

**Congress of the United States**  
**House of Representatives**  
Washington, D.C. 20515

February 10, 2009

The Honorable Gene Dodaro  
Acting Comptroller General of the United States  
441 G Street, NW  
Washington, DC 20548

Dear Mr. Dodaro:

As Congress focuses on legislation intended to reduce greenhouse gas emissions, attention should be directed at the quality of data underlying estimates of global greenhouse gas emissions. National greenhouse gas inventories, compiled in accordance with the 1992 United Nations Framework Convention on Climate Change (Framework Convention), provide the source of information on greenhouse gas emissions for the purposes of international agreements and coordination of climate change policies.

Past reviews of the quality of global emissions reporting by the Government Accountability Office (GAO) have not been encouraging. In 1996, for example, the GAO found “greenhouse gas emissions cannot be fully assessed because the emissions data are incomplete, unreliable, and inconsistent.” In 1999, GAO reported that an international assessment of emissions reporting and monitoring under the Kyoto Protocol revealed “a number of important gaps: data were missing, parties submitted their reports late, and information about how the data were prepared was lacking.”

Most recently, in 2003, GAO reported on the status of selected greenhouse gas inventories by developed and developing countries. Under the Framework Convention, economically developed nations agreed to submit annual inventories of greenhouse gas emissions. Developing countries also agreed to report on their emissions but with less detail and less frequency than developed countries, which created large gaps in the global quality of emissions data. Based on expert reviews of inventories submitted by four developed countries, GAO concluded that the submissions from the United Kingdom and the United States were largely complete, while those from Germany and Japan lacked critical elements. Regarding developing countries, which account for an increasingly substantial portion of global greenhouse gas emissions, neither China nor India had submitted an inventory at that time, but were

expected to do so in mid to late 2004. Notably, the data China and India finally submitted in 2004 were estimates for 1994 emissions, and have yet to be updated. Indeed, the most recent emissions data reported by most large developing countries are now 12 years older than what the United States and other developed countries have reported. Moreover, as a bloc, we understand that the developing countries, including China, Brazil, and India, refuse to bring reporting regimes into closer accordance with the developed countries.

Since 2003, parties to the Framework Convention have refined the requirements for nations' inventories, introducing measures to standardize emissions estimates and to enhance processes to evaluate the quality of each inventory. The purpose of the changes to the inventory requirements was to improve the quality of the inventories and to encourage more developing nations to submit inventories. However, several contributors to the *Harvard Project on International Climate Agreements* reported in late 2008 that, while current inventory guidelines "reflect an attempt to incorporate a broad array of reporting practices used in different countries, the breadth of the different reporting practices can mask genuine differences among countries." As a result, it may be difficult to establish meaningful emissions reduction goals or assess progress toward such goals.

In light of the upcoming negotiations for a global climate change agreement as well as Congress's ongoing consideration of legislation to limit greenhouse gas emissions, we would like GAO to update the 2003 review on greenhouse gas inventories, *Climate Change: Selected Nations' Reports on Greenhouse Gas Emissions Varied in Their Adherence to Standards* (GAO-04-98). Specifically, we would like GAO to answer the following questions:

- (1) What does available information indicate about the quality and comparability of greenhouse gas inventories submitted since 2003 by five economically developed nations—Australia, Germany, Japan, the United Kingdom, and the United States?
- (2) What does available information indicate about the quality and comparability of the greenhouse gas inventories submitted since 2003 by five developing nations—China, India, Mexico, Brazil, and Indonesia?
- (3) According to available information, what are the limits to international auditing and validation of national greenhouse gas inventories?
- (4) According to available information, what are the barriers to closing any gaps in knowledge about emissions among developed and developing countries?
- (5) According to available information, what are the implications of the state of inventory reports for establishing an international agreement to reduce greenhouse gas emission?

Thank you for your prompt attention to this request. Please work with Mr. Peter Spencer of the Minority Committee Staff at (202) 225-3641 on the specifics of your study.

Sincerely,



Joe Barton  
Ranking Member  
Committee on Energy and Commerce



Greg Walden  
Ranking Member  
Subcommittee on Oversight and Investigations

cc: The Honorable Henry Waxman, Chairman  
Committee on Energy and Commerce

The Honorable Bart Stupak, Chairman  
Subcommittee on Oversight and Investigations