



BOTSCHAFT DER REPUBLIK BULGARIEN
IN DER BUNDESREPUBLIK DEUTSCHLAND

Nr. Pv.-21-352/12.08.2010

MR. FENG GAO
Secretary to the Compliance Committee
UNFCCC Secretariat
Haus Carstanjen, Martin-Luther-King-Strasse 8
D-53175 Bonn, Germany

DEAR MR.FENG GAO,

In accordance with paragraph 20 (b) of the Preliminary Finding, which forms an integral part of the Final Decision of the Enforcement Branch, herewith please find attached the updated document *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 Improvement plan contains measures planned for the period 2010–2012 in order to fulfill the recommendations of the Expert Review team as set out in the annual review report FCCC/ARR/2009/BGR. The updated Improvement plan also indicates the progress of implementation of the planned measures as of August 2010.

As stated in the *Written Response regarding Final Decision concerning Bulgaria* we would like to confirm that today Bulgaria will provide officially by UNFCCC Submission Portal the improved GHG inventory for 2008 (CRF tables and NIR) – 2010 resubmission.

In reference to future correspondence with the designated representatives of Bulgaria, please address the correspondence only to the relevant representatives of Bulgaria as nominated here – Mrs. Milya Dimitrova, Director of Climate Change Policy directorate, Ministry of Environment and Water and National Focal Point for UNFCCC for Bulgaria – e-mail address: madimitrova@moew.government.bg; and Mrs. Evelina Nikolova, Head of Air Quality Unit, Executive Environment Agency and National Inventory Focal Point – e-mail address: serafimov@nfp-bg.eionet.eu.int

Please accept the assurances of my highest consideration.

Attachment:

1. Updated Improvement plan as referred to under paragraph 20 (b) of the Preliminary Finding and Final Decision concerning Bulgaria

Sincerely,


STEFANKA IGOVA
CHARGÉ D'AFFAIRES A.I.



Attachment 1

UPDATED 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 Improvement plan is prepared according to the requirements as set out in para 20 (b) of the Preliminary Finding which forms an integral part of the Final Decision of the Enforcement Branch of the Compliance Committee of the Kyoto Protocol.

The activities are planned for the period 2010 – 2012 in order to fulfill the recommendations of Expert Review Team as set out in the annual review report FCCC/ARR/2009/BGR.

The table bellow presents the status of implementation of the activity in Improvement Plan till August 2010.

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

Issue	Planned improvement for 2010 and next submissions	Priority high - medium -low	Status of implementation August 2010
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: <ul style="list-style-type: none"> ➤ National Statistic Institute (NSI) ➤ Ministry of Agriculture and Food (MAF) ➤ Ministry of Economy and Energy (MEE) ➤ Ministry of Internal Affairs (MIA) 	High priority March 2010 March 2010 June 2010 June 2010	New agreements have entered into force: <ul style="list-style-type: none"> ➤ NSI (RD21-35/12.02.2010) ➤ MAF (04-00-517/26.02.2010 and RD 50-47/15.03.2010) ➤ MEE (14/06/2010) ➤ MIA (08/06/2010)
Legal basis FCCC/ARR/2009/BGR: ARR § 5 - 67	ARR § 67 (a) (i) <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. It will reinforce the institutional agreements by specifying the roles of all data providers as well as QA/QC obligations 	High priority September 2010	<ul style="list-style-type: none"> ➤ A draft Regulation for the functioning of BGNIS is prepared by an interministerial working group from all engaged institutions. The draft will be approved by the Ministry of Environment and Water and send to the Concil of Ministrets by the end of August.
Expert capacity in ExEA FCCC/ARR/2009/BGR: ARR § 5 - 67	ARR § 67 (a) (ii) (iii) (iv) <ul style="list-style-type: none"> ➤ Strengthening the staff, engaged in planning, preparation and management of the emissions inventory. ➤ 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 Project 1 “LULUCF” ➤ Incorporation of the preliminary results from Project 2 ” Recalculations” ➤ Incorporation of the results from completed Project 4 “F-gases” 	High priority 2010 and 2011 submission	<ul style="list-style-type: none"> ➤ A new Order №110/30.04.2010 by the Executive Director of ExEA has been issued. The order regulates the name and responsibilities of sector experts from different departments within the ExEA, who are engaged in planning, preparation and management of National GHGs emission inventory (see Figure 1) ➤ Incorporated results from completed Project 1 “LULUCF” (CRF tables and NIR) ➤ Incorporation of the preliminary results from Project 2 ” Recalculations” ➤ Incorporated results from completed Project 4 “F-gases” (CRF tables and NIR)

Issue	Planned improvement for 2010 and next submissions	Priority high - medium -low	Status of implementation August 2010
<p>Collaboration with consultants and external auditors FCCC/ARR/2009/BGR: ARR § 5 - 67</p>	<p>ARR § 67 (c) (iii)</p> <ul style="list-style-type: none"> ➤ Strengthening the contacts with Branch Business Associations. ➤ Further intensive cooperation for studies (verification of EFs) with other non-governmental institutions, universities and private consultants ➤ Support of external auditors for improvement of QA procedures 	<p>High priority 2010 and 2011 submission</p>	<p>Contracts with external consultants for supporting preparation of GHGs inventory and NIR have been signed:</p> <ul style="list-style-type: none"> ➤ Forestry University ➤ Denkstatt Ltd ➤ Energy Institute Ltd ➤ Bulgarian Academy of Science, Geophysical Institute ➤ Branch Assosiation for Cement Industry
<p>Quality Management System FCCC/ARR/2009/BGR: ARR § 53 - 57</p>	<ul style="list-style-type: none"> ➤ Improvement of the activity in QMS ➤ Ensuring that other institutions are engaged in the checking and review of the annual submission as set out in its QA/QC plan ➤ Improvement of Sector specific QA/QC procedures ➤ Starting the documentation and archiving process 	<p>High priority 2010</p>	<ul style="list-style-type: none"> ➤ Update of the National QA/QC Plan due to the newly implemented institutional, legal and procedural arrangements within the BGNIS ➤ A new System for sector experts workflow organization, documentation and archiving has been implemented in the ExEA (see figure 2)
	<ul style="list-style-type: none"> ➤ ARR § 55 During the in-country review, Bulgaria provided details of some sector-specific QA undertaken in the industrial processes sector. The Party explained that data obtained under the European Union emissions trading scheme (EU ETS)) and data reported by industry under other regulations (e.g. EPRTR) are used to verify emissions data for the categories cement production, iron and steel production and nitric acid production. However, Bulgaria has provided little evidence or documentation of QA undertaken for the other sectors. The ERT recommends that Bulgaria provide sufficient information in the NIR on the use of EU ETS data for verification of its emissions data, including which tier approach from the EU ETS guidelines was used for the QA and/or verification of the EU ETS data used. 		<ul style="list-style-type: none"> ➤ Intensive cross-check with ETS, EPRTR, IPPC permits was undertaken. The relevant data was incorporated into the GHG inventory;
			<ul style="list-style-type: none"> ➤ Internal Review of the national system by EEA/EC in July 2009

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Source categories improvements			
<p>Energy sector FCCC/ARR/2009/BGR: ARR § 69 - §90</p>	<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 permits data will be undertaken ➤ 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. ➤ Support of consultants and external auditors are envisaged for 2010 and next submissions 	<p>High priority 31/07/2010</p>	<ul style="list-style-type: none"> ➤ Contract with external consultants Denkstatt for supporting preparation of GHGs inventory and NIR for Sector Energy (excluding sub-sector Transport) ➤ Recalculated emissions in Energy Sector based on revised AD for entire time series (IEA/EUROSTAT questionnaire). ➤ A cross-check with ETS, EPRTR, IPPC permits was realized; ➤ Improved documentation and archiving of the inventory, including work sheets ➤ 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)

Issue	Planned improvement for 2010 and next submissions	Priority high - medium -low	Status of implementation August 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 permits data ➤ 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/revise 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 31/07/2010</p> <p>High priority 2010 - 2011 submission</p> <p>High priority 2010 - 2011 submission</p> <p>Medium priority 2011 – 2012 submission</p>	<ul style="list-style-type: none"> ➤ Contract with external consultants Denkstatt for supporting preparation of GHGs inventory and NIR for Sector Energy (excluding sub-sector Transport) ➤ Recalculated emissions in Energy Sector based on revised AD for entire time series (IEA/EUROSTAT questionnaire). ➤ A cross-check with ETS, EPRTR, IPPC was realized; ➤ Improved documentation and archiving of the inventory, including work sheets
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/revise 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>	<ul style="list-style-type: none"> ➤ Contract with external consultants Denkstatt for supporting preparation of GHGs inventory and NIR for Sector Energy (excluding sub-sector Transport) ➤ Recalculated emissions in Energy Sector based on revised AD for entire time series (IEA/EUROSTAT questionnaire). ➤ A cross-check with ETS, EPRTR, IPPC permits was undertaken; ➤ Improved documentation and archiving of inventory, including work sheets

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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 data 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 IV, which is a country support tool 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. ➤ 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 time series-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 	High priority 31/07/2010 2011 submission	<ul style="list-style-type: none"> ➤ Recalculated emissions based on revised AD for entire time series (IEA/EUROSTAT questionnaire) ➤ Recalculation in accordance with the IPCC GPG ➤ Improved documentation and archiving of the inventory, including work sheets
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	<ul style="list-style-type: none"> ➤ Contract with external consultants Denkstatt for supporting preparation of GHGs inventory and NIR for Sector Energy (excluding sub-sector Transport) ➤ Recalculated emissions in Energy Sector based on revised AD for entire time series (IEA/EUROSTAT questionnaire). ➤ Improved documentation and archiving of the inventory, including work sheets

Issue	Planned improvement for 2010 and next submissions	Priority high - medium -low	Status of implementation August 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	<ul style="list-style-type: none"> ➤ Contract with external consultants Denkstatt for supporting preparation of GHGs inventory and NIR for Sector Energy (excluding sub-sector Transport) ➤ Recalculated emissions in Energy Sector based on revised AD for entire time series (IEA/EUROSTAT questionnaire). ➤ Improved documentation and archiving of the inventory, including work sheets
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) 	<p>High priority 31/07/2010</p> <p>2011 – 2012 submission</p> <p>2011 submission</p> <p>High priority 31/07/2010</p>	<ul style="list-style-type: none"> ➤ Contract with external consultants Denkstatt for supporting preparation of GHGs inventory and NIR for Sector Energy (excluding sub-sector Transport) ➤ Recalculated emissions in Energy Sector based on revised AD for entire time series (IEA/EUROSTAT questionnaire).

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<p>Industrial processes (CRF sector 2) FCCC/ARR/2009/BGR: ARR §91 - 113</p>	<ul style="list-style-type: none"> ➤ Revising of the AD with ETS, EPRTTR, IPPC permits data ➤ Revising of the EF. Investigation whether it would be possible to update country specific emission factors ➤ 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 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. 	<p>High priority 2010 - 2011 submission</p>	<ul style="list-style-type: none"> ➤ Recalculated emissions based on revised AD in accordance with plant specific data submitted under EPRTTR and ETS for productions of CRF 2.B.1 Ammonia, CRF 2.B.2, Nitric acid, CRF 2.A.1Cement, CRF 2.C.1 Iron and steel, 2.A.7 Glass and Bricks. ➤ 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). ➤ Improved documentation and archiving of the inventory, including work sheets
<p>Consumption of Halocarbons and SF6 (CRF 2.F) FCCC/ARR/2009/BGR: ARR §110</p>	<ul style="list-style-type: none"> ➤ A study on F-gases actual emissions is under way. 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 	<p>High priority 31/072010</p>	<ul style="list-style-type: none"> ➤ For the NIR 2010 a complete new and changed estimation was carried out for CRF 2.F (F-gases) (complete time series). ➤ Incorporated results from completed Project 4 “F-gases” (CRF tables and NIR) ➤ Improved documentation and archiving of the inventory, including work sheets ➤ Contract with external consultants Denkstatt
<p>Solvent and other product use (CRF sector 3)</p>	<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). 	<p>medium priority 2011 - 2012 submission</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).

Issue	Planned improvement for 2010 and next submissions	Priority high - medium -low	Status of implementation August 2010
	<ul style="list-style-type: none"> ➤ 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. ➤ 		
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 statistics of agriculture and food provided by Ministry of Agriculture and Food ➤ Food and Agriculture Organization of the United Nations (FAO) ➤ Documentation and archiving of all information required in NIR, Background documentation and archive. ➤ Support of consultants and external auditors are envisaged for 2010 and next submissions 	High priority 2010 - 2011 submission	<ul style="list-style-type: none"> ➤ Recalculated emissions in Agriculture Sector based on revised AD for entire time series in accordance with data provided by national agro statistic (MAF) ➤ Implementation of higher tier method for key categories like cattle ➤ Improving QA/QC ➤ Improved documentation and archiving of the inventory, including work sheets

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<p>LAND-USE, LAND-USE CHANGES AND FORESTRY (CRF sector 5) FCCC/ARR/2009/BGR: ARR §139 - 153</p>	<ul style="list-style-type: none"> ➤ ARR § 153 Bulgaria has successfully completed Project 1 – “Development of methodology for calculation of emissions and removals for LULUCF sector according to requirements of UNFCCC and Kyoto Protocol”. The results of this project have already been incorporated into the 2010 submission. The methodology for calculation of emissions and removals for LULUCF sector according to requirements of UNFCCC and Kyoto Protocol has already been prepared under the contract between ExEA and University of Forest. ➤ For 2011 an improvement of the inventory of the areas of the cropland as well as estimations of the organic carbon stock in cropland and grassland by soil groups is planned. ➤ In 2011 estimations of the organic carbon stock in forest soil, by soil groups (WRB, 2006) is planed. ➤ Support of consultants and external auditors are envisaged for 2010 and next submissions ➤ Bulgaria will carry out an assessment of the most important factors contributing to the results of the LULUCF sectors together with their uncertainties and needs to improve them as well as the available resources for improvements. On basis of this assessment a prioritization and a plan of improvement will be made. 	<p>High priority 2010 submission</p> <p>2011 submission</p> <p>2011 submission</p>	<ul style="list-style-type: none"> ➤ For the NIR2010 a complete new and changed estimate was carried out for the whole LULUCF-sector of Bulgaria (complete time series). ➤ Incorporated results from completed Projects 1 “LULUCF” (CRF tables and NIR) ➤ Improved documentation and archiving of the inventory, including work sheets <ul style="list-style-type: none"> ➤ Internal Review of the national system by EEA/EC (JRC) in July 2009

Figure 1: ExEA capacity for ensuring the function of BGNIS

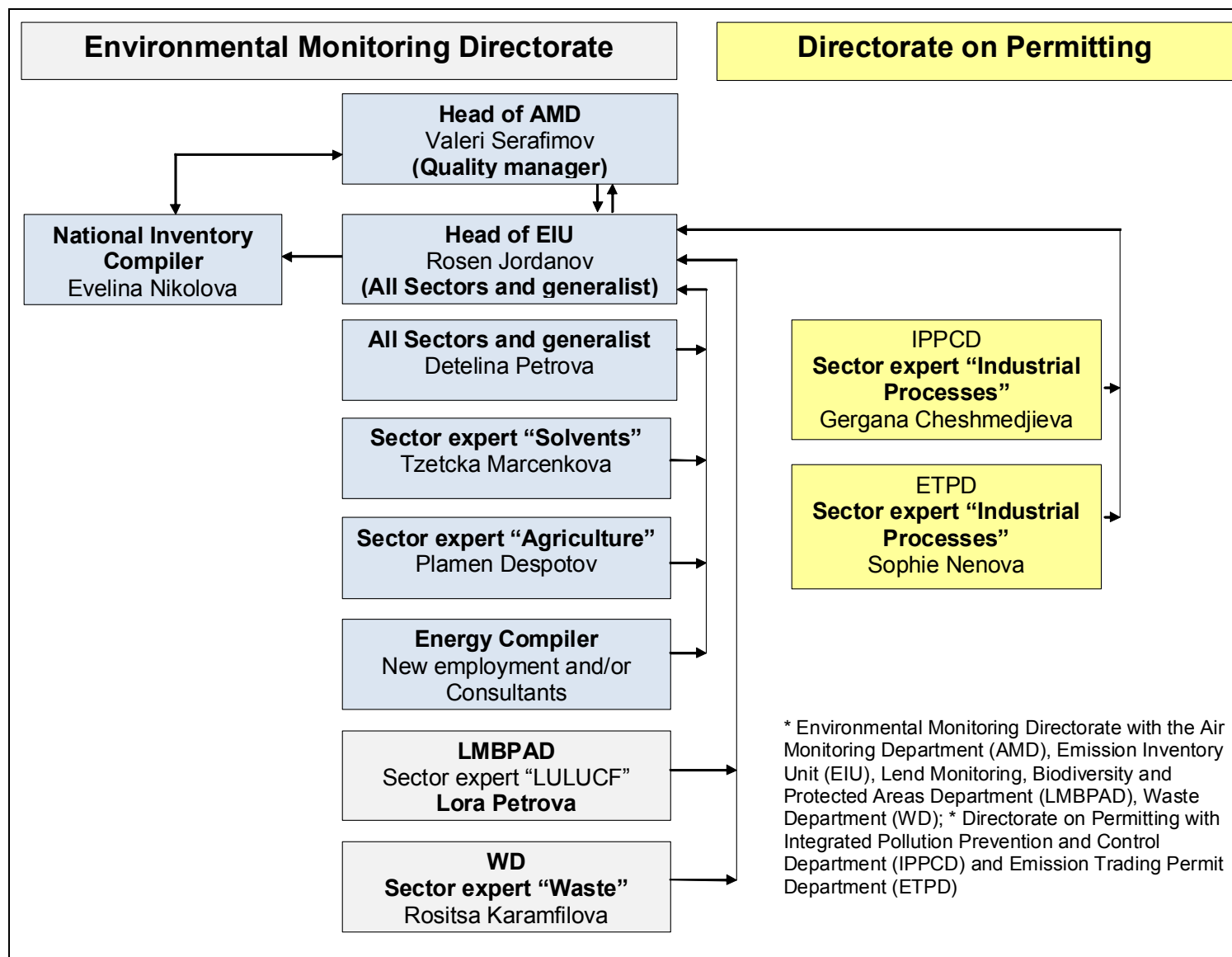


Figure 2: Documentation and archiving in ExEA

