

Problems identified during the UNFCCC reviews: overview of KP LULUCF issues for the EU and MS

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“National system” LULUCF issues

MS	KP activity	MS specific issue (according latest version of SP)	Potential relevance for EU completeness	Likely quantitative relevance for EU
Luxemburg	ARD	KP tables not submitted in time	Yes	Likely small
Germany	ARD, FM	Land identification system is not consistent across categories and over time	maybe	Difficult to assess
Hungary	ARD, FM	KP tables not submitted in time	Yes	Difficult to assess
Lithuania	ARD, FM	KP tables not submitted in time	Yes	Difficult to assess
Romania	ARD, FM	Land identification system is not consistent	maybe	Difficult to assess

“Land identification/ representation” issues

MS	KP activity	MS specific issue	Potential relevance for EU completeness	Likely quantitative relevance for EU*
Estonia	ARD	Land identification	No	Probably small
Romania	AR, FM	Activity data time series	maybe	Probably small
Estonia	D	Distinguishing of harvesting/ disturbance from deforestation	maybe	Potentially large
UK	D	Incomplete land coverage & Deforestation activities began on or after 1 January 1990	Yes	Probably small
Greece	D	Incomplete land coverage	Yes	Probably small

*Small: < 1 MtCO₂, Medium: 1-5 Mt CO₂, Large: >5 MtCO₂

AR “direct-human induced” issues

MS	KP activity	MS specific issue	Potential relevance for EU completeness	Likely quantitative relevance for EU*
France	AR	“direct human induced”	No	Large
Austria	AR	“direct human induced”	No	Medium
Bulgaria	AR	“direct human induced”	No	Medium

*Small: < 1 MtCO₂, Medium: 1-5 Mt CO₂, Large: >5 MtCO₂

“C pools estimation” issues: C pool not reported (“NR” in table NIR-1) without demonstrating it is not a source

MS	KP activity	MS specific issue	Issues or Notation key reported in specific tables	Potential relevance for EU completeness	Likely quantitative relevance for EU*
Denmark	AR	Litter, SOM - organic soils	NR	Yes	Small
Denmark	ARD, FM, CM, GM	ABG, BGB, LT, DW, SOM	Inconsistent CRF-KP tables	Yes	Small
France	D	DW	NO	Yes	Small
Greece	ARD, FM	LT, DW, SOM	NE, NO, NA	Yes	Small
Ireland	D	LT, DW, SOM	NO	Yes	Small
Netherlands	ARD	LT, DW, SOM	NE	Yes	Small
Portugal	ARD, FM	LT, DW, SOM	NE	Yes	Small
Spain	AR, FM	SOM	NE	Yes	Medium

*Small: < 1 MtCO₂, Medium: 1-5 Mt CO₂, Large: >5 MtCO₂

“C pools estimation” issues: C pool not reported (“NR” in table NIR-1) without demonstrating it is not a source

MS	KP activity	MS specific issue	Issues or Notation key reported in specific tables	Potential relevance for EU completeness	Likely quantitative relevance for EU*
Bulgaria	ARD	DW	NO	Yes	Small
Czech Republic	AR, FM	LT, DW, SOM	NE, NO	Yes	Small
Estonia	ARD	LT, DW, SOM	NE	Yes	Small
Latvia	AR, FM	LT, DW, SOM	NE	Yes	Small
Latvia	D	ABG, BGB, LT, DW, SOM	NA	Yes	Probably small
Poland	ARD, FM	LT, DW, SOM	NA	Yes	Medium
Romania	AR, FM	LT, DW, SOM	NE + Tier 1 for KC	Yes	Medium
Slovakia	ARD	LT, DW	NE, IE	Yes	Small
Slovenia	D	LT	NE	Yes	Small

*Small: < 1 MtCO₂, Medium: 1-5 MtCO₂, Large: >5 MtCO₂

“Base year data” issues

MS	KP activity and year	MS specific issue	Potential relevance for EU completeness	Likely quantitative relevance for EU*
Portugal	CM&GM 1990	NE	Yes	difficult to assess
Spain	CM 1990	NE	Yes	Probably medium
Denmark	CM&GM 1990&2008	SOM model	No	Probably medium

*Small: < 1 MtCO₂, Medium: 1-5 MtCO₂, Large: >5 MtCO₂

“other sources” issues

MS	KP activity	MS specific issue	Potential relevance for EU completeness	Likely quantitative relevance for EU*
France	FM	Emissions from wildfires missing	yes	Small-medium
France	D	Lime application missing	yes	small
UK	D	Emissions from wildfires on Deforestation lands missing	yes	small

*Small: < 1 MtCO₂, Medium: 1-5 MtCO₂, Large: >5 MtCO₂

Some consideration on the KP review process ...

- Some inconsistency in classification of issues by the reviewers (i.e. land issues classified inconsistently as sectoral issue or national system)
- Some inconsistency in considering the argumentations for “no source” and “direct human induced”
- Some problems identified by the EU QA/QC were not raised by ERT
- Slow process of harmonization and common understanding of requirements (both for reviewers and compilers)

“The procedures within the EU do not guarantee that the inventory is complete for all categories for which IPCC methods are available” ... The ERT recommends that *‘the EU provide information on procedures that will be put in place in order to ensure the **completeness** of the next submission’*

In the other sectors incompleteness is usually identified by “**NE**”, i.e. **not estimated**... in LULUCF things are typically a bit more complicated...

During the EU QA/QC of MS’ LULUCF submissions, we suggested:

- under **Convention reporting**: **NE** may be used for *"existing E/R which have not been estimated or which are considered to be negligible. NE may be used also for not reported pools (e.g. DOM /soil in FL-FL and living biomass in GL-GL, using the tier 1), provided this is clearly explained in the CRF and NIR"*
- under **KP reporting**: use "**NR**" (**not reported**) for pools not reported, provided that transparent and verifiable information is given showing that the pool is not a source. In KP LULUCF NIR1 "NE" is allowed only for GHG in tabs. 5(KP-II)1 to 5(KP-II)5 (but a Party should provide evidence that emissions are negligible).

The reality of KP LULUCF submissions showed that:

- The use of notation keys still appears not well harmonized, i.e. notation keys are used with different meanings by different MS. This would not a too big problem as long as the rationale for using a certain notation keys is clearly included in both CRF tables (documentation box) and NIR !

however, **based on review reports**, several MS has problems (in many cases, already highlighted in the EU QA/QC!) of:

- 1) **incomplete estimates**, and only some of these are indicated as NE (in some case NO or NA clearly denoted incomplete estimates).
- 2) **incomplete supplementary information** required for KP LULUCF (e.g. identification of lands, demonstrating that a pool is not a source, direct human induced AR,) This may be linked to 1, e.g. in the case of a pool not reported..

- Respect deadline of 15th January!
- Automatic checks would allow detecting some incomplete estimates (these checks would be most effective if we agree on a more harmonized use of notations keys among MS)
- If we continue with the current fairly wide interpretations and applications of notation keys, the identification of a "real" gap needs expert assessment which is provided only by the UNFCCC review (but some review reports will likely not be published in time for this scope...)
- For any identified gap, possible correction actions will be discussed bilaterally with the MS concerned (by end of February)
- If MS submission to the European Commission by 15 March still contains incompleteness, the EU experts will start the **gap filling procedures** according to articles 13-16 of Commission Decision 2005/166/EC. *In particular as regards the LULUCF sector, gap-filling procedures based on expert judgment will be applied to all categories or C pools for which the UNFCCC review identified gaps and/or missing estimates. (MS will have to use these estimates in their national submissions to the UNFCCC).*

EU internal review

Which topics

Volunteer reviewers

Timelines

Thanks!