

FURTHER WRITTEN SUBMISSION FROM BULGARIA



BOTSCHAFT DER REPUBLIK BULGARIEN
IN DER BUNDESREPUBLIK DEUTSCHLAND
DER BOTSCHAFTER

Pv-21-352

June 14th 2010

Mr. Feng Gao
Secretary to the Compliance Committee
UNFCCC Secretariat
Haus Carstanjen, Martin-Luther-King-Strasse 8
D-53175 Bonn, Germany

DEAR MR.GAO,

Please find attached a further written submission by Bulgaria to the Enforcement Branch of the Compliance Committee, made pursuant to section X, paragraph 1 (e) of the procedures and mechanisms relating to compliance under the Kyoto Protocol (Decision 27/CMP.1). The further written submission consists of the following documents:

1. Comments on the Preliminary finding of the Enforcement Branch regarding Bulgaria – document entitled: "*Letter of response to preliminary finding regarding Bulgaria*"
2. Information on new measures and activities taken by Bulgaria – document entitled "*Improvement Plan for ensuring the effective and timely functioning of Bulgarian National Inventory System in accordance with the requirements of Article 5.1 of the Kyoto Protocol and Decision 19/CMP.1, as well as the relevant requirements of EU.*"
Document contains two annexes.

Enclosures follow as per text above.

SINCERELY,


IVO PETROV

FURTHER WRITTEN SUBMISSION of BULGARIA
Under Section X, paragraph 1 (e) of the Procedures and mechanisms relating to
compliance under the Kyoto Protocol (Decision 27/CMP.1)

**DOCUMENT 1: LETTER OF RESPONSE TO PRELIMINARY FINDING
REGARDING BULGARIA**

In Response to “Preliminary finding” of the Enforcement Branch of the
Compliance Committee under the Kyoto Protocol (CC-2010-1-6/Bulgaria/EB)

June 14th 2010

Summary

1. Herewith Bulgaria is providing a further written submission as according to Section X, paragraph 1 (e) of the Procedures and mechanisms relating to compliance under the Kyoto Protocol, which is being sent within the due date (on or before 15th of June) as stated in a notification from the Secretariat of the Compliance Committee of 21st of May 2010.
2. This document addresses section “Conclusions and reasons” of the Preliminary finding of the Enforcement Branch from 12th of May 2010 and proposes textual changes to ensure that the text in the above mentioned section is fully in accordance with the mandate of the Enforcement Branch as set out in the Procedures and Mechanisms Relating to Compliance under the Kyoto Protocol in Decision 27/CMP.1.

Background

3. The Enforcement Branch of the Compliance Committee held its ninth meeting in Bonn, Germany from 10th to 12th of May 2010 to consider question of implementation posed to Bulgaria relating to compliance with the “Guidelines for national systems for the estimation of anthropogenic greenhouse gas emissions by sources and removals by sinks under Article 5, paragraph 1, of the Kyoto Protocol”.
4. On 10th of May Bulgaria made an oral presentation based on its written submission (submitted on 5th of May, document CC-2010-1-5/Bulgaria/EB) elaborating on the improvements of the Bulgarian national inventory system, in particular the institutional arrangements, roles and responsibilities of the national respective governmental bodies, the underlying legal framework, arrangements for technical competence of staff and measures taken for improvement of the national system since the ERT review in 2009.
5. In the course of the hearing the Enforcement Branch received advice from experts who provided their views on the findings of the ERT in relation to the national system of Bulgaria, the question on implementation raised by the Enforcement Branch and on the implementation of the work plan submitted by Bulgaria to the ERT on 16th of November 2009. The experts identified the need of subsequent in-country review to asses the results of measures and actions already taken by Bulgaria for the improvement of the national system.

6. However, section “Conclusions and reasons” of the Preliminary finding (at paragraph 14) concludes as follows: “Experts advised that significant improvements in the quality of Bulgaria’s annual submission cannot be expected to become evident until the review of the 2011 annual submission.”
7. Bulgaria acknowledges it has been facing challenges with its institutional arrangements and technical competence of staff due to the lack of human and financial resources. However, Bulgaria reminds that it has already implemented improvements in its national system and is working with a plan for further elimination of the identified problems. Bulgaria respectfully notes that prognosis of the expected results of implemented measures and actions it has taken since the 2009 ARR lies outside of the scope and mandate of the Enforcement Branch and requests the statement mentioned in paragraph 6 above to be removed from the text of the Preliminary finding, paragraph 14.
8. Bulgaria notes that evaluation of the progress made concerning its institutional arrangements and evident results reflected in its annual inventory report can be analyzed only after an in-country review and review of the annual inventory report of 2010.

Analysis

9. The mandate of the Enforcement Branch as set out in Section V, paragraph 4 of the Annex to Decision 27.CMP.1 states:

“The Enforcement Branch shall be responsible for determining whether a Party included in Annex I is not in compliance with:

- a) Its quantified emission limitation or reduction commitment under Article 3, paragraph 1, of the Protocol;
- b) The methodological and reporting requirements under Article 5, paragraphs 1 and 2, and Article 7, paragraphs 1 and 4, of the Protocol; and
- c) The eligibility requirements under Articles 6, 12 and 17 of the Protocol.”

10. The two possible consequences the Enforcement Branch shall apply, if a Party has been determined to be in non-compliance with Article 5, paragraph 1 or paragraph 2, or Article 7, paragraph 1 or paragraph 4 of the Kyoto Protocol, are –

as stipulated in Section XV, paragraph 1:

“(a) Declaration of non-compliance; and
 b) Development of a plan in accordance with paragraphs 2 and 3 below”

and according to section XV, paragraph 2:

“2. The Party not in compliance [...] shall, within three months after the determination of non-compliance [...] submit to the Enforcement branch [...] a plan that includes:

- a) An analysis of the causes on non-compliance of the Party;
- b) Measures that the party intends to implement to remedy the non-compliance; and
- c) A timetable for implementing such measures within a time frame not exceeding twelve months [...]

3. The Party not in compliance [...] shall submit to the enforcement branch progress reports of the implementation of the plan on regular basis.”
11. Pursuant to these provisions, the Enforcement Branch is mandated to determine only whether a Party is in compliance or not and to apply the consequences as set by Section XV, paragraph 1.
12. Bulgaria notes, respectfully, that an estimate of timeframe within which Bulgaria will be able to provide evidence of the necessary improvements of its national system does not fall within the mandate of the Enforcement Branch, but could be concluded only after an in-country review.
13. Moreover, the consideration of the question of implementation and currently ongoing procedure for determination of compliance are based on the assessment of the April 2009 submission by Bulgaria. It does not include the efforts and already implemented improvements of the national inventory system since the ERT in-country review in 2009.
14. Bulgaria would also like to request a balanced referral to all statements by experts provided at the hearing, and to remind the Enforcement Branch that another expert expressed the view that if Bulgaria deploys sufficient efforts it could rectify identified problems by the early fall of 2010 and could request an ERT visit in September-October 2010 to reinstate its eligibility.

Proposed Amendments

15. In light of the above outlined, Bulgaria invites the Enforcement Branch to remove the concluding remark of paragraph 14 of the Preliminary finding:
“Experts advised that significant improvements in the quality of Bulgaria’s annual submissions cannot be expected to become evident until the review of 2011 annual submission”.

Conclusion

16. The unresolved problems of the Bulgarian national inventory system, referred to in paragraphs 12 and 13 of Section “Conclusions and reasons”, resulting in non-compliance with the “Guidelines for national systems...” can only be referred to at the time of finalization of the 2009 ARR.
17. Noting that paragraph 20 of the Section “Finding and consequences” of the Preliminary finding follows the mandate of the Enforcement Branch, Bulgaria requests the conclusions remark of paragraph 14 of Section “Conclusions and reasons” of the Preliminary finding:

“Experts advised that significant improvements in the quality of Bulgaria’s annual submissions cannot be expected to become evident until the review of 2011 annual submission”

to be removed from the text of the Preliminary finding.

FURTHER WRITTEN SUBMISSION of BULGARIA

Under Section X, paragraph 1 (e) of the Procedures and mechanisms relating to compliance under the Kyoto Protocol (Decision 27/CMP.1)

DOCUMENT 2: IMPROVEMENT PLAN

for ensuring the effective and timely functioning of Bulgarian National Inventory System in accordance with the requirements of Article 5.1 of the Kyoto Protocol and Decision 19/CMP.1, as well as the relevant requirements of EU

The already planned improvements are implemented or envisaged to be implemented in the Bulgarian National Inventory System in order to fulfill the recommendations of Expert Review Team as set out in the annual review report FCCC/ARR/2009/BGR.

Issue	Planned improvement for 2010 and next submissions	Priority high - medium -low
General Improvements		
Institutional arrangements FCCC/ARR/2009/BGR: ARR § 5 - 67	ARR § 67 (a) (i) New agreements between MoEW and the following data provider have been signed: ➤ National Statistic Institute (RD21-35/12.02.2010) ¹ ➤ Ministry of Agriculture and Food (04-00-517/26.02.2010 and RD 50-47/15.03.2010) ² ➤ Ministry of Economy and Energy (see Annex 1) ➤ Ministry of Internal Affairs (see Annex 2)	High priority March 2010 March 2010 June 2010 June 2010
Legal basis	ARR § 67 (a) (i)	High priority

¹ The agreement with National Statistic Institute has already been presented in the first written submission to the Enforcement branch on 05/05/2010.

² The agreement with Ministry of Agriculture and Food has already been presented in the first written submission to the Enforcement branch on 05/05/2010.

Issue	Planned improvement for 2010 and next submissions	Priority high - medium -low
FCCC/ARR/2009/BGR: ARR § 5 - 67	<ul style="list-style-type: none"> ➤ The BGNIS will be enshrined in law through a special Regulation of the Council of Ministers which will be adopted in September 2010. The new regulation will Establish and maintain the institutional, legal and procedural arrangements necessary to perform the functions of BGNIS, defined in Decision 19/CMP.1 for national systems 	September 2010
Expert capacity in ExEA FCCC/ARR/2009/BGR: ARR § 5 - 67	<p>ARR § 67 (a) (ii) (iii) (iv)</p> <ul style="list-style-type: none"> ➤ Extension of the staff, engaged in planning, preparation and management of the emissions inventory has been realized in 2010. A new Order №110/30.04.2010 by the Executive Director of ExEA has been issued³. The order regulates the name and responsibilities of experts from different departments within the ExEA, which are engaged to support preparation of National GHGs emission inventory. Thus the engaged departments in planning, preparation and management of emissions inventory are AMD and its EIU, LMBPAD, WD, IPPCD and ETPD (see Figures 1-2) ➤ Training of the staff within the project with the Federal Environment Agency of Austria (workshops in the period December 2009 to June 2010) ➤ Incorporation of the results from completed Projects 1 "LULUCF" (in 2010 submission) ➤ Incorporation of the results from completed Project 2 "Recalculations" and Project 3 "Software tool" (in 2011 submission) ➤ Incorporation of the results from completed Project 4 "F-gases" (in 2010 and 2011 submission) 	High priority 2010 and 2011 submission
Collaboration with consultants and external auditors FCCC/ARR/2009/BGR: ARR § 5 - 67	<p>ARR § 67 (c) (iii)</p> <ul style="list-style-type: none"> ➤ Improvement of the relation with Branch Business Associations. ➤ Further intensive cooperation for studies (verification of EFs) with other non-governmental institutions, universities and private consultants <p>Support of external auditors for improvement of QA procedures</p>	High priority 2010 and 2011 submission

³ The Order №110/30.04.2010 by the Executive Director of ExEA has already been presented in the first written submission to the Enforcement branch on 05/05/2010.

Issue	Planned improvement for 2010 and next submissions	Priority high - medium -low
Source categories improvements		
Energy sector FCCC/ARR/2009/BGR: ARR § 69 - §90	<p>ARR § 90 (a), § 90 (b)</p> <ul style="list-style-type: none"> ➤ Revising of the AD (entire time series) due to differences in IEA/EUROSTAT questionnaire (international reporting obligation) and national energy balance (national reporting obligation with different allocation/definition fuel) due to different reporting obligation on national and international level. Outcome: consolidated "Energy Balance" for national and UNFCCC/ UNECE reporting obligation (High Priority) ➤ Revising of the EF. Investigation whether it would be possible to update country specific emission factors (High Priority) ➤ A cross-check with ETS, EPRTR, IPPC data will be realized ➤ Providing carbon mass balance ➤ Comparison of emissions using alternative approaches. ➤ Documentation for the national energy balance, provided by National Statistic Institute will be incorporated. ➤ Documentation and archiving of all information required in NIR, Background documentation and archive. ➤ ARR § 71 § 72 Transparency - In submission 2010 for CRF 1 information on methodology, activity data and emission factor for the entire time series is provided, but within the next submission further improvements concerning transparency will be undertaken. This will be done by updating and revising EF and AD. <p>ARR § 73 & § 74 Recalculations and time-series consistency</p> <ul style="list-style-type: none"> ➤ To ensure TACCC internal energy experts and external consultants were involved in the submission 2010. Further collaboration is foreseen for the future submission. <p>ARR § 75 Verification and quality assurance/quality control approaches</p> <ul style="list-style-type: none"> ➤ Sector specific QA/QC procedures were implemented in 2010 submission. QA procedures have been performed by the Sector expert in the MoEW (Order № RD-218/05.03.2010 by the Minister of Environment and Water). ➤ Support of consultants and external auditors are envisaged for 2010 and next submissions 	High priority 31/07/2010
Energy Industries (CRF 1A1)	<ul style="list-style-type: none"> ➤ Revising of the AD based on IEA/EUROSTAT questionnaire ➤ A cross-check with ETS, EPRTR, IPPC data 	High priority 31/07/2010

Issue	Planned improvement for 2010 and next submissions	Priority high - medium -low
	<ul style="list-style-type: none"> ➤ Revising of the EF - Investigation whether it would be possible to update country specific emission factor (CS EF) for solid and liquid fuels. A comparison of applied EFs and parameters with the (a) IEF with the default EF of the IPCC guidelines, (b) information about NCV of relevant fuels provided by NSI, and (c) the SAI 2009 report (Table 1.4; FCCCWEB/SAI/2009). Point out the need for update/revision of all emission factors. This investigation includes updated/revised country specific NCV for the important fuels. ➤ Allocation emission from autoproducers in the CRF 1.A 1 / CRF 1.A 2 ➤ Allocation emission from iron and steel industry in the CRF 1.A 2 ➤ Recalculations and time-series consistency, due to revised AD and EF ➤ Investigation on combustion plant types and technology will be carried out (submission 2011/2012) because for the whole period after the base 1988, there have been no changes in methodology of calculation and collection of data. 	<p>High priority 2010 - 2011 submission</p> <p>High priority 2010 - 2011 submission</p> <p>Medium priority 2011 – 2012 submission</p>
Manufacturing industries and Construction (CRF 1.A 2)	<ul style="list-style-type: none"> ➤ Revising of the AD based on IEA/EUROSTAT questionnaire ➤ Revising of the EF - Investigation whether it would be possible to update country specific emission factor (CS EF) for solid and liquid fuels. A comparison of applied EFs and parameters with the (a) IEF with the default EF of the IPCC guidelines, (b) Investigation whether it would be possible to update country specific emission factor (CS EF) for liquid fuels and gasous fuels. information about NCV of relevant fuels provided by NSI, and (c) the SAI 2009 report (Table 1.4; FCCCWEB/SAI/2009).Point out the need for update/revision of all emission factors. This investigation includes updated/revised country specific NCV for the important fuels. ➤ Recalculations and time-series consistency, due to revised AD and EF ➤ Allocation emission from autoproducers in the CRF 1.A 1 / CRF 1.A 2 ➤ Allocation emission from iron and steel industry in the CRF 1.A 2 	<p>High priority 31/07/2010</p> <p>Medium priority 2011 – 2012 submission</p>
Transport (CRF 1.A 3) FCCC/ARR/2009/BGR: ARR § 83, § 84, § 85, § 86 § 88	<ul style="list-style-type: none"> ➤ Revising of the AD based on IEA/EUROSTAT questionnaire and compare to national statistics to make sure that these are in line. ➤ Revising of the EF (gasoline, Diesel, LPG). Investigation whether it would be possible to update country specific emission factor for liquid fuels and gaseous fuels. ➤ The model Copert, which is a country support tools for reporting provided by the European Environment Agency (EEA) will be incorporated within the next submission. With this model a higher TIER method for estimation CO2, N2O and CH4 als well non-GHG will be realized. 	<p>High priority 31/07/2010</p> <p>2011 submission</p>

Issue	Planned improvement for 2010 and next submissions	Priority high - medium -low
	<ul style="list-style-type: none"> ➤ Investigation of the country specific parameters used in the COPERT IV model concerning the car fleet and vehicle split. ➤ Allocation of fuel (kerosene) consumption between civil aviation (1.A.3.a) and international bunkers (aviation) for the complete time-series and ensure timeseries-consistency. ➤ Allocation of fuel consumption between navigation (1.A.3.c) and international bunkers (navigation) for the complete time-series. ➤ Recalculations and time-series consistency, due to revised AD and EF 	
Other Sectors (CRF 1A4)	<ul style="list-style-type: none"> ➤ Revising of the AD based on IEA/EUROSTAT questionnaire ➤ Revising of the EF. Investigation whether it would be possible to update country specific emission factor (CS EF) for solid and liquid fuels. A comparison of applied EFs and parameters with the (a) IEF with the default EF of the IPCC guidelines, (b) information about NCV of relevant fuels provided by NSI, and (c) the SAI 2009 report (Table 1.4; FCCCWEB/SAI/2009). Point out the need for update/revision of all emission factors. This investigation includes updated/revised country specific NCV for the important fuels. ➤ Recalculations and time-series consistency, due to revised AD and EF 	High priority 31/07/2010
Other (CRF 1A5)	<ul style="list-style-type: none"> ➤ Revising of the AD based on IEA/EUROSTAT questionnaire ➤ Revising of the EF. 	High priority 31/07/2010
Fugitive emissions from solid fuels and oil and natural gas (CRF 1.B)	<ul style="list-style-type: none"> ➤ For 1. B. 1. a. Coal Mining and Handling - an estimation of CH4 emission can be realized with the CORINAIR methodology (TIER 1), which is also provided in the 2006 IPCC GL. In the emission factor database relevant EF are provided. ➤ For applying Tier 2 or even higher methodology, the relevant activity data and emission factor are not available at the present; this will be an issue for submission 2011 and/or 2012 ➤ For subcategory 1.B.1.b. Solid Fuel Transformation - the emissions can also be included in sector 1.A.1.c or 1.A.2.a, also to avoid double counting. The estimation of these emissions will be realized in submission 2011 ➤ For 1.B.2. Oil and Natural Gas - Method (TIER 1) is provided in 2006 IPCC GL (Chapter 4 FUGITIVE EMISSIONS), Default emission factor (TIER 1) is provided in 2006 IPCC GL (Chapter 4 FUGITIVE EMISSIONS) 	High priority 31/07/2010 2011 – 2012 submission 2011 submission High priority 31/07/2010
Industrial processes (CRF sector 2) FCCC/ARR/2009/BGR: ARR §91 - 113	<ul style="list-style-type: none"> ➤ Revising of the AD with ETS, EPRTR, IPPC data ➤ Revising of the EF. Investigation whether it would be possible to update country specific emission factors 	High priority 2010 - 2011 submission

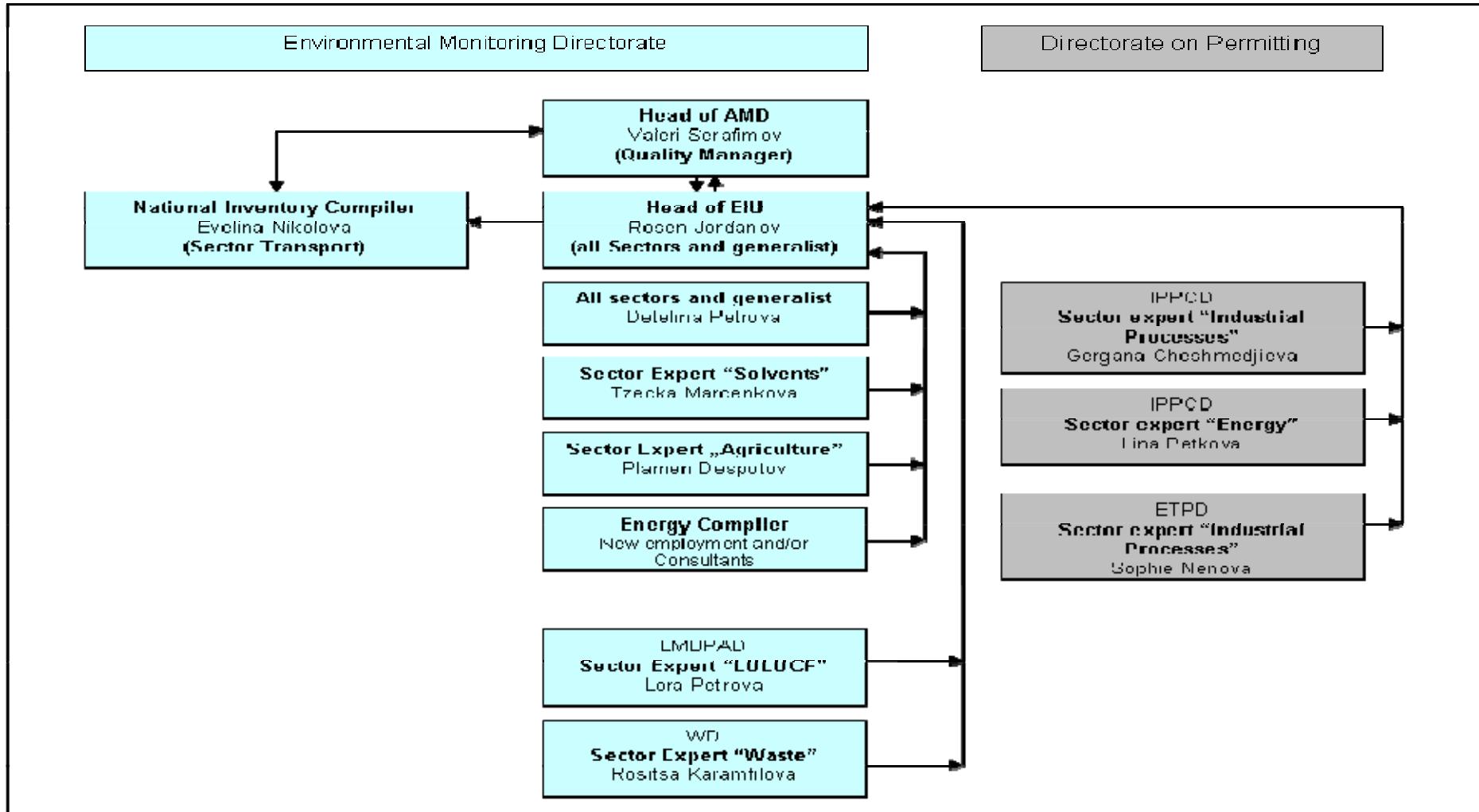
Issue	Planned improvement for 2010 and next submissions	Priority high - medium -low
	<ul style="list-style-type: none"> ➤ Sector specific QA/QC procedures were implemented in 2010 submission. QA procedures have been performed by the Sector expert in the MoEW (Order № RD-218/05.03.2010 by the Minister of Environment and Water). ➤ Support of consultants and external auditors are envisaged for 2010 and next submissions ➤ Comparison of emissions using alternative approaches. ➤ Documentation and archiving of all information required in NIR, Background documentation and archive. 	
Mineral Products (CRF 2.A)	<ul style="list-style-type: none"> ➤ To improve the accuracy of the emission factors based on the EU ETS Verified reports of installations as well as EPRTR and EU LCP. ➤ Revising activity data and emission factor based on EU ETS, E-PRTR or the IPPC permits ➤ Improving Timeseries and completeness ➤ Allocation emission from desulphurization process in power plants to limestone and dolomite use 	High priority 2010 - 2011 submission
Cement production (CRF 2.A.1)	<ul style="list-style-type: none"> ➤ Gathering through BACI (a recently established organization) of a reliable country specific data on the CaO content in the clinker and/or on the use of non-carbonate sources (the data must be representative for the whole period since 1988 to 2008); ➤ Data validation through the Regional Environmental Inspectorates (the competent authorities for compliance with the IPPC and GHG emission permits), incl. on-site checks; ➤ Depending on the results from the validation, correction of the applied (CS) CaO weight fraction (i.e. CaO clinker content and/or used non-carbonate sources). ➤ Respectively, the accuracy of the applied EF will be improved based also on the available verification. 	Medium priority 2011 submission
Lime production (CRF 2.A.2) FCCC/ARR/2009/BGR: ARR §106	<ul style="list-style-type: none"> ➤ applying the default ratio for high-calcium to dolomitic lime of 85:15 ➤ gathering through the Association of Lime Producers country-specific data on the content and types of lime produced ➤ country-specific ratio and EF ➤ Increase TACCC in the NIR. 	High priority 2010 - 2011 submission
Limestone and dolomite use (CRF 2.A.3)	<ul style="list-style-type: none"> ➤ update/revision of activity data ➤ country-specific EF (long term) ➤ Increase TACCC in the NIR. 	Medium priority 2011 submission

Issue	Planned improvement for 2010 and next submissions	Priority high - medium -low
Soda ash use (CRF 2.A.4)	<ul style="list-style-type: none"> ➤ Sector specific QA/QC procedures have to be intensified. ➤ Comparison of emissions using alternative approaches. ➤ Documentation and archiving of all information required in NIR, Background documentation and archive. 	Medium priority 2011 submission
Other (CRF 2.A.7)	<ul style="list-style-type: none"> ➤ Sector specific QA/QC procedures have to be intensified. ➤ Comparison of emissions using alternative approaches. ➤ Documentation and archiving of all information required in NIR, Background documentation and archive. 	Medium priority 2011 submission
Chemical Industry (CRF 2.B)	<ul style="list-style-type: none"> ➤ Revision of activity data with EPRTR, LCP data ➤ Improving methodology and EF ➤ Developing a country-specific EF, either based on plant-specific data (from the single operator) or using data collected within the framework of E-PRTR and the IPPC permits ➤ Sector specific QA/QC procedures have to be intensified. ➤ Comparison of emissions using alternative approaches. ➤ Documentation and archiving of all information required in NIR, Background documentation and archive. 	High priority 2010 - 2011 submission
Metal Production (CRF 2.C)	<p>Revision of activity data</p> <ul style="list-style-type: none"> ➤ Incorporation of EU ETS, EPRTR, LCP data ➤ Incorporation of information regarding integrated primary plant, which closed in 2008 for Steel production (CRF 2.C.1.1) <p>Allocation of emissions</p> <ul style="list-style-type: none"> ➤ Process-related emission and combustion-related emission ➤ Improving methodology and EF ➤ Developing a country-specific EF, either based on plant-specific data (from the single operator) or using data collected within the framework of EU ETC, E-PRTR and the IPPC permits <p>QA/QC activities</p> <ul style="list-style-type: none"> ➤ Sector specific QA/QC procedures have to be intensified. ➤ Comparison of emissions using alternative approaches. ➤ Documentation and archiving of all information required in NIR, Background documentation and archive. 	High priority 2010 - 2011 submission

Issue	Planned improvement for 2010 and next submissions	Priority high - medium -low
Other Production (CRF 2.D)	<p>Revision of activity data</p> <ul style="list-style-type: none"> ➢ Incorporation of E-PRTR and IPPC data ➢ Investigation of statistical data. <p>Improving methodology and EF</p> <ul style="list-style-type: none"> ➢ Developing a country-specific EF, either based on plant-specific data or using data collected within the framework of E-PRTR and the IPPC permits <p>QA/QC activities</p> <ul style="list-style-type: none"> ➢ Sector specific QA/QC procedures have to be intensified. ➢ Comparison of emissions using alternative approaches. ➢ Documentation and archiving of all information required in NIR, Background documentation and archive. 	High priority 2010 - 2011 submission
Consumption of Halocarbons and SF6 (CRF 2.F) FCCC/ARR/2009/BGR: ARR §110	<ul style="list-style-type: none"> ➢ A study on F gases actual emissions is under way now. The main findings and proposals for methodologies to be used are presented in NIR 2010, submitted to UNFCCC and EC on 27/05/2010. The final results of the study will be reported in the next submission of the inventory. ➢ Support of consultants and external auditors are envisaged for 2010 and next submissions 	High priority 31/07/2010
Solvent and other product use (CRF sector 3)	<ul style="list-style-type: none"> ➢ Recalculation of all the estimates of the sector based on the updated CORINAIR methodology will be implemented during the processing of the next submission. ➢ Sector specific QA/QC procedures were implemented in 2010 submission. QA procedures have been performed by the Sector expert in the MoEW (Order № RD-218/05.03.2010 by the Minister of Environment and Water). ➢ Support of consultants and external auditors are envisaged for 2010 and next submissions ➢ Documentation and archiving of all information required in NIR, Background documentation and archive. 	medium priority 2011 - 2012 submission
Agriculture (CRF sector 4) FCCC/ARR/2009/BGR: ARR §114 - 138	<ul style="list-style-type: none"> ➢ Collection of data for implementation higher TIER method. ➢ Revision of activity data and emission factor ➢ Sector specific QA/QC procedures have to be intensified. ➢ Comparison of emissions using alternative approaches. ➢ documentation for national statistic of agriculture and food provided by Ministry of Agriculture and Food ➢ Food and Agriculture Organization of the United Nations (FAO) 	High priority 2010 - 2011 submission

Issue	Planned improvement for 2010 and next submissions	Priority high - medium -low
	<ul style="list-style-type: none"> ➤ Documentation and archiving of all information required in NIR, Background documentation and archive. ➤ Recalculations and time-series consistency ➤ To account for the methane capture and separation of waste during and after collection, and to use specific degradable organic carbon (DOC) for every year after year 2000 as these data are available. 	

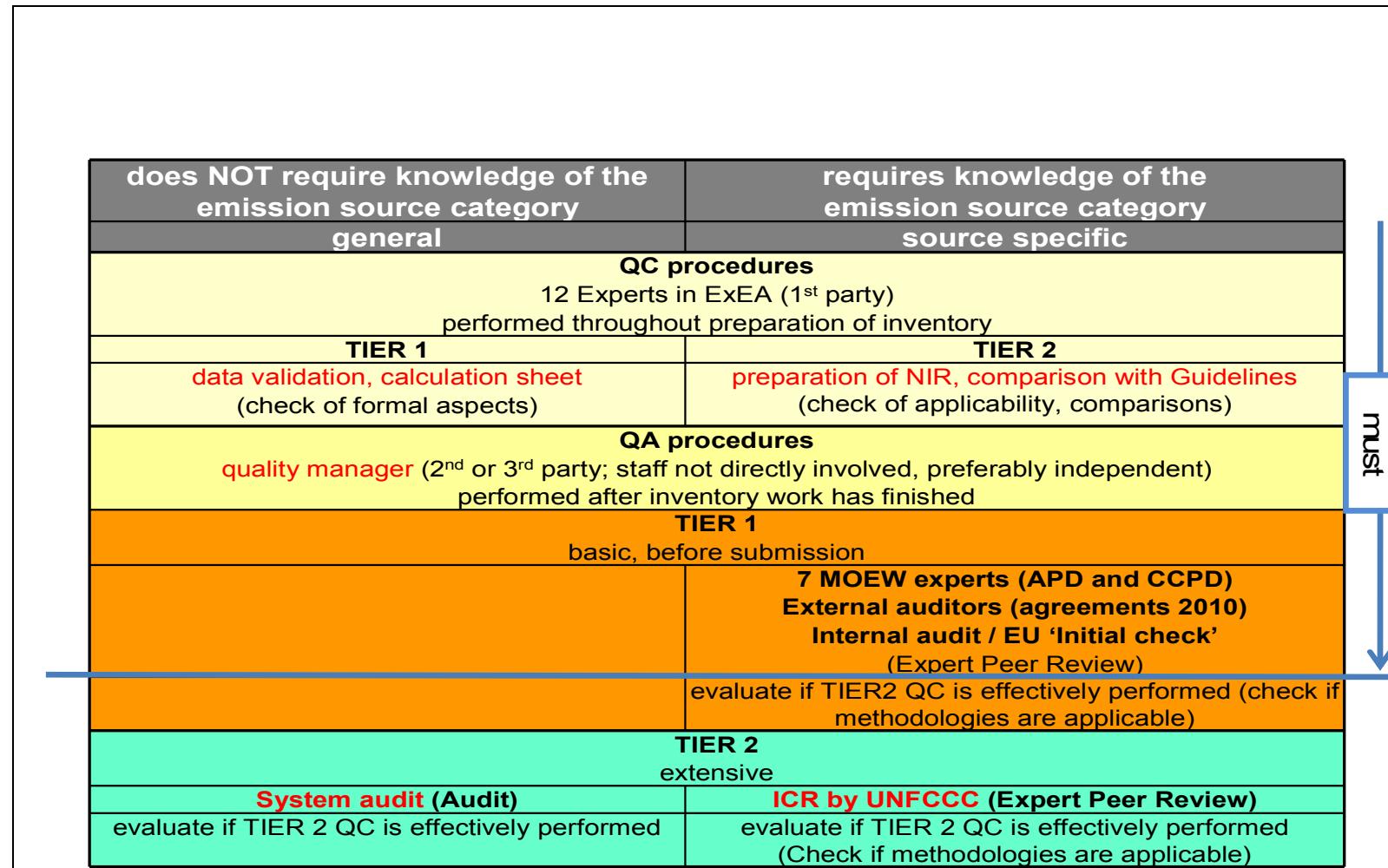
Figure 1: ExEA capacity for ensuring the function of BGNIS



- **Environmental Monitoring Directorate** with the Air Monitoring Department (AMD), Emission Inventory Unit (EIU), Land Monitoring Biodiversity and Protected Areas (LMBPAD), Waste Department (WD) and

- Directorate on Permitting with the Integrated Pollution Prevention and Control Department (IPPCD) and Emission Trading Permit Department (ETPD).

Figure 2: Quality Management System within the Bulgarian National Inventory System



ATTACHMENTS

1. ANNEX 1

Agreement between the Ministry of Environment and Water and Ministry of Economy, Energy and Tourism (attached translation of the original)

The agreement has been signed in Bulgarian language. Original can be provided upon request.

2. ANNEX 2

Agreement between the Ministry of Environment and Water and Ministry of Interior (attached translation of the original)

The agreement has been signed in Bulgarian language. Original can be provided upon request.

Translation of the original

AGREEMENT

**BETWEEN THE MINISTRY OF ENVIRONMENT AND WATER
AND MINISTRY OF ECONOMY, ENERGY AND TOURISM**

Today, 14th of June 2010 in the city of Sofia

by the Ministry of Environment and Water (MEW), UIC No 000697371 represented by Nona Karadzhova – Minister of Environment and Water

and

the Ministry of Economy, Energy and Tourism (MEET), UIC No 130169256, represented by Traycho Traykov – Minister of Economy, Energy and Tourism

having regard to:

the commitments of the Republic of Bulgaria for the application of the United Nations Framework Convention on Climate Change (UNFCCC), the Kyoto Protocol, including Decision 280/2004/EC of the European Parliament and of the Council dated 11.02.2004 concerning the mechanism for monitoring Community greenhouse gas emissions and for implementing the Kyoto Protocol, the Convention on Cross-Border Long-Distance Air Pollution (CCBLDAP) and Directive 2001/81/EU on national emission ceilings for certain atmospheric pollutants

this Agreement was entered into as follows:

I. Subject-matter of the agreement

Art.1. The Ministry of Environment and Water and the Ministry of Economy, Energy and Tourism hereby agree on cooperation and exchange of information for making annual inventories of the emissions of harmful substances and greenhouse gases into the ambient air herein under referred to as Inventories.

Art.2. All relations between the parties shall be regulated in accordance with the contractual commitments of the Republic of Bulgaria for the application of the United Nations Framework Convention on Climate Change (UNFCCC), the Kyoto Protocol, including Decision 280/2004/EC of the European Parliament and of the Council dated 11.02.2004 concerning the mechanism for monitoring Community greenhouse gas emissions and for implementing the Kyoto Protocol, the Convention on Cross-Border Long-Distance Air Pollution (CCBLDAP) and Directive 2001/81/EU on national emission ceilings for certain atmospheric pollutants; where the aim is to set up a frame of cooperation between the parties under this Agreement, in the scope of their competences, and in observance of their constitutive rules.

II. Rights and obligations of the parties under the Agreement

A. Rights and obligations of the Ministry of Environment and Water

Art.3. The Ministry of Environment and Water via the Executive Environment Agency (EEA) shall coordinate the overall activities for the preparation of the inventories, including:

1. It shall inform the Ministry of Economy, Energy and Tourism about the relevant amendments in the effective guidelines and/or methodologies (national, European-wide and/or international) for the preparation of the Inventories in due time, including such in the revised Guidelines of IPCC for National Greenhouse Gas Inventories (1996) and/or the Good Practice Guidance for National Greenhouse Gas Inventories (2000) under the United Nations Framework Convention on Climate Change and/or the Unified Methodology for inventory of the emissions of harmful substances into the atmosphere by the Ministry of Environment and Water (2008).
2. It shall inform the Ministry of Economy, Energy and Tourism in due time about the relevant terms and format, including scope and contents, in which the available data about the natural and the related to them indicators needed for the preparation of the Inventories should be presented, in conformity with the commitments of the country pursuant to Art.2.
3. It shall annually perform the final preparation of the Inventories within the relevant terms and format, including scope and contents.
4. It shall annually prepare (after coordination with competent authorities) a Plan for Quality Assurance, Control and Evaluation, and verification of the authenticity of the data from the national emissions of harmful substances into the atmosphere under the Convention on Cross-Border Long-Distance Air Pollution and/or the United Nations Framework Convention on Climate Change (the Inventories), which shall be presented for ratification by the Ministry of Environment and Water.
5. It shall coordinate the activities for the implementation and the application (by the Ministry of Environment and Water, the National Statistical Institute, the Ministry of Agriculture and Food, the Ministry of Economy, Energy and Tourism, Ministry of Interiors, and other institutions) of the Plan under item 4 hereinabove ratified by the Ministry of Environment and Water.
6. It shall develop and improve the Inventories via the provision of adequate technical and institutional capacity, including via training of experts engaged in association of the implementation of this Agreement.

B. Rights and obligations of the Ministry of Economy, Energy and Tourism

Art.4. The Ministry of Economy, Energy and Tourism shall render the necessary assistance to the Ministry of Environment and Water with a view to the fulfillment of the obligations under Art.3, item 3, 4 and 5, including:

1. It shall participate in the elaboration of the national inventories in part “Energy sector”.
2. Annually, within a term of up to November 30th of the current calendar year it shall send to the Executive Environment Agency data concerning the preceding calendar year, of the competencies of the Ministry, inclusive of:
 - Quantity of the natural gas (transit) in nm³;
 - Length of the gas transmission network particularized as follows: natural gas – transit in km; natural gas – conduction in the country in km; natural gas – distribution in the country in km.
3. It shall determine the relevant experts in charge of the control over the quality of the data delivered by the Ministry of Economy, Energy and Tourism into the Executive Environment Agency about the natural or other indicators related to them in conformity with the Plan under Art.3, item 4.

4. It shall participate in the development, fulfillment and implementation of the Plan pursuant to Art.3, item 4, included, make proposals for enhancing the quality of the Inventories, i.e. for the improvement of the representativeness, the reliability and the accuracy (respectively reduction of the ambiguity) of the data contained in them.
5. In conformity with its competence it shall participate in the elaboration, the selection and/or the determination of the national (specific for the country) emission factors/coefficients and/or other indicators related to them, used for determination of the emissions (greenhouse gases) within the framework of the Inventories.
6. It shall make proposals for the improvement and/or the optimization of the procedure for the elaboration of the Inventories.

III. Other conditions under the Agreement

Art.5 This Agreement between the Ministry of Environment and Water and the Ministry of Economy, Energy and Tourism shall enter into force from the date of its signing.

Art.6 This Agreement may be amended and supplemented by mutual agreement between the Parties stated in writing.

Art.7 The Parties under the Agreement shall send all the communications and notifications between each other in writing.

Art.8 The provisions of the legislation effective in the country shall be applied to all the issues unsettled by this Agreement.

This Agreement was drawn up in six uniform copies, three for each of the Parties.

**FOR THE MINISTRY OF
ENVIRONMENT AND WATER**

MINISTER:

/NONA KARADZHOVA/

Coordinated by,

Executive Director of the Executive Environment Agency:

/V. Grigorova/

Director of the Legal and Legislative Servicing of Public Procurements Directorate, MEW

/V. Gerova/

Director of the Environmental Policies Directorate, MEW

/G. Hristova/

Director of the Air Cleanness Directorate, MEW

/I. Angelov/

Director of the Climate Change Policy Directorate, MEW

/M. Dimitrova/

**FOR THE MINISTRY OF ECONOMY,
ENERGY AND TOURISM**

MINISTER:

/TRAYCHO TRAYKOV/

Coordinated by,

Translation of the original

**AGREEMENT
BETWEEN THE MINISTRY OF ENVIRONMENT AND WATER
AND MINISTRY OF INTERIOR**

Today, 14th of June 2010 in the city of Sofia

by the Ministry of Environment and Water (MEW) UIC No.000697371, represented by Nona Karadzhova – Minister of Environment and Water

and

the Ministry of Interior (MI), UIC No.000695235, represented by Tsvetan Tsvetanov – Minister of Interior

having regard to:

the commitments of the Republic of Bulgaria for the application of the United Nations Framework Convention on Climate Change (UNFCCC), the Kyoto Protocol, including Decision 280/2004/EC of the European Parliament and of the Council dated 11.02.2004 concerning the mechanism for monitoring Community greenhouse gas emissions and for implementing the Kyoto Protocol, the Convention on Cross-Border Long-Distance Air Pollution (CCBLdap) and Directive 2001/81/EU on national emission ceilings for certain atmospheric pollutants

this Agreement was entered into as follows:

I. Subject-matter of the agreement

Art.1. The Ministry of Environment and Water and the Ministry of Interior hereby agree on cooperation and exchange of information for making annual inventories of the emissions of harmful substances and greenhouse gases into the ambient air herein under referred to as Inventories.

Art.2. All relations between the parties shall be regulated in accordance with the contractual commitments of the Republic of Bulgaria for the application of the United Nations Framework Convention on Climate Change (UNFCCC), the Kyoto Protocol, including Decision 280/2004/EC of the European Parliament and of the Council of 11.02.2004 concerning the mechanism for monitoring Community greenhouse gas emissions and for implementing the Kyoto Protocol, the Convention on Cross-Border Long-Distance Air Pollution (CCBLdap) and Directive 2001/81/EU on national emission ceilings for certain atmospheric pollutants; where the aim is to set up a frame of cooperation between the parties under this Agreement, in the scope of their competences, and in observance of their constitutive rules.

III. Rights and obligations of the parties under the Agreement

A. Rights and obligations of the Ministry of Environment and Water

Art.3. The Ministry of Environment and Water via the Executive Environment Agency (EEA) shall coordinate the overall activities for the preparation of the inventories, inclusive of:

1. It shall inform the Ministry of Interior about the relevant amendments in the effective guidelines and/or methodologies (national, European-wide and/or international) for the preparation of the Inventories in due time, including such in the revised Guidelines of IPCC for National Greenhouse Gas Inventories (1996) and/or the Good Practice Guidance for National Greenhouse Gas Inventories (2000) under the United Nations Framework Convention on Climate Change and/or the Unified Methodology for inventory of the emissions of harmful substances into the atmosphere, by the Ministry of Environment and Water (2008).
2. It shall inform the Ministry of Interior in due time about the relevant terms and format, including scope and contents, in which the available data about the natural and the related to them indicators needed for the preparation of the Inventories should be presented, in conformity with the commitments of the country, pursuant to Art.2.
3. It shall annually perform the final preparation of the Inventories within the relevant terms and format, including scope and contents.
4. It shall annually prepare a Plan for Quality Assurance, Control and Evaluation and verification of the authenticity of the data from the national emissions of harmful substances into the atmosphere under the Convention on Cross-Border Long-Distance Air Pollution and/or the United Nations Framework Convention on Climate Change (the Inventories), which shall be presented for ratification by the Ministry of Environment and Water.
5. It shall coordinate the activities for the implementation and the application (by the Ministry of Environment and Water, the National Statistical Institute, the Ministry of Agriculture and Food, the Ministry of Economy, Energy and Tourism, the Ministry of Interior and others) of the Plan under item 4 hereinabove ratified by the Ministry of Environment and Water.
6. It shall develop and improve the Inventories via the provision of adequate technical and institutional capacity.

B. Rights and obligations of the Ministry of Interior

Art.4. The Ministry of Interior shall render the necessary assistance to the Ministry of Environment and Water with a view to the fulfillment of the obligations under Art.3, item 3, 4 and 5, including:

1. Annually, within a term of up to November 30th of the current calendar year it shall send to the Executive Environment Agency data of the competence of the Ministry, inclusive of data about the fleet of motorcar vehicles in the country.
2. It shall define the relevant experts in charge of the control over the quality of the data presented in the Executive Environment Agency about the natural or other related to the indicators in conformity with the Plan under Art.3, item 4.
3. It shall participate in the development, fulfillment and implementation of the Plan pursuant to Art.3, item 4, including, make proposals for enhancing the quality of the Inventories, i.e. for improvement of the representativeness, the reliability and the accuracy (respectively reduction of the ambiguity) of the constituent data.
4. In accordance with its competence it shall participate in the elaboration, the selection and/or the determination of the national (specific for the country) emission factors/coefficients inclusive of coefficients associated with them and/or other

indicators related to them, used for determination of the emissions (of harmful substances and/or greenhouse gases) within the framework of the Inventories.

5. It shall make proposals for the improvement and/or the optimization of the procedure for the elaboration of the Inventories.

IV. Other conditions under the Agreement

Art.5 This Agreement between the Ministry of Environment and Water and the Ministry of Interior shall enter into force from the date of its signing.

Art.6 This Agreement may be amended and supplemented by mutual agreement between the Parties stated in writing.

Art.7 The Parties under the Agreement shall send all the communications and notifications between each other in writing.

Art.8 The provisions of the legislation effective in the country shall be applied to all the issues unsettled by this Agreement.

This Agreement was drawn up in four uniform copies, three for the Ministry of Environment and Waters and one for the Ministry of Interior.

**FOR THE MINISTRY OF
ENVIRONMENT AND WATER**

MINISTER:

/NONA KARADZHOVA/

**FOR THE MINISTRY OF THE
INTERIOR**

MINISTER:

/TSVETAN TSVETANOV/

Coordinated by,

Executive Director of the Executive Environment Agency:

/V. Grigorova/

Director of the Legal and Legislative Servicing of Public Procurements Directorate, MEW

/V. Gerova/

Director of the Environmental Policies Directorate, MEW

/G. Hristova/

Director of the Air Cleanness Directorate, MEW

/I. Angelov/

Director of the Climate Change Policy Directorate, MEW

/M. Dimitrova/

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