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Item 4 (a) of the provisional agenda

METHODOLOGICAL ISSUES

GUIDELINES ON REPORTING AND REVIEW OF GREENHOUSE GAS INVENTORIES FROM PARTIES INCLUDED IN ANNEX I TO THE CONVENTION (IMPLEMENTING DECISIONS 3/CP.5 AND 6/CP.5)

Views from Parties on the proposals for revision of the guidelines on reporting and review of greenhouse gas inventories from Parties included in Annex I to the Convention

Addendum

Submission from a Party

In addition to the submissions included in document FCCC/SBSTA/2002/MISC.11 and Add.1, a submission from Spain on behalf of the European Community and its member States has also been received.* In accordance with the procedure for miscellaneous documents, this submission is attached and is reproduced in the language in which it was received and without formal editing.

* This submission has been electronically imported in order to make it available on electronic systems, including the World Wide Web. The secretariat has made every effort to ensure the correct reproduction of the text as submitted.

FCCC/SBSTA/2002/MISC.11/Add.2

BNJ.02-067

SUBMISSION FROM SPAIN ON BEHALF OF THE EUROPEAN COMMUNITY AND ITS
MEMBER STATES

**Revision of guidelines on reporting and review of greenhouse gas inventories from annex I Parties
to the Convention**

EU Comments to the Draft Revised CRF Tables (FCCC/SBSTA/2002/2/Add3)

Spain, on behalf of the European Community and its Member States, welcomes the elaboration of draft revised CRF Tables as contained in document FCCC/SBSTA/2002/2/Add.3. In this regard, the EU would like to reiterate its thanks for the work done by the Secretariat, the Chairman of the SBSTA and some selected experts.

Previous comments on the draft revised guidelines were included in a Submission by the EU. As announced in that submission, the EU has continued elaborating its views and is providing now further comments that are considered suitable to improve the draft guidelines.

General Comments

There were no macros, links nor autocompletion in the new electronic version (Excel® file), so it could not be checked whether obvious functionalities were available. Such functionalities could considerably improve the internal consistency of the CRF.

The intensive application of the IPCC good practice guidance in the revised CRF Tables contrasts with the recommended but not mandatory use of the IPCC good practice guidance in the Reporting Guidelines. The EU made a comment on this aspect in its previous submission.

In the Sectoral Background Data Tables, it would appear more logical to have the three basic fields in the order of emissions, activity data and implied emission factors. The current structure is more like calculation sheets. The alternative would make it more obvious that the implied emission factors are indeed implied by the other two items.

The footnotes are not repeated in all sheets of most tables of the CRF where this is relevant, and these footnotes are needed for clarity. Examples of this can be found in Table 1.A(a), Table 2(II), Table 2(II).F and Summary Table 1.A. In addition, there is inconsistency in the way footnotes are used in Tables with multiple sheets. In most cases, the reference numbering continues from sheet to the next, while in other (Table 2(II).F, Table 4) it starts from 1 again on the second sheet.

Finally, we would like to point out that we will not elaborate on Tables 5.A-D. In line with the conclusions of the expert meeting held in Bonn last December we consider appropriate not to revise these tables before the IPCC's ongoing work on LULUCF is finalised.

Specific Comments

Footnotes

The wording of the third sentence of the footnote regarding biomass in Table 1 and Summary Table 1.A, sheet 3, is a little ambiguous and it is not exactly in line with the IPCC Guidelines. A more complete wording might be:

"Amounts of biomass used as a fuel are included in the national energy consumption but the corresponding CO2 emissions are not included in the national total because the biomass production is assumed to be sustainable. If the biomass has been produced in an unsustainable manner, net CO2 emissions are accounted for as a loss of biomass stocks in the Land Use Change and Forestry Sector."

For completeness, this footnote should also appear in Tables Summary 1.B and Summary 2.

Documentation boxes

We believe that the wording of the general sentence used in many Documentation boxes:

"Detailed explanations on the energy sector can be found in section 5.1 of the NIR. If any additional information is needed to understand the content of this table, use this documentation box to provide references to the relevant section of the NIR where further details can be found."

Should be replaced by:

"Parties are to put detailed explanations on the energy sector in section 5.1 of the NIR. Use this documentation box to provide references to relevant sectors of the NIR if any additional information and further details are needed to understand the content of this table."

Table 1, sheet 2 of 2

Footnote reference (1) may be wrongly placed in '5.Other', because it refers only to Memo Items.

Table 1.A (a)

The implied emission factors for fuel groups (liquid, solid, gaseous, biomass and other) in Tables 1.A (a) sheet 1 through sheet 4 may be of very limited use for comparison purposes and for the review due to the potential number and diversity of fuels in these categories. In addition, the input here requires substantial preparatory aggregation and checking of activity data with consequent risk of error and a need for notes and explanations. It would be better if the sectoral background data tables for energy were structured to accept the data on the basis of individual fuels in the various sectors. Drop-down menus (replacing the lines for liquid, solid, gaseous, biomass and other fuels) could be used to select the fuels relevant to a particular Party. The current form gives little or no information on the actual emission factors used. Information compiled from drop down menus on individual fuels would be much more valuable for comparison and review purposes. The EU believes that the work with regard to the improvement of the review process should be further developed. Footnote reference (2) is not helpful in filling the CRF tables and is not specific to this table. It could be removed.

The text in the added row in sheet 2 (row below 'f. Other') would fit better in a footnote. It is unclear and inconsistent with other tables that for such explanatory text additional rows are added.

Lines to enter 'Other Fuels' in sheet 3 should be maintained for Railways and Navigation. The removal of this line (that was present in former CRF tables) is not an improvement. Although highly improbable it is not completely impossible to use biomass derivatives in this transportation modes. The inclusion of biomass under (b) of sheet 3 causes confusion as biomass could also be reported as other liquid fuels.

Table 1.A (b)

Replace “gas biomass” by “gaseous biomass” in the last row.

Table 1.A (c)

The column showing the percentage difference between energy consumption from the reference and sectoral approaches is seen as useful and should be kept. Nevertheless, in order to make energy consumption figures comparable in both approaches, the reference approach should not include biomass fuels as well as fuels used for non-energy purposes.

Table 1.B.1

Footnote (1) could be misleadingly interpreted as saying that Mining activities should be calculated based on the amount of fuel produced for Underground mines, and Post-mining activities should be calculated based on the amount of fuel produced in Surface Mines. This is not the aim of the footnote and contradicts the IPCC Guidelines. So, the footnote should be changed, deleting the word ‘respectively’.

Table 1.B.2

It should be explained why the shading for N₂O was removed for 1.B.2.a.

Regarding footnote (1), only International Standard Units should be allowed and doubtful units as billion (which varies among countries) should not be referred. Please remove ‘bill_ft^3_yr.’

Table 1.C

‘Marine Navigation’ should be changed to ‘Marine Bunkers’ for consistency with other tables.

Table 2(I)

In sheet 2, F.6, ODS should be spelled out.

Table 2 (I).A-G

All columns under emissions should have headings, footnotes do not seem to be appropriate as headings. Replace column title (net) by net emissions and column title (4) by recovery, oxidation, destruction or transformation.

We propose to remove shadings of cells for CO₂ emissions from Adipic Acid Production (Chemical Industry) and CH₄ emissions from Steel (Metal Production), since some EU Member States estimate these emissions.

Regarding footnote (5) on sheet 1, it is unclear how it relates to the way the table should be filled in. It seems to be a more general methodological advice, but those should be in guidelines, not in CRF tables.

Table 2(II)

Even with footnote (1), the column headings 'Other HFCs' and 'Other PFCs' could imply that the gases are not among those listed in the table, which is not intended. We propose to use 'Unspecified Mix of Listed HFCs' and 'Unspecified Mix of Listed PFCs', or similar notation, instead of 'Other HFCs' and 'Other PFCs' respectively.

ODS should be spelled out in sheet 1, F (a) 6.

In sheet 2, the second note in the documentation box is unclear. The NIR seems to be more appropriate for more detailed explanations on how confidentiality was addressed.

Table 2(II).C, E

All columns under emissions should have headings, footnotes do not seem to be appropriate as headings. Replace column title (net) by net emissions and column title (4) by recovery, oxidation, destruction or transformation.

Table 3

Removal of shading should be explained.

The footnote should be rephrased to refer that NMVOC should be converted to eq-CO₂ and added to the CO₂ column.

Table 3.A-D, 4.A, 4.B (a) and 4.B (b)

There are no emissions in these tables, this being inconsistent with other Sectoral Background Data Tables. The concept of implied emission factors is best suited to tables where they appear along with the emissions and activity data. In these tables it is not clear the definition of implied emission factors.

Table 4, sheet 2

The requirement to provide a reference to the NIR regarding background information on precursor gas estimates is not common to other Sectoral Report Tables.

Table 4.A

The table for additional information has a column without heading which should either be specified or deleted.

Footnote (1) is not necessary, as it is duplicated in the second note (c) of the documentation box.

Table 4.C

Regarding footnote (3), it is not clear where one should specify whether is dry or wet weight. It could be in the documentation box.

Table 4.D

N-fixing crops include also non-annual crops (such as carob tree – *Ceratonia siliqua*). Therefore “Nitrogen fixed by N-fixing crops cultivated annually” should change to “Nitrogen fixed by N-fixing crops”.

In the table for additional information it is not very clear what could be included as “Other (Please specify)”. It should be clarified whether it refers to other fractions.

The new title in row 2, “Pasture, Range and Paddock Manure” is no longer consistent with any headline in 1996 IPCC guidelines. Proposal to replace with “Manure from animal grazing”.

The note under the additional information box implies that country-specific values of the various fractions cannot be used, but this is consistent with allowed methodologies.

Table 5

The removal of the shading in the cells for CO₂ removals and net CO₂ emissions/removals under “5.B Forest and grass land conversion” should be clarified.

Summary Table 1.A

The removal of the shading in the cell for CO₂ removals of row “5.B Forest and grass land conversion” should be clarified.

For consistency, we propose to use ‘removals’ instead of ‘uptake’ in footnote (5) of sheet 2.

Also in sheet 2, new columns under CO₂ emissions/removals are included that actually contain references to footnotes. The columns do not have headings and it is unclear if, and which, data should be included there.

Summary Table 3

With regard to footnote (1), a notation should be available for other methods and emission factors that are not IPCC or CORINAIR and are neither country specific because they refer to other international literature (USEPA AP-42, for example).

Table 7(a)

The table becomes complicated when level and trend are assessed jointly. The table would also be more complete if the actual emission values were included. Table 7(a) should be split into two sheets: one for level assessment and one for trend assessment, simply following the IPCC good practice guidance.

The reason, use and content of the column ‘output box’ are unclear and should be explained. As the need is unclear, it may be deleted.

Delete columns “method applied to estimate emissions”, “type of emission factors” and “is source specific QA/QC implemented” as these columns do not necessarily relate to the determination of key sources, but to other issues that are addressed in other CRF tables and the NIR. With regard to the implementation of source-specific QA/QC procedures, the NIR seems to be a more appropriate place for

description. The “Yes/No” answer that should be provided in the QA/QC column does not seem to provide very useful information for review purposes.

The heading of the first column should be reduced to ‘Key Sources’, as sinks are not covered.

The meaning of the footnote (1) in relation to the column "Criteria used for key source identification" is not fully clear. We propose to amend this footnote as follows:

“Use the following notation keys to specify the criteria applied to identify each key source: Q=Qualitative methods; L1=Level using Tier1 method,...”

Footnote (2) is not quite in line with the IPCC good practice guidance. We propose the alternative wording:

“Level assessment is the percentage contribution of a given source-category to the total inventory level calculated as described in the IPCC good practice guidance.”

There is an incorrect reference for Footnote (3). Rank is determined from level assessment rather than cumulative total. Current wording is improved by using:

“Rank of key sources determined by their relative contributions to total inventory level.”

The Footnote (7) requests information where a conflict with information given in Summary Table 3 is possible.

Table 7(b)

This table looks insufficient to convey all the information of the uncertainty analysis as proposed in the IPCC Good Practice Handbook. The table would be much more informative if the emissions from the various key sources were included along with the corresponding uncertainty estimates. The column “Specific Reference to NIR” is not necessary. ‘Uncertainty in Emissions’ would be more appropriate than ‘Source Category Uncertainty’ in the fifth column.

Modify the footnote (2), adding at the end of the sentence: “If this occurs, it also must be indicated in “comments” column”.

Modify the footnote (4), adding at the end of the sentence: “It should be indicated if the key source is a key source in the level assessment or in the trend assessment or both”.

Tables 7(a) and 7(b)

If there were to be some allowance for reporting in respect of the potential Source Category 7 (as for sectors 1 to 6), then the new Tables 7(a) and 7(b) would have to be Summary 4 and Summary 5. These may be better titles in any case.

Table 8 (b)

Substitute “replacement” by “reallocation” in the heading of the 6th column as replacement is unclear.

Table 10, all sheets

These tables do not actually provide any trend as defined by the IPCC good practice guidance. It would be informative to include a right-hand column in all sheets of Table 10 showing the percentage change in emissions between the base year and the latest year, for all relevant source categories.

Table 10, 1 to 4

It would be more practical to present data as CO₂ equivalent (Gg), as Summary Table 2.

Table 10, sheet 1 and 5

We find the first part of Table 10, sheet 5, difficult to follow in the way total is presented i.e. there is Total (with net CO₂ emissions/removals) and a Total (without CO₂ from LUCF). Also, we note that Net CO₂ emissions/removals in this sheet is referred to as Total Emissions/Removals with LUCF in sheet 1. The second part of sheet 5 should also contain a total, simply to show that emissions by sector correspond to one of the totals given by gas in the first part. The review reports are likely to be read by people that are not normally involved in inventory preparation or the use of the CRF so we believe it is important to be precise in presenting total emissions in easily understood tables. We propose to modify Table 10, sheet 5 as follows (only a few years are presented):

TABLE 10 EMISSION TRENDS (SUMMARY)							
(Sheet 5 of 5)							
(a) Emissions by Gas							
GREENHOUSE GAS	Base year ⁽¹⁾	1990	1991	1992	1993	1994	1995
	CO ₂ equivalent (Gg)						
CO ₂ emissions including net CO ₂ from LUCF							
CO ₂ emissions excluding net CO ₂ from LUCF ⁽⁷⁾							
CH ₄							
N ₂ O							
HFCs							
PFCs							
SF ₆							
Total (including net CO₂ from LUCF)							
Total (excluding net CO₂ from LUCF)⁽⁷⁾							
(b) Emissions by IPCC Source and Sink Category							
GREENHOUSE GAS SOURCE AND SINK CATEGORIES	Base year ⁽¹⁾	1990	1991	1992	1993	1994	1995
	CO ₂ equivalent (Gg)						
1. Energy							
2. Industrial Processes							
3. Solvent and Other Product Use							
4. Agriculture							
5. Land-Use Change and Forestry ⁽⁸⁾							
6. Waste							
7. Other							
Total (including net CO₂ from LUCF)							
⁽⁷⁾ The information in these rows is requested to facilitate comparison of data, since Parties differ in the way they report CO ₂ emissions and removals from Land-Use Change and Forestry. ⁽⁸⁾ Net emissions.							

For consistency, we suggest that the description of total in Table 10, sheet 1, be changed to those of this modified sheet 5 (including/excluding is more precise than with/without).