

Submissions by Liechtenstein on behalf of the Environmental Integrity Group, comprising Liechtenstein, Mexico, Monaco, South Korea and Switzerland

SBSTA Work Programme on the revision of the guidelines for the review of biennial report and national communication, including the national inventory, submitted by developed country Parties.

In accordance with Paragraph 6 of FCCC/SBSTA/2012/L.13¹, Liechtenstein, on behalf of the Environmental Integrity Group (EIG), would like to take the opportunity to submit its views with respect to the key elements of the revision of the guidelines for the review of biennial reports and national communications, including the national inventory, from developed country parties. The Environmental Integrity Group acknowledges the importance of national communications and biennial reports as well as the necessity of objective, efficient and coherent review procedures and guidelines.

According to several CP and CMP decisions², each National Communication (NC) of an Annex I Party is subject to an "in-depth" review. Under the Kyoto Protocol³ each NC shall be subject to an in-country review.

Regarding the review of biennial reports ("International Assessment and Review", IAR), Parties decided in Durban (2/CP.17) that IAR should commence two months after the submission of the biennial reports⁴ and that IAR will be conducted every two years, whether independently or in conjunction with a NC.

Review reports of biennial reports and national communications should be available in time to be considered fully for the next submission, i.e. approx. 6 months before the next submission date. Furthermore, the reviews should be scheduled and the dates communicated well in advance (6 months). This particularly applies for in-country reviews.

The current system for reviewing national communications requires considerable resources, but the outcome based on the review seems limited. While it is helpful to have in-country reviews to fully understand national circumstances, the number of experts could potentially be reduced.

In-depth review of the GHG Inventory is crucial. It should normally be a centralized review (maybe occasionally an in-country review). Effort for review is considerable, but required to make sure inventories comply with guidelines. The delays between submission, review and the finalization of the review report can be rather long (i.e. the subsequent submission is provided before completion of the previous review). The system of Saturday papers with the request to recalculate parts of the inventory in October/November for reconsideration by the review team adds considerable delays. Such requests should only be made for correction of substantial errors in the inventory that are too fundamental to be left until the next submission. Small corrections to be "considered insignificant", as per the revised inventory

¹ www.unfccc.int/resource/docs/2012/sbsta/eng/l13.pdf

² 2/CP.1, 9/CP.2, 6/CP.3 11/CP.4, 33/CP.7, 7/CP.11, 9/CP.16, 22/CMP.1 and 26/CMP.1

³ paragraph 19 of 22/CMP.1

⁴ see 2/CP.17 www.unfccc.int/resource/docs/2011/cop17/eng/09a01.pdf

reporting guidelines⁵, would not trigger a re-submission of the CRF tables but will be included in the next CRF tables submitted.

Elements of reporting that are provided in different reports should only be reviewed once, i.e. the GHG inventory should be reviewed annually. The GHG inventory summary provided in biennial reports and national communications should be identical to the latest inventory submission and therefore needs not be reviewed again. Similarly, elements that are both in biennial reports and the national communications should not undergo double-review.

Review guidelines should cover reviews of all types of reports (GHG inventory, biennial reports, national communications) and also point out the synergies between the individual review processes.

As developed country Parties have to submit their first biennial reports to the secretariat by 1. January 2014, the review of the first biennial reports will most likely be conducted in-country, in conjunction with the review of the sixth NC during 2014-2015. Whether subsequent reviews of biennial reports, especially those that will not be reviewed in conjunction with national communications, will also include an in-country review has not yet been decided.

The Environmental Integrity Group acknowledges that the respective review approaches are necessary to fully ensure the purpose of national communications and biennial reports of developed country Parties. However, the current review processes do not differ with respect to a party's contribution relevance regarding GHG emissions as well as the quantum of relevant information to be reviewed.

Considering the fact that a successful first round of the enhanced reporting obligations for developed country Parties as well as their respective review processes will be subject to the availability of resources, especially on the Secretariat's side, the Environmental Integrity Group proposes the incorporation of the adjusted review approach as it was defined in Paragraphs 3 and 4 of FCCC/SBI/2010/L.36/Add.2 into the general guidelines for the review of biennial reports (as applicable) and national communications.

The EIG proposal annexed to this submission reflects SBSTA's request to take into consideration experiences from current review practices and addresses the implications of the growing reviewing tasks to be performed by the Secretariat. Hence, it is its aim to contribute to the establishment of a cost-effective, efficient and practical review process without setting an excessive burden on Parties and the Secretariat.

Finally, and more generally, it may be worth evaluating to what extent the secretariat can contribute to the reviews. At least in terms of a standardized examination, the secretariat would be in a good position to do so.

The EIG would also recommend the use of new information and communication technologies in view to enhance efficiency and reduce the burden on the Secretariat.

⁵ para 37(b) of Decision 15/CP.17 (FCCC/CP/2011/9/Add.2): "an emission should only be considered insignificant if the likely level of emissions is below 0.05 per cent of the national total GHG emissions, and does not exceed 500 kt CO₂ eq".

Annex: Proposal by the Environmental Integrity Group to be considered under the work program on the revision of the guidelines for the review of biennial reports and national communications for developed country Parties:

1. For Parties with total greenhouse gas emissions of less than 50 million tons of carbon dioxide equivalent (excluding land use, land-use change and forestry) in accordance with their most recent greenhouse gas inventory submission, the Secretariat will conduct centralized reviews of their respective sixth National Communications and first Biennial Report (if applicable), with the exception of Parties included in Annex II to the Convention, for which the secretariat will organize in-country reviews.
2. The Secretariat conducts an in-country review for those Parties referred in Paragraph 1 above that requested one.
3. The Subsidiary Body for Implementation will consider applying the procedure foreseen in paragraph 1 and 2 above to the review of subsequent national communications and biennial reports, with a view to recommending a decision on this matter to the Conference of the Parties at its twentieth session.