

United States Submission to the Subsidiary Body for Scientific and Technological Advice

Views on the work programme on the revision of the guidelines for the review of biennial reports and national communications, including national inventory reviews, for developed country Parties.

October 2012

This submission responds to the invitation from SBSTA 36 to Parties to submit their views on the elements of the work programme and on the timeline of proposed activities, as well as on the key elements of the revision of the review guidelines for the review of biennial reports from developed country Parties and national communications, including national GHG inventories from Annex I Parties, taking into consideration experience from current inventory and national communications review practices.

For more than a decade now, the feedback resulting from review processes for Annex I GHG Inventories and National Communications have resulted in significantly improved reporting under the established practices. The addition, in Durban, of new requirements for review of biennial update reports under the process of International Assessment and Review (IAR), will add an additional element to the existing processes of expert review (both existing reviews of GHG inventories and National Communications).

In Durban, Parties agreed to establish a work programme on the revision of the guidelines for the review of national communications (and therefore biennial reports), including national inventory reviews, for developed country Parties, with a view to completing this work by the nineteenth session of the COP.

In June, SBSTA agreed that in revising the review guidelines, Parties should take into account experience with the reporting and review of information under the Convention and the need to have a cost-effective, efficient and practical review process that does not impose an excessive burden on Parties, expert reviewers, or the secretariat.

The U.S. considers the purpose of this exercise is to consolidate and align the existing review guidelines for GHG inventories and national communications, to integrate into this existing process the review of biennial reports, and to do so in a manner that enhances the coordination between different review processes to ensure effective and efficient processes for review.

Although the existing review processes will be expanded to incorporate the new biennial report review, it should be done in a manner that allows for the seamless functioning of the existing review processes, taking into account the need to consider how best to allocate limited staff and expert reviewer resources.

The U.S. is of the view that there should be two objectives for the work program with regard to revision of national communication review guidelines:

1. Consolidate the current guidance contained in various COP decisions together into one document that provides a comprehensive set of guidelines for review of national communications and biennial reports (similar to what has been done for GHG inventory reviews). Revise the existing guidance to include the additional reporting content required by 1/CP.16 and 2/CP.17 and integrate the review of biennial reports into the existing national communication review process.
 - In undertaking the alignment, consolidation and revision of review guidelines under the Convention, a work programme that considers all reporting elements in a single

set of guidelines comprised of two complementary elements: inventories and national communications (which would include biennial reports). In our view this type of approach avoids unnecessary duplication.

- We would note, however, that the work in consolidating and revising the guidelines for review of GHG inventories should take into consideration the need to align closely with the process for revision of the Inventory reporting guidelines.
2. Rationalize the overall review processes to consider ways to ensure an effective and efficient process that does not impose an excessive burden on Parties, experts or the Secretariat. This would include an evaluation of the resources available to conduct not only GHG inventory and National Communication reviews, but also the additional reviews of biennial reports and technical analysis of biennial update reports from non-Annex I Parties.
- There are many ways to consider rationalization of the review process that upholds the quality and integrity of the existing review process in a way that allocates time and resources to the elements that require the most attention.
 - For example, for more than a decade now, the annual review process for Annex I GHG inventory reports has resulted in considerable improvement of Annex I GHG inventories and most now meet the quality standards required under the UNFCCC reporting guidance and the IPCC good practice guidance. Annual inventory review is no longer a necessity to maintain those standards and could be replaced with a review every two years (with half of the Annex I Parties reviewed each year). On an exceptional basis, if problems were to be identified, an inventory review could be scheduled for the next year as a follow up. Although Parties would continue to submit GHG inventories on an annual basis, the review would occur only every second year, which would provide a more practical timeframe in which to implement recommendations from previous reviews. The current system where many review reports are only finalized two or three months before the next national inventory report is submitted does not give the Party enough time to follow through on recommendations from the previous review.

Next Steps

The U.S. suggests that in order to make progress under the work programme in 2013, we should build on the work that the secretariat has been requested to do in advance of SBSTA 37 and request that the secretariat also prepare a “zero-order” draft of a single guidelines document with text drawn from existing Convention review guidelines where relevant, and with input from Parties’ submissions. Parties could consider this document in technical discussions that could be facilitated early in 2013.