise the categories and the conservativeness factors and the EU is aiming at providing input for such technical work for the first Workshop in 2013 related to this item. Potential additions to this guidance related to forest reference levels, may only be discussed in autumn together with the CRF tables for LULUCF when a more advanced version of the IPCC report is available.

7. Decision 22/CMP.1 – Review guidelines

7.1. Implications previously identified and not yet addressed in the CMP.8 decision:

This decision has not yet been discussed and the issues raised in EU submission in 2012 remain valid. In addition to the necessary revision of the guidelines for review under Article 8 for the second commitment period, the EU suggested some changes to address the current problems with the timing and availability of experts for the inventory review and the future situation with additional reviews of biennial reports which will put additional strain on the availability of review experts. We suggested a slightly modified approach for the second commitment period: the annual inventory review should consist of the initial checks, status reports and synthesis and assessment checks. The individual inventory review should only take place every second year (centralized and in-country reviews) and assess the two most recent inventory years in one review. In the first and the last year of the second commitment period, an individual inventory review should be undertaken for all Kyoto Parties to have a robust basis for the assessment of compliance for all Parties and an assessment of the recalculations due to methodological changes at the beginning of the commitment period.

The timing and procedure for the review of the report to facilitate the calculation of the assigned amount for CP2 needs to be established. Both the content and the timing of the provision of this report were revised at CMP 8 which now triggers consequential changes to the review guidelines. Without such changes the inventory review for the second commitment period cannot start.

In addition the following issues should be addressed:

- Review of the national registries: If registries continue to work without discrepancies and problems, there is no need for a comprehensive review in conjunction with the review of the reporting facilitating the calculation of the assigned amount for CP2. However, some Parties may only have commitments under the Kyoto Protocol in the second commitment period and still need to establish their national registries. In such cases a specific need for a comprehensive review arises, which should also be addressed in the revised guidelines.
- National systems no longer need a separate thorough review, but only a review of changes or in relation to problems that were identified for the national system during the inventory review. If new Parties join in the second commitment period, a thorough review of the national system should still occur.
- It is also important that the revision for the second commitment period takes into account the changes in the revised guidelines for the reporting of Annex I national GHG inventories such as the revised definition of the notation key ‘not estimated’ and related implications on the review guidelines.
- Updating of references (e.g. to IPCC source categories, other decisions, the Kyoto Protocol amendment)
- The coordination functions of the secretariat should be specified more clearly.

- The responsibility of the UNFCCC secretariat to conduct the initial checks and produce the synthesis and assessment report (currently the guidelines mention that the ERT should conduct these checks as a desk or centralized review);
- The SIAR reports prepared and provided by the UNFCCC secretariat should be mentioned as part of the review of registries
- The practice implemented in decision 10/CMP.6 to review small Parties with low emissions in a centralized review of national communications should continue in the second commitment period should be implemented in a general way in the guidelines.

For these implications, the EU already provided proposals for draft legal text in its submission in 2012. One of the additional issues that arise from the experiences with the implementation of the review in the first commitment period would be a clarification of the identification of questions of implementation in relation to the national system.

7.2. Additional implications arising from decision 1/CMP.8:

The following implications arise from the CMP.8 decisions agreed in Doha:

- Timing and implementation of the review of the report to facilitate the calculation of the assigned amount for the 2nd commitment period.
- Updating of references to the assigned amount.

8. Other areas

Decisions 18/CMP.1 (criteria for cases of failure to submit information related to LULUCF activities) may also require some changes, e.g. the mandatory nature of forest management in CP 2 needs to be reflected. As there is still on-going IPCC work related to LULUCF activities under the Kyoto Protocol by the IPCC in 2013, it is not a priority for the EU to address the implications on this decision in 2013.

Paper no. 3: Japan

Submission by the Government of Japan

Implications of the implementation of decisions 2/CMP.7 to 4/CMP.7, as well as those of decision 1/CMP.8, on the relevant decisions adopted for the first commitment period (12 March, 2012)

Japan welcomes the opportunity to submit its views on the implications of the implementation of decisions 2/CMP.7 to 4/CMP.7 as well as those of decision 1/CMP.8, on the relevant decisions adopted for the first commitment period, in response to the invitation in paragraph 9 of Decision 2/CMP.8.

Methodological issues relating to Articles 5, 7 and 8 of the Kyoto Protocol such as accounting methodologies, reporting requirements and review procedures are effective tools to tackle climate change. It is important to carry on the discussions for the continued functioning of these valuable tools in the second commitment period.

In order to implement fully functional and legitimate methodological rules for the second commitment period, Japan expects that SBSTA will build on the achievements at CMP8 on this issue and further proceed the work to make relevant CMP decisions operational.

1. Japan's comprehension of the Kyoto Protocol and CMP Decisions

- Article 7, paragraph 1 states that supplementary information shall be incorporated into the annual inventory of an Annex I Party “for the purposes of ensuring compliance with Article 3.” Therefore, Japan is of the view that, during the second commitment period, the Annex I Parties, which do not have a quantified emission limitation and reduction commitment (QELRC) inscribed in the third column of Annex B to the Kyoto Protocol, are not obliged to submit supplementary information required under Article 7, paragraph 1.
- Nonetheless, with regards to LULUCF rules, it was decided at CMP8 that during the second commitment period, all Annex I Parties including Japan will continue to incorporate supplementary information in their annual inventories, in accordance with Article 5, paragraph 2 of the Protocol.
- On the other hand, under Article 7, paragraph 2, supplementary information is to be incorporated by a Party included in Annex I in its national communication “to demonstrate compliance with its commitments under this Protocol.” In Japan's view, as long as a country is a Party to the Kyoto Protocol, even an Annex I Party that does not have a QELRC for the second commitment period is obliged to submit supplementary information under Article 7, paragraph 2 incorporating in its national communication. Japan is also of the view that all Annex I Parties are also subject to review of this information under Article 8 of the Protocol.

2. Review of supplementary information regarding LULUCF activities to be included in annual greenhouse gas inventories according to Decision 2/CMP.8, paragraph 4
 - Japan will account and report its emissions from and removals by the LULUCF sector based on Decision 2/CMP.7 and be ready to be reviewed on the reported information for 2013 and onwards. In Japan's view, it is important that this review is conducted in such a way that avoids duplication with other review processes (reviews for biennial reports and national communications) for the purposes of ensuring efficiency.
 - With regard to consideration of supplementary reporting tables required for the reporting of land use, land-use change and forestry activities as requested in paragraph 8 of decision 2/CMP.8, Japan supports initiation of the work at the earliest opportunity. As Parties will need to use any supplementary reporting tables in their preparation of GHG inventory reports starting from 2014, this work needs to be completed in time for such tables to be adopted at CMP9. Thus, the SBSTA is expected to allocate enough time to conclude the task as requested.
3. Submission and review of supplementary information other than that regarding LULUCF activities to be included in annual inventories
 - As a Party to the Kyoto Protocol, Japan intends to adhere to the rules of the Kyoto Protocol to the extent possible for the purposes of ensuring transparency. With regard to the submission of supplementary information other than that concerning LULUCF activities as part of annual inventories, there is no legal obligation for Parties who do not have a QELRC for the second commitment period, as already noted above. However, as a Party to the Kyoto Protocol, Japan is willing to voluntarily submit information, for the purposes of ensuring transparency.

Japan looks forward to engaging on these issues with other Parties, and reaching practical solutions with legal clarity at subsequent workshops, SBSTA38, and COP19/CMP9.

New Zealand submission to the Subsidiary Body for Scientific and Technological Advice

Further views on the implications of the implementation of decisions 2/CMP.7 to 5/CMP.7 on the previous CMP decisions on methodological issues related to the Kyoto Protocol, including those relating to Articles 5, 7 and 8 of the Kyoto Protocol, and on how these implications should be addressed.

February 2013

Introduction

1. This submission responds to the CMP.8 invitation to Parties to submit their views on, and proposals or elements of proposals, to address the implications of the implementation of decisions 2/CMP.7 to 5/CMP.7 on the previous CMP decisions on methodological issues related to the Kyoto Protocol, including those relating to Articles 5, 7 and 8 of the Kyoto Protocol, (draft decision - / CMP.8, paragraph 9).
2. We note the CMP has requested the secretariat to make these submissions available on the UNFCCC website and compile them into a miscellaneous document before the first technical workshop scheduled to happen before the thirty-eighth session of SBSTA this year.

Context

3. New Zealand welcomes the progress Parties made at Doha in identifying and addressing the implications of the implementation of decisions 2/CMP.7 to 5/CMP.7 on previous CMP decisions on methodological issues related to the Kyoto Protocol, including those relating to Articles 5, 7 and 8 of the Kyoto Protocol.
4. This submission highlights issues not resolved in Doha and provides New Zealand's further views on issues raised in the technical paper, at the workshop in Bonn in October 2012 and in the negotiations at Doha. We look forward to discussing the technical details at future technical workshops in Bonn and at the thirty-eighth and thirty-ninth sessions of SBSTA.
5. This submission builds on our previous submission for this work that was prepared in time for the technical workshop held in Bonn in October 2012 (http://unfccc.int/documentation/submissions_from_parties/items/5901.php).

Relevant issues

Reporting and review

6. The SBSTA and CMP8 did not have sufficient time in Doha to address adequately the implications of decisions 2/CMP.7 to 5/CMP.7 on the previous CMP decisions related to review guidelines under the Kyoto Protocol. It is important this work is addressed this year to allow Parties sufficient time to understand the reporting and review requirements prior to the first inventory submission under the second commitment period which is due in April 2015.

7. The revision of relevant methodological decisions related to the Kyoto Protocol provides Parties with an opportunity to use their experiences from the first commitment period and to streamline decisions where it makes sense to do so. Areas where this could apply are in national system and national registry requirements and the nature of reviews.

8. New Zealand notes the large review load for Annex I Parties, the Secretariat and reviewers that will occur over the 2014-2016 period with the final first commitment period inventory reviews, the true-up report and subsequent review and the 6th national communication and 1st biennial report reviews. There is justification for rationalising the overall review process and re-visiting the requirement for in-depth reviews of the initial reports.

9. In addition, New Zealand considers that the requirement for an in-depth review of the national system and national registry as part of the initial review for the second commitment period is not necessary. The national registry and national system were thoroughly reviewed during the initial review for the first commitment period and are regularly and comprehensively reviewed as part of the annual review process for national inventories. The resources that the Secretariat and Parties would need to expend to duplicate these processes are unlikely to result in any additional benefits.

Reporting requirements for Annex 1 Parties without a QELRC

10. In the second commitment period of the Kyoto Protocol there are now two groups of Annex I Parties that are party to the Kyoto Protocol: those with a QELRC and those without a QELRC but still with reporting requirements. There is a need to clarify which parts of the Kyoto Protocol reporting requirements are mandatory for Kyoto Protocol Parties without a QELRC and will thus be included in the review processes under the Kyoto Protocol during the second commitment period.

Registry

11. In relation to technical implication issues in decision 13/CMP.1, New Zealand welcomes the opportunity to review the requirements for publicly accessible information in light of Parties' experiences gained during the first commitment period.

12. New Zealand is a strong supporter of transparency but has some specific concerns with the amount of information related to individual accounts that is publicly available. A particular concern is information that could potentially present a security risk to the account-holder (e.g. phone numbers and email addresses), and information that may be commercially prejudicial to the account-holder (information relating to the types and amounts of units within an individual account). New Zealand supports a decision that addresses these concerns while ensuring sufficient public transparency.

Land-use, land-use change and forestry

Definition of 'reforestation' in the second commitment period

13. In relation to the definition of reforestation in the second commitment period (paragraph 59 of the technical paper (FCCC/TP/2012/6)), the UNFCCC Secretariat has previously advised that, based on decisions 16/CMP.1, 2/CMP.6 and 2/CMP.7, the definition of reforestation remains the same for the second commitment period. On that basis, the second sentence of decision 16/CMP.1, paragraph 1(c) should therefore read as "For the *second commitment period*, reforestation activities will be limited to reforestation occurring on those lands that did not contain forest on 31 December 1989".

14. Due to time constraints at Doha, however, the SBSTA was unable to complete its work on assessing and addressing the implications of the implementation of decisions 2/CMP.7 to 4/CMP.7 on the relevant decisions adopted for the first commitment period, including 16/CMP.1.

15. The definition of reforestation is an essential underpinning element for the completion of the current IPCC work to prepare the 2013 Revised Supplementary Methods and Good Practice Guidance Arising from the Kyoto Protocol, which will update Chapter 4 of the existing 2003 GPG-LULUCF to take account of decision 2/CMP.7, and it is unfortunate that this work was not completed in Doha.

16. To provide clarity, the definition of reforestation in decision 16/CMP.1 should be updated to ensure its continued application during the second commitment period. This should be addressed under the Article 5, 7 and 8 work programme as a matter of urgency, with a view to the SBSTA reaching an agreed conclusion at its thirty-eighth session in Bonn, for adoption at CMP.9 in Warsaw.

Common reporting format tables

17. New Zealand sees the agreement of the common reporting tables for land use, land-use change and forestry activities under Article 3, paragraphs 3 and 4 of the Kyoto Protocol as critical this year to enable the UNFCCC Secretariat sufficient time to integrate the tables into the current CRF Reporter upgrade and time for Parties to test the functionality of such tables.

18. New Zealand would strongly urge the SBSTA to address this work as soon as possible and suggests a work plan be agreed at the thirty-eighth SBSTA session that includes:

- A request the UNFCCC Secretariat to prepare draft CRF tables.
- The draft CRF tables to be input to the technical workshop.
- Confirm dates and venue for the technical workshop.
- Final CRF tables for adoption at CMP.9 in Warsaw.

19. New Zealand is of the view that the work on new CRF tables is crucial to enable Parties to report beginning in 2015, and that the LULUCF tables (Kyoto Protocol Article 3.3 and 3.4 activities) need to be integrated into the current CRF Reporter upgrade. New Zealand notes the current budget shortfall for completing the CRF Reporter upgrade. Budget needs for the LULUCF tables need to be identified early to enable the resources to be secured.

Conclusion

32. New Zealand looks forward to continuing to engage on these important issues with other Parties at the technical workshops and at thirty-eighth and thirty-ninth sessions of SBSTA this year.

SUBMISSION BY NORWAY ON THE IMPLICATIONS OF THE IMPLEMENTATION OF DECISIONS 2/CMP.7 TO 4/CMP.7, AS WELL AS THOSE OF DECISION -/CMP.8, ON THE RELEVANT DECISIONS UNDER THE KYOTO PROTOCOL, AND ANY SUPPLEMENTARY REPORTING TABLES UNDER ARTICLES 3.3 AND 3.4

Norway welcomes the conclusion of the work of the Ad Hoc Working Group on Further Commitments for Annex I Parties under the Kyoto Protocol, and the adoption of the second commitment period under the Kyoto Protocol. Norway appreciates the opportunity to submit views on the implications of the implementation of decisions 2/CMP.7 to 4/CMP.7, as well as those of decision -/CMP.8, on the relevant previous decisions under the Kyoto Protocol, and any supplementary reporting tables under articles 3.3 and 3.4.

Prior to Doha most of the outstanding technical issues were identified through the secretariats analysis, submissions by Parties, and work undertaken at a technical workshop in October reflected in FCCC/SBSTA/2012/INF.12. In Doha the Conference of the Parties serving as the meeting of the Parties to the Kyoto Protocol concluded the outstanding political issues relating to the second commitment period under the Kyoto Protocol, and progress was made on technical work through decision -/CMP.8 on the implementation of decisions 2/CMP.7 to 5/CMP.7 on the previous decisions on methodological issues related to the Kyoto Protocol, including those relating to Articles 5, 7 and 8 of the Kyoto Protocol (herein referred to as the CMP.8 decision on Implications). Further technical work must now be undertaken, to tidy up the decision set under the Kyoto Protocol. These consequential amendments will facilitate consistent implementation of national systems and registries, as well as reporting and review. We notice that some of the issues identified in FCCC/SBSTA/2012/INF.12 are now redundant, while a few other issues have arisen.

Implementation of decisions 2/CMP.7 to 4/CMP.7 and decision -/CMP.8

SBSTA 36 acknowledged the importance of the technical work for the implementation of the second commitment period under the Kyoto Protocol and noted that considerable amount of work had to be done. Substantial work was undertaken prior to SBSTA 37 in addressing the implications of the implementation of decisions 2/CMP.7 to 5/CMP.7 on the previous decisions on methodological issues related to the Kyoto Protocol, including those relating to Articles 5, 7 and 8 of the Kyoto Protocol.

The CMP.8 decision on Implications does not cover all the technical work needed to follow up decisions 2/CMP.7 to 4/CMP.7. Further technical work is therefore needed under SBSTA, building on the thorough work undertaken so far. The technical workshop to be held before SBSTA 38 will be useful in advancing and prioritizing the work in 2013. With regards to the architecture of a decision or decisions, Norway sees merit in option b in the secretariat's report from the workshop held in October 2012, an overarching decision including annexes, where there is need for substantial consequential changes. The overarching decision should include necessary changes of references for the second commitment period (one example is that references to the Revised 1996 IPCC Guidelines and IPCC Good Practice Guidance need to be changed to the IPCC 2006 Guidelines). For those methodological decisions that require substantial changes, these should be included as annexes.

The CMP.8 decision on Implications covers to a large extent the timing and content of the report to facilitate the calculation of assigned amounts, and information related to land-use activities under Article 3.3 and 3.4 to be submitted starting with the annual inventory for the first year of the second commitment period. This means that not all necessary elements of decisions 13/CMP.1 and 15/CMP.1 have been addressed and the remaining elements in these decisions should be given priority. The guidelines for review under Article 8 need to be updated for the second commitment period, priority should therefore also be given to decision 22/CMP.1.

Implementation of decision -/CMP.8 on Amendment to the Kyoto Protocol

Paragraph 28 of the decision -/CMP.8 on Amendment to the Kyoto Protocol pursuant to its Article 3, paragraph 9 (herein referred to as the CMP.8 decision on Amendment) reflects that this decision has implications that are relevant for SBSTA to consider. Among these issues are the increased ambition during the second commitment period, the previous period surplus reserve and the use of units from new market based mechanisms.

The technical workshop to be held before SBSTA 38 should identify all implications of the CMP.8 decision on Amendment and explore options on how to address them. The secretariat's report on the workshop should reflect the discussions on the implications of decision CMP.8 decision on Amendment.

Supplementary reporting tables for the reporting LULUCF activities under Article 3.3 and 3.4

Norway recognizes that there will be a need to revise the supplementary reporting tables for reporting of land-use, land-use change and forestry activities under Article 3, paragraphs 3 and 4, of the Kyoto Protocol for the second commitment period (hereinafter referred to as the supplementary reporting tables).

It is important that the timeline for revising these tables allows for finalization of the work and adoption of the revised tables by the Conference of the Parties serving as the meeting of the Parties to the Kyoto Protocol at its ninth session. This is necessary since the Parties will need the tables for reporting their annual greenhouse gas inventory in April 2015.

Norway recalls that SBSTA has ongoing work to revise the CRF tables in accordance with the revised UNFCCC Annex I reporting guidelines. The supplementary reporting tables will be one module of the CRF reporting software. It would therefore be beneficial if this work is seen in conjunction and are adopted at the same time, to allow the Secretariat to make only one final version of the software.

The work to revise the supplementary reporting tables also needs to be seen in conjunction with the ongoing work of the IPCC to review and, if necessary, update supplementary methodologies for estimating anthropogenic greenhouse gas emissions by sources and removals by sinks resulting from land use, land-use change and forestry activities under Article 3, paragraphs 3 and 4, of the Kyoto Protocol, on the basis of, inter alia, chapter 4 of its Good Practice Guidance for Land Use, Land-use Change and Forestry. According to the timeline for this process, the revised methodologies will be adopted at the IPCC Plenary in October 2013. Norway has noted that the revised methodologies also contain proposals for updated CRF tables for reporting under the Kyoto Protocol.

Norway welcomes the workshop for discussing the supplementary reporting tables to be held prior to SBSTA 39, and suggests that the workshop should be held after the IPCC Plenary in October. The updated tables suggested by the IPCC could then form the basis for the discussions at the workshop. Further, the workshop report would form an important basis for the final discussions at SBSTA 39.

When the revised supplementary reporting tables are adopted, such decision needs to replace decision 6/CMP.3 and its Annex containing the current version of the supplementary tables.
