

Proposal from the Netherlands regarding:
Guidelines for estimating and reporting emissions (agenda item 11)

At its 40th meeting the Working Group on Strategies and Review has asked the ad hoc Legal Expert Group to do some further work on the Guidelines. Also, the WGSR will have to discuss and decide on policy related issues concerning the Guidelines. This is foreseen at the next 41st meeting of the WGSR in April 2008. One of the policy issues is the date of submission of the emission inventories/projections and the date of submission of the Informative Inventory Report.

The further work of the Legal expert Group and the necessary decisions on policy issues will prevent the adoption of the Guidelines this year. One of the advantages of this delay by an extra year is that the Convention might consider to attune the date of delivery of the emission inventory/projections and the date for the inventory report with the dates for the delivery to the UNFCCC.

Parties to UNFCCC and CLRTAP are obliged to report emissions on different dates and document them in separate inventory reports. For EU Member States (EUMS), the obligations are even more complicated. For reasons like improved efficiency and QA/QC aspects (consistency, transparency) it might be preferable to include all reporting obligations under UNFCCC and CLRTAP (and EU for EUMS) into one general emission inventory/projections report for air and climate. Because under UNECE it has been already decided to uniform the CLRTAP reporting guidelines with the UNFCCC reporting guidelines (may be some minor details left open for discussion), the only new issue at the moment seems to be to decide on timing aspects.

For UNECE CLRTAP, formal reporting dates are: 15th of February (NFR) and 15th of March (IIR)¹.

Under UNFCCC, reporting is due by 15th of April (CRF and NIR). EUMS furthermore have formal reporting obligations for NECD (31st of December) and for UNFCCC (15th of January a draft CRF/NIR and 15th of March: final CRF/NIR).

If Parties (within UNECE/CLRTAP as well as UNFCCC) decide to integrate reporting obligations in just one report containing air emissions, what would be the best due date for this report?

There are several aspects to take into account in this discussion:

- (1) Parties need time to prepare their national inventories, as the basis for filling the reporting formats (NFR, CRF). For this discussion note, it is assumed that Parties will be able to collect the basic activity data (statistics) and emission factors for the reporting year within one year. So all basic information necessary to calculate the emissions of 2006, will be available by the end of 2007;

¹ The date of March 15 is proposed in the new not yet adopted guidelines. Probably, this proposed date has been put forward to enable stage-3-in-depth reviews.

(2) preparing one integrated report for air and climate will initially take extra time. On the other hand, time is saved by not making separate reports for air and climate;

(3) Timing: A too early submission date may lead to poor reporting. Another issue related to timing, is that also QA/QC takes time;

(4) As a Party to both Conventions, the EC always needs additional time (at least one month) to prepare its inventory, by merging the inventory data of the EUMS. Under CLRTAP, one could think of waving the obligation for the EC to submit an inventory since the EC does not emit itself. The EC would be doing nothing more than just totaling the emissions of the EUMS anyway. Within the UNFCCC however, the EU still has to submit its inventory by 15th of April. The EU-MS therefore are obliged to submit their inventory by 15th of March to the EC.

The 15th of March seems to be the earliest date Parties might be able to prepare just one emission inventory/projection and one inventory report for the CLRTAP, UNFCCC and EU (for EU Member States). And since we cannot mess with the dates for climate 15th of March seems to be the date to harmonise emission inventories and inventory reports. In effect for air emissions it would mean an extra month's time for countries to prepare the emission inventory/projections for the CLRTAP. For the IIR it would mean the same date. If so decided, it should be noted that Parties, especially the first few years, will have to carefully plan the capacity to prepare such an integral inventory for air and climate and inventory report.

The advantages are obvious. One emission inventory and one informative report saves time and will prevent different figures going to various international organisations. It will also boost the integration of air pollution and climate change further. It might even be possible to work together on the in-depth reviews these organisations are conducting, saving time and money.

This informal document tries to open the discussion on merging the emission inventories for air pollution and climate change. At this EB25 we do not have to take a stand. Think about it and let us come back to it at the next WGSR in April.