# Response to Reporting Groups Summary of Findings: Expert Meeting Dec 4-6 2001

## Standards Indicators

Neither the working papers nor the discussions at the expert meeting have addressed all the issues raised in the Parties submissions in relation to the use of the standard indicators. In redrafting the reporting guidelines the Secretariat will need to provide advice on what indicator is to be used in sector/subsector totals where different indicators are used in the subcategories. For example, where the subcategories making up 2B Chemical Industries may be reported as NE, NO and NA, what indicator is given in the total. In these situations, Australia is currently reporting NE in the total as an estimate could potentially be given.

The other issue raised in the submissions was use of indicators in tables such as Table 7 and Summary 3. See discussion FCCC/SBSTA/2001/MISC.4. page 26 para 6

## National Inventory Report

The Reporting group recommended that the Guidelines be revised to include a common structure for the NIR. While we agree with this recommendation, the Secretariat need to be aware that for some Parties the NIR is required for both UNFCCC and domestic reporting purposes. As such, we would suggest that any proposed table of contents be provided as a "general structure" for guidance rather than a structure to be strictly adhered to. Parties should be able to incorporate additional information or make small modifications to the structure to address domestic reporting needs.

Australia's NIR largely follows the proposed structure with two major exceptions. 1) The information contained in Chapters 1,2 and 4 are covered within a single chapter; 2) Detailed methodology descriptions are provided in separate methodology workbooks.

*Specific comments to proposed table of contents*

- Instruction arrangements are an inventory preparation issue and should come under Chapter 2.

- Reverse order of Chapters 3 and 4

- Chapter 4
  - If Summary Table 3 is to be included in the NIR it should be removed from the CRF. Otherwise text should just refer to summary table 3 of the CRF.
  - The information required for the Source allocation and completeness section is best provided in the sectoral methodology sections.

- Chapter 5
  - The most logical way to present the sector methodologies and other information is following standard IPCC source category numbering (eg. 1A, 1B). If a Party is to be fully transparent in reporting then methods should be provided for all sectors/sub-sectors. Reporting by key source and non-key sources has little advantage and may require additional work if the key sources change from year to year.

## Common Reporting Format Tables

In general the suggested changes to the CRF tables are acceptable. There are, however, a couple of recommendations, which are unclear or could be problematic. These are discussed below.

**Energy**

*Table 1.A(b)*
Unclear what is meant by "will be shaded starting with carbon emission factor".

*Table 1.B.1*
It is recommended that the information contained in the Additional Information box should be placed in the NIR. If the information contained in this table is a useful indicator for review purposes then this data should remain in the CRF tables. If this data is moved to the NIR it will be much more difficult to locate and do inter-country comparisons. If the data serve no other purpose (ie. number of mines is not required to estimate emissions even for Tier 1) then there should be no requirement to report it either in the CRF or NIR.

It is suggested that the $CH_4$ column be divided in the "actually emitted and "recovered". It is unclear whether "actually emitted" refers to gross or net emissions. If we included a gross emission column we will also need a net emissions total to link through to the summary tables. How would the flared $CH_4$ adjustment fit into this format?

If we make the above split then it may be more useful to calculate the IEF using the gross emissions, as this will provided a consistent basis on which to make inter-country comparisons. Differing rates of recovery will make IEFs differ between Parties even when the same EF is used to estimate gross emissions.

It is unclear what is meant by the recommendation- "The format of the table is to be kept with all additional sources (such as flaring) to be included under Other". If this refers to the data on $CH_4$ recovered and flared reported in the additional information box then it is not appropriate to report this under 1.b.1.C Other. Flaring is not a fugitive emission source category in itself, it would need to be reported under the underground mines source category (ie. it reduces gross CH4 emissions).

*Table 1.B.2*
It is recommended that the information contained in the Additional Information box should be placed in the NIR. If the information contained in this table is a useful indicator for review purposes then this data should remain in the CRF tables. If this data is moved to the NIR it will be much more difficult to locate and do inter-country comparisons. If the data serve no other purpose then there should be no requirement to report it either in the CRF or NIR.

**Industrial Processes, Solvent Use and Waste**

Table 2(II)
Suggest that the additional column should be called "Other" as it is likely to contain information both on blends and substances that are subject to confidentiality restrictions. It is

suggested that an aggregate GWP be provided, however, it may be better to report these emissions as $CO_2$-equivalents, as this would protect any confidential data.

**Agriculture**

*Table 4.A*
Note that the unit for the proposed Average CH4 conversion rate (Ym) is actually a fraction not a rate as the name suggests (ie. fraction of gross energy converted to methane).

Additional information box: We would suggest that the additional information box is not changed to include all variables required in the Good Practice methodology. The table currently seeks information that some Parties may be able to provide even if they are not using the more detailed approaches to estimating emissions (eg. average milk production or average weight). Matching the table to the Good Practice methodology could actually result in fewer Parties completing the tables.

Livestock disaggregation: We would suggest that livestock disaggregation is not changed to match those recommended in Good Practice work. The table currently asks for the highest level summary information, which all Parties should be able to report regardless of the methodology Tier being used. A such, these table allow us to undertake inter-country comparisons relatively easily. If we move to the Good Practice disaggregated livestock categories this will make reporting more difficult for those Parties who use different categories. The risk is that fewer Parties will fill in the tables. Parties using disaggregated methodologies to estimate enteric emissions should document these in the NIR.

*Table 4.D*
Need to insert the subsector numbering ie. 4.D.1, 2,3 and 4.

**Land Use Change and Forestry**

*Table 5*
Unclear what Footnote 5 is, could not find on page 8 of Working Paper 7 as indicated.

**Confidential Data**

In preparing the 2000 Inventory, Australia has struck a problem with how to report confidential data in the Industrial Processes sector. Due to commercial-in-confidence requirements emissions from nitric acid production ($N_2O$) and ammonia production ($CO_2$) are aggregated and reported as $CO_2$-e emissions only. Industry has only provided data on the basis that company level emissions will not be distinguishable. As there may only be 1 or 2 companies involved these requirements can only be meet by aggregating source categories. There are no obvious places to report these emissions in the CRF. We did not wish to report them under the $CO_2$ or $N_2O$ columns of the Chemical Industries total as this would cause distortion to the by-gas trends analysis. As such we have had to make modification to Summary Table 2 and Table 10 so that these emissions could be incorporated into the Industrial processes total and total national $CO_2$-e in the CRF.

If would be good if the Secretariat if could consider some mechanism for Parties to report confidential data as aggregated $CO_2$-e in the drafting of revised reporting guidelines and CRF tables.