

Submission by the Government of Japan

“Guidelines for the preparation of national communications by Parties included in Annex I to the Convention, Part I: UNFCCC reporting guidelines on annual greenhouse gas inventories” and the new common reporting format tables contained in annex I and II to decision 15/CP.17, and the upgraded CRF Reporter (April 2013)

The Government of Japan welcomes the opportunity to submit its views on the new “Guidelines for the preparation of national communications by Parties included in Annex I to the Convention, Part I: UNFCCC reporting guidelines on annual greenhouse gas inventories” (hereinafter referred to as “the UNFCCC Annex I inventory reporting guidelines”) and the new common reporting format tables contained in annex I and II to decision 15/CP.17, and the upgraded CRF Reporter. The submission consists of comments on main points of concern, and comments on more technical points or minor error corrections.

1. Main issues

I. General comments

The Government of Japan recognizes that the UNFCCC Annex I inventory reporting guidelines, especially the CRF Tables, and the CRF reporter, needs to be practical and accurate enough to develop appropriate inventories for the reporting. We look forward to refining the reporting guidelines through discussions already scheduled up to COP19, however, would propose that necessary technical improvements such as those spelled out in the "Features not implemented" section of the CRF reporter User Manual, and other issues raised through the Party's submissions will be continuously carried out after COP19, so that each Party can start reporting appropriately from April 2015.

II. CRF Tables

Energy

#	CRF Sheet	Modification needed	Rationale
1	Table 1.A(a) (s4/4)	Of the column for EMISSIONS/CO2/Amount captured in this Table, all mobile related rows should be colored grey. (Those rows in 1.A.c.ii, 1.A.c.iii should be grey.)	The Table lacks consistency.

IPPU

#	CRF Sheet	Modification needed	Rationale
1	Table 2(I)	This is a sub-category called SF6 and	It is probably a mistake during

		PFCs from other product use, therefore all cells for gases other than SF6 and PFCs should be colored grey.	preparation of the draft.
2	Table2(II)	The terms Unspecified mix of listed HFCs, and Unspecified mix of listed PFCs should be modified to Unspecified mix of HFCs, and Unspecified mix of PFCs	In order to be consistent with the terms in other sections
3	General	The GWP for PFC-9-1-18 is shown as >7500 in Annex III, therefore decision needs to be taken on how to calculate for this gas.	This issue has not been discussed.

Agriculture

#	CRF Sheet	Modification needed	Rationale
1	Table 3.D	Footnote (4) reads “, including NOx associated with the burning of savannas and crop residues,” but this should be modified to be “, <u>not</u> including NOx associated with the burning of savannas and crop residues.”	It is probably a mistake during preparation of the draft

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#	CRF Sheet	Modification needed	Rationale
1	Table 4D	As a general principle, Table 4D needs to be modified in line with the content of the Wetlands Guidelines.	The treatment of the Wetlands Guidelines will be determined at COP19.
2	Table 4D	Under the above premise, a subcategory “1.3 Other wetlands remaining other wetlands” will be needed under 4.D.1 Wetlands remaining wetlands.	The Wetlands Guidelines takes up wetlands that do not fall under peat extraction, or flooded land. Additionally, there are already rows in place for conversion to other wetlands in 2.3.
3	Table 4D	Columns for IEFs and Emissions of CH4 and N2O can be deleted from Table 4D.	There is an overlap with Table 4(II).
4	Table 4(II)	The emissions columns for 4D Wetlands overlap with the CH4 and N2O emissions cells in Table 4D.	See comment 3.
5	Table 4(II)	A sub-category “Other wetlands” is needed below Wetlands.	See comment 2.
6	Table 4(III)	The description in the 2006 Guidelines is ambiguous regarding whether or not N immobilization can be reported for carbon gain. A footnote is necessary. Additionally, this issue should be	The description in vol.4 page 11.15-16 of the 2006 Guidelines seems as if it targets emissions during losses, however the title in the CRF Table seems as if gains

		clarified with the IPCC.	are also targeted. In order to avoid any confusion during review, it is better to clarify it in the CRF sheet.
7	Table 4(IV)	Footnote (3) should be modified as follows: N mineralization associated with loss of soil organic matter resulting from change of land use or management on mineral soils in all land use categories.	It can be read that N emissions from organic soils are not the target for reporting here.

Waste

#	CRF Sheet	Modification needed	Rationale
1	Table 5.C	The grey coloring on the IEF and emissions cells of CH4 and N2O for Fossil liquid waste should be taken off.	There is possibility of CH4 and N2O emissions from incineration of fossil liquid waste

III. CRF Reporter

General

#	Sub-category	Modification needed	Rationale
1	General	Copy-and-pasting should be enabled for more than one cell.	Copy-and-pasting can only be done per cell.
2	General	Any modifications to the CRF Reporter from now on should be done by confirming that each modification made at the lower level of the CRF Reporter is reflected in the aggregation at higher levels.	In order to minimize mistakes in the final version of the CRF Reporter.

Energy

#	Sub-category	Modification needed	Rationale
1	1.A.2.g	There is now a new dropdown list under 1.A.2.g Other, however these classifications do not necessarily fit the realities of the Parties. In order to report by using detailed classifications as currently done, we would like to be able to freely add classifications to the dropdown list.	If the Reporter does not suit the realities of the Parties, reporting for Other probably will not be separated as classified in the dropdown list, but will be clustered together and reported under 1.A.2.g.vii 'Non-specified industry.'
2	1.A.2.g.iii	The sheet tabs in the exported excel sheets should be modified to be correct.	When exported, the names on the sheet tabs for Liquid fuels, Solid fuels, Gaseous fuels, Other fossil fuels, Peat, and Biomass are false.
3	1.AD	The formula in row L13 in fuel consumption should be modified to be	"L13=((L10*1000)/L1)/44)/12" is a mistake.

		“L13=((L10*1000)/L1)/44)*12.”	
4	1.B.2	Modification of the units for activity data for Oil – Exploration, Natural Gas – Exploration, Transmission and storage, Venting - Gas, is needed so that units such as number of wells drilled, and km can be used.	The units can only be chosen from PJ, 10 ⁶ m ³ , 10 ⁶ bbbl/yr, and the example such as number of wells drilled, and other units of choice cannot be entered.
5	1.D.1.b	The cell for Other liquid fuels in International navigation needs to be allowed for entering. It would be further useful if several different fuels could be added.	It says “Please specify,” however nothing can be entered. We would also like to add Kerosene, Fuel oil A, Fuel oil B, and Fuel oil C, but this cannot be done.
6	1.D.1.b	It should be modified so that the ratio of domestic and international activity of International aviation and International navigation is automatically calculated.	These activity data are already entered in other cells, therefore in order to avoid duplication of effort and mistakes, data entry can be avoided here.
7	General	It should be made possible that NOx, CO, NMVOC, and SO2 emissions be reported at the sub-category level (1A1a, 1A1b)	The CRF Reporter requires that these emissions be reported by fuel type, however the CRF Tables only require reporting at the level of 1A1a, 1A1b.
8	General (e.g. 1A1)	It should be possible for all sub-categories (e.g. 1A1, 30 worksheets) to be imported at once.	An error occurs when we try to import the whole of 1A1.
9	General (e.g. 1A1ai)	It should be possible for all sub-categories (e.g. 1A1ai, 6 worksheets) to be imported at once.	An error occurs when we try to import the whole of 1A1ai.

IPPU

#	Sub-category	Modification needed	Rationale
1	2B	Directly entering total emission data at the category level should be allowed. (The ‘disable aggregation’ function should be maintained.)	Similar to the current CRF Reporter, and in order to maintain the confidentiality of the sub-category level emissions when needed.
2	2F	Entry cells for manufacturing, stocks, and disposal should be added.	It is probably a mistake during preparation of the draft
3	2F1, 2F5	It should be possible to import data into the cells for emissions.	Importing is currently not possible.
4	2G1, 2G2	Entry cells for manufacturing, stocks, and disposal should be added.	It is probably a mistake during preparation of the draft
5	2G (e.g. 2G1)	It should be possible to import data into the cells for emissions.	Importing is currently not possible.
6	General (e.g.	It should be possible to import data into	Importing is currently not possible.

	2A, 2B3, 2B5, 2B8, 2C1 (but excluding 2B9))	the cells for activity data.	
7	General (e.g. 2D)	It should be possible to enter data into the cells for description of activity data.	Entering is currently not possible.
8	General	It should be possible to import data into at the category level (e.g. sector 2) and the sector level (e.g. 2A).	Importing data can only be done at the sub-category level (e.g. 2A1).

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#	Sub-category	Modification needed	Rationale
1	4A	It should be possible to enter data into the cells for Net CO2 emissions/removals in the 4A1 and 4A2 Carbon stock change sheets.	In order to be consistent with footnote (8) in CRF Table 4A.
2	4A1, 4A2	It should be possible to import activity data (N input from organic N fertilizers to land) from the excel files to the 4.A.1 Inorganic N Fertilizers, 4.A.1 Organic N Fertilizers, 4.A.2 Inorganic N Fertilizers, and 4.A.2 Organic N Fertilizers sheets.	When we enter data into the Excel sheets and import them back, the activity data is not reflected in the CRF Reporter. (It is reflected when done by direct entering or copy-and-pasting.)
3	4A1, 4A2	The results of automatic calculation should appear in the 4.A.1 Direct N2O Emissions, and 4.A.2 Direct N2O Emissions sheets of the CRF Reporter.	The data are entered into the sheets, however the automatic calculation results do not appear.
4	4B	It should be possible to enter data into the cells for Net CO2 emissions/removals in the 4B1 and 4B2 Carbon stock change sheets.	In order to be consistent with footnote (10) in CRF Table 4B.
5	4C	It should be possible to enter data into the cells for Net CO2 emissions/removals in the 4C1 and 4C2 Carbon stock change sheets.	In order to be consistent with footnote (10) in CRF Table 4C.
6	4D	It should be possible to enter data into the cells for Net CO2 emissions/removals in the 4D1 and 4D2 Carbon stock change sheets.	In order to be consistent with footnote (6) in CRF Table 4D.
7	4E	It should be possible to enter data into the cells for Net CO2 emissions/removals in the 4E1 and 4E2 Carbon stock change sheets.	In order to be consistent with footnote (7) in CRF Table 4E.
8	4F	It should be possible to enter data into the cells for Net CO2	In order to be consistent with footnote (6) in CRF Table 4F.

		emissions/removals in the 4F1 and 4F2 Carbon stock change sheets.	
9	4H 4(III)	It should be possible to freely name the new entry sheets when they have been added.	New sheets can be added by the function “add new child node,” but the titles are to be added from a dropdown list, and cannot be freely named. Additionally, the choices in the dropdown are 4E2.1 to 4, which is not appropriate here.
10	4F	The node title “4F3” should be modified to be “4(III),” similar to other categories.	It is currently difficult to recognize the titles.
11	4F	The node title “4F4” should be modified to be “4(V),” similar to other categories.	It is currently difficult to recognize the titles.
12	4H	A sheet for 4H 4(V) should show up on the screen.	Nothing currently shows up on the screen, even when the sheet has been selected.
13	4A-4F	The activity data cells need to be allowed for entry.	Nothing can be selected with “please specify,” nor can data entry be done.
14	4G	Although it is possible to add sheets to “Solid wood” under Approach A, B, and C, it is necessary to be able to choose titles from a dropdown list.	A dropdown list does not show up. Choices only show up when you type in S or W or O, and with other letters an error occurs.
15	4G	It is necessary to modify the summary sheet for CO2 so that the aggregation of the values in the lower levels shows up.	The aggregated value of CO2 does not show up.
16	4G	For Approach B, the aggregation results should show up for the lower levels.	Aggregation results do not show up for “Approach B”, “Approach B1,” “Total HWP from Domestic Harvest,” “Approach B2,” “Total HWP from Domestic Harvest,” “HWP Produced and Consumed Domestically,” and “HWP Produced and Exported.”
17	4G	It should be possible to enter activity data for years before 1990 in the CRF Reporter so to be consistent with footnote (3) of CRF Table 4G Sheet 2/2.	The CRF Tables only show rows for 1961 and onward, however the CRF Reporter only allows data entry for 1990 and onward. Footnote (3) of the CRF Table reads “Provide activity data from the first year for which they are available.”
18	4G	The lower levels (Dropdown list) of “Solid wood” and “Paper and paperboard,” of the Additional information for Activity data need to be	Nothing can be specified with “Please specify,” nor can data be entered.

		allowed entry.	
19	4(IV) below 4A and 4D	The entry sheet should be brought directly below 4, in line with the CRF Tables.	The CRF Tables do not require separate reporting by category.

Technical issues/Minor error corrections

I. CRF Tables

Energy

#	CRF Sheet	Modification needed	Rationale
1	Table1(s2/2)	The N2O cell in the B.2.a Oil row should be an automatic reference, and should be colored green.	It is probably a mistake during preparation of the draft
2	Table1.A(a) (s1/4)	The sentence “are considered, Parties should provide information on the allocation of these derived gases under the above fuel categories (liquid, solid, gaseous, biomass and other fuels) in the NIR (see also documentation box at the end of sheet 4 of this table).” needs to be legible at the end of the second Note below the Table in PDF format.	Letters cannot be seen when put into PDF format.
3	Table1.A(a) (s4/4)	The emissions columns for each fuel row in 1.A.4.b Residential should be colored orange.	These cells should show automatic calculation results of aggregation.
4	Table1.A(a) (s4/4)	The “Other liquid fuels” and “Other fossil fuels” of 1.A.4.cii “Off-road vehicles and other machinery” and ciii “Fishing” should be colored orange. (A total of four rows)	Each row already has an entry row below it.
5	Table1.A(a) (s4/4)	The sentence “i.e. CO2 emissions + amount captured” needs to be legible at the end of footnote (1) below the Table in PDF format.	Letters cannot be seen when put into PDF format.
6	Table1.B.1	The sentence “+ amounts of CH4 flared/recovered] / activity data.” needs to be legible at the end of footnote (1) below the Table in PDF format.	Letters cannot be seen when put into PDF format.
7	Table1.B.2	The sentence “i.e. CO2 emissions + amount captured” needs to be legible at the end of footnote (2) below the Table in PDF format.	Letters cannot be seen when put into PDF format.
8	Table1.B.2	The Emissions columns of 1.B.2.c Venting and flaring, Venting, and Flaring rows should be colored orange.	These cells should show automatic calculation results of aggregation.
9	Table1.C	The white cells in the Implied Emission Factors column need to be colored orange.	These cells should show automatic calculation results of the IEFs.
10	Table1.D	The sentence “where further information is provided.” needs to be legible at the end of footnote (1) below the Table in PDF format.	Letters cannot be seen when put into PDF format.

Agriculture

#	CRF Sheet	Modification needed	Rationale
1	Table 3.B(b)	A footnote that clarifies whether “Pit storage, deep bedding, poultry manure with and without litter, aerobic treatment” is included in “Other” should be added.	The relationship between “Other” and “Pit storage, deep bedding, poultry manure with and without litter, aerobic treatment” is ambiguous.
2	Table 3.B(b)	The footnote on Dairy Cattle reads “(3)” but it should be modified to be “(4).”	Typographical error.

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#	CRF Sheet	Modification needed	Rationale
1	Table 4	The cells “4E1 N2O,” “4E2 N2O,” “4F2 N2O,” ”4H CO2, CH4, N2O” should be colored green.	Since this is a sheet that shows automatic calculation results.
2	Table 4	The cells for 4G HWP CH4, N2O, NOx, CO, NMVOC should be colored grey.	Reporting of off-site non-CO2 emissions from incineration would be duplication in reporting with the Waste sector.
3	Table 4.1	Footnotes (2), (4), (5), (6), (7), (8) should be deleted, and references should be made to the definitions of land use categories shown in the 2006 Guidelines Volume 4 chapter 3 section 3.2. Or another option would be to add the second sentence from the description on Other land in the same section of the Guidelines, to footnote (8).	In order to avoid using terminology different from the 2006 Guidelines in the CRF Tables. Additionally, these footnotes are a simple repetition of definitions in the 2006 Guidelines, therefore lack in necessity.
4	Table 4.1	It is necessary to add a sentence at the end of footnote (3) indicating that Parties should use NA in the relative cells, in cases where they decide not to use the classification unmanaged land.	There is no reporting guidance given when the classification unmanaged land does not exist.
5	Table 4B	5B1 in footnote (6) and (7) should be modified to be 4B1.	Typographical error.
6	Table 4C	5C1 in footnote (6) and (7) should be modified to be 4C1.	Typographical error.
7	Table 4C	Footnote (6) should be deleted.	2006 Guidelines Vol.4 chp.6 6.2.1 also touches on estimation for herbaceous biomass, which causes contradictions with the footnote.
8	Table 4D	The row that reads “Drop down list” should be colored orange.	It is not a row for data entry.

9	Table 4E	Footnote (5) should be deleted.	The formula in the 2006 Guidelines Vol.4 chp.8 8.2.1.1 is described in a way that could include changes in herbaceous biomass, which causes contradictions with the footnote.
10	Table 4F	The column “Carbon Stock Change in living biomass – Net Change” should be colored orange.	Since it is a column that shows automatic calculation results.
11	Table 4(I)	It may be necessary to add wetlands categories in the Land-use category column.	The second order draft of the Wetlands Guidelines includes such a Table.
12	Table 4(II)	The cells for “Subdivision” and “Area” in the row directly above H. Other should be colored orange.	It is not a row for data entry.
13	Table 4(III)	In footnote (1), equation number 11.18 should be modified to be 11.8.	Equation number 11.18 does not exist in the 2006 Guidelines.
14	Table 4G	The row that reads “Drop down list” should be colored orange.	It is not a row for data entry.

Waste

#	CRF Sheet	Modification needed	Rationale
1	Table 5.B	The term Annual waste should be modified to be Annual municipal waste (or Municipal solid waste)	The term and definition of Annual waste is ambiguous.
2	Table 5.C	The term Annual waste should be modified to be Annual municipal waste (or Municipal solid waste)	The term and definition of Annual waste is ambiguous.

II. CRF Reporter

General

#	Sub-category	Modification needed	Rationale
1	General	For Methods and Emission factor information, alternative choices such as NA and OTH should be added.	In cases where notation keys are used for reporting of emissions, it is unclear what to choose, since there does not exist the option of NA.
2	General	It should be possible to adjust the width of the navigation tree so that the title of the tree can be seen.	There are cases where the tree title cannot be seen.

Energy

#	Sub-category	Modification needed	Rationale
1	General	When items need to be added to the Navigation tree on the left side of the Reporter, we are to use the right click and choose from Delete child node, Select row, Add new child node, Collapse children, however, Select row could be deleted.	Of the options Delete child node, Select row, Add new child node, and Collapse children, Select row is not functioning.

IPPU

#	Sub-category	Modification needed	Rationale
1	2E	The cells for gas consumption by species could be grouped in to gases (HFCs, PFCs).	In order to make it easier to see on the screen.
2	2F1, 2F5	Cells needed to be added for activity data, methods, and emission factor information	There are no cells for entry.
3	2F1	It should be possible to completely import into the recovery cells.	Importing is only partly possible.
4	2F5	It should be possible to completely import into the recovery cells.	Importing is only partly possible.
5	2G (e.g. 2G1)	It should be possible to import into the recovery cells.	Importing is not possible.
6	General	It should be possible to expand the interface of the CRF Reporter so that all years can be seen, if one's computer screen width allows it.	In order to make data entry easier.

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#	Sub-category	Modification needed	Rationale
1	General	It should be possible to export the Excel file for the whole sector (sub-tree), and after entering the data, import it back all at once, for all data. It seems as though importing is only possible at the below levels, and 4A seems to have the most problems: 4A1, 4A2 CF, 4A2 GF, 4A2 WF, 4A2 SF, 4A2 OF, 4A2 4(I), 4A2 (III), 4A2 (V), 4B, 4C, 4D, 4E, 4F.	Minimization of data entry time is necessary, since there is a time-lag before the Reporter shows the data entry screen again.
2	4A1	Of the categories listed in pages 21 to 24 of the User Manual, for the ones that are not from the dropdown list, data entry sheets should be prepared in advance.	Data entry sheets do not exist for the mentioned categories at present. It is possible to add them at the Party's choice, but it is better if they are prepared in advance.
3	4A2, 4D2	The sheet for 4(IV) should be brought directly below 4, in line with the CRF	To be consistent with the CRF Tables. Additionally, 4(IV)

		Tables.	includes lands other than Forest land and Wetlands for estimation, therefore the current positioning of the sheets are inappropriate.
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