The EC Monitoring Mechanism

Towards comparable and transparent greenhouse gas inventories?

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INTRODUCTION

The European Community (EC) monitoring mechanism is the legal instrument established by the European Commission to assess progress across the EC in meeting commitments to reduce greenhouse gas (GHG) emissions. As such, the monitoring mechanism constitutes a cornerstone of EC climate policy.

The Commission announced the mechanism in June 1992, as part of a package of proposed measures to implement EC climate policy and commitments under the United Nations Framework Convention on Climate Change (UNFCCC). The monitoring mechanism was adopted by the European Council as Decision 93/389 in June 1993.[1] The focus of EC policy at this time was to stabilise carbon dioxide emissions in the EC at 1990 levels by 2000, as agreed by a meeting of the Council of Environment and Energy Ministers in October 1990. This agreement was reached in light of targets identified by a number of member states for stabilising or reducing emissions. Similarly, under the UNFCCC, (ratified by the EC in 1993) the EC and its Member states are obliged to take measures to limit emissions of greenhouse gases with the aim of returning to 1990 emissions levels by 2000. As a party to the Convention the EC is also obliged to report on its progress to the Conference of the Parties. The purpose of the monitoring mechanism then is to monitor the progress of member states in reaching agreed individual targets, and to enable the Commission to assess the progress of the EC overall in meeting its commitments and reporting to the UNFCCC.

The mechanism has recently been amended to encompass new requirements under the 1997 Kyoto Protocol to the UNFCCC, signed but not yet ratified by the EC. Council Decision 1999/296/EC was adopted on 26 April 1999 and came into force on 1 May 1999. The emphasis under the amended mechanism has shifted to the EC commitment under the Kyoto Protocol to reduce GHG emissions by 8% in the commitment period 2008-2012. This reduction target will be legally binding, and non-compliance could carry heavy penalties under Article 18 of the Protocol.

Furthermore, the EC member states plan to take advantage of Article 4 of the Kyoto Protocol and fulfil their commitments to reduce emissions jointly. In June 1998 the European Council reached agreement, in principle, on individual targets for members (see box). Under the rules of Article 4, if the collective 'bubble' is not reached, each party remains responsible for its own target, as set out in the burden-sharing agreement. Should any one party fail to reach its target, meaning the EC falls into non-compliance, both that party and the EU will be held responsible. Therefore, the need for a reliable measure of progress by each party, and by the EC itself has increased. The Commission has recognised that the monitoring mechanism should now be enhanced to meet these new challenges. In a communication to the Council and Parliament in May 1999 the Commisson stated that 'More efforts must be made to develop the Monitoring Mechanism as an integral part of a Community compliance

[1] Council Decision 93/389/EEC of 24 June 1993 for a monitoring mechanism on CO_2 and other greenhouse gas emissions, OJL 167/31, 9.7.93.

system'.[2]

Analysis of accurate and timely baseline and annual data on GHG emissions is the key means by which the Commission can make a quantitative review of progress towards emissions targets by member states and the EC overall. In addition, the EC is required to submit such data to the UNFCCC. Therefore GHG inventories are a critical component of the monitoring mechanism. In the future, reliable inventories will become even more important to assess member states' compliance with the targets agreed under the burden-sharing agreement, and to track transfers of GHG emissions allowances under the Kyoto Mechanisms. This paper analyses use of inventory data under the original monitoring mechanism and looks at prospects for the future.

Member State	Burden Sharing Agreement target
Austria	-13%
Belgium	-7.5%
Denmark	-21%
Finland	0%
France	0%
Germany	-21%
Greece	+25%
Ireland	+13%
Italy	-6.5%
Luxembourg	-28%
Netherlands	-6%
Portugal	+27%
Spain	+15%
Sweden	+4%
UK	-12.5%

PROGRESS UNDER THE ORIGINAL DECISION

Decision 93/389 required member states to 'devise, publish and implement national programmes for limiting their anthropogenic emissions of carbon dioxide' and to report these to the Commission "periodically". The contents of the programmes had to include:

- the 1990 base year anthropogenic emissions of CO_2
- inventories of national anthropogenic CO_2 emissions by sources and removals by sinks
- details of national policies and measures limiting CO_2 emissions
- trajectories for national CO_2 emissions between 1994 and 2000
- measures being taken or envisaged for the implementation of relevant EC legislation and policies
- a description of policies and measures in order to increase sequestration of CO_2 emissions
- an assessment of the economic impact of the above measures.

Although the national programmes only had to be reported periodically, the Decision required member states to report annually to the Commission on their CO_2 emissions and removal by sinks for the previous calendar year. Within three months of receiving the information, the Commission was to establish inventories of emissions and removals by sinks in the Community and circulate them to all member states. These inventories, together with the programmes, were to form the basis of an annual assessment of progress by the Commission, which would be reported to the European Council and the European Parliament. The amended Decision extends the requirement to establish national programmes for limiting or reducing carbon dioxide to all other GHGs, except those controlled by the Montreal Protocol.

Although it is not mentioned in the Decision, the European Environment Agency (EEA), established in 1993, has much of the responsibility for assisting member states in compiling their inventories and assisting the Commission in compiling the overall EC inventory. In 1995 responsibility for compiling GHG inventories was given to the European Topic Centre on Air Emissions (ETC/AE), led by the Federal Environment Agency (UBA Berlin).

To date, universal annual submission of inventories has not been achieved and only two assessments of progress have taken place. In 1994 the first evaluation of national programmes was published, as required. At this time no inventory data was available to the Commission and assessment of progress was impossible.[3] The second evaluation and assessment was published in 1996[4] and should have reviewed progress up to 1993. Provisional 1990 inventories had been submitted by member states and the EEA had compiled these into an EC inventory. However, the Commission reported that inadequate data had been provided by member states to compile an EC inventory for subsequent years. Energy data from Eurostat was used as a proxy for 1993 inventories to assess progress. The EC 1990 inventory was submitted to the UNFCCC later in 1996, as part of the first national communication, so at least one of the aims of the mechanism was met.[5]

In 1997 the EEA presented a 1994/5 EC inventory to the Commission.[6] In June 1998 it was submitted 15 months overdue to the UNFCCC as part of the Second National Communication of the EC.[7] The Annual EC GHG inventory for 1996, compiled by the EEA for the Commission, was submitted to the UNFCCC in May 1999.[8] The Commission has not used either of these inventories to assess progress as required under the monitoring mechanism. This is blamed on a lack of resources.[9] However, this year the EEA issued an 'Overview of national programmes to reduce greenhouse gas emissions',[10] which fulfils many of the functions of a Commission assessment of progress. The report states that the EC inventories were late because member states did not provide national inventories on time. By 31 July 1997 only a few member states had submitted 1996 estimates to the Commission as required under the monitoring mechanism. By April 1999, twelve out of 15 member states had provided 1996 estimates and Austria, Finland, Germany, Luxembourg, Ireland and Sweden had reported their 1997 estimates. Therefore the EC inventory could only be estimated by the EEA for the years up to 1996. Even so, data was missing from Italy, Spain and Portugal. For these countries (covering 21.5% of emissions of CO2) data from 1995 (Italy and Spain) and 1994 (Portugal) was used.

It is understandable that member states have had problems reporting on time, given the rapid development of the climate issue and demand for compilation of GHG inventories. However, timely data is vital to an effective review of progress in implementing commitments under the UNFCCC. While this is true for all countries that are, or will be, party to the UNFCCC and Kyoto Protocol, the onus on the EC is particularly strong given the burden sharing approach that it has chosen to take. In recognition of problems that member states face, the new monitoring mechanism defers the annual reporting date to 31 December. It remains to be seen whether member states will manage to reach this new deadline.

Of equal concern as the timeliness of submissions to the monitoring mechanism has been the quality of the inventories when they do arrive. Between 1994 and 1996 VERTIC carried out an EU-funded study that examined how the EC and its member states compiled GHG inventories.[11] The study was carried out in collaboration with University of Bradford, UK; Forschungszentrum Jülich GmbH, Germany; and LABEIN Technological Research Centre, Spain. It was entitled 'Greenhouse Gas inventories: National reporting processes and implementation review mechanisms in the EU' (GGRIP). The study revealed a number of problems with inventory compilation and reporting at that time. First, member states' and EC inventories were simply not accurate or reliable apart from CO_2 emissions from the energy sector. This is not surprising given the sudden demand for emissions data from a wide range of sectors. Of greater concern was the lack of consistency between inventories and the lack of transparency surrounding the data supplied. Although member states made a serious attempt to prepare their GHG inventories according to UNFCCC guidelines (as required under the monitoring mechanism), substantial national differences occurred in the way that the inventories were compiled, partially reflecting differences in national government systems and cultures. There were significant differences in the way guidelines or methodologies were interpreted and applied and in the transparency, comprehensiveness and disaggregation of submitted inventory data. The UNFCCC 'in-depth reviews' of national communications in 1996 also reported that many errors, inconsistencies and omissions were found in the inventories.[12] The GGRIP report also noted that in most member states inventory compilation process was in practice quite closed and lacking in external review. The method by which the EC inventory was compiled was described as particularly non-transparent.

Work by the EEA and member states has led to many improvements in inventory quality between 1996 and 1999, but further improvements are possible and needed.[13] The 1999 EEA Overview of national programmes concludes:

[2] Commission Communication to the Council and the Parliament 19 May 1999, Preparing for implementation of the Kyoto Protocol, COM(1999)230.

[3] Report from the Commission under Council Decision 93/389/EEC, First evaluation of existing national programmes under the monitoring mechanism of community CO2 and other greenhouse gas emissions COM(94) 67, Brussels, 10.03.94.

[4] Report from the Commission under Council Decision 93/389/EEC, Second evaluation of national programmes under the monitoring mechanism of community CO2 and other greenhouse gas emissions: Progress towards the Community stabilisation target, COM(96)91, Brussels, 14.03.96.

[5] Reported in Air Emissions Annual Summary report 1996 EEA Topic Report 6/1997.

[6] Reported in Air Emissions Annual topic update 1997 EEA Topic Report 4/1998.

[7] Second Communication from the European Community under the UN framework Convention on Climate Change, SEC(98) 1770, 26 June 1998.

[8] Annual European Community Greenhouse Gas Inventory 1990-1996, EEA Technical Report 19, May 1999.

[9] Environment Directorate personal communication.

[10] EEA Topic Report 8/1999.

[11] Prepared for Directorate General XII/D-5 Environment Programme, CEC Contract No EV SV-CT94-0387.

[12] FCCC/SB/1996/1Add.1.

[13] EEA personal communication.

Information on emissions and removals from the Member states has improved compared to the second evaluation report of the Commission and the reported inventory estimates are more consistent with the IPCC Guidelines for estimation and reporting required under both the UNFCCC and the EC monitoring mechanism. However, inconsistencies and methodological questions still remain to be addressed by the Member states... in order to further improve the comparability, completeness, transparency and consistency of emission inventories. The main issues still to be resolved are guaranteeing consistent use of the revised 1996 IPCC Guidelines by the Member states (including the current and the future definitions of emissions and removals from land-use change and forestry), and the inclusion of actual emissions from non-energy fossil fuel use ('feedstocks'), international bunkers, and from biomass used as fuel.

Consistency and comparability between member states inventories is essential for producing an accurate aggregated EC inventory and assessing progress. The Commission is now working on this issue. Specifically, Article 3 of the amended monitoring mechanism contains a new obligation on the Commission to 'take further steps to promote the comparability and transparency of national inventories and reporting'. A working group is to be set up to work on the improvement of annual GHG inventories.[14]

INVENTORY COMPILATION SYSTEMS IN THE EC - PROBLEMS AND SOLUTIONS

One possible reason for the lack of consistency and comparability across member states' inventories reported in 1996 is the variety of national systems for compiling the data at that time. Two international systems operate in Europe to compile national GHG inventories. One is the IPCC system that member states must use to report to the UNFCCC and the Monitoring Mechanism. The other is CORINAIR, the European inventory system set up to report to the Convention on Long Range Transboundary Air Pollution, but now used by the EEA to collect data on European air emissions for a variety of purposes. In addition, several member states have developed their own national inventory systems to meet their own requirements for emissions data. Countries compile their inventory using their preferred approach and then transform it into the IPCC format to report to the UNFCCC and the monitoring mechanism. At that time data collected under national and CORINAIR systems was slightly different from that required by the IPCC. For example source sectors were defined in different ways.

From its inception, the EEA, assisted by the ETC/AE, has worked to overcome these problems. The approach has been to harmonise the CORINAIR inventory compilation system with the IPCC reporting guidelines, and to encourage member states to use CORINAIR to compile their inventories, with the objective of improving comparability and consistency.[15] Ultimately, the ETC/AE hopes to automate data collection, storing and handling throughout Europe. To this end a set of software tools are being developed to allow transparent and standardised inventory compilation. They should also speed up the transmission of national data to the EEA for compilation into the EU inventory. There are two key software packages: CollectER, which allows national centres to collect the data for all their reporting requirements in a transparent way, and ReportER, which interprets and formats the data into the required form, in the case of the UNFCCC and EU monitoring mechanism, this is the IPCCC format. Other efforts by the ETC/AE to improve compilation and reporting of air emissions inventories have included the establishment of a group of technical advisors to assist national experts, regular workshops of national experts and development of CORINAIR/EMEP guidelines.

The Commission shall take further steps to promote the comparability and transparency of national inventories and reporting

Article 3, Decision 1999/296/EC

ETC/AE experts have also worked closely with the IPCC and OECD in order to harmonise CORINAIR methodology with IPCC reporting requirements. An International Liaison Group was set up for this purpose and ETC/AE members also participate in IPCC working groups. As a result, CORINAIR source sector definitions and nomenclature have been changed in order to correspond as much as possible with IPCC source sectors and CORINAIR reports can now be directly and automatically aggregated to the requirement of the IPCC guidelines. This work indicates that technical and theoretical difficulties associated with reporting to the UNFCCC and the monitoring mechanism have been largely overcome.[16]

[14] EC Call for tender A2/SER/990097 and Environment Directorate personal communication.

[15] See note 5.

[16] See notes 4 and 5.

The other cause of lack of consistency and comparability across inventories identified by the GGRIP team was of a more cultural nature. Differences in institutional structures, resources and capacity of national monitoring agencies meant they compiled their inventories in different ways, which impacted on the overall reliability, comprehensiveness and comparability of the national inventories. This may continue to be a problem. The success of the current approach will depend on member states adopting the CORINAIR approach and applying it consistently. It is not clear whether this is possible.

INVENTORY REVIEW MECHANISMS

Systematic technical review of member states' inventories would permit the Commission to control the quality and timeliness of GHG inventories under the monitoring mechanism. Such a system could also improve comparability (across states and time) and transparency of the inventories.

The inventory review system under the monitoring mechanism was agreed by the Monitoring Mechanism Committee in May 1995.[17] The Commission was to review member states inventories with representatives of Eurostat and the EEA, in collaboration with member states. The EEA would review the emissions factors used, while Eurostat would compare energy data submitted under the monitoring mechanism to Eurostat figures. There was no mention of any official review process for the EC inventory. The second evaluation of national programmes under the monitoring mechanism in 1996 was a first attempt to use this review system. It is not clear to what extent they have been used since.[18]

Enhancing the monitoring mechanism inventory review system would extend knowledge of the accuracy and reliability of the data. It would promote transparency and comparability and deter misreporting and non-compliance. The information made available would promote awareness and knowledge of progress in implementing GHG commitments, thus building mutual confidence amongst member states and EC institutions that climate change commitments are being implemented. Last, comprehensive inventory review should promote informal evaluation and assessment of implementation of commitments alongside the formal EU political assessment and evaluation.

The GGRIP study team presented a proposal for a European inventory review system in 1996 that could be worth reconsidering in light of the Commission's new obligation to improve transparency and comparability.[19] The proposal aims to increase the transparency of, and participation in, the process of compiling and reviewing GHG inventories. It also recognises the need for confidentiality at some points and efficient use of limited resources. The proposed scheme consisted of a number of components as described below.

Develop Guidelines

National Inventory Compilation Phase
Establish Reviews at key points *during* nationa compilation process:
i) expert (sub-) sectoral review
ii) open consultation on draft inventory.

EC Technical Review on National Inventories
Coordinated by independent technical assessmen body.
Involve EEA and wide range of groups i assessment.
All inputs to assessment made public.

Implementation review and political assessment
Wide informal review of implementation promoted by transparency and openness of technical revie phase.
Formal evaluation by Commission, Council an Parliament under the monitoring mechanism.

GGRIP proposed inventory review system 1996

Guidelines
As Annex I parties to the UNFCCC, EC members and the Commission should prepare inventories according to the guidelines established or endorsed by the UNFCCC Conference of the Parties. Thus EC guidelines should always be compatible with, and subordinate to, those of the UNFCCC. However, UNFCCC guidelines may not always be sufficiently closely defined to avoid problems of comparability between states. Within the EC there is scope for more elaborate or closely defined guidelines on inventory compilation to promote comparability and meet special EC requirements.

[17] Fifth Monitoring Mechanism Committee meeting, 18 May 1995. Committee paper 'Proposal for the contents and formats of annual inventories'.

[18] Environment Directorate, personal communication.

[19] S. Comes, O. Greene, J. Lanchbery 'Developing an EU greenhouse gas inventory implementation review system: An outline proposal'. Greenhouse Gas inventories: National reporting processes and implementation review mechanisms in the EU, KFA, Jülich. 1996

Pre-submission review of national inventories
Review systems are integrated into the inventory compilation phase in order to identify and address problems from the beginning. Technical review of national inventories would proceed in two stages. The first would be closed and involve technical experts from the host country, EU institutions and other member states. The experts would review in detail the data (including confidential data), emission factors and methodologies the country was using at each sector or subsector level. The EEA would have a prominent role and could ask for specific changes to be made. This stage could proceed via workshops. They need not be held for every sector every year, but emission factors and methodologies should not be changed without a prior debate by experts. The second stage would be release of the draft inventory for public consultation and review before it was finalised and submitted. Although there might not be wide interest in reviewing the inventory at first, the system would create confidence and transparency and might at some point develop into an effective review tool.

Post-submission review of national and EC inventories
Technical assessment of submitted inventories needs to be systematic and rigorous, sensitively manage relations between the review body and the country concerned and result in an authoritative technical report. This requires a dedicated coordinating body, with some provision for confidentiality. However, a wide range of groups and institutions have relevant knowledge and expertise and the review system should promote input to the review as well as access to the resulting inventories and assessment report.

It was therefore proposed that technical assessment of submitted national inventories would be co-ordinated by an independent body established for the purpose, supported by the EEA and DGXI but retaining sufficient independence from them to be impartial. This body would review the accuracy, reliability, and completeness of both national and EC inventories and make recommendations for their improvements. Members could include experts from member states, the Commission, EEA, ETC/AE, international bodies (e.g. OECD, IPCC), environmental non-governmental organisations and industry. The members would be sent relevant information which they would return with comments, and could meet occasionally. On the basis of these assessments and comments the body would provide a detailed report on the inventory. The report and the inventory itself (perhaps revised) would be available to the public, as would evidence that had been submitted.

Implementation review and political assessment
The technical review process would facilitate informal political evaluation of the inventories and their implications for policy and compliance, by a wide range of interested groups. This would complement and re-inforce the formal EC annual evaluation of progress.

INVENTORY REVIEW UNDER THE UNFCCC

Any re-examination of inventory review under the monitoring mechanism should aim to reinforce, rather than duplicate, current efforts under the UNFCCC. Improved review processes for inventories are under consideration by the Fifth Conference of the Parties to the UNFCCC. Improved reporting guidelines on annual inventories, including a common reporting format, have been drafted,[20] and it is intended that these will result in GHG inventories being reported in a manner that facilitates their effective review.[21] It is proposed that post-submission review will proceed in three parts. First, initial checks on completeness and consistency would be carried out by the Secretariat according to a checklist. A status report would be posted on the web. Next, synthesis and assessment of inventories by the Secretariat would be carried out, with a focus on accuracy, transparency, comparability and consistency over time and among countries. Emissions factors would be compared across states and activity data compared to international data. The results of this stage will be presented in a synthesis and assessment report. Last, every 2-3 years each party would be subject to an individual review of their inventory by expert teams in order to clarify issues that have been raised in the earlier stages and look in greater detail at how the inventory is produced. This might proceed by sending material to experts, holding meetings and conducting country visits, to assess the quality of the information on emissions. Again reports will be available on the web.[22]. These systems will be trialled between 2000 and 20002.

In addition, the IPPC/OECD/IEA Programme on National GHG inventories is currently completing work on managing uncertainty in national GHG inventories and preparing a report on good practice in inventory management. One of the goals of the IPPC good practice guidance is to develop emissions inventories that can be readily assessed in terms of quality and completeness. Quality assurance/quality control (QA/QC) procedures have been identified as

[20] FCCC/SBI/1999/L.6.
[21] FCCC/SBSTA/1999/3.
[22] FCCC/SBI/1999/13.

tools to reach this goal.[23] UNFCC reporting guidelines already state that national inventory reports from countries should include 'information on QA/QC procedures implemented',[24] the IPCC/OECD/IEA programme will provide guidance how to achieve this.

QA/QC procedures provide standards for documentation and external audit to allow transparency. QC activities are undertaken during compilation of the inventory to provide routine checks and documentation points to verify data integrity correctness and completeness, identify errors and facilitate review processes. Some country inventory processes follow international standards such as International Organisation for Standardisation (ISO) 9000 series in order to implement QC. ISO9000 certification in available for those institutes that comply with it, but there is no standard specific to emissions inventories.[25]

QA activities include a system of review and audit procedures performed by personnel not involved in the inventory development process. A number of tools are available. First, independent audits can be carried out to determine whether QC procedures are being properly implemented. Next expert technical review can be used to check issues such as choice of methodology, assumptions, data and time series consistency. These would usually be undertaken for individual sectors and sub-sectors, specific categories or gases and could be very detailed. Such peer review would be most important when a method is first adopted or revised. Formal stakeholder review can also focus on specific source categories or gases. This procedure might then overlap with expert review. Public review allows a broader range of comments and issues to be raised by groups outside the main inventory process.

Early implementation by the EC of quality control and quality assurance tools would demonstrate a leadership role in this important area.

SUMMARY AND RECOMMENDATIONS

The current system for compiling reporting and reviewing inventories in the EC has a number of great strengths (see box). However, the formal system for promoting comparability and transparency of national inventories remains at an early stage of development. The lack of a systematic GHG inventory review system in the monitoring mechanism means that the European Commission has no means of ensuring that it receives timely and reliable data with which to assess progress on implementing climate commitments.

The EEA has worked hard to overcome the technical requirements for compiling an accurate EC inventory but has no real means for dealing with problems such as late reporting or poor quality inventories.

Strengths of the EC inventory compilation system

- Relatively well developed national systems for compiling comparable inventories and reporting to Commission and UNFCCC.
- Good formal and informal links between national experts.
- Established expert resource for promoting and improving reliability and consistency among national inventories and for technical review of submitted national inventories in EEA and ETC/AE.
- The Monitoring Mechanism provides a framework for the Commission and other EC institutions to evaluate national and EC inventories and programmes.

A number of ideas for improving the inventory review system could be considered in light of the Commission's obligation to promote the comparability and transparency of national inventories and reporting in the EC. These might include the following:

- Updating the GGRIP study on national and EU compilation systems, to see what differences persist in the way inventories are compiled and reported and why these occur.
- Updating guidelines for inventory compilation, reporting and review guidelines under the monitoring mechanism giving precise instructions where alternative options are available.
- Adoption of common QA/QC procedures, including independent auditing in all EC Member States as mandatory.
- Systematic pre-submission technical review of national inventories with involvement of ETC/AE experts to ensure consistency. Adopt requirement for formal clearance at this stage for new or revised methods. Emphasis should be placed on source sectors for which there is a high level of uncertainty in the emissions estimate, and sources that contribute a large proportion of overall emissions.
- Pre-submission technical review of inventories by stakeholders such as industrial groups.

[23] Managing uncertainty in national greenhouse gas inventories. Meeting report Paris, France 13-15 October 1998.
[24] FCCC/SBSTA/1999/L.5.
[25] See note 23.

- Release of draft national inventories for public consultation and review.
- Initial checks on consistency and accuracy, and compilation and assessment of inventories by EEA with results made public.
- Wide review process for submitted national inventories and EC inventory coordinated by an impartial body.

VERTIC recommends that the Commission considers the ideas listed with a view to implementing a systematic inventory review system.

The inventory review system should achieve an appropriate combination of confidentiality and transparency, and a balance between technical review by experts and policy assessment by a wide range of interested groups and institutions. A focus on review in the pre-submission phase would build understanding among EC institutions of national inventory compilation methods and help identify and tackle problems at an early stage. It would also help ensure that member states were working to appropriate timeframes.

New procedures should be chosen so as to build on existing institutions and practices, both formal and informal. This will ensure that the change is politically and bureaucratically acceptable and contributes to the likely effectiveness of the system.

The EC review system and the UNFCCC review should be kept separate, but the EC system should aim to ensure that they mutually reinforce one another. For example, EC inventory reviews should be available to UNFCCC in-depth review teams and vice versa. Appropriate communication should be maintained between the Commission and the UNFCC Secretariat to allow those setting up the two systems to learn from one another. For example, EEA staff and UNFCCC Secretariat staff could compare notes on methods for carrying out the initial checks on consistency and accuracy, and compilation and assessment of inventories.

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