



UNFCCC ITL Administrator

Standard Independent Assessment Report
Assessment Report
Part 2 - Substance

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Document change record

Version	Date	Description
0.1	03/07/2012	Initial draft
0.2	09/07/2012	Updates to initial draft
1.0	11/7/2012	Approved draft for review and consultation by Party
1.1	24/07/2012	Updated draft to include Party comments on draft
2.0	24/07/2012	Finalized approved report

Summary

Ref Nr	Description	Value	Comments
P2.0.1	Party name	Bulgaria	
P2.0.2	Reporting period	2011	
P2.0.3	Submission under review	Files submitted: - [SEF] SEF_BG_2012_1_16-27-24 2-5-2012.xls - [SEF1] SEF_BG_2012_1_10-2-22 17-4-2012.xls - [NIR 1] Bulgarian National Inventory Report-final.pdf - [REPORTS] Not submitted - [RESPONSE 1] BG_Response on Part 1_SN.doc - [RESPONSE 2] BG_Response on Part 2_SN.doc	Information from the ITL Administrator: - [SEFCR] SEF_BG_2012_1_16-27-24 2-5-2012_CR.xls - [SEFCR1] SEF_BG_2012_1_10-2-22 17-4-2012_CR.xls - [RRITL] SIAR_Reports_2011_BG_v1.xls - IAR/2011/BGR/1/2
P2.0.4	Previous annual review report reference	FCCC/ARR/2010/BGR (29/11/2010)	FCCC/ARR/2011/BGR was not published prior to the April 15 annual submission deadline and the commencement of the SIAR assessment process.

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1. Introduction

The SIAR Part 2 report assesses the substance of a Party's annual submission with regard to its national registry. Each section contains questions related to the specific items to be assessed.

1.1. Overall assessment

Ref Nr	Requirement	Assessment
P2.1.1	Is the information submitted by Party, in relation to its national registry, complete?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
P2.1.2	Problem found with Party's national registry?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P2.2.5
P2.1.3	Any unresolved problem with Party's national registry?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P2.2.10.4
P2.1.4	Problems identified with the significant changes to the Party's national registry?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
P2.1.5	National registry related recommendations from previous annual review were fully addressed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
P2.1.6	Is there any recommendation that needs to be addressed by the Party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

1.2. Summary of findings

Ref Nr	Summary of findings
P2.2.1	<ol style="list-style-type: none"> 1. The information on Kyoto Protocol units has been reported in accordance with section I.E of the annex to decision 15/CMP.1 and is accurate. The national registry continues to fulfill the requirements related to its reporting and accounting of information on Kyoto Protocol units, transaction procedures, and conformance to the technical standards, security, data integrity and recovery measures. 2. Party has reported information on its accounting of Kyoto Protocol units in the required SEF tables, as required by decisions 15/CMP.1 and 14/CMP.1. The SIAR assessor reviewed the findings included in the SIAR on the SEF and the SEF comparison report.¹ The SIAR was forwarded to the ERT prior to the review, pursuant to decision 16/CP.10. 3. Information on the accounting of Kyoto units has been prepared and reported in accordance with section I E of the annex to decision 15/CMP.1, and reported in accordance with decision 14/CMP.1 using the SEF tables. 4. Information reported by Party on records of any discrepancies was not found to be consistent with information provided to the secretariat by the international transaction log (ITL). The SIAR identified the following as problems that will need corrective action from the Party in its national registry: discrepancy type 5061. 5. The SIAR assessor finds that the national registry continues to perform the functions set out in the annex to decision 13/CMP.1 and the annex to decision 5/CMP.1, and continues to adhere to the technical standards for data exchange between registry systems in accordance with relevant Conference of the Parties serving as the meeting of the Parties (CMP) to the Kyoto Protocol decisions. 6. Party has reported its commitment period reserve in its 2012 annual submission. 7. The national registry has not fulfilled the requirements regarding the public availability of information in accordance with Paragraph 47 (a-1) Section II.E of the annex to decisions 13/CMP.1. The SIAR assessor recommends that Party include a link to a complete set of information and reports related to Holding and transaction information on the Party's public website. If any part of this information is deemed confidential, the Party should include an explicit statement in its NIR and on its public website indicating exactly which data are confidential, referencing the relevant regulations.

¹ The SEF comparison report is prepared by the ITL administrator and provides information on the outcome of the comparison of data contained in the Party's SEF tables with corresponding records contained in the ITL.

Ref Nr	Summary of findings
	<p data-bbox="315 228 533 252"><u>Recommendations</u></p> <ol style="list-style-type: none"> <li data-bbox="360 296 2051 357">8. The SIAR assessor reiterates a recommendation made in section 4.2 that it is recommended that the Party takes all necessary measures to make sure discrepancies do not keep re-occurring or elaborate on the root cause if it is not caused by Party registry. <li data-bbox="360 395 2051 525">9. The SIAR assessor reiterates the previous ERT recommendations with respect making publicly available information required by paragraph 47 (holding and transaction information) of the annex to 13/CMP.1. If any part of this information is deemed confidential, the Party should include an explicit statement in its NIR and on its public website indicating exactly which data are confidential, referencing the relevant regulations.

2. Identification of Problems

The purpose of this section is to identify any problems with the national registry based on the Party's annual submission and transaction log records that may affect the performance of the functions of the national registry pursuant to paragraph 88 of the annex to decision 22/CMP.1.

Ref Nr	Requirement	Assessment	Comment
	22/CMP.1 paragraph 88.(a) The information is complete and submitted in accordance with section I.E of the annex to decision 15/CMP.1 and relevant decisions of the COP/MOP;	Assessed in SIAR Part 1. Kept here for completeness	
P2.2.2	22/CMP.1 paragraph 88.(b) The information relating to issuance, cancellations, retirement, transfers, acquisitions, replacement and carry-over is consistent with information contained in the national registry of the Party concerned and with the records of the transactions log;	Problem Identified? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Party submitted a SEF which is consistent with the ITL records.
P2.2.3	22/CMP.1 paragraph 88.(c) The information relating to transfers and acquisitions between national registries is consistent with the information contained in the national registry of the Party concerned and with the records of the transaction log, and with information reported by the other Parties involved in the transactions;	Problem Identified? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Party submitted a SEF which is consistent with the ITL records.
P2.2.4	22/CMP.1 paragraph 88.(d) The information relating to acquisitions of CERs, tCERs, and ICERs from the CDM registry is consistent with the information contained in the national registry of the Party concerned and with the records of the transaction log, and with the clean development mechanism (CDM) registry;	Problem Identified? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Party submitted a SEF which is consistent with the ITL records.

Ref Nr	Requirement	Assessment	Comment
P2.2.5	22/CMP.1 paragraph 88.(e) ERUs, CERs, AAUs and RMUs have been issued, acquired, transferred, cancelled, retired, or carried over to the subsequent or from the previous commitment period in accordance with the annex to decision 13/CMP.1;	Problem Identified? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Discrepancy type 5061 significantly exceeded the average figures reported by all registries occurred in Party registry in [RRITL] report R-2.
P2.2.6	22/CMP.1 paragraph 88.(f) tCERs and ICERs have been issued, acquired, transferred, cancelled, retired and replaced, in accordance with the annex to decision 13/CMP.1 and the annex to decision 5/CMP.1;	Problem Identified? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Discrepancy 5061 significantly exceeded the average figures reported by all registries occurred in Party registry. Both [SEF] and [SEFCR] confirm no transactions with tCERs or ICERs occurred in Party registry during reported period.
P2.2.7	22/CMP.1 paragraph 88.(g) The information reported under paragraph 11 (a) of section I.E. in the annex to decision 15/CMP.1 on the quantities of units in accounts at the beginning of the year is consistent with information submitted the previous year, taking into account any corrections made to such information, on the quantities of units in accounts at the end of the previous year;	Problem Identified? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Party submitted a SEF which is consistent with the ITL records and with information submitted in the year prior to the reported year.
P2.2.8	22/CMP.1 paragraph 88.(h) The required level of the commitment period reserve, as reported, is calculated in accordance with paragraph 6 of the annex to decision 18/CP.7;	Only assessed by the Expert Review Team. Kept here for completeness	
P2.2.9	22/CMP.1 paragraph 88.(i) The assigned amount is calculated to avoid double accounting in accordance with paragraph 9 of the annex to decision 16/CMP.1;	Only assessed by the Expert Review Team. Kept here for completeness	

Ref Nr	Requirement	Assessment	Comment	
P2.2.10	22/CMP.1 paragraph 88.(j) A discrepancy has been identified by the transaction log relating to transactions initiated by the Party, and if so the expert review team shall:	Has the discrepancy been identified by the transaction log? [x] Yes [] No	[RRITL] R-2 identified 3 transactions as discrepancies. DES Response Codes 4003 and 4010 are assumed due to a flaw in the DES message model for external transfers and should not be reported as a problem/discrepancy. One discrepant transaction with DES Response Code 5061 was identified by the ITL in [RRITL] R-2 transaction BG1299 related to the conversion of ERUs.	
Repeat for each discrepancy type (5061)	P2.2.10.1	22/CMP.1 paragraph 88.(j)(i) Verify that the discrepancy has occurred and been correctly identified by the transaction log;	Has the discrepancy been identified by the transaction log? [x] Yes [] No [] N/A	The ITL correctly identified this transaction.
	P2.2.10.2	22/CMP.1 paragraph 88.(j)(ii) Assess whether the same type of discrepancy has occurred previously for that Party;	Has the same type of discrepancy occurred previously for that Party? [] Yes [x] No [] N/A	This discrepancy did not previously occur for the Party according to [RRITL] R-2.
	P2.2.10.3	22/CMP.1 paragraph 88.(j)(iii) Assess whether the transaction was completed or terminated;	Was the transaction completed or terminated? [x] Yes [] No [] N/A	The transaction final state was ALL terminated according to [RRITL] R-2.
	P2.2.10.4	22/CMP.1 paragraph 88.(j)(iv) Has the Party corrected the problem that caused the discrepancy?	Problem that caused the discrepancy corrected? [] Yes [x] No [] N/A	Party has not acknowledged the discrepancies in [NIR] or in [REPOSE 1]. It is therefore assumed that the problem which caused the discrepancy was not resolved by the party. In [RESPONSE2] Party noted that they will provide more detailed information regarding discrepancies in the next annual submission.

Ref Nr	Requirement	Assessment	Comment
P2.2.10.5	22/CMP.1 paragraph 88.(j)(v) Assess whether the problem that caused the discrepancy relates to the capacity of the national registry to ensure the accurate accounting of Kyoto Protocol units, issuance, holding, transfer, acquisition, cancellation and retirement of ERUs, CERs, tCERS, ICERs, AAUs and RMUs, the replacement of tCERs and ICERs, and the carry-over of ERUs, CERs and AAUs	Discrepancy relates to the capacity of the national registry to ensure the accurate accounting? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	The problem that caused the discrepancy does not relate to the capacity of the national registry to ensure the accurate accounting of Kyoto protocol units.

Ref Nr	Requirement	Assessment	Comment	
P2.2.11	22/CMP.1 paragraph 88.(k) Any record of non-replacement has been sent to the Party by the transaction log in relation to tCERs or ICERs held by the Party, and if so the expert review team shall:	Any tCERs or ICERs subject to non-replacement held by Party? [] Yes [x] No	No non-replacements occurred for the Party.	
Repeat for each non-replacement type (incl Type number	P2.2.11.1	22/CMP.1 paragraph 88.(k)(i) Verify that the non-replacement has occurred and been correctly identified by the transaction log;	Has the transaction log identified the non-replacement? [] Yes [] No [x] N/A	No non replacements occurred for the Party.
	P2.2.11.2	22/CMP.1 paragraph 88.(k)(ii) Assess whether non-replacement has occurred previously for that Party;	Has this type of non-replacement previously occurred for that Party? [] Yes [] No [x] N/A	No non replacements occurred for the Party.
	P2.2.11.3	22/CMP.1 paragraph 88.(k)(iii) Assess whether the replacement was subsequently undertaken;	Was the replacement subsequently undertaken? [] Yes [] No [x] N/A	No non replacements occurred for the Party.
	P2.2.11.4	22/CMP.1 paragraph 88.(k)(iv) Examine the cause of the non-replacement and whether the Party has corrected the problem that caused the non-replacement;	Has the Party corrected the problem that caused the non-replacement? [] Yes [] No [x] N/A	No non replacements occurred for the Party.
	P2.2.11.5	22/CMP.1 paragraph 88.(k)(v) Assess whether the problem that caused the non-replacement relates to the capacity of the national registry to ensure the accurate accounting of Kyoto Protocol units, holding, transfer, acquisition, cancellation, and retirement of ERUs, CERs, tCERs, ICERs, AAUs and RMUs, and the replacement of tCERs and ICERs, and if so, initiate a thorough review of the registry system in accordance with part V of these guidelines.	Non-replacement relates to the capacity of the national registry to ensure the accurate accounting? [] Yes [] No [x] N/A	No non replacements occurred for the Party.

3. Identification of Significant Changes

The purpose of this section is to identify any **significant changes** in the national registry reported by the Party that may affect the performance of the functions contained in the annex to decision 13/CMP.1, the annex to decision 15/CMP.1 and the adherence to the technical standards for data exchange between registry systems in accordance with relevant COP/MOP decisions.

If a change to a Party's national registry has been identified under paragraph 22 of the annex to decision 15/CMP.1 then information relating to this change should be submitted by the Party in accordance with paragraph 32 of the annex to decision 15/CMP.1. This section assesses the submitted changes reported by Party in accordance with paragraph 32 of decision 15/CMP.1, and the further guidance elaborated in the Independent Assessment Report common operational procedure.

Ref Nr	Requirement	Has the Party reported a change?	Problem Identified with the Change?	Comment
P2.3.1	15/CMP.1 paragraph 32.(a) The name and contact information of the registry administrator designated by the Party to maintain the national registry	Not a significant change, left here for completeness		
P2.3.2	15/CMP.1 paragraph 32.(b) The names of the other Parties with which the Party cooperates by maintaining their national registries in a consolidated system	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	No changes occurred for the Party for this item.
P2.3.3	15/CMP.1 paragraph 32.(c) A description of the database structure and capacity of the national registry.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	No changes occurred for the Party for this item.

Ref Nr	Requirement	Has the Party reported a change?	Problem Identified with the Change?	Comment
P2.3.4	15/CMP.1 paragraph 32.(d) A description of how the national registry conforms to the technical standards for data exchange between registry systems for the purpose of ensuring the accurate, transparent and efficient exchange of data between national registries, the clean development mechanism registry and the transaction log (decision 19/CP.7, paragraph 1)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	No changes occurred for the Party for this item.
P2.3.5	15/CMP.1 paragraph 32.(e) A description of the procedures employed in the national registry to minimize discrepancies in the issuance, transfer, acquisition, cancellation and retirement of ERUs, CERs, tCERs, ICERs, AAUs and/or RMUs, and replacement of tCERs and ICERs, and of the steps taken to terminate transactions where a discrepancy is notified and to correct problems in the event of a failure to terminate the transactions	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	No changes occurred for the Party for this item.
P2.3.6	15/CMP.1 paragraph 32.(f) An overview of security measures employed in the national registry to prevent unauthorized manipulations and to prevent operator error and of how these measures are kept up to date	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The party sufficiently reported the changes in security measures implemented in the registry.

Ref Nr	Requirement	Has the Party reported a change?	Problem Identified with the Change?	Comment
P2.3.7	15/CMP.1 paragraph 32.(g) A list of the information publicly accessible by means of the user interface to the national registry	Not a significant change, left here for completeness		
P2.3.8	15/CMP.1 paragraph 32.(h) The Internet address of the interface to its national registry	Not a significant change, left here for completeness		
P2.3.9	15/CMP.1 paragraph 32.(i) A description of measures taken to safeguard, maintain and recover data in order to ensure the integrity of data storage and the recovery of registry services in the event of a disaster	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	No changes occurred for the Party for this item.
P2.3.10	15/CMP.1 paragraph 32.(j) The results of any test procedures that might be available or developed with the aim of testing the performance, procedures and security measures of the national registry undertaken pursuant to the provisions of decision 19/CP.7 relating to the technical standards for data exchange between registry systems.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	No changes occurred for the Party for this item.

4. Recommendations

4.1. Previous Expert Review Team recommendations

This section assesses Party's response to the previous annual review recommendations.

Ref Nr	Recommendation from previous Annual Review report (with ref)	Has Party acted on recommendation? [] Yes [x] No	Comment
P2.4.1.1	FCCC/ARR/2010/BGR 204 ... the ERT reiterates a finding of the SIAR that the national registry does not fulfil the requirements regarding the public availability of information in accordance with section I.E of the annex to decision 13/CMP.1.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	In [NIR] table 234 party...JI projects publicly accessible information: http://bg-server1.etr.moew.government.bg/iaos/projects.php Accounts holding's publicly accessible information: http://bg-server1.etr.moew.government.bg/iaos/contacts.php Assessor notes that while formally addressed in the [NIR] the issues raised in ERT recommendation have not been fully met. See issues in IAR/2011/BGR/1/1 section 1.4.
P2.4.1.2	FCCC/ARR/2010/BGR 206 (k) Make publicly available information required by paragraph 45 (account information), paragraph 46 (Article 6 JI, project information) and paragraph 47 (holding and transaction information) of the annex to 13/CMP.1. If any part of this information is deemed confidential, the Party should include an explicit statement in its NIR and on its public website indicating exactly which data are confidential, referencing the relevant regulations;	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	In [NIR] table 234 party reports JI projects publicly accessible information at: http://bg-server1.etr.moew.government.bg/iaos/projects.php Account holding's publicly accessible information: http://bg-server1.etr.moew.government.bg/iaos/projects.php

			server1.etr.moew.government.bg/iaos/contacts.php Assessor notes that while formally addressed in the [NIR] the issues raised in ERT recommendation have not been fully met. See issues in IAR/2011/BGR/1/1 section 1.4.
P2.4.1.3	FCCC/ARR/2010/BGR 206 (I) The ERT reiterates a recommendation from both the 2008 and 2009 SIARs that the Party report changes to the national registry system from the previous reporting year as required by paragraph 32 (a.j) of the annex to decision 15/CMP.1.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	In [NIR] table 234 party reports “Changes to the national registry system from the previous reporting year as required by paragraph 32 (a.j) of the annex to decision 15/CMP.1. will be included in the final NIR – 15/04/2011” The assessor notes that changes to the national registry as required by paragraph 32 (a.j) of the annex to decision 15/CMP.1. are reported satisfactorily in [NIR] section 14.
P2.4.1.x		<input type="checkbox"/> Yes <input type="checkbox"/> No	

4.2. Recommendations to address identified problems

If a problem has been identified earlier in section 2 and 3 or a previous recommendation listed in section 4.1 has not been taken into account, then this section of the report lists a recommendation for each problem to be brought to the attention to the Expert Review Team.

Ref Nr	Recommendation Ref	Recommendation description	Comment
P2.4.2.1	P1.2.4, P2.2.5, P2.2.10	The SIAR assessor recommends that the party fully report on discrepant transactions through use of Reports R-2 through R-5.	RRITL identified a discrepancy not reported by the Party in NIR, or Response 1. Party also has not provided reports R2-R5.
P2.4.2.2	P2.2.10.4	The SIAR assessor recommends that the Party takes all necessary measures to make sure discrepancies do not keep re-occurring or elaborate on the root cause if it is not caused by the Party registry.	Party reported in [NIR] section 14 that no changes of discrepancies procedures occurred during the reported period.
P2.4.2.3	P1.4.3, P2.4.1.1, P2.4.1.2	The SIAR assessor reiterates the previous ERT recommendations with respect making publicly available information required by paragraph 47 (holding and transaction information) of the annex to 13/CMP.1. If any part of this information is deemed confidential, the Party should include an explicit statement in its NIR and on its public website indicating exactly	P1.4.3 1-12 were identified as incomplete by the SIAR assessor in IAR/2011/BGR/1/1. Party did not respond to the paragraphs with supplemental information in [Response 1].

		which data are confidential, referencing the relevant regulations.	
P2.4.2.x			