

Record 1: Revision of the Monitoring Mechanism Decision (Decision 280/2004/EC)

General Questions

I am responding on behalf of: a non-governmental organisation

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Air Transport Association of America, Inc. (ATA) (comments filed by Nancy Young, VP Environment). ATA airline members and their affiliates transport more than 90 percent of all U.S. passenger and cargo traffic. For more information, visit www.airlines.org

Country (please indicate your current country of residence): Outside the EU

Are you familiar with policies dealing with climate change? I am very familiar

Are you aware that greenhouse gas data are collected and made publicly available in the European Union? Yes

Do you consider that you are well informed by the national and European public authorities on their efforts to combat climate change? I am very well informed

Do you think there is a need for more and better information on greenhouse gas emissions and on actions taken to combat climate change at national and European level? No

Are you familiar with the Monitoring Mechanism Decision? Yes

If "yes", have you been involved in implementing it? I have not been involved

The data collected through the current monitoring mechanism is comprehensive: Strongly agree

The reliability of data collected through the current monitoring mechanism is satisfactory: Agree

The transparency of the data collected through the current monitoring mechanism is satisfactory: Agree

Does the Monitoring Mechanism Decision need to be changed to improve reporting of greenhouse gas emissions and/or climate change related information? No

Should the Monitoring Mechanism Decision be the main instrument for monitoring and reporting on matters relating to greenhouse gas emissions and climate change (e.g. on finance, adaptation, technology transfer, etc.) or would multiple dedicated instruments be more appropriate? No opinion

Reporting of emissions, policies and measures

I am satisfied with the level of information provided by national authorities and the EU with regard to their policies, measures and projections, and with the methodologies used to produce this information. Agree

With regard to reporting on policies, measures and projections, the monitoring mechanism needs to lay down more precise rules on (choose all that apply):
Reporting formats

The Monitoring Mechanism Decision should enable streamlining of reporting with regard to (choose all that apply):

The EU should establish a national inventory review process (similar to the reviews under the UNFCCC) to assess the information provided by national authorities on climate change. No opinion

Please explain your answer above:

Climate change-related financial flows

The information provided by EU countries on climate-related funding for developing countries is transparent, easy to access and to compile. Somewhat disagree

Including climate funding information in the EU Monitoring Mechanism Decision will have an added value compared to existing development finance reporting (e.g., reporting to the OECD Development Assistance Committee (DAC)) on financial flows to developing countries. No opinion

Please explain your answer above:

It would be useful to monitor financial flows centrally at EU level. Yes

If "yes", what types of financial flows would be best monitored at EU level?

It would be helpful to have EU-level reporting, because the current reporting on a country-by-country basis differs in degree, content and accessibility. Reporting should include how Member States spend the monies collected from auctioning under the EU Emissions Trading Scheme.

Adaptation

What reporting requirements should there be with regard to adaptation to climate change? No opinion

Is it necessary to set up a national focal point to provide information on adaptation to the adverse effects of climate change? No opinion

Land use, land use change and forestry (LULUCF)

Do you think additional reporting on the following would be useful (as discussed under the UNFCCC)?

Reporting on emissions and removals from rewetting and drainage of organic soils. No opinion

Reporting on emissions and removals related to large natural disturbances, so-called force majeure events. No opinion

Reporting on emissions and removals from the harvested wood products pool. No opinion

If you answered "yes", for one or more options, please define the type of information that could usefully be reported.

Emissions from international maritime transport

More accurate data on emissions from international maritime transport should be required to facilitate future action to tackle these emissions. Strongly disagree

Who should be responsible for collecting and consolidating greenhouse gas data for international maritime transport based on fuel consumed and ports visited?

other

Please specify:

The EU does not have jurisdiction over greenhouse gas emissions from international maritime. Thus, it is inappropriate for the EU to compel reporting and regulation of such emissions. We note that the EU also does not have jurisdiction over greenhouse gas emissions from international aviation, a point ATA has made in repeated filings with the European Commission and in litigation challenging the EU ETS as applied to non-EU airlines. The EU is in violation of international law for its unilateral regulation of such emissions.

Full impact of aviation on the global climate

Do existing reporting instruments provide enough information to enable us to understand the full impact of aviation on the climate? No

If "no", please explain what additional data, type of data, or methods are needed to improve our understanding of the full impact of aviation (besides CO2).

The requirements are sufficient, and should not be revised. A great deal is known about aviation and climate change, through comprehensive data and analysis developed and reported in the relevant United Nations peer-review process. Specifically, in 1999, the Intergovernmental Panel on Climate Change (IPCC) undertook a sector-specific study of the climate change impacts of aviation— the only sector-specific report ever completed. The work in this report, which was fully integrated into the comprehensive IPCC reporting process, received a full update during the IPCC's fourth assessment process, culminating in 2007, and is again undergoing a full review as part of the IPCC's fifth assessment. The IPCC work includes both CO2 and non-CO2 impacts. As with the non-CO2 greenhouse gas emissions from other sectors, there are greater levels of uncertainty with the non-CO2 impacts of aviation greenhouse gas emissions than with CO2 impacts. This is a result of limitations in the science, not in collected data. The way to address this is not through a separate, EU-specific data-collection, reporting and analysis process, as this would be duplicative of IPCC efforts and likely would lead to confusion. Instead, the European Union should continue to provide scientific input into the IPCC process. In any event, the EU should not add requirements to its already overly burdensome emissions reporting regime for airlines under the EU ETS. Compliance with existing provisions already has forced the airlines to spend millions of dollars in new information technology systems and exposes them to exorbitant, ongoing compliance costs. Further, the relevant Directive, 2008/101/EC, and national acts implementing it violate international law and U.S. bilateral Air Services Agreements with the European Union for the reasons set forth in proceedings before the Court of Justice of the European Union upon a preliminary reference from the High Court of Justice in London. See Case C-366/10.

Access to data and user-friendliness of reports

*I use the data available through the European Environment Agency's (EEA) **greenhouse gas data viewer** at least:* once a year

*The data available through the EEA's **greenhouse gas data viewer** is easily retrievable and usable.* agree

Please suggest ways of improving the EEA's greenhouse gas data viewer:

*I use the **EEA's database on climate change policies and measures** in Europe at least:* once a month

*The information available through the EEA's **database on climate change policies and measures** in Europe is easily retrievable and usable.* agree

Please suggest ways of improving the EEA's database on climate change policies and measures in Europe:

*I use the information available through the **EEA's progress towards Kyoto and 2020 targets** report at least:* once a year

*The **EEA's progress towards Kyoto and 2020 targets** report is easily understandable and clear.* agree

Please suggest ways of improving the EEA's progress towards Kyoto and 2020 targets report:

*I use the information available through the annual **EU greenhouse gas inventory report** at least:* once a year

*The annual **EU greenhouse gas inventory report** is easily understandable and clear.* agree

*I use the information in the **Commission's annual progress report** towards achieving the Kyoto objectives at least:* once a year

*The Commission's **annual progress report** towards achieving the Kyoto objectives is easily understandable and clear.* agree

Please suggest ways to improve the Commission's annual progress report towards achieving the Kyoto objectives:

Final Comments

Please provide any further input or comments you would like us to take into account when revising the Monitoring Mechanism Decision:

Record 2: Revision of the Monitoring Mechanism Decision (Decision 280/2004/EC)

General Questions

I am responding on behalf of: a non-governmental organisation

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

TERRA Mileniul III

Country (please indicate your current country of residence): Romania

Are you familiar with policies dealing with climate change? I am very familiar

Are you aware that greenhouse gas data are collected and made publicly available in the European Union? Yes

Do you consider that you are well informed by the national and European public authorities on their efforts to combat climate change? I am somewhat informed

Do you think there is a need for more and better information on greenhouse gas emissions and on actions taken to combat climate change at national and European level? Yes

If "yes", please explain how you think information could be improved:

Ar fi necesara o mai mare transparenta a acestor date in special la nivel national. In general ele exista insa sunt fragmentate si nu sunt grupate. Spre exemplu pentru politica de schimbari climatice exista date la Ministerul Mediului inasa in ceea ce priveste politica energetica, aceste date se gasesc la Ministerul Economiei. Ministerul Economiei este cel mai putin transparent minister din Romania si de multe ori informatiile lipsesc de pe site. Este greu sa corelezi politica de schimbari climatice cu politica energetica a Romaniei.

Are you familiar with the Monitoring Mechanism Decision? Yes

If "yes", have you been involved in implementing it? I have not been involved

The data collected through the current monitoring mechanism is comprehensive: Somewhat disagree

The reliability of data collected through the current monitoring mechanism is satisfactory: Somewhat disagree

The transparency of the data collected through the current monitoring mechanism is satisfactory: Somewhat agree

Does the Monitoring Mechanism Decision need to be changed to improve reporting of greenhouse gas emissions and/or climate change related information? Yes

If "yes", in which areas could reporting be improved (choose all that apply):
Actual emissions and removals at national

level

Reporting on policies and measures

Projected emissions and removals

Maritime emissions

Aviation emissions

Land-use, land-use change and forestry (LULUCF)

Adaptation

Financial support for developing countries

Technology transfer to developing countries

Capacity building in developing countries

Accessibility of data and user friendliness of reports

Should the Monitoring Mechanism Decision be the main instrument for monitoring and reporting on matters relating to greenhouse gas emissions and climate change (e.g. on finance, adaptation, technology transfer, etc.) or would multiple dedicated instruments be more appropriate? The Monitoring Mechanism Decision should be the main instrument

Reporting of emissions, policies and measures

I am satisfied with the level of information provided by national authorities and the EU with regard to their policies, measures and projections, and with the methodologies used to produce this information. Somewhat disagree

With regard to reporting on policies, measures and projections, the monitoring mechanism needs to lay down more precise rules on (choose all that apply):

Methods to be used

Other

The Monitoring Mechanism Decision should enable streamlining of reporting with regard to (choose all that apply): Actual emissions and removals

Projected emissions and removals

Reporting on policies and measures

The EU should establish a national inventory review process (similar to the reviews under the UNFCCC) to assess the information provided by national authorities on

climate change.

Please explain your answer above:

Climate change-related financial flows

The information provided by EU countries on climate-related funding for developing countries is transparent, easy to access and to compile. Strongly disagree

Including climate funding information in the EU Monitoring Mechanism Decision will have an added value compared to existing development finance reporting (e.g., reporting to the OECD Development Assistance Committee (DAC)) on financial flows to developing countries. Agree

Please explain your answer above:

Ar trebui sa existe periodic un inventar cu contributiile fiecarui SM fata de Tarile in curs de Dezvoltare in felul acesta am putea afla cat si cum contribuie fiecare tara membra UE. In Romania astfel de informatii le aflam uneori din presa insa nu stim niciodata daca un angajament s-a si finalizat sau nu decat daca facem o cerere de informatii publice, iar raspunsul il aflam in 30 de zile de la depunerea cererii (in cel mai bun caz).

It would be useful to monitor financial flows centrally at EU level. Yes

If "yes", what types of financial flows would be best monitored at EU level?

- pentru Tarile in curs de Dezvoltare privitor la asistenta in dezvoltarea capacitatii, la adaptarea la schimbarile climatice, transfer de tehnologii, reduceri de emisii etc.

Adaptation

What reporting requirements should there be with regard to adaptation to climate change? They should include measures taken at national and regional level and budgetary allocation.

Is it necessary to set up a national focal point to provide information on adaptation to the adverse effects of climate change? Yes

Land use, land use change and forestry (LULUCF)

Do you think additional reporting on the following would be useful (as discussed under the UNFCCC)?

Reporting on emissions and removals from rewetting and drainage of organic soils. No opinion

Reporting on emissions and removals related to large natural disturbances, so-called force majeure events. No opinion

Reporting on emissions and removals from the harvested wood products pool. Yes

If you answered "yes", for one or more options, please define the type of information that could usefully be reported.

Cantitatile de lemn exploatate, cantitatile de deseuri rezultate si ce se intampla cu acestea, cantitatea de CH4 emisa in admosfera rezultata din depozitarea deseurilor precum si estimarea cantitatii de CO2 care ar fi sechestrata de padurea respectiva.

Emissions from international maritime transport

More accurate data on emissions from international maritime transport should be required to facilitate future action to tackle these emissions. Strongly agree

Who should be responsible for collecting and consolidating greenhouse gas data for international maritime transport based on fuel consumed and ports visited? a central body for the EU

Full impact of aviation on the global climate

Do existing reporting instruments provide enough information to enable us to understand the full impact of aviation on the climate? Yes

Access to data and user-friendliness of reports

*I use the data available through the European Environment Agency's (EEA) **greenhouse gas data viewer** at least:* once a year

*The data available through the EEA's **greenhouse gas data viewer** is easily retrievable and usable.* somewhat agree

Please suggest ways of improving the EEA's greenhouse gas data viewer:

*I use the **EEA's database on climate change policies and measures** in Europe at least: once a year*

*The information available through the EEA's **database on climate change policies and measures** in Europe is easily retrievable and usable. agree*

Please suggest ways of improving the EEA's database on climate change policies and measures in Europe:

*I use the information available through the **EEA's progress towards Kyoto and 2020 targets** report at least: once a year*

*The **EEA's progress towards Kyoto and 2020 targets** report is easily understandable and clear. agree*

Please suggest ways of improving the EEA's progress towards Kyoto and 2020 targets report:

O problema este cea a raportarilor SM care este neunitara si inconsidenta uneori.

*I use the information available through the annual **EU greenhouse gas inventory report** at least: once a year*

*The annual **EU greenhouse gas inventory report** is easily understandable and clear. somewhat agree*

*I use the information in the **Commission's annual progress report** towards achieving the Kyoto objectives at least:*

*The Commission's **annual progress report** towards achieving the Kyoto objectives is easily understandable and clear.*

Please suggest ways to improve the Commission's annual progress report towards achieving the Kyoto objectives:

Final Comments

Please provide any further input or comments you would like us to take into account when revising the Monitoring Mechanism Decision:

Record 3: Revision of the Monitoring Mechanism Decision (Decision 280/2004/EC)

General Questions

I am responding on behalf of: a research/educational institution

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Laboratoire des Sciences du climat et de l'environnement (LSCE - UMR8212, CNRS-CEA-UVSQ)

Country (please indicate your current country of residence): France

Are you familiar with policies dealing with climate change? I am familiar

Are you aware that greenhouse gas data are collected and made publicly available in the European Union? Yes

Do you consider that you are well informed by the national and European public authorities on their efforts to combat climate change? I am well informed

Do you think there is a need for more and better information on greenhouse gas emissions and on actions taken to combat climate change at national and European level? Yes

If "yes", please explain how you think information could be improved:

Pour le grand public : Mettre en place et communiquer des indicateurs de suivi des émissions de gaz à effet de serre (GES), via le WEB. Pour la communauté scientifique : poursuivre et accentuer l'effort de constitution et de mise à jour des inventaires d'émissions "gapfilled" pour le GES (tels que ceux proposés par l'EEA). L'estimation des incertitudes sur les inventaires d'émissions de GES est fondamentale et doit être améliorée.

Are you familiar with the Monitoring Mechanism Decision? Yes

If "yes", have you been involved in implementing it? I have not been involved

The data collected through the current monitoring mechanism is comprehensive: Somewhat agree

The reliability of data collected through the current monitoring mechanism is

satisfactory: Disagree

The transparency of the data collected through the current monitoring mechanism is satisfactory: Agree

Does the Monitoring Mechanism Decision need to be changed to improve reporting of greenhouse gas emissions and/or climate change related information? Yes

If "yes", in which areas could reporting be improved (choose all that apply):
Actual emissions and removals at national level

Land-use, land-use change and forestry (LULUCF)

Accessibility of data and user friendliness of reports

Should the Monitoring Mechanism Decision be the main instrument for monitoring and reporting on matters relating to greenhouse gas emissions and climate change (e.g. on finance, adaptation, technology transfer, etc.) or would multiple dedicated instruments be more appropriate? Multiple dedicated instruments are preferable

Reporting of emissions, policies and measures

I am satisfied with the level of information provided by national authorities and the EU with regard to their policies, measures and projections, and with the methodologies used to produce this information. Somewhat agree

With regard to reporting on policies, measures and projections, the monitoring mechanism needs to lay down more precise rules on (choose all that apply):

Reporting formats

Methods to be used

The Monitoring Mechanism Decision should enable streamlining of reporting with regard to (choose all that apply): Actual emissions and removals

Reporting on policies and measures

The EU should establish a national inventory review process (similar to the reviews under the UNFCCC) to assess the information provided by national authorities on climate change. Agree

Please explain your answer above:

Il semble indispensable d'avoir une ou plusieurs approches indépendantes des actions déclaratives des états afin de pouvoir les vérifier. En ce sens, les estimations de flux de GES se basant sur l'inversion d'observations atmosphériques de GES est une possibilité qui demande de pouvoir disposer d'observations fiables et nombreuses (ex: projet d'infrastructure de recherche européenne ICOS). Par ailleurs, la spatialisation des émissions est aussi en enjeu majeur. La confrontation

des inventaires produit au niveau mondial ou européen avec les initiative d'organismes nationaux ou regionaux semble très importante. Par exemple, en Il de France, les inventaires produits au niveau européens pourraient être comparé et améliorer grâce au travail d'AIRPARIF et du CITEPA.

Climate change-related financial flows

The information provided by EU countries on climate-related funding for developing countries is transparent, easy to access and to compile.

Somewhat agree

Including climate funding information in the EU Monitoring Mechanism Decision will have an added valued compared to existing development finance reporting (e.g., reporting to the OECD Development Assistance Committee (DAC)) on financial flows to developing countries.

Somewhat agree

Please explain your answer above:

It would be useful to monitor financial flows centrally at EU level. Yes

If "yes", what types of financial flows would be best monitored at EU level?

Les flux liés au marche carbone

Adaptation

What reporting requirements should there be with regard to adaptation to climate change?

They should include measures taken at

national and regional level and budgetary allocation.

Is it necessary to set up a national focal point to provide information on adaptation to the adverse effects of climate change?

Yes

Land use, land use change and forestry (LULUCF)

Do you think additional reporting on the following would be useful (as discussed under the UNFCCC)?

Reporting on emissions and removals from rewetting and drainage of organic soils.

Yes

Reporting on emissions and removals related to large natural disturbances, so-called force majeure events. Yes

Reporting on emissions and removals from the harvested wood products pool. Yes

If you answered "yes", for one or more options, please define the type of information that could usefully be reported.

Emissions de carbone anormales liées à un évènement climatique extrême Flux de carbone entre pays générés par le marché du bois Flux de carbone entre pays générés par l'agriculture

Emissions from international maritime transport

More accurate data on emissions from international maritime transport should be required to facilitate future action to tackle these emissions. Agree

Who should be responsible for collecting and consolidating greenhouse gas data for international maritime transport based on fuel consumed and ports visited?
both

Full impact of aviation on the global climate

Do existing reporting instruments provide enough information to enable us to understand the full impact of aviation on the climate? No

If "no", please explain what additional data, type of data, or methods are needed to improve our understanding of the full impact of aviation (besides CO₂).

Il faudrait pouvoir connaître les espèces importantes pour la génération des nuages d'altitudes (cirrus). Par ex : NO_x, SO₂, aérosols.

Access to data and user-friendliness of reports

I use the data available through the European Environment Agency's (EEA) [greenhouse gas data viewer](#) at least: once a year

The data available through the EEA's [greenhouse gas data viewer](#) is easily retrievable and usable. somewhat agree

Please suggest ways of improving the EEA's greenhouse gas data viewer:

Le site est assez touffu (cela veut dire qu'il y a beaucoup de choses) mais on a parfois du mal à trouver ce que l'on cherche. Un tableau de bord simplifié rendrait les choses plus efficaces

*I use the **EEA's database on climate change policies and measures** in Europe at least:* once a month

*The information available through the EEA's **database on climate change policies and measures** in Europe is easily retrievable and usable.* somewhat agree

Please suggest ways of improving the EEA's database on climate change policies and measures in Europe:

Simplifier l'accès aux pages

*I use the information available through the **EEA's progress towards Kyoto and 2020 targets** report at least:* once a year

*The **EEA's progress towards Kyoto and 2020 targets** report is easily understandable and clear.* somewhat agree

Please suggest ways of improving the EEA's progress towards Kyoto and 2020 targets report:

*I use the information available through the annual **EU greenhouse gas inventory report** at least:* once a year

*The annual **EU greenhouse gas inventory report** is easily understandable and clear.* no opinion

*I use the information in the **Commission's annual progress report** towards achieving the Kyoto objectives at least:* never

*The Commission's **annual progress report** towards achieving the Kyoto objectives is easily understandable and clear.* no opinion

Please suggest ways to improve the Commission's annual progress report towards achieving the Kyoto objectives:

Final Comments

Please provide any further input or comments you would like us to take into account when revising the Monitoring Mechanism Decision:

En résumé : -Importance de bien prendre en compte toutes les composantes des GES. A ce titre la composante "sols" semble assez absente alors que c'est elle qui drive les stocks sur le long terme.-Importance de générer de inventaires d'émissions de GES fiables spatialement et avec des incertitudes-Importance de disposer de systèmes indépendants d'estimation et de vrification des flux de GES comme ceux proposés à partir d'observations atmosphériques (ex : ICOS).