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SUBSIDIARY BODY FOR IMPLEMENTATION

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Item 8 (a) of the provisional agenda

**NATIONAL COMMUNICATIONS FROM PARTIES INCLUDED
IN ANNEX I TO THE CONVENTION**

GREENHOUSE GAS INVENTORY DATA

**Views of Parties on difficulties with submitting greenhouse gas inventories
in a timely manner**

Note by the secretariat

1. The Subsidiary Body for Implementation, at its tenth session, invited Parties experiencing difficulties with submitting greenhouse gas inventories in a timely manner to provide submissions to the secretariat by 1 August 1999 describing the nature of these difficulties (FCCC/SBI/1999/8, para.17 (b)).
2. Four such submissions have been received in electronic form. In accordance with the procedure for miscellaneous documents, these submissions are reproduced as received and without formal editing.

FCCC/SBI/1999/MISC.6

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PAPER NO. 1: FINLAND

**SUBMISSION BY FINLAND ON BEHALF OF THE EUROPEAN COMMUNITY
AND ITS MEMBER STATES ON**

**THE NATURE OF DIFFICULTIES WITH SUBMITTING GREENHOUSE GAS
INVENTORIES IN A TIMELY MANNER**

Finland, on behalf of the European Community and its Member States welcomes the opportunity to clarify the nature of difficulties with submitting greenhouse gas inventories in a timely manner and to contribute information on this issue (FCCC/SBI/1999/L.5). General aspects related to this subject will also be included in a future submission on the characteristics of national systems by the EU.

The following examples have been experienced by some Member States and the European Commission. Possible solutions to problems are also discussed.

Data collection systems

Problems with data collection have been the main reason for difficulties faced by some Member States in submitting emission inventory data on time. Statistics in several sectors are in some cases available only with significant delays: for instance, energy statistics and fuel consumption data for the previous year are published in many cases at the end of the year, whereas industrial production statistics and agriculture and forestry statistics are generally published after two years or even more infrequently in some cases. Data collection requires time and personnel resources. Data on emissions from energy production and the use of energy for annual energy statistics are often collected from various sources. In order to improve air emission calculations it is necessary in many cases to:

- * enlarge and modernise the emission register data base of various institutes,
- * produce air emission data according to the standard industrial classification used in economic statistics,
- * improve computerised processing of emission data.

In some Member States new routines for the collection of activity data will improve the accuracy of future inventories. However, discontinuity and irregularities in time series on activity data can cause delay and require more work than originally expected.

Methodological aspects

The EU has identified some elements which need further clarification regarding the presentation of summary information on GHGs, detailed worksheets for fuel combustion, land-use change and the forestry sector, agriculture, and the submission of national inventories on these to the secretariat on an annual basis. These have been the cause of delays in some cases. We expect that the common reporting format will improve the situation in the future.

The EU hopes that Good Practice Guidance will help in the preparation of future annual inventories, for example by providing advice that may be relevant to data acquisition and the organisation of national inventory systems.

Future work

In the context of the revised European Council Decision 99/296 - for a monitoring mechanism on CO₂ and other greenhouse gas emissions - which entered in force on 1 May 1999, the Commission intends to discuss with Member States in the near future possible ways of submitting the European Community inventory to the UNFCCC secretariat on time, that is on 15 April each year. This implies that Member States will have to complete their own inventories by 31 December of the previous year.

PAPER NO. 2: JAPAN

**Submission on difficulties with submitting GHGs inventory
in a timely manner**

In replying the request in (FCCC/SBI/1999/L.5 of 8 June 1999) to provide a submission to the secretariat describing the nature of the difficulties with submitting emissions inventory data by 15 April, Japan submits the following comments:

1. Most of all statistics are prepared on Japan's fiscal year basis, *i.e.* April through March. The period of these statistics is 3 months behind the calendar year.
2. Inventory of Japan's GHG data is calculated with the best use of existing annual statistics such as Energy Balance Table, Emission Inventory Survey for Air Pollution Control, *etc.* These existing statistics have their own purposes apart from climate change such as analysis of energy balance and local air pollution control following Japan's fiscal year. Re-designing statistics system or having original statistics solely for climate change involves immense costs and human resources.
3. Some of annual statistic data, especially Emission Inventory Survey for Air Pollution Control, are not accomplished by the end of next fiscal year, namely the end of March. After getting statistic data, it takes 3 months to calculate GHGs emissions data for checking error strictly and recalculating them several times.
4. Japan is doing the best in preparing the inventory as early as possible, however, due to the above circumstances, Japan cannot submit inventory sooner than the end of July every year.

PAPER NO. 3: POLAND

**Comments to the document FCCC/SBI/1999/ L.5
(Annex I national communications. Inventory of national greenhouse gas data)**

Taking into account difficulties which are encountered in submission of national inventories in a timely manner (April 15th) Poland proposes to postpone this deadline to July 15. The rationale behind such proposal is that according to observed practice many Parties are not in position to submit their inventories reports in due time. Poland belongs also to this group of Parties. There are few reasons of such delay.

First is that official statistical data are available approximately with one year delay. It means that these works on inventory report may start at the best not earlier than in the second half of December.

Secondly financial resources for such works are submitted usually at the end of January, so in practice real works begin at the beginning of February. It means that for preparation of this report inventory team has no more than two months. To keep this deadline is in fact impossible taking into account necessity of verification of activity data and emission factors.

Proposed a new deadline does not disturb works of SBs and COP. Summary report on national inventories can be considered by the SBs during fall's instead of during summer sessions.

PAPER NO. 4: UNITED STATES OF AMERICA

U.S. Submission on “Describing the difficulties with Submitting Greenhouse gas inventories in a Timely Manner”

The United States believes that emissions inventories are the most important data needed for understanding the extent to which atmospheric concentrations of greenhouse gases are being altered anthropogenically. Provision of the emissions inventory is one of the most critical commitments under the UN Framework Convention on Climate Change. Inventory estimation and reporting will be equally, if not more, crucial under the Kyoto Protocol.

We strongly support the effort to improve inventory methodologies through the good practice effort underway in the Intergovernmental Panel on Climate Change. Similarly we are participating actively in the revision of the reporting guidelines for Annex I Parties now being discussed in the Subsidiary Body for Scientific and Technical Advice (SBSTA). In addition to this work, the United States feels that it is essential for the Parties to the UNFCCC to continually review and take steps to correct the problems faced by Parties in meeting their current commitments for timely and accurate reporting. In the most recent meetings of the subsidiary bodies, many Parties and observers commented at length about future needs for data and information but few commented on this most basic, fundamental issue already confronting the Parties.

The United States expected and experienced some delays in implementation of the 1996 IPCC revisions; hence our 1998 inventory was submitted some 6 months late. We continue to develop an estimate for CO₂ emissions and removals from soils due to agriculture. We anticipate having such an estimate in our next inventory, thus making the U.S. inventory complete and comprehensive.

We note that, as of the last meeting of the subsidiary bodies, a significant number of Annex I Parties (10) had not submitted their 1998 inventories. In addition, very few reports (16) had been submitted to the Secretariat in time for the 1999 deadline. Some of those Parties are in the midst of transition to a market economy. We appreciate the difficulties these Parties may face, including problems related to staffing and data collection. However, a significant number of those with late inventories are Annex II Parties. In addition, a number of Parties still have incomplete inventories. In some cases, entire gases or sectors are missing. These problems persist despite the fact Annex I Parties have been conducting emissions inventories since 1994.

Particularly with regard to Annex II Parties, we are extremely concerned about this recurring difficulty in reporting, not only on time, but also completely and in a transparent manner. We view this not only as a matter of meeting the commitments under the Convention but as a worrisome sign about the ability to meet potentially more stringent inventory and reporting requirements in the future.

To illuminate the extent of the problem, the next inventory summary report by the Secretariat should include information from all Annex I Parties, and if they have not reported information, that should be apparent from the gaps and blanks in the tables (similar to the

database summary tables on the web site). This report should not only cover those that have reported most recently, but track all of the data submitted – indicating where there are gaps, indicating when Parties have not provided submissions. Such a report would allow the COP to see what data is available, and make greater awareness of gaps – we would like the presentation to look more like tables in FCCC/CP/1998/11/Add.2, instead of the reporting tables in FCCC/SBI/1999/5.

We hope that other Parties' submissions to respond to this request will detail the institutional, financial and political impediments that Parties are experiencing, that result in incomplete inventory estimation and reporting. We hope that these submissions (and if not, future submissions or discussions) will provide details on the internal efforts by Annex I Parties to remove these impediments, as well as the assistance being provided by Annex II Parties to help other Annex I partners in meeting their inventory commitments. Annex I Parties could also suggest additional measures that Annex I Parties might take individually or collectively to resolve these problems.

Given the relevance of this issue to the future requirements of the Kyoto Protocol, we recommend that further consideration of inventory reporting problems be integrated with the Secretariat's ongoing work in two other areas: national systems for greenhouse gas estimation and capacity building needs of the mechanisms. Specifically, we note that the Secretariat will assess and report on existing national systems for the preparation of GHG inventories, including the special needs of economies in transition, as input to the development of guidelines for national systems. As part of this report, we suggest that the Secretariat examine the institutional problems encountered in the preparation and submission of inventories, taking into account the concerns raised by Parties. We also recommend that the Secretariat identify ongoing activities to improve Annex I Parties' capacity to prepare and submit complete greenhouse gas emissions inventories, and include these activities in the report to SBSTA12 on capacity building needs of the mechanisms.

On the basis of these submissions and the Secretariat report, Annex II Parties should be prepared to act to help to resolve these critical but solvable problems. Clearly Annex II Parties should bear the onus of correcting their own problems in fulfilling their commitments to produce timely and complete inventory reports. In addition, we would like to propose an Annex II initiative to support the efforts of Parties with economies in transition to fulfill this reporting commitment – this effort could be funded by the GEF, or from a contingency or voluntary fund.

The United States understands that EIT countries may need assistance in improving their greenhouse gas inventory capacities, especially in light of the recent changes to the inventory reporting guidelines. In the past, we have worked closely with several EIT countries through the U.S. Country Studies Program in preparing national greenhouse gas inventories. At this point, the needs of the EIT countries might be best served through a multilateral effort from the Annex II countries, assisted and coordinated through the FCCC Secretariat. We are prepared to participate in such an effort. Elements could include the following: technical support on new reporting guidelines and Common Reporting Format; preparation of training materials and software; development of web-based reporting and dissemination systems; and improvements in data management and archive systems.