

**Proposed Amendments by Australia to Revised Guidelines for the Preparation of  
National Communications by Annex I Parties  
- comments relate to Annex to FCCC/SBSTA/1996/9**

Cross-cutting issues (para's 4-10)

Except for the specific points below, Australia supports the proposed revisions.

Paragraph 4, 4th line - We propose the deletion of text after "information on sources and sinks" as this exception should not be confined to any single sector or category if it is impossible to separate sources from sinks.

Paragraph 5, 6th line - The amendment to require the reporting of the "total" (ie. direct and indirect) effects of GWPs would be difficult to comply with as the SAR provides total effects for methane only. Australia suggests the addition of the following phrase, "whenever possible" at the start of the sentence, so that the sentence would read: "Whenever possible, any use of GWPs...".

Inventories (para's 11-15)

Except for the specific points below, Australia supports the proposed amendments.

Paragraph 11, line 6 - We suggest the use of the term "indirect greenhouse gases:" instead of "precursor". "Indirect greenhouse gas" is the term used in *Radiative Forcing of Climate Change* (IPCC, 1994). Some of the indirect gases are involved in the breaking down of 'direct' greenhouse gases and this fact is not captured in the description of 'precursor'.

Paragraph 11bis - Given that the guidelines are now intended to be used as generic guidelines and not just for the second national communications (this is implied from the change of title for the Guidelines and para 11 of FCCC/SBSTA/1996/9), the end of the para. should be amended to read: "...where available, for 1995 for the second national communication. Subsequent national communications should provide data up to three years prior to the submission year, and if possible, later years."

Paragraph 12bis - in order to improve its clarity, we propose the addition of the following as an additional sentence at the end of the para.: "This should include attribution to those sectors of the emissions associated with electricity consumed by those sectors." Also, to reflect the Secretariat's proposal to include "institutional" in the table in para. 19 (which we assume refers to Governmental energy use, including educational and correctional facilities etc.), add "(including Institutional)" after "commercial" in the second line.

Paragraph 13, line 7 and para. 15bis - as suggested in the footnote, IPCC worksheets are used only by countries that use the IPCC methodology. Countries like Australia that develop and use their own methodology (which are consistent with the IPCC