



United States Department of State

Washington, D. C. 20520

*Roger*  
- They want us to propose some limitations on applicability of 3.4 activities in first budget period.

BRIEFING MEMORANDUM  
S/S

SENSITIVE BUT UNCLASSIFIED

TO: G - Under Secretary Loy

FROM: OES - R. Tucker Scully, Acting *JAM for*

SUBJECT: Meeting with environmental NGOs, Monday, August 2, 1999, at 2:30-4:00 p.m. in Room 1207

Meeting Details

You will meet with about 25 representatives of environmental non-governmental organizations (ENGOS) on Monday, August 2, 1999, at 2:30 p.m. in Room 1207. We have set aside an hour and a half for the meeting. Roger Ballentine and David Sandalow will participate, as will technical experts from EPA and USDA. The meeting's purpose is to discuss their two letters (May 25 and July 13), which express concern about several aspects of U.S. climate change policy. We have drafted responses to both letters; they are in the final stages of interagency clearance but have not yet been sent. Our objectives for the meeting are to:

- show that the Administration is paying attention
- ensure that we understand their concerns
- explain the rationale for our approaches and correct misunderstandings
- adjust our direction, if appropriate, and
- elicit their support

Background - May 25 Letter

The May 25 letter from the ENGOS dealt with sinks. It asked that we clarify our position, and expressed concern about our policies. The authors fear that the Administration may be seeking to weaken its Kyoto commitment by adding new sequestration activities (e.g.,

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forest, agriculture and range management) under Article 3.4. They question these additions on three grounds:

- 1) they represent "business-as-usual" in many cases, with no net gain to the environment
- 2) their inclusion would upset the level of effort agreed for the first commitment period by each of the Annex I Parties (i.e., "renegotiate Kyoto")
- 3) their inclusion would undermine the Protocol and put the climate at greater risk

If their understanding is inaccurate, the authors ask for clarification. If not, they ask that the U.S. position be "revised" to take into account their concerns. The underlying principle they espouse is adherence to the level of effort for the first commitment period represented by Annex I commitments now contained in Annex B to the Kyoto Protocol.

The authors fear that our current approach would increase the U.S. assigned amount by 13 percent - they allege that this would change our 7 percent reduction commitment to a 5 percent increase from 1990 levels.

#### Sinks -- U.S. Position

Article 3.4 allows for expanding the list of human-induced sink activities that may be used to offset emission limitation commitments (e.g., sequestration in agricultural soils, land use changes, forest conservation practices) if Parties can agree on them by consensus.

Any such decision would apply in the second commitment period and later (i.e., after 2012); but a Party could also choose to apply the decision to offset its commitment in the first budget period, if the activities claimed had taken place since 1990.

"pull back" provision

Environmental NGOs largely see the Article 3.4 issue in terms of how it will affect the U.S. target in the first budget period, and they oppose weakening that commitment through the addition of "business-as-usual" activities.

But there are two issues at work here, and it may be useful to separate them:

- 1) what makes sense in terms of the development of the Convention and our efforts to address climate change over the long term; and
- 2) how would decisions that make sense in that context affect commitments in the first budget period?

We believe that it is important to "get it right" for the long term. Separately, we can consider whether and to what extent Parties should be able to benefit from such a decision in the first commitment period.

Now is the time to come to grips with the real issues surrounding the potential addition of new categories of activities - can they be accurately measured, monitored and verified? This is what the Intergovernmental Panel on Climate Change (IPCC) is seeking to do, among other things, in its Special Report on Land-Use, Land-Use Change and Forestry (LULUCF) that will be completed later this year. We should base our decisions on sound science and on what makes sense over the long term. This is fully consistent with the "comprehensive approach" we have long endorsed.

We can deal later with the issue of how these decisions that make sense for the long term would affect commitments in the first budget period. At the same time, we acknowledge that all Parties will be anxious to preserve the delicate balance achieved in Kyoto. Because of this, and because additional categories under Article 3.4 can only be added by consensus, we anticipate that Parties will approach this exercise conservatively, based on sound science.

#### July 13 Letter

On July 13, many of the same organizations wrote a longer, more comprehensive letter that raised three sets of issues:

- 1) national communications data
- 2) land-use, land-use change and forestry
- 3) international bunker fuels

The authors of this letter asserted that, "The U.S. position [as reflected by actions of the U.S. delegation at the June meetings in Bonn of the Convention's subsidiary bodies] demonstrated an alarming lack of commitments to

transparency, core principles of information sharing, and consideration of relevant data." The three main areas of concern to the authors are described below.

### National Communications and Inventory Guidelines

The authors contend that U.S. "behavior" in Bonn created the impression that the United States does not support transparent and full accounting of emissions data. They maintain that the "U.S. seems especially opposed to reporting on the progress it has made in reducing emissions through its policies." While giving the Administration high marks for its efforts to improve national inventory accuracy and transparency through the IPCC process, the authors criticize our stance in Bonn, saying that "the general tenor of U.S. interventions... was to obfuscate the reported data and make it more difficult to consume."

The authors cite two examples: U.S. "failure" to support the E.U. in advocating use of the word "shall" versus "should" in the guidelines for national communications, and lack of U.S. support for the use of indicators, which assist in the process of monitoring and evaluation. The authors ask, "Is the U.S. trying to hide the affects of policies on their emissions? Why is the U.S. trying to reduce the usefulness of the data and make it more difficult for average citizens to understand? Why would the U.S. be interested in making reporting requirements optional?"

### Communications and Inventories -- U.S. Position

Since it most directly relates to climate change, emissions data is the single most important information that must be reported. Improving the quality and timeliness of this reporting is therefore a key U.S. objective. In fact, the U.S. is one of the few nations pushing for full and timely annual inventory reporting, not just of data or aggregated estimates but of the assumptions and methods used in the inventory estimation process. Our goal is to provide observers with sufficient information to confirm the aggregate emissions data reported by Annex I Parties. In this way, we are working diligently to build more accuracy and transparency into inventory reporting.

In Bonn, contrary to the view expressed by the authors, the U.S. delegation was perfectly comfortable

using the term "shall" in relation to greenhouse gas inventory requirements; at no time did the delegation oppose use of the term "shall" for inventory reporting requirements. The U.S. delegation did oppose the use of "shall" in relation to certain other, non-inventory reporting requirements, as explained below.

At a SBSTA workshop on national communications in March, participants noted that transparency can be diminished, not enhanced, by vague, unfocussed reporting. Some Parties noted that the sheer bulk of information now being provided is overwhelming. With even more extensive reporting likely to be necessary under the Kyoto Protocol, this problem could become severe. The issue then becomes: What information is absolutely necessary (and feasible) to collect, and how can current reporting be streamlined? In addition, participants at the workshop also noted that, for non-inventory reporting, it was important to distinguish between mandatory and optional requirements.

We have taken the view that high quality, timely and complete inventory information is the most important. With such information, observers are able to reproduce a variety of other statistics.

In Bonn, we opposed the Secretariat's effort to extend use of the word "shall" to a variety of other, non-inventory, reporting requirements. We did so both because some of these requirements are unfocussed (for example, what are "new and additional" financial resources?), and because of the burden involved, particularly for less advanced members of Annex I, e.g., the Economies in Transition. In the discussion over "indicators" we sought to enhance the accessibility of reported information by focussing on the most critical information, particularly inventories.

We are increasingly concerned about the ability of other Annex I Parties to meet their overall reporting requirements. We are providing technical and other assistance to EIT Parties to improve their capacity to meet these requirements. At the same time, we are deeply concerned at the recurring lag - as long as two years - in reporting by some other Annex I Parties. Extending mandatory reporting requirements, particularly to more marginal, less focussed issue areas, has significant implications for Parties' abilities to provide accurate,

timely reports with respect to information vital to combating global warming.

### Sinks

The authors believe that national estimates of the carbon sequestration potential in each country from various activities, e.g., cropland, range land and forestry management, will be important to decisions that will be taken under Article 3.3 and 3.4 of the Kyoto Protocol. They note that the E.U. and others asked that such estimates be part of the decision-making framework, i.e., one of the criteria taken into account when deciding which new or additional activities may be added to Article 3.4 of the Protocol. They maintain that, while the U.S. delegation supported such a criterion in the sinks contact group in Bonn, the U.S. and others moved to delete an important clause -- "Given the importance of country-specific data and information, and of a decision-making framework" - in the final session of the Subsidiary Body on Scientific and Technical Advice (SBSTA).

In their view, "such a position opposes to the principle of transparency that the U.S. has supported throughout these negotiations." They maintain that these data are readily available, but that "it appears that the U.S. does not wish to provide data at this time on this highly complex and controversial article of the Protocol." They believe that, "Full data disclosure should be a principle of operation of the United States in these negotiations, thus setting an example for others across the globe."

### U.S. Position

ENGO criticism on this point likely results from a misunderstanding of our position and of our assessment of the tactical situation in the final SBSTA plenary.

We recognize the importance of country-specific data in the debate over land use, land use change and forestry (LULUCF). We look forward to the discussions on how such data should relate to the criteria and process for deciding how and which new activities should be included under Article 3.4. In our view, however, discussion of country-specific data should not hinder the development of criteria and procedures for adding new activities.

In the final SBSTA discussion in Bonn, another Party questioned whether it was appropriate to include a reference anywhere in the decision to a "decision-making framework." Whereupon, still another Party seized the opportunity to reopen the issue of whether the Parties could even begin discussing a decision-making framework over the next year - something we have felt to be very important to making further progress on Article 3.4.

At that juncture, the SBSTA Chair suggested deleting the clause. We worried then that the entire sentence might disappear. For this reason, we (and other delegations) supported the Chair's suggestion - to save the operative portion of the sentence, which we accomplished.

In other words, this was a judgment call, and our judgement was to agree with the Chair's suggestion to delete the questioned clause in order to save the operative portion of the sentence.

#### Bunker Fuels

The authors allege that the U.S. delegation in Bonn tried to undermine the text proposed by the SBSTA Chairman on the issue of international bunker fuels (fuels used for international aviation and marine transport). "In particular," they say, "the U.S. called into question the implications of Decision 2/CP.3, and singled itself out as the only Party to deny that this decision calls for a discussion on the allocation of emissions of international bunker fuels."

The authors seem to acknowledge, as did the EU in Bonn, that Decision 2/CP.3 rules out allocating international bunker fuels to national totals (i.e., including emissions from bunker fuels in national targets) for the first commitment period. But in their view, it is important now to work toward "closing the international bunker fuels loophole and to elaborate an approach to bunker fuel allocation into Parties targets' for the second commitment period."

They contend that, "the U.S. suggestion of leaving the entire responsibility to ICAO and IMO would render a medium term decision highly unlikely" and that, "such a delay in the further negotiations of a proposal is unacceptable."

The authors were particularly disturbed because "the U.S. delegation did not see the need for Parties to submit their views on the IPCC Special Report on Aviation, nor the necessity for a formal review of the IPCC Special Report and its implications by the SBSTA or a future COP." They were relieved that the final SBSTA decision nevertheless calls for Parties to submit views to the Secretariat by August 16.

### U.S. Position

While there was agreement in Kyoto that control of bunker fuels emissions would be pursued through the International Civil Aviation Organization (ICAO) and the International Maritime Organization (IMO), and that these emissions "should not be included in national totals, but reported separately", Decision 2/CP.3 also "urges SBSTA to further elaborate on the inclusion of these emissions in the overall greenhouse gas inventories of Parties." While the U.S. has interpreted this clause to refer to the need for improved reporting of bunkers emissions data, others have read it as a call to reconsider allocation to national totals (i.e., inclusion in national targets).

Because the Kyoto targets are fixed, there seems to be agreement that the issue of allocation will not come into play until after 2012. For this reason, we see no benefit in focussing on this issue in the near term.

In fact, efforts to deal with this issue in the near term under the Convention could raise questions about the exemption for military operations, which is also contained in Decision 2/CP.3. We have gone to great lengths to rebut accusations that the Kyoto Protocol will somehow undermine our national security. It would not be prudent to run this risk in order to resolve an issue that cannot arise until, at the earliest, the second commitment period.

At a minimum, we think it makes sense to see what actions ICAO and IMO take to limit or reduce these emissions in the period before 2013. After considering those actions, Parties will be in a better position to evaluate what further steps, if any, may be appropriate in future negotiations leading to a second budget period.

With the ENGOs, we should emphasize that the focus of bunkers control efforts needs to be on ICAO and IMO, and that spending time and valuable political capital on second budget period issues now is counter-productive. We should applaud the recent ICAO decision to grant environmental NGOs observer status. This action should enhance transparency and, ultimately, the environmental effectiveness of actions taken by ICAO to address bunker fuel emissions and other environmental issues.

We should also highlight the need for further methodological work to improve the quality, consistency and comparability of bunkers emissions data reporting. Finally, we should welcome the IPCC Special Report on Aviation and the Global Atmosphere, which will soon be taken up by ICAO.

Attachments:

- Tab A - Talking Points
- Tab B - ENGO Letter of May 25
- Tab C - Draft Administration Response
- Tab D - ENGO Letter of July 13
- Tab E - Draft Administration Response

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Clearance: OES/EGC:JAMiotke - ok  
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OES/EGC:JBrennan - ok  
L/OES:SKBiniaz (info)  
OES:MGHambley - ok  
G:NPurvis - ok



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## Talking Points

### Welcome

- First, let me thank you and your organizations for coming today, and for your letters of May 25 and July 13.
- We have wanted to hold this meeting to discuss the points raised in those letters and to clarify our position with respect to them.
- Having reviewed the substance of the letters in detail, it would seem that, for the most part, we have the same objectives, although we could do a better job of explaining some of our tactical approaches and the reasons for them.
- I would like to walk through both the May 25 letter and the July 13 letter to address each of the points raised; along the way, I am sure further questions will arise, and we will do our best to respond.
- We have a number of our senior climate change officials and experts with us today, and perhaps it would be best to start with a few introductions.

### May 25 Letter

- Turning first to the May 25 letter, we understand that there is concern about additional activities under Article 3.4 of the Kyoto Protocol for several perceived reasons:
  - 1) they represent "business-as-usual" in many cases, with no net gain to the environment
  - 2) their inclusion would upset the level of effort agreed for the first commitment period by each of the Annex I Parties
  - 3) their inclusion would undermine the Protocol and put the climate at greater risk

- As you know, Article 3.4 allows for expanding the list of human-induced sink activities that may be used to offset emission limitation commitments (e.g., sequestration in agricultural soils, land use changes, forest conservation practices) if Parties can agree on them by consensus.
- Any such decision would apply in the second commitment period and later (i.e., after 2012); but a Party could also choose to apply the decision to offset its commitment in the first budget period, if the activities claimed had taken place since 1990.
- In my view, there seem to be two issues at work here, and it may be useful to separate them:
  - 1) what makes sense in terms of the development of the convention and our efforts to address climate change over the long term; and
  - 2) how would decisions that make sense in that context affect commitments in the first budget period?
- We believe that it is important to "get it right" for the long term.
- Separately, we can consider whether and to what extent Parties should be able to benefit from such a decision in the first commitment period.
- Now is time to come to grips with the key issues surrounding the potential addition of new categories of activities - can they be accurately measured, monitored and verified?
- This is what the Intergovernmental Panel on Climate Change (IPCC) is seeking to do, among other things, in its Special Report on Land-Use, Land-Use Change and Forestry (LULUCF) that will be completed later this year.
- We should base our decisions on sound science and on what makes sense over the long term.
- We can deal later with the issue of how these decisions that make sense for the long term would affect commitments in the first budget period.

- At the same time, we acknowledge that all Parties will be anxious to preserve the delicate balance achieved in Kyoto. Because of this, and because additional categories under Article 3.4 can only be added by consensus, we anticipate that Parties will approach this exercise conservatively, based on sound science.
- I hope that we can agree to work together for the long-term inclusion of real sink activities can be monitored and verified; once we have agreement on this, let's come back and look at how the addition of these activities might affect each countries 1<sup>st</sup> budget period level of effort.

**Encourage discussion**

*(If pressed or appropriate)*

- Let me make a political point: U.S. ratification of the Kyoto Protocol will require broad support from the American public and major constituencies.
- Need to build support; architecture is more important than the numbers; don't make this seem any harder than it needs to be.

*Ask Sue Biniarz to speak to the misperception regarding the 3% reduction figure.*

- Before leaving the points raised in the first letter on sinks, allow me to ask Sue Biniarz of the legal adviser's office to correct a misperception about the commitments we make at Kyoto.

**July 13 Letter**

- Your July 13 letter raised three sets of issues:
  - 1) national communications data
  - 2) land-use, land-use change and forestry
  - 3) international bunker fuels

- The overarching claim in the letter is that our policies impede transparency and will retard climate protection.
- Let me say at the outset that our record on transparency and openness is second to none, and I believe that the concerns you identified have arisen out of miscommunication or misunderstanding.
- There has been no change whatsoever in our firm support for the fullest possible transparency and openness, either with respect to our domestic climate change policies or our positions in international fora.
- Let me ask Ambassador Mark Hambley and Climate Change office director Jeff Miotke, who led our delegation in Bonn, to address the specifics of your concerns on communications, inventory guidelines, sinks and bunker fuels.

## Talking Points for Mark Hambley and Jeff Miotke

### National Communications and Inventory Guidelines

- While you gave us high marks for our efforts to improve national inventory accuracy and transparency through the IPCC process, you criticized our stance in Bonn, saying that "the general tenor of U.S. interventions ...was to obfuscate the reported data and make it more difficult to consume.
- You cited two examples: U.S. "failure" to support the E.U. in advocating use of the word "shall" versus "should" in the guidelines for national communications, and lack of U.S. support for the use of indicators, which assist in the process of monitoring and evaluation.
- You asked: "Is the U.S. trying to hide the affects of policies on their emissions? Why is the U.S. trying to reduce the usefulness of the data and make it more difficult for average citizens to understand? Why would the U.S. be interested in making reporting requirements optional?"

### U.S. Position

- Since it most directly relates to climate change, emissions data is the single most important information that must be reported. Improving the quality and timeliness of this reporting is therefore a key U.S. objective.
- In fact, the U.S. is one of the few nations pushing for full and timely annual inventory reporting, not just of data or aggregated estimates but of the assumptions and methods used in the inventory estimation process.
- Our goal is to provide observers with sufficient information to confirm the aggregate emissions data reported by Annex I Parties.
- In this way, we are working diligently to build more accuracy and transparency into inventory reporting.

- In Bonn, contrary to the view expressed in the letter, U.S. delegation was perfectly comfortable using the term "shall" in relation to greenhouse gas inventory requirements; at no time did the delegation oppose use of the term "shall" for inventory reporting requirements.
- The U.S. delegation did oppose the use of "shall" in relation to certain other, non-inventory reporting requirements, which I will explain.
- At the SBSTA workshop on national communications in March, participants noted that transparency can be diminished, not enhanced, by vague, unfocussed reporting.
- Some Parties noted that the sheer bulk of information now being provided is overwhelming.
- With even more extensive reporting likely to be necessary under the Kyoto Protocol, this problem could become severe.
- The issue then becomes: What information is absolutely necessary (and feasible) to collect, and how can current reporting be streamlined?
- In addition, participants at the workshop also noted that, for non-inventory reporting, it was important to distinguish between mandatory and optional requirements.
- We have taken the view that high quality, timely and complete inventory information is the most important -- with such information, observers are able to reproduce a variety of other statistics.
- In Bonn, we opposed the Secretariat's effort to extend use of the word "shall" to a variety of other, non-inventory, reporting requirements.

- We did so both because some of these requirements are unfocussed (for example, what are "new and additional" financial resources?), and because of the burden involved, particularly for less advanced members of Annex I, e.g., the Economies in Transition.
- In the discussion over "indicators" we sought to enhance the accessibility of reported information by focussing on the most critical information, particularly inventories.
- We are increasingly concerned about the ability of other Annex I Parties to meet their overall reporting requirements.
- We are providing technical and other assistance to EIT Parties to improve their capacity to meet these requirements.
- At the same time, we are deeply concerned at the recurring lag - as long as two years - in reporting by some other Annex I Parties.
- Extending mandatory reporting requirements, particularly to more marginal, less focussed issue areas, has significant implications for Parties' abilities to provide accurate, timely reports with respect to information vital to combating global warming.

### Sinks

- Your letter noted that national estimates of the carbon sequestration potential in each country from various activities, e.g., cropland, range land and forestry management, will be important to decisions that will be taken under Article 3.3 and 3.4 of the Kyoto Protocol.
- It also noted that the E.U. and others asked that such estimates be part of the decision-making framework, i.e., one of the criteria taken into account when deciding which new or additional activities may be added to Article 3.4 of the Protocol.

- You stated that, while the U.S. delegation supported such a criterion in the sinks contact group in Bonn, the U.S. and others moved to delete an important clause - "Given the importance of country-specific data and information, and of a decision-making framework" - in the final session of the Subsidiary Body on Scientific and Technical Advice (SBSTA).
- You said that, "such a position opposes to the principle of transparency that the U.S. has supported throughout these negotiations.

### U.S. Position

- In this instance, I believe that there may have been a misunderstanding of our position and of our assessment of the tactical situation in the final SBSTA plenary.
- We recognize the importance of country-specific data in the debate over LULUCF.
- We look forward to the discussions on how such data should relate to the criteria and process for deciding how and which new activities should be included under Article 3.4.
- In our view, however, discussion of country-specific data should not hinder the development of criteria and procedures for adding new activities.
- In the final SBSTA discussion in Bonn, another Party questioned whether it was appropriate to include a reference anywhere in the decision to a "decision-making framework."
- Whereupon, still another Party seized the opportunity to reopen the issue of whether the Parties could even begin discussing a decision-making framework over the next year - something we have felt to be very important to making further progress on Article 3.4.
- At that juncture, SBSTA Chair Chow Kok Kee suggested deleting the clause.
- We worried then that the entire sentence might disappear.

- For this reason, we (and other delegations) supported the Chair's suggestion - to save the operative portion of the sentence, which we accomplished.
- In other words, this was a judgment call, and our judgement was to agree with the Chair's suggestion to delete the questioned clause in order to save the operative portion of the sentence.

### Bunker Fuels

- Your letter also alleged that the U.S. delegation in Bonn tried to undermine the text proposed by the SBSTA Chairman on the issue of international bunker fuels.
- "In particular," you said, "the U.S. called into question the implications of Decision 2/CP.3, and singled itself out as the only Party to deny that this decision calls for a discussion on the allocation of emissions of international bunker fuels."
- I think it is clear that Decision 2/CP.3 rules out allocating international bunker fuels to national totals (i.e., including emissions from bunker fuels in national targets) for the first commitment period. There was broad agreement among Parties in Bonn on this point.
- So this concern really arises with respect to subsequent commitment periods.
- You suggest that it is important now to work toward "closing the international bunker fuels loophole and to elaborate an approach to bunker fuel allocation into Parties targets' for the second commitment period."
- You also believe that, "the U.S. suggestion of leaving the entire responsibility to ICAO and IMO would render a medium term decision highly unlikely" and that, "such a delay in the further negotiations of a proposal is unacceptable."

- You suggest that "the U.S. delegation did not see the need for Parties to submit their views on the IPCC Special Report on Aviation, nor the necessity for a formal review of the IPCC Special Report and its implications by the SBSTA or a future COP."

### U.S. Position

- I think we agree that the issue of allocation to national totals (i.e., inclusion in national targets) of bunker fuel emissions will not come into play until after 2012.
- For this reason, we see no benefit in focussing on this issue in the near term.
- We are all aware that there are a great many hurdles in the international negotiations to make the Protocol a reality. To add an issue as politically contentious as allocation - which would not even be considered until the second budget period - would be unwise.
- In fact, efforts to deal with this issue in the near term under the Convention could raise questions about the exemption for military operations, which is also contained in Decision 2/CP.3.
- We have gone to great lengths to rebut accusations that the Kyoto Protocol will somehow undermine our national security.
- It would not be prudent to run this risk in order to resolve an issue that cannot arise until, at the earliest, the second commitment period.
- As you know, Article 2.2 of the Kyoto Protocol commits Annex I Parties to work through ICAO and IMO to pursue limitation and reductions in bunker fuel emissions.
- At a minimum, we think it makes sense to see what actions ICAO and IMO take to limit or reduce these emissions in the period before 2013.
- After considering those actions, Parties will be in a better position to evaluate what further steps, if any,

may be appropriate in future negotiations leading to a second budget period.

- We are working closely through our delegations to ICAO and IMO to develop aggressive programs to control greenhouse gas emissions, and we are encouraging other Parties to do likewise.
- We were pleased to note the recent action by ICAO to grant observer status for the first time to environmental NGOs to enable them to participate meaningfully in its work, a position we had also strongly pushed.
- This action should enhance transparency and, ultimately, the environmental effectiveness of actions taken by ICAO to address bunker fuel emissions and other environmental issues.
- We hope you will join us in actively pursuing and monitoring the efforts of these two organizations.
- The Bonn meetings highlighted the need for improved data reporting in the aviation and maritime sectors as part of national inventories.
- The quality, consistency and comparability of this reporting need to be improved in the near-term for transparency and to serve as a basis for determining the effectiveness of future actions by ICAO and IMO.
- This was an important focus of our efforts in Bonn, and we will continue to participate actively in the IPCC and SBSTA processes to develop improved reporting guidelines for bunker fuel emissions.
- As a final point, we saw no pressing need for the Parties to the Framework Convention to comment on the IPCC Special Report on Aviation and the Global Atmosphere.
- We agree that this Special Report is both timely and an important step toward improving our understanding of how aviation affects both climate change and depletion of the stratospheric ozone layer.

- This Report was requested by ICAO and will be carefully considered by that body with the active participation of the US delegation. We expect its conclusions to provide an analytical basis for ICAO's actions.
- Still, we were aware of the multiple requests in Bonn for views of Parties in a very short time frame; we have been struggling - as large as we are with as many people and resources as we have - to meet the deadlines for all of these comments.
- And if we are struggling, we can imagine what it must be like for other, smaller countries that do not begin to have our resources.
- We did not think it necessary to add an additional requirement to submit views on the IPCC Special Report when it would soon be taken up in ICAO.