

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 and Serbia.

Dublin, 15 May 2013

Subject: Revision of the UNFCCC reporting guidelines on annual inventories for Parties included in Annex I to the Convention (SBSTA)

Decision 15/CP.17 invited Parties included in Annex I to the convention, to use the UNFCCC Annex I inventory reporting guidelines voluntarily during a trial period from October 2012 to May 2013 and to submit their views on the experience of using these revised guidelines and the new CRF Reporter application.

The EU and several Member States used the guidelines agreed in decision 15/CP.17 and the new CRF Reporter application and provide experiences with this trial use in this submission.

The submission is structured in the following way with a general section related to overall views of the EU on the reporting guidelines, a more specific section related to the EU's views on the CRF tables, from Annex II to decision 15/CP.17 and experiences with the new CRF Reporter application.

1. General views on the experiences with using the UNFCCC Annex I inventory reporting guidelines adopted by decision 15/CP.17 and the CRF software application

In general the EU believes that the inventory reporting guidelines agreed in decision 15/CP.17 are well designed and incorporate many improvements and useful clarifications, e.g. the inclusion of requirements related to national inventory arrangements. The agreed CRF tables also generally incorporate all important changes arising from the implementation of 2006 IPCC Guidelines. The outstanding issues that arise from the trial period and which the EU would like to address in the negotiations in 2013 are few and concern a number of specific issues in the guidelines or the CRF tables which should be further improved in some aspects.

CRF reporter application

The EU considers that the trial version of the CRF Reporter web application has a clear structure and functionality but the EU is concerned that the revised CRF reporter application was not fully functional during the trial period. The reporter application version released is lacking some of the important elements currently developed within the software based CRF Reporter v3.6.2 for reporting under the first commitment period of the Kyoto Protocol including; the generation of submissions, generate CRF tables, completeness checks, consistency checks, recalculation checks, importation of xml (simple, inter reporter or Party specific), export xml and time series viewing (data and bar chart). The EU is looking forward to testing the next release version later in 2013 which we hope includes these crucial elements for reporting of annual GHG inventories. The functioning of the CRF reporter application is crucial for a timely delivery of the first submission under the revised guidelines in 2015.

- A fully functional version of the CRF reporter application has to be available at the latest by June 2014, otherwise the 2015 submission will need to be delayed.

The EU is fully committed to providing a complete submission on time for the first year of 2nd Commitment Period of the Kyoto Protocol. It would be regrettable if this was not possible due to a technical issue.

Supplementary IPCC guidance on Wetlands and LULUCF

The EU recognizes that additional work related to the CRF reporter application will be necessary to address potential changes arising from the IPCC methodological supplement on wetlands and on KP-LULUCF. However, this work needs to await the final adoption of the respective report of the IPCC at the end of October 2013.

The EU also recognizes that Parties need some time to consider the full impact of the supplementary guidance on wetlands on the inventory reporting and to implement any supplementary guidance. Therefore Parties should consider the IPCC methodological supplement on wetlands at the SBSTA session at COP 19, however it is possible that more time is needed after COP 19 for this discussion.

Allocation of emissions from ammonia production

The 2006 IPCC Guidelines changed the reporting practice concerning the allocation of CO₂ emissions from ammonia production/urea. In the current IPCC methodology urea production based on CO₂ emissions from ammonia production was considered short term storage and hence should not be subtracted and the full CO₂ emissions were to be reported under ammonia production. In the 2006 IPCC Guidelines this has been changed so that the CO₂ emissions recovered from ammonia production are no longer reported in the IP sector. Instead the CO₂ emissions from the use of urea in agriculture and from catalysts are to be estimated and reported.

A significant weakness of the proposed new approach is that the 2006 IPCC Guidelines only considers two uses of urea, which are fertilizer in agriculture and for catalysts in road transportation. According to the literature the agricultural use of urea accounts for around 75 % of the global use (Glibert et al., 2006), this means that up to 25 % of the urea has different end-uses. These include many very different processes, either by direct application on lands or in manufactured products:

- feed additive for ruminants (about 10% of non-fertilizer usage according to Glibert et al. 2006);
- urea-based herbicides or pesticides;
- in aquaculture;
- de-icing agents at airports and for other de-icing purposes;
- Urea may also be spread on coastal oil spills, to stimulate the growth of natural bacteria populations which break down the oil;
- manufacture of a wide range of common materials such as urea formaldehyde and plastics; in melamine production, as an ingredient in the manufacture of resins, plastics, adhesives, coatings, textile anti-shrink agents, and ion-exchange resins;
- urea is an additive in fire retardant paints, tobacco products, and in some wines;
- Urea is also used as ingredient in moisturizing creams;
- numerous uses of urea in holistic medicine therapies;
- reductant in catalytic and non-catalytic reduction of combustion products in vehicles;

During the testing of the revised reporting guidelines, it has proven impossible to get the detailed activity data for all of the relevant uses of urea. The 2006 IPCC Guidelines also do not contain guidance on estimating emissions for other uses than as fertilizers and as urea-based catalysts. Therefore, the EU considers that changing of the reporting will lead to fewer emissions being reported than with the current reporting guidelines and hence a lower degree of completeness in reported anthropogenic emissions and a loss of environmental integrity.

The 2006 IPCC Guidelines include a warning about potential double counting of recovered emissions and the reported emissions from the urea use, but no adequate guidance on the completeness of emissions from all relevant urea uses. Whereas the 2006 IPCC guidelines recommend that “all quantity of CO₂ recovered for downstream use in urea production must be subtracted from the total quantity of CO₂ generated”, the guidelines only recommend that “emissions of CO₂ from urea use should be accounted for in the corresponding sectors”¹. Apart from the lack of completeness, the switch of the allocation principle of emissions towards urea use, also potentially implies a shift of emissions to Non-Annex I Parties which are net importers of urea fertilizers.

Clarification of mandatory requirements related to the CRF tables

Paragraph 55 (a) of the Annex to decision 15/CP.17 requires that Parties Annex I Parties should provide a full set of CRF tables for the base year and all years from 1990 up to the most recent inventory year. The EU believes that for this requirement should be mandatory and the ‘should’ should be replaced by ‘shall’.

¹ See Box 3.2 on page 3.16 in Chapter 3: Chemical Industry Emissions of Volume 3.

Global warming potentials – Annex III of decision 15/CP.17

The EU believes that there are two mistakes in Annex III with the Global warming potential values:

The errata of the IPCC 4th assessment reports lists an additional PFC which is perfluorocyclopropane (c-C3F6) which is not included in Annex III of the reporting guidelines. The GWP of this PFC for a 100-year time horizon is indicated as > 17,340 in the IPCC AR4. The list of substances under the UNFCCC was based on the GWPs listed in the column entitled “Global warming potential for given time horizon” in table 2.14 of the errata to the contribution of Working Group I to the Fourth Assessment Report of the IPCC, based on the effects of greenhouse gases over a 100-year time horizon. It is not clear why this PFC was not included in the list in Annex III of the reporting guidelines, even taking into account that for reporting purposes it may be necessary that the > 17,340 should be read as = 17,340. The scientific knowledge that the GWP may even be higher should not lead to the exclusion of this substance from the reporting.

The GWP of HFC 152a for the 100-year time horizon is indicated with 124 in the Errata of the IPCC and with 38 in Annex III of the UNFCCC reporting guidelines. Thus the value 38 should be replaced by 124.

Harvested Wood Products reporting

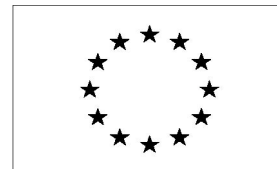
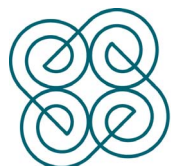
The EU prefers to use a single approach to report and account for emissions and removals from harvested wood products (HWP) under the Convention to achieve a comparable reporting of emissions and removals in this area taking into account the agreement achieved under the Kyoto Protocol. In a long term perspective, a common and comparable reporting framework on LULUCF reporting under the Convention is important and the implementation of different principles and approaches as foreseen for HWPs undermines the general objective of the reporting guidelines to achieve GHG inventories that are comparable across Parties.

2. CRF Reporter application and CRF tables

This section outlines the experiences of users within the EU in trialling the UNFCCC CRF Reporter application and the CRF tables in Annex II to Decision 15/CP.17 ([FCCC/CP/2011/9/Add.2](#)). The comments are presented below. The section under “General” relates to the practical use and functionality of the CRF Reporter web application.

CRF Reporter application

Some Member States within the EU had different experiences using the export function (Export Grid and Export Subtree). This functionality seems to be erratic and doesn't seem to be working at the time of preparing this submission but did work for a time after the release date. When the function worked the experiences were generally positive with no substantive issues.



EU comments/issues related to the CRF Reporter application:

1. Additional Functions that should be implemented

- It is important to maintain the current functionality of the CRF Reporter software of simple, internal xml import/export in the new web application (IMPORTANT)
- It is not clear how multiple users from the same Party can edit data at the same time which is important for control over the generation of the official submission process. This could be implemented by providing different permissions for a National inventory Compiler (NIC) and Sectoral Experts (SE) and it would be useful for the NIC to be able to lock specific sectors at different points in time (IMPORTANT)
- Implement the checks in the current CRF software into the web application (IMPORTANT)
- Automate the key category analysis (KCA, tier 1) in the web application
- Concerns over the lack of control of data storage using a web based application before the submission deadlines. There needs to be an option for Parties to store/save a copy of what is on the web application at any point in time (IMPORTANT)
- Provide additional information in the user manual regarding “bulk” import formats, both xml and excel
- It is important for the EU that when its Member States generate an official submission, that an official xml file is also generated to enable the EU to aggregate Member States submissions (IMPORTANT)
- The GWPs used in the application should be visible and a list of GWPs should be accessible (IMPORTANT)
- The CRF Reporter application should allow for downloading and saving of different versions of Parties’ annual GHG inventories e.g. generating CRF tables without official submission process (IMPORTANT)

2. Improved display of information and data

- Allow users to change font size/resolution (increase/decrease to assist visually impaired users) and allow viewing of more years in the grid for users with larger screens
- Allow data time series functionality under the “data review” mode by CRF code not just in the “data entry” mode
- Consider the use of the current “traffic light” functionality in the CRF software in the next release of the web application
- Allow of “refreshing” of child nodes so the nodes are in the correct order and not the order of input; 1.A.4.a.i before 1.A.4.a.ii etc.
- Display the same number of decimal places (user defined) in all adjacent cells in the grid regardless of the number entered
- Allow for expanding/collapsing of the navigation tree so the full CRF category name can be viewed and allow automated grid cell column widths
- It should be clear within the application how shaded “green” cells are estimated (show formula)

3. Handling procedures for users

- The application is now web based which means that Parties will no longer have to keep updating the software
- It is possible to enter a “zero” value in this web application but not in the current CRF Reporter software. Only non-zero entries or notation key entries should be allowed
- Develop a roll-back undo function to correct erroneous inputs
- No backward compatibility with previous xml procedures
- Automate recalculation explanations (when implemented) to show if a change is due to AD of EF or both and avoid multiple entries of explanations for all disaggregated sub-categories
- Provide a grid import function for recalculation explanations and for provision of explanations for the notation keys “IE” and “NE”
- Allow a simple copy/paste function in the web application if possible
- Some users had difficulty adding “child nodes” as it was not obvious when the category was selected (no highlighting) before allowing the “right click” function to add a child node or select from the drop-down list
- Keep the CRF category highlighted in the navigation tree that is “live” when editing data in the grid cells relating to AD, EF, emissions or year

CRF Tables in Annex II, decision 15/CP.17

Energy (1.A Combustion)

1.A.1.a Public Electricity and Heat Production

During the testing of the revised reporting guidelines, many EU Member States encountered significant difficulties in collecting the data necessary for the further disaggregation of sector 1.A.1.a. into the sub-categories; electricity generation (1.A.1.a.i), combined heat and power (1.A.1.a.ii) and generation of heat plants (1.A.1.a.iii), especially, considering that data should be collected back to 1990, which will be impossible for many Parties. Also there is not much added value in providing the further disaggregation, the emission characteristics are identical for e.g. a coal fired boiler regardless of whether it is used for power only, CHP of heat or boiler only. Also, the default EFs in the 2006 IPCC Guidelines do not distinguish between the different sub-categories.

Therefore, the EU would prefer that the 3 current sub-categories under 1.A.1.a were available for election in a drop down list to enable disaggregated reporting where data is available. Parties should be able to report at the aggregated higher level if no data is available. Parties should be able to avoid reporting of notation keys for the whole time series for several new sub-categories.

1.A.1.c Manufacture of Solid Fuels and Other Energy Industries

The same issue of data collection as described for 1.A.1.a has been identified for this category. The EU would therefore prefer that the 3 current sub-categories under 1.A.1.c were available to elect in a drop down list to enable disaggregated reporting where data is available. Parties should be able to report at the aggregated higher level if no data is available. Parties should be able to avoid reporting of notation keys for the whole time series for several new sub-categories.

1.A.2.a-g Manufacturing Industries and Construction

CRF category 1.A.2.g contains a drop down menu for including other categories (please specify) for stationary (1.A.2.g.i to 1.A.2.g.vii). There should also be a subcategory to report off road mobile machinery emissions from industry.

1.A.3.b Road Transportation

The EU considers that emissions from urea-based catalysts do not belong in the Energy Sector and should be reported in the IPPU Sector (see reasoning above). Since this is different from the approach taken in the 2006 IPCC Guidelines, a footnote should be added in the CRF table.

Energy (1.B Fugitive)

TABLE 1.B.2 SECTORAL BACKGROUND DATA FOR ENERGY

The EU would like to propose a footnote to CRF Table 1.B.2 that clarifies the reporting of emissions from flaring and other fugitive emissions.

The footnote could read: “In this table fugitive CH₄ emissions should also be reported for the transmission/distribution of biogas. Emissions associated with the biogas production without energy production should be included in the waste sector under biological treatment of waste (CRF Table 5.B). For emissions from flaring, this table should only be used for reporting of flaring emissions associated with oil/gas extraction and refining.”

Energy (Reference Approach)

The CRF Reporter application does not follow the CRF tables (table 1.A(b) and table 1.A(d)). Fuels are not listed in the application by fuel group (Liquid fossil-primary fuels, secondary fuels).

The fuel “Waste (non-biomass fraction)”, cell for “production” is shaded grey in the draft CRF Tables in Annex II of decision 15/CP.17. This cell should be shaded white to allow entering of data. The CRF Reporter application correctly allows data entry for this fuel under the column for “production”.

Industrial Processes and Product Use

General

- The EU is of the view that all emissions from all urea-based products should be reported in the IPPU Sector and a related footnote should be included in the relevant CRF Tables.
- For CRF Table 2(II), NF₃ needs to be added to the title

2.G Other Product Manufacture and Use

The following subcategories are missing from the CRF Reporter application drop-down list
2.G.3.c Other and 2.G.4 Other

2.H Other (please specify)

The following subcategories are missing from the CRF Reporter application, 2.H.3 Other.

Agriculture

General

The EU proposes to allow for more detailed and transparent reporting by facilitating in the CRF Reporter application the option to add sub-categories to the following livestock categories; 3.A.1.ii Other Cattle, 3.A.2 Sheep, 3.A.3 Swine and Poultry under 3.A.4 Other Livestock (drop-down menu). Also the same disaggregated breakdown should be provided in Manure Management (3.B) for completion of sectoral CRF tables 3.A and 3.B (a) and 3.B(b).

The pre-defined animal categories under 3A and 3B should be identical. This will facilitate the comparability between Parties.

3.B Manure Management (Methane CH₄)

The CRF Reporter application should allow for additional information (for Tier 2) to complete CRF Table 3.B (a) for more AWMS including digesters, deep bedding etc.

3.B Manure Management (Nitrous Oxide N₂O)

The CRF Reporter application does not have a drop-down list for the following subcategories under 3.B.2.4 Other Livestock; Fox and Raccoon, Mink and Polecat.

In general orange shaded cells in the CRF-tables cannot be filled out by the Party itself. These cells are automatically calculated.

In CRF Table 3.B(b), row 41 ("IEF Direct N₂O (kg N₂O-N/kg N handled)") and 42 ("Direct N₂O emissions per AWMS (Gg[kt] N₂O)") cannot be filled automatically since the required information is missing in the CRF-table (in white cells). The SUM of direct emissions from each individual AWMS is required to generate an IEF based on nitrogen excreted in each AWMS. One of these two rows has to be filled out by the Party before the other row can be filled automatically.

The EU considers that the column "Total N excreted" in CRF Table 3.B(b) can be filled automatically from the SUM of nitrogen excreted in each AWMS by animal type. (L15 in CRF Reporter application should sum L5 to L14 for each animal category).

3.H Urea application (CO₂)

Emissions from urea application should be reported in IPPU as per comments above under energy and IPPU.

Land Use, Land-Use Change and Forestry

General

The documentation boxes should be edited to reference chapter 6 instead of chapter 7 of the NIR.

Land Transition Matrix (CRF Table 4.1)

Remove the word “managed” after Cropland.

4.A Forest Land, 4.B Cropland and 4.C Grassland

Delete the reference to footnote 2 in the cell for “Area of organic soil” since it is confusing to refer to total when the area of organic soils is a sub group of the total area. One option could be to include a new footnote for “Area of organic soil” reading “The part of the total area assessed as organic soils”.

4.D Wetlands

The addition of child nodes should be allowed in this category under “wetlands remaining wetlands” as there may be additional wetlands other than peatland extraction and flooded land remaining flooded land.

The EU considers that additional changes may be required to this table after the supplementary IPCC guidance on Wetlands will be completed.

Footnote 8 states that “There is no default methodology for estimating methane (CH₄) emissions and information for the methods is provided in appendix 3, volume 4 of the 2006 IPCC Guidelines”. The method in the appendix only relates to Flooded land so the footnote should read: “There is no default methodology for estimating methane (CH₄) emissions. Information for the methods for Flooded land is provided in appendix 3, volume 4 of the 2006 IPCC Guidelines”.

4.E Settlements

There is a footnote (8) in the cell for Settlements remaining Settlements that should not be there.

CRF Table 4(II) Non-CO₂ emissions from management and drainage of organic soils

The EU has had some difficulties to understand why Wetlands are included here since N₂O emissions from Peat extraction areas and Flooded land are already covered in table 4.D. If there are adequate reasons for keeping the emissions related to management and drainage apart from the emissions reported in table 4.D then add a footnote with information that the N₂O emissions reported for Wetlands in this table are the emissions due to the drainage of land to distinguish the emissions reported here from the emissions reported in CRF Table 4.D Wetlands. In this table only the emissions associated with management and drainage should be reported (section 11.2.1 in the IPCC 2006 GL). All other emissions/removals for Wetlands should be reported in table 4.D.

Footnotes 5 and 6 are not consistent. Footnote 5 requests to report Non-CO₂ emissions from forest land in the remaining-category, whereas footnote 6 requests to report Non-CO₂ emissions from peatland and flooded lands in the conversion-category. This should be corrected for consistency reasons, although these requests will not have any implication for the results nor the estimation. The emissions should be added to the emissions at the level of respective category (forest land, wetlands).

CRF Table 4(III) Direct N₂O emissions from nitrogen (N) mineralization/immobilization associated with loss/gain of soil organic matter

Footnote 1 refers to equations 11.1 and 11.18 2006 IPCC Guidelines. The correct reference should be to equations 11.1, 11.2 and 11.8.

Add a footnote clarifying what area is to be reported in the Activity data column. Proposed text: “The total area of the subcategories, in accordance with the subdivision used, should be entered here. For converted lands the cumulative area remaining in the category in the reporting year should be reported here”.

CRF Table 4(IV) Indirect N₂O emissions from managed soils

Include a footnote referring to the relevant equations: “Methodologies for indirect N₂O emissions are based on equations 11.9, 11.10 and 11.11 of the 2006 IPCC Guidelines.”

Redraft footnote 1: “If the sources of nitrogen (N) cannot be separated other than between cropland and grasslands, they should be included in the agriculture sector and reported in table 3.D (b). This should be explicitly indicated in the documentation box.”

CRF Table 4.G Harvested wood Products

The EU will give further consideration to this issue after the finalisation of the IPCC Revised Supplementary Methods and Good Practice Guidance Arising from the Kyoto Protocol.

The EU would like to streamline the possible reporting approaches for HWP, with the goal of having one consolidated reporting approach in order to ensure comparability between Parties and facilitate the review process.

Waste

5.C Waste Incineration

In category 5C ‘Incineration and open burning of waste’, the CRF Tables first level of disaggregation is ‘Biogenic’ and ‘Non-Biogenic’. Nevertheless, in the CRF Reporter application the first level of disaggregation is ‘Waste incineration’ and ‘Open burning of waste’ and only the second level is ‘Biogenic’ and ‘Non-biogenic’. In fact, CRF Tables are not clear on this issue, as there is no codification for ‘Biogenic’ and ‘Non-biogenic’. Respective clarification should be introduced in the CRF tables.

5.F Memo Item

Information items: Long-term storage of carbon in waste disposal sites; Annual change in total long-term storage of carbon stored and Annual change in long-term storage of carbon in HWP waste are to be reported as mass of carbon, but only CO₂ can be entered. The EU proposes to insert a footnote specifying that the values should be entered as carbon dioxide (CO₂).

Cross sectoral CRF Tables

Summary Table 1.A

Some of the footnotes should be attached to the main category instead of the cells for NET CO₂ (footnote 4 and 5).

CRF Tables 8 and 10 (Recalculations and Trends)

Include the same footnote as in table 1 and 2 related to Memo items.

CRF Table 9 (Completeness)

The explanation is to be included on category level. However in the LULUCF sector a single pool of a category could be reported using the notation key NE or IE. A problem with the current CRF tables and the CRF Reporter software is that it is not possible to make a proper reference to the specific pool. Hence, reporting of one pool as IE or NE results in the whole category appearing in CRF Table 9. So for LULUCF categories rather than just specifying carbon as GHG, the table could include the pool, e.g. above ground biomass, below ground biomass, etc.
