

<General review comments by governments on Second Order Draft of KP Supplement>

ID	Government	Chapter/Section	Start Line	End Line	Comment	Supplementary documents	Authors' action	Authors' note
GE_G_001	Austria				Austria is concerned about the increasing complexity of the different GPG elaborated by the IPCC related to LULUCF, a complex sector which was already very difficult to handle during the 1st CP. It is likely that the additional increase in complexity by the two supplements as well as the mandatory reporting of FM and HWP add difficulties in reporting and the review process. Every effort should therefore be made to facilitate the implementation of the GPG related to LULUCF. One option could be to transform the whole GPG, now included in three different documents, into one international standard, based on good practice in industry (e.g. following the ISO/IEC rules). The goal should be to codify the current GPG without amending it materially but following the strict rules of an international standard. This should also help to identify any inconsistency and probably would result in much less pages because it would not allow for duplication of requirements. Trying to implement with the current material runs the significant risk that it turns out to be unmanageable.		Reject. This is a much larger question relating to the entire process of negotiations and complexity of rules and outside the scope of this work. The IPCC guideline strive to reach own high technical and scientific standard subject to UNFCCC negotiations and approval.	
GE_G_002	China	0			The Chinese government appreciates members of the Bureau of the IPCC Task Force on Inventories and lead authors and TSU of the 2013 Revised Supplementary Methods and Good Practice Guidance Arising from the Kyoto Protocol for their contributions made to the preparation of this report. Taking this opportunity, we would like to make comments on this report. Having estimated, measured, monitored and reported methods on land use, land-use change and forestry activities as described in Article 3, paragraphs 3 and 4, of the Kyoto Protocol, it is a high quality report. In order to better characterize an IPCC assessment report with objectiveness, comprehensiveness and balance, we wish to make the following comments (see the Table) on the present report in the hope that they can be adopted in the modification process.		Noted	
GE_G_003	China	Overview, 1、 2	142	4718	Paragraph 11 of Decision 2/CMP.7 decided that “2013 Revised Supplementary Methods and Good Practice Guidance Arising from the Kyoto Protocol” should be revised under the second commitment period (CMP.8 defined that the second commitment period is from 1 January 2013 to 31 December 2020.), therefore, it is suggested to specify “2013 onward” in Line 513 as “2013 to 2020”. Accordingly, other similar expressions in the text should be specified into 2020 as well. For example: In the heading of 2.2.3 in Table 2, Line 142, “CP2 and beyond” should be changed to “CP2”; In Line 335, “the second and subsequent commitment periods” should be changed to “the second commitment period”; In Box 1.1, Line 698 to Line 716, “for all years 2010 onwards including CP2” should be changed to “for all years from 2010 to 2020”; In Line 837, “CP2 and beyond” should be changed to “CP2”; In the heading of 2.2.3, Line 1221, “CP2 and beyond” should be changed to “CP2”; In the heading of 2.2.6.2, Line 1390-1391, “the second and subsequent CPs” should be changed to “the second commitment period”; In Line 4718, “the second and subsequent commitment periods” should be changed to “the second commitment period”.		Reject. The usage of terms depends on the context-in some instances it would be necessary to state CP2 and beyond because the decisions require it.	
GE_G_004	Finland	General			In text, please harmonize the use of the terms 'crown cover', 'canopy cover' and 'crown cover density'. Also, land vs. units of land and Party vs. country, are not used consistently in the draft.		Accept. "Crown cover" and "lands" are consistently used.	
GE_G_005	Finland	General			The new supplement increases the reporting burden significantly due to additional requirements on documentation in the NIR. Therefore also additional resource will be needed in reviews. The authors are strongly encouraged to consider what information need to be included in the NIR, and what could be provided in background documents referenced in the NIR.		Reject. It's up to the country to decide what information is provided in the NIR.	

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GE_G_006	Finland	General			The KP Supplement assumes that the IPCC Wetlands Supplement will be adopted by COP and CMP in its entirety in the inventory submissions due 2015. The implementation of the Wetlands Supplement may for many countries require more time (due to new data collection and development of national EFs and other parameters). Therefore the COP and CMP may decide for later or partial implementation of the Wetlands Supplement. This would need some consideration in e.g. the Overview.		Accept. Suitable changes have been made to the references to the Wetlands Supplement to address this concern.	
GE_G_007	Finland	General			Consistent with the bullet point in line 0.175-0.177, judgements about rules referring to commitment periods after the 2nd commitment period should not be included in the KP LULUCF Supplement. All references to subsequent commitment periods should be removed, unless direct references to KP decisions (see e.g. sections 1.2, 2.2.6.2 and 2.3.9.8).		Accept with modification. It is context-specific; in some instances, references to subsequent commitment periods are mandated by the decisions, while in some others subsequent CPs have to be kept in mind.	
GE_G_008	Finland	Overview	General		Please include the decision 15/CP.17 to those considered in drafting the KP LULUCF Supplement. Decision 15/CP.17 addresses the UNFCCC reporting guidelines for Annex I Parties from 2015 submission onwards and its impacts are addressed in the KP Supplement.		Accept. Implemented	
GE_G_009	Germany	0	1	7883	The 2013 revised supplement is a wonderfully precise document. Terms are used consistently (which was not the case for the wetlands supplement) and decisions are operationalised in a logical, user friendly way. The reporting is more complicated, but this is not the fault of the supplement, but that of the decisions taken at the COPs/COPMOPs. Thank you!		Noted	
GE_G_010	New Zealand	0			The New Zealand Government thanks the authors and the TSU for their work, and congratulates them on the production of this second order draft.		Noted	
GE_G_011	Spain	General	general	general	It seems that the definition of WDR is being misinterpreted in relation to the allocation of lands. There is an inexact interpretation of the intention of the definition of WDR. The intention is that the national definition prevails over the international consideration of activities. "not accounted under any other activity" means that, if a Party has selected grassland management and WDR, and there is an area that is "grassland" according to national definition that is rewetted or drainage, this area, and emissions and removals associated to rewetting or drainage, would be reported under GM, but, if this same party decides that WDR is higher in the hierarchy than GM, emissions and removals could be reported under WDR. Therefore, it isn't true that WDR only covers the "residual" areas not included in other activities, and this should be corrected in the text as a country can decide to prioritize WDR in its hierarchy of 3,4, activities.		Accept. Changes have been made.	
GE_G_012	Sweden	0			This GPG-guidelines is in line with the former guidelines, but still very difficult to read and navigate.		Accept. Effort to improve the document consistency and readiness was done for last version.	
GE_G_013	Sweden	1			change "FM" to "article 3.4"		Reject. The two are not synonymous	
GE_G_014	UNITED STATES OF AMERICA	Whole Document			The report is - perhaps by necessity in parts - quite complex and complicated, particularly as it mixes the intricate evolution of the guidelines with the guidelines themselves. We imagine that at some level it is useful to provide the history as the guidance evolves based on new decisions, but including this makes it an even more difficult read. Having just the current guidelines based on current agreements might make things much simpler.		Accept with modification. While efforts have been made to remove unnecessary history, in some cases that is necessary to provide context.	
GE_G_015	UNITED STATES OF AMERICA	Whole Document			That there are so many options is particularly confounding - i.e., that countries can choose and change definitions for example. It might be worth providing some justification for this (is it different capacities, ecosystems, etc.)?		Reject. Question Unclear	

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GE_G_016	UNITED STATES OF AMERICA	Whole Document			In effect, the guidelines are in practicality, a design for a global cadastre at the national level. The authors are calling for tracking of landscape polygons through time, daunting enough but more so when these myriad polygons must be populated with stock, stock change and activity data. Though probably too late, it might have been better to just state this upfront, and built the entire process around that concept, that they are asking for a dynamic geospatially-specific land information system.		Reject. Concept behind KP supplement (as for GPG) is to first define the reporting requirements and then to provide guidance on implementing them, under national circumstance of the Party. Geospatial information is not always required	
GE_G_017	UNITED STATES OF AMERICA	Whole Document			There does not seem to be a consideration as to prioritizing what classes most influence the overall C budget. That is, recommending more-intensive sampling in more important classes might be a valuable discussion the authors should consider adding to the text.		Reject. Sampling is covered in the 2006 GL	
GE_G_018	UNITED STATES OF AMERICA	Whole Document			Table 1 is helpful, but throughout the document, it is not always clear what is carried over from the 2003 guidance, the 2006 guidance, or what is new in this guidance. It would be helpful to add a table up front or at the front of each major section that summarizes what is new, modified, remains as 2006, or remains as 2003.		Accept with modification. This is already implemented across the document by "box"-es showing the links with all relevant Ch & Sections from GL 2006 and 2013 WL supplement. The links with GPG 2003 are indeed relevant, but it would increase substantially the text length.	