



**BOTSCHAFT DER REPUBLIK BULGARIEN  
IN DER BUNDESREPUBLIK DEUTSCHLAND  
DER BOTSCHAFTER**

**TO  
THE COMPLIANCE COMMITTEE  
SECRETARIAT**

**Pv-21-25/27.01.2011**

**Ref: Submission of progress report on the implementation of the Compliance Action Plan of Bulgaria and electronic copy of the presentation to be given by Bulgaria at the 12<sup>th</sup> meeting of the Enforcement Branch**

**DEAR MR. FENG GAO,**

Pursuant to paragraph 20 (b) (ii) of the final decision of the enforcement branch (CC-2010-1-8/Bulgaria/EB) and according to paragraph 3 of Section XV of the annex to decision 27/CMP.1 "Procedures and mechanisms relating to compliance under the Kyoto Protocol",

Attached herewith Bulgaria submits a progress report on the implementation of the Compliance Action Plan, developed in accordance with paragraph 20 (b) of the final decision and Section XV, paragraph 2 and submitted in accordance with Section XI, paragraph 3 of the annex to decision 27/CMP.1.

This is also to acknowledge the receipt of your letter dated 21 January 2011 and to confirm our request to make a presentation at the twelfth meeting of the Enforcement Branch of the Compliance Committee. For the purpose of facilitating the preparations by the secretariat for the delivery of the presentation, I would like to provide the following details:

Title of the presentation: **"Compliance of the Bulgarian National Inventory System with the Kyoto Protocol Commitments"**

Speaker: **Dr. Vanya Grigorova, Executive Director of the Executive Environmental Agency, Bulgaria**

Duration: 12-15 minutes.

An electronic copy of the presentation has been sent directly to the e-mail of the Compliance Committee secretariat: [compliance.committee@unfccc.int](mailto:compliance.committee@unfccc.int).

Please accept the assurances of my highest considerations.

**Attachments:**

1. Progress report on the implementation of the Compliance Action Plan
2. Copy of the presentation to be given by Bulgaria at the 12<sup>th</sup> meeting of the Enforcement Branch of the Compliance Committee

**SINCERELY YOURS,**

**AMBASSADOR IVO PETROV**



**PROGRESS REPORT**  
**on the implementation of the Compliance Action 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 **Compliance Action Plan** was prepared in 2010 according to the requirements as set out in paragraph 20 (b) of the preliminary finding (CC-2010-1-6/Bulgaria/EB), confirmed by the final decision of the Enforcement Branch concerning Bulgaria (CC-2010-1-8/Bulgaria/EB).

The activities have been planned for the period 2010-2011 in order to remedy the non-compliance and to fulfill the recommendations of Expert Review Team (ERT) as set out in the annual review report FCCC/ARR/2009/BGR.

The progress report showing the status of implementation of the **Compliance Action Plan** as of August 2010 was submitted by Bulgaria to the Enforcement Branch of the Compliance Committee of the Kyoto Protocol on 1 October 2010 (CC-2010-1-12/Bulgaria/EB).

The conclusions and recommendations of ERT set out in the Report of the individual review of the 2010 annual submission of Bulgaria (FCCC/ARR/2010/BGR) indicate that all activities for improvements of institutional, legal and procedural arrangements within the National Inventory System as well as for improvement of quality of inventory are adequately planned and implemented by the Bulgarian government in 2010. The main results are written in the paragraph §203 from the annual review report FCCC/ARR/2010/BGR - “The ERT concludes that the national system of Bulgaria is performing its required general and specific functions, as set out in the annex to decision 19/CMP.1 with respect to the institutional, legal and procedural arrangements to perform these functions; that the institutional, legal and procedural arrangements established and formalized by the “Ordinance on the way and order of organization of the national inventories of hazardous substances from greenhouse gases in the ambient air” (Ordinance No. 215) that entered into force on 21 September 2010 are fully operational; and that Bulgaria has in place the institutional arrangements and the capacity, including the arrangements for the technical competence of staff involved in the national system, to plan, prepare and manage inventories on an annual basis”. As a result from implemented activities for improvements “No questions of implementation were identified by the ERT during the review” (§207 FCCC/ARR/2010/BGR).

The enclosed progress report presents the updated status of implementation of the **Compliance Action Plan** and the implementation of activities and planned improvements for the next annual submission following the recommendations of the Expert Review Team as set out in the annual review report FCCC/ARR/2010/BGR. The progress report of the **Compliance Action Plan** implementation is prepared and submitted in accordance to paragraph 20 (b) of the final decision concerning Bulgaria and Section XV, paragraph 3 of the Annex to Decision 27/CMP.1 “Procedures and mechanisms relating to compliance under the Kyoto Protocol”.

**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	Comments
<b>General Improvements</b>				
<b>Institutional arrangements</b>	<b>FCCC/ARR/2009/BGR</b> New agreements between MoEW and the main data provider: <ul style="list-style-type: none"> <li>➤ National Statistic Institute (NSI)</li> <li>➤ Ministry of Agriculture and Food (MAF)</li> <li>➤ Ministry of Economy and Energy (MEE)</li> <li>➤ Ministry of Internal Affairs (MIA)</li> </ul>	High priority 30/06/2010	<ul style="list-style-type: none"> <li>➤ New four institutional agreements have entered into force.</li> </ul>	Adequately planned and implemented in 2010. (FCCC/ARR/2010/BGR § 203)
<b>Legal basis</b>	<b>FCCC/ARR/2009/BGR</b> <ul style="list-style-type: none"> <li>➤ Update of legal basis of BGNIS</li> </ul>	High priority 30/09/2010	New Regulation of the Council of Ministers 215/21.09.2010 SG 76/2010: <ul style="list-style-type: none"> <li>➤ Establish and maintain the institutional, legal and procedural arrangements necessary to perform the functions of BGNIS, as defined in Decision 19/CMP.1.</li> <li>➤ reinforce the institutional agreements by specifying the roles of all data providers</li> <li>➤ QA/QC activities.</li> </ul>	Adequately planned and implemented in 2010 (FCCC/ARR/2010/BGR § 203)
<b>Expert capacity</b>	<b>FCCC/ARR/2009/BGR</b> <ul style="list-style-type: none"> <li>➤ Strengthening the staff, engaged in planning, preparation and management of the emissions inventory.</li> <li>➤ Training of the staff within the project with the Federal Environment Agency of Austria (workshops in the period December 2009 to June 2010)</li> </ul>	High priority 30/09/2010	<ul style="list-style-type: none"> <li>➤ Extension of the staff, engaged in planning, preparation and management of inventory</li> <li>➤ Order № 110/30.04.2010 by the Executive Director of ExEA</li> <li>➤ Training of the staff within the project with the Federal Environment Agency of Austria</li> <li>➤ Incorporated results from completed Projects with external consultants “Energy”, “LULUCF”, “F-gases” (CRF tables and NIR)</li> </ul>	Adequately planned and implemented in 2010 (FCCC/ARR/2010/BGR § 203)

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	<p><b>FCCC/ARR/2010/BGR</b></p> <ul style="list-style-type: none"> <li>➤ Further extension of the staff involved in planning, preparation and management of the emissions inventory (§ 39).</li> <li>➤ Further training of the staff</li> <li>➤ Participation of the Bulgarian experts in the meetings, organized by UNFCCC and EC</li> <li>➤ Further collaboration with Austrian Environment Agency</li> <li>➤ On-line UNFCCC training</li> </ul>	High priority 2011	<ul style="list-style-type: none"> <li>➤ New Order N 202/29.09.2010 by the Executive Director of ExEA (see Figure 1)</li> <li>➤ Training of the staff in the frame of contracts with external consultants</li> </ul>	

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<b>Collaboration with consultants and external auditors</b>	<b>FCCC/ARR/2009/BGR</b> <ul style="list-style-type: none"> <li>➤ Strengthening the contacts with Branch Business Associations.</li> <li>➤ Further intensive cooperation for studies (verification of EFs) with other non-governmental institutions, universities and private consultants</li> <li>➤ Support of external auditors for improvement of QA procedures</li> </ul>	High priority 13/08/2010	Signed Contracts with external consultants for supporting the preparation of 2010 GHGs inventory and NIR: <ul style="list-style-type: none"> <li>➤ Forestry University</li> <li>➤ Denkstatt Ltd</li> <li>➤ Bulgarian Academy of Science, Geophysical Institute</li> <li>➤ Branch Association for Cement Industry</li> </ul>	Adequately planned and implemented in 2010 (FCCC/ARR/2010/BGR § 203)
	<b>FCCC/ARR/2010/BGR</b> <ul style="list-style-type: none"> <li>➤ Sustainable development of inventory planning, preparation and management (§ 37)</li> </ul>	High priority 2011 submission 15/04/2011	<ul style="list-style-type: none"> <li>➤ Signed new contracts with the same consultants for the 2011 submission</li> </ul>	The cooperation with external consultants for 2011 submission is presented in Table 2 below
<b>Quality Management System</b>	<b>FCCC/ARR/2009/BGR</b> <ul style="list-style-type: none"> <li>➤ Improvement of the activity in QMS</li> <li>➤ Ensuring that other institutions are engaged in the checking and review of the annual submission as set out in its QA/QC plan</li> <li>➤ Improvement of Sector specific QA/QC procedures</li> <li>➤ Starting the documentation and archiving process</li> <li>➤ ARR § 55 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.</li> </ul>	High priority 13/08/2010	<ul style="list-style-type: none"> <li>➤ Update of the National QA/QC Plan due to the newly implemented institutional, legal and procedural arrangements within the BGNIS</li> <li>➤ A new System for sector experts workflow organization, documentation and archiving has been implemented in the ExEA</li> <li>➤ Intensive cross-check with ETS, EPRT, IPPC permits was undertaken. The relevant data was incorporated into the GHG inventory</li> </ul>	Adequately planned and implemented in 2010 (FCCC/ARR/2010/BGR § 52)  Need of better implementation in the next submission (FCCC/ARR/2010/BGR §52 )
	<b>FCCC/ARR/2010/BGR</b> <ul style="list-style-type: none"> <li>➤ Improvement of implementation of QA/QC in the next submission (§ 52)</li> <li>➤ Including of provisions of QA/QC activities for a final check of the consistency between</li> </ul>	High priority 2011 submission 15/04/2011	<ul style="list-style-type: none"> <li>➤ Revision of QA/QC check lists following the recommendations of ERT</li> <li>➤ Preparation of Manual for using of documentation and archiving system</li> </ul>	

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	<p>the NIR and CRF.</p> <ul style="list-style-type: none"> <li>➤ 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</li> <li>➤ Support of external auditors for improvement of QA procedures</li> </ul>			
<b>Source categories improvements</b>				

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<p align="center"><b>Energy sector</b></p>	<p><b>FCCC/ARR/2009/BGR</b></p> <ul style="list-style-type: none"> <li>➤ 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</li> <li>➤ Revision of the EF. Investigation whether it would be possible to update country specific emission factors</li> <li>➤ A cross-check with ETS, EPRTR, IPPC permits data</li> <li>➤ Comparison of emissions using alternative approaches.</li> <li>➤ Documentation and archiving of all information required in NIR, Background documentation and archive.</li> <li>➤ Improvements in transparency by updating and revising EF and AD.</li> <li>➤ Recalculations and time-series consistency</li> <li>➤ To ensure TACCC internal energy experts and external consultants were involved in the submission 2010. Further collaboration is foreseen for the future submission.</li> <li>➤ Implementation of Sector specific QA/QC procedures</li> <li>➤ Support of consultants and external auditors for 2010 and next submissions</li> </ul>	<p>High priority 13/08/2010</p>	<ul style="list-style-type: none"> <li>➤ Contract with external consultants Denkstatt for supporting preparation of GHGs inventory and NIR for Sector Energy (excluding sub-sector Transport)</li> <li>➤ Recalculated emissions in Energy Sector based on revised AD for entire time series (IEA/EUROSTAT questionnaire).</li> <li>➤ A cross-check with ETS, EPRTR, IPPC permits was realized;</li> <li>➤ Improved documentation and archiving of the inventory, including work sheets</li> <li>➤ 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 )</li> </ul>	<p>Adequately planned and implemented in 2010 (FCCC/ARR/2010/BGR §63-80)</p>
	<p><b>FCCC/ARR/2010/BGR (§62 - §82)</b></p>	<p>High priority</p>	<ul style="list-style-type: none"> <li>➤ Signed Contract with consultant Denkstatt for</li> </ul>	



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	<ul style="list-style-type: none"> <li>➤ Sustainable development of inventory planning, preparation and management (§ 37)</li> <li>➤ Implementation of higher tier method for Road Transport (COPERT 4)</li> <li>➤ Develop and use country-specific EFs</li> <li>➤ A cross-check with ETS, EPRTR, IPPC permits data</li> <li>➤ Estimation of fugitive emissions from solid fuels and oil and natural gas activities</li> <li>➤ Estimation of emissions from combusting waste fuels at industrial facilities</li> <li>➤ Estimation of emissions from the combustion of biofuels in transport.</li> <li>➤ Report emissions related to the combustion of gaseous fuels from utility combined heat and power plants under public electricity and heat production instead of other manufacturing industries and construction.</li> <li>➤ Determine a better allocation of emissions for residual fuel oil in road transport</li> <li>➤ Improved QA/QC activities</li> <li>➤ Revising of AD in domestic aviation and navigation</li> </ul>	<p>2011 submission 15/04/2011</p>	<p>preparation of 2011GHG inventory in Sector Energy and implementation of model COPERT in sub sector “Road transport”.</p> <ul style="list-style-type: none"> <li>➤ Most of the ERT recommendations are implemented in the preliminary 2011 GHGs inventory</li> </ul>	

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<b>Industrial processes (CRF sector 2)</b>	<p><b>FCCC/ARR/2009/BGR</b></p> <ul style="list-style-type: none"> <li>➤ Revising of the AD with ETS, EPRTR, IPPC permits data</li> <li>➤ Revising of the EF. Investigation whether it would be possible to update country specific emission factors</li> <li>➤ 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 ).</li> <li>➤ Support of external auditors are envisaged for 2010 and next submissions</li> <li>➤ Comparison of emissions using alternative approaches.</li> <li>➤ Documentation and archiving of all information required in NIR, Background documentation and archive.</li> </ul>	High priority 13/08/2010	<ul style="list-style-type: none"> <li>➤ Recalculated emissions based on revised AD in accordance with plant specific data submitted under EPRTR 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.</li> <li>➤ 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).</li> <li>➤ Improved documentation and archiving of the inventory, including work sheets</li> </ul>	Adequately planned and implemented in 2010 (FCCC/ARR/2010/BGR §84, 92)  Need of improvements in the next submission
	<p><b>FCCC/ARR/2010/BGR</b></p> <ul style="list-style-type: none"> <li>➤ To continue to develop expertise and level of engagement with industry</li> <li>➤ Provide additional information in relation to recalculations made as a response of 2010 Saturday Paper (§93)</li> <li>➤ Assessment of underestimates in the industrial processes sector, namely missing activities under limestone and dolomite use and under soda ash use</li> <li>➤ Improved QA/QC activities (§ 94)</li> <li>➤ Strengthen the routine CRF checking to ensure that the CRF is correct and that it is consistent with the data in the individual calculation sheets and in the NIR (§ 94).</li> </ul>	High priority 2011 submission 15/04/2011	<ul style="list-style-type: none"> <li>➤ Most of the ERT recommendations are implemented in the preliminary 2011 GHGs inventory</li> </ul>	
<b>Consumption of Halocarbons and</b>	<p><b>FCCC/ARR/2009/BGR</b></p> <ul style="list-style-type: none"> <li>➤ Support of consultants and external auditors for 2010</li> </ul>	High priority	<ul style="list-style-type: none"> <li>➤ Contract with external consultants Denkstatt For the</li> </ul>	Adequately planned and implemented in 2010

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<b>SF6 (CRF 2.F)</b>	and next submissions ➤ A study on F-gases “National study for determine the quantity of actual fluorinated gases (F-gases) (HFCs, PFCs and SF6) in Bulgaria and methods for their calculations”. ➤ Incorporation of final results of the study in the August resubmission of the inventory.	13/08/2010	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	
	<b>FCCC/ARR/2010/BGR</b> ➤ Sustainable development of inventory planning, preparation and management ➤ Report a complete time series for the F-gases between 1988 and 1994 ➤ Using of appropriate notation keys ➤ Improved QA/QC activities	High priority 2011 submission 15/04/2011	➤ Signed Contract with consultant Denkstatt for Preparation of 2011F-gases inventory in Industrial processes ➤ Most of the ERT recommendations are implemented in the preliminary 2011 GHGs inventory	
<b>Solvent and other product use (CRF sector 3)</b>	<b>FCCC/ARR/2009/BGR</b> <b>FCCC/ARR/2010/BGR</b> ➤ Recalculation of all the estimates based on the updated EMEP/CORINAIR Emission Inventory Guidebook ➤ Implementation of Sector specific QA/QC procedures ➤ QA procedures by the Sector expert in the MoEW (Order № RD-218/05.03.2010 by the Minister of Environment and Water ). ➤ Documentation and archiving of all information required in NIR, Background documentation and archive.	Medium priority 2011 submission 15/04/2011	➤ Recalculations of Sub-sectors 3A, 3B and 3C are already incorporated into preliminary inventory ➤ In the final GHG inventory also Sub-sector 3D will be incorporated	Adequately planned in 2010 and implemented in 2011
<b>Agriculture (CRF sector 4)</b>	<b>FCCC/ARR/2009/BGR</b> ➤ Collection of data for implementation higher TIER method.	High priority 13/08/2010	➤ Recalculated emissions in Agriculture Sector based on revised AD for entire time series in accordance with data provided	Adequately planned and implemented in 2010

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	<ul style="list-style-type: none"> <li>➤ Revision of activity data and emission factor</li> <li>➤ Sector specific QA/QC procedures have to be intensified.</li> <li>➤ Comparison of emissions using alternative approaches.</li> <li>➤ Documentation for national statistics of agriculture and food provided by Ministry of Agriculture and Food</li> <li>➤ Food and Agriculture Organization of the United Nations (FAO)</li> <li>➤ Documentation and archiving of all information required in NIR, Background documentation and archive.</li> <li>➤ Support of external auditors are envisaged for 2010 and next submissions</li> </ul>		<p>by national agro statistic (MAF)</p> <ul style="list-style-type: none"> <li>➤ Implementation of higher tier method for key categories like cattle</li> <li>➤ Improving QA/QC</li> <li>➤ Improved documentation and archiving of the inventory, including work sheets</li> </ul>	Need of improvements in the next submission
	<p><b>FCCC/ARR/2010/BGR</b></p> <ul style="list-style-type: none"> <li>➤ Improvement the consistency of the time series by using national statistics in the first instance, and, if this is not possible, use of international statistical data from the Food and Agriculture Organization of the United Nations (FAO) for the years before 2001 which are well harmonized with recent national statistics.</li> <li>➤ Improvement of the transparency of information on emission trends by explaining any fluctuations in the trends</li> <li>➤ Improvement of documentation on the milk yield of dairy cattle or the live weight of animals (cattle, sheep and swine) in the NIR</li> <li>➤ Obtaining more precise data on animal populations by climate zone within the country</li> <li>➤ Obtaining information on the amount of sewage sludge that is applied to agricultural soil and to estimate emissions from this activity.</li> <li>➤ Estimation of CH4 emissions from mature dairy cattle in the agriculture sector;</li> <li>➤ Estimation of CH4 emissions from cattle (mature, non-mature and young) in the agriculture sector;</li> </ul>	High priority 2011 submission 15/04/2011	<ul style="list-style-type: none"> <li>➤ Most of the ERT recommendations are implemented in the preliminary 2011 GHGs inventory</li> </ul>	

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	<ul style="list-style-type: none"> <li>➤ Estimation of CH4 emissions from manure management in the agriculture sector;</li> <li>➤ Estimation of N2O emissions from other (sewage sludge applied to soil – 4.D.1.6) in the agriculture sector</li> <li>➤ Use higher-tier methods to estimate emissions from agricultural soils;</li> <li>➤ Improved QA/QC activities</li> <li>➤ Documentation and archiving of all information required in NIR, Background documentation and archive.</li> </ul>			

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<p><b>LAND-USE, LAND-USE CHANGES AND FORESTRY (CRF sector 5)</b></p> <p><b>KP-LULUCF</b></p>	<p><b>FCCC/ARR/2009/BGR</b></p> <ul style="list-style-type: none"> <li>➤ Incorporation of the results from successfully completed Project “Development of methodology for calculation of emissions and removals for LULUCF sector according to requirements of UNFCCC and Kyoto Protocol”.</li> <li>➤ 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.</li> <li>➤ In 2011 estimations of the organic carbon stock in forest soil, by soil groups (WRB, 2006) is planned.</li> <li>➤ Support of consultants and external auditors are envisaged for 2010 and next submissions</li> <li>➤ 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.</li> </ul>	<p>High priority 13/08/2010</p> <p>2011 submission 15/04/2011</p> <p>2011 submission 15/04/2011</p>	<ul style="list-style-type: none"> <li>➤ For the NIR2010 a complete new and changed estimate was carried out for the whole LULUCF-sector of Bulgaria (complete time series).</li> <li>➤ Incorporated results from completed Projects 1 “LULUCF” (CRF tables and NIR)</li> <li>➤ Improved documentation and archiving of the inventory, including work sheets</li> <li>➤ Internal Review of the national system by EEA/EC (JRC) in July 2010</li> </ul>	<p>Adequately planned and implemented in 2010</p> <p>Need of improvements in the next submission (FCCC/ARR/2010/BGR §139)</p>
	<p><b>FCCC/ARR/2010/BGR</b></p> <ul style="list-style-type: none"> <li>➤ To include the information required by paragraphs 6(e) and 8(a) of the annex to decision 15/CMP.1 in the next annual submission (§27)</li> <li>➤ Strengthen arrangements to ensure the sustainability of existing capacities and competence of technical staff for LULUCF reporting in accordance with the IPCC good practice guidance;</li> <li>➤ Improve the transparency of the LULUCF inventory by reporting information in the NIR on methodologies, parameters and AD used;</li> <li>➤ Ensure consistency in land classification by using the LUC matrices;</li> <li>➤ Check the coherence of reported data and apply QC checks, ensuring consistency and accuracy in the</li> </ul>	<p>High priority 2011 submission 15/04/2011</p>	<ul style="list-style-type: none"> <li>➤ Bulgaria will try to provide more information which demonstrates that dead wood is not a net source in its 2011 submission. All other carbon pools are reported.</li> <li>➤ A project for estimation of carbon stock in soil by soil type and regions has been launched. After the implementation of the project and the revision of the AD in carbon stock in litter, Bulgaria will try to report CSC in litter separately, as ERT recommended, if that would not end in double accounting.</li> </ul>	

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Issue	Planned improvement for 2010 and next submissions	Priority high - medium -low	Status of implementation	Comments
	<p>estimation process and in the reporting phase;</p> <ul style="list-style-type: none"> <li>➤ Include the LULUCF sector in its uncertainty analysis, assessing the uncertainties for each LULUCF category.</li> <li>➤ Improved QA/QC activities</li> <li>➤ Documentation and archiving of all information required in NIR, Background documentation and archive.</li> </ul>		<ul style="list-style-type: none"> <li>➤ Bulgaria puts a lot of efforts to provide sufficient information according to par.8 (a) of the Decision 15/CMP.1. Forestry agency in Bulgaria is the data provider for AR areas. The agency has launched a project to revise the data from all forest inventories done during the time series. Then the agency will provide more detailed information and ExEA will correctly estimate the AR areas. The best-case scenario is that Bulgaria will provide more information according to par.8 (a) in its 2012 submission.</li> <li>➤ Bulgaria will improve the transparency of the LULUCF inventory in its 2011 annual submission by giving more information on the estimation approach which is used to develop the LUC matrix</li> </ul>	

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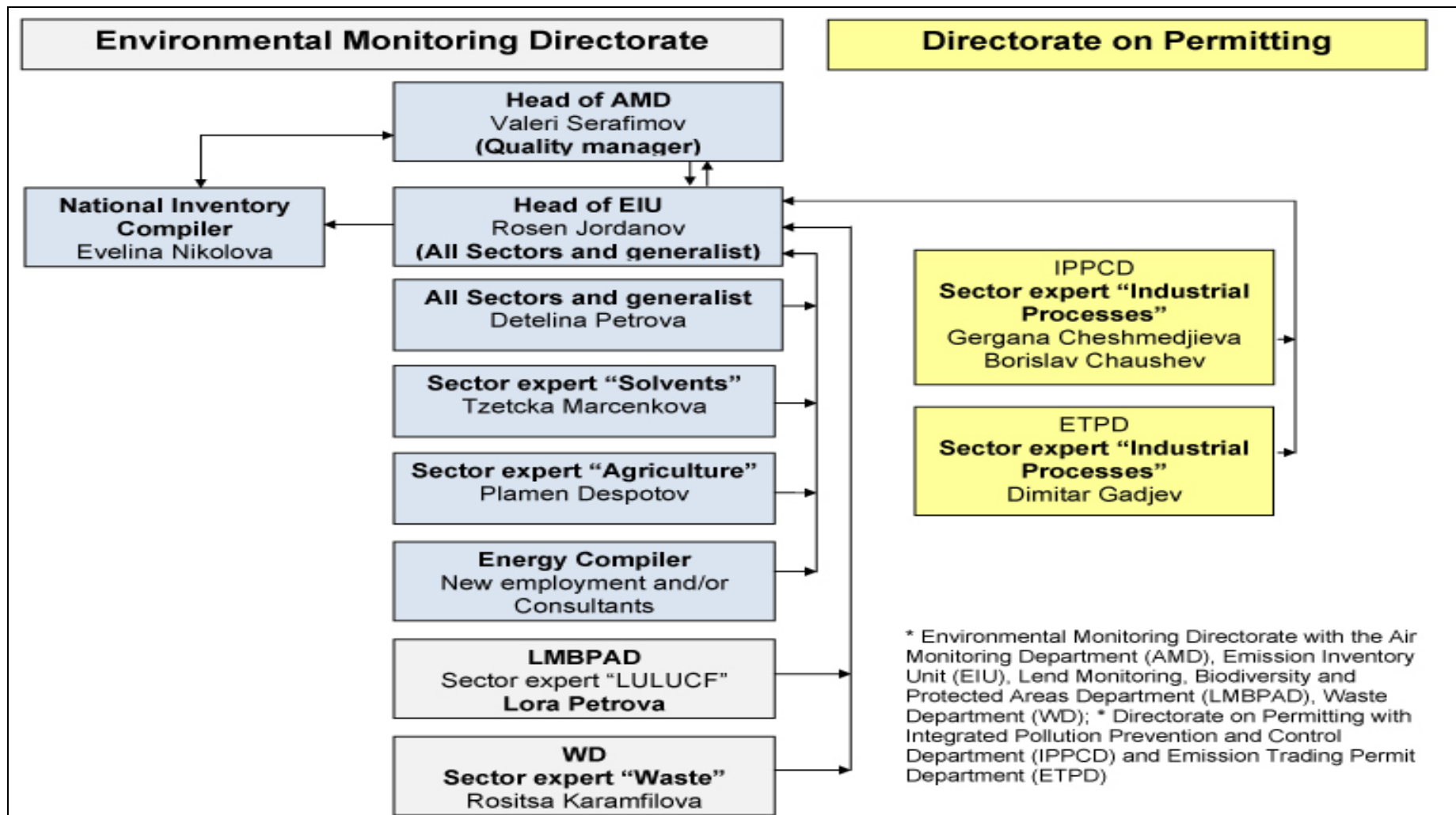
Issue	Planned improvement for 2010 and next submissions	Priority high - medium -low	Status of implementation	Comments
<b>Waste (CRF sector 6)</b>	<b>FCCC/ARR/2009/BGR</b> <ul style="list-style-type: none"> <li>➤ Incorporation of the FOD model provided by the 2006 IPCC Guidelines</li> <li>➤ Revision of activity data and emission factor - Waste statistics and DOC value and other related parameters</li> <li>➤ Sector specific QA/QC procedures were implemented in 2010 submission. QA procedures have been performed by the Sector expert in the ExEA and MoEW (Order № RD-218/05.03.2010 by the Minister of Environment and Water).</li> <li>➤ Collaboration with external auditors are envisaged for 2010 and next submissions</li> <li>➤ Documentation and archiving of all information required in NIR, Background documentation and archive.</li> <li>➤ Recalculations and time-series consistency</li> <li>➤ 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.</li> </ul>	High priority 13/08/2010           2011 submission 15/04/2011	<ul style="list-style-type: none"> <li>➤ The complete new and changed estimation was carried out for the sub-sector CRF 6 A Solid waste Disposal on Land (complete time series).</li> <li>➤ The complete new estimation was carried out for the sub-sector CRF 6 C Waste Incineration 2004 – 2008</li> <li>➤ Recalculation of the emissions in sub-sector CRF 6 C Waste Incineration, based on revised AD for entire time series (IPA questionnaire)</li> <li>➤ Documentation and archiving of all information required in NIR, Background documentation and archive.</li> </ul>	Adequately planned and implemented in 2010  Need of improvements in the next submission (FCCC/ARR/2010/BGR §)
	<b>FCCC/ARR/2010/BGR</b> <ul style="list-style-type: none"> <li>➤ Improve consistency between CRF and NIR</li> <li>➤ To provide information and detailed descriptions of background data and references, AD and EFs and methodologies and assumptions used.</li> <li>➤ To provide more information on waste management policies and existing practices and technologies of waste recovery and waste disposal facilities</li> <li>➤ To provide an explanation for the trend in the waste generation rate in the next annual submission</li> <li>➤ Revision of the landfill parameters for the entire time series</li> </ul>	High priority 2011 submission 15/04/2011	<ul style="list-style-type: none"> <li>➤ Signed contract with University of Chemical technology and metallurgy for Preparation of 2011 GHG inventory in Sector Waste – 6C. The contractor has to Support of ExEA staff in preparation of 2011 submission (6C CRF tables and NIR). Training of ExEA's staff.</li> <li>➤ Most of the ERT recommendations are implemented in the</li> </ul>	



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Issue	Planned improvement for 2010 and next submissions	Priority high - medium -low	Status of implementation	Comments
	<ul style="list-style-type: none"> <li>➤ Estimate of CH4 recovery from landfill</li> <li>➤ Provision of information on the wastewater streams and treatment technologies used at wastewater treatment plants</li> <li>➤ N2O emissions from human sewage in the waste sector; and CO2 emissions from waste incineration (without energy recovery) in the waste sector</li> </ul>		preliminary 2011 GHGs inventory	
<b>National registry</b>	<p><b>FCCC/ARR/2010/BGR §206κ,1</b></p> <ul style="list-style-type: none"> <li>➤ (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;</li> <li>➤ (l) 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.</li> </ul>	High priority 2011 submission 15/04/2011	<p>Implemented in 2010</p> <ul style="list-style-type: none"> <li>➤ JI projects' publicly accessible information: <a href="http://bg-server1.etr.moew.government.bg/iaos/projects.php">http://bg-server1.etr.moew.government.bg/iaos/projects.php</a></li> <li>➤ Accounts holding's publicly accessible information: <a href="http://bg-server1.etr.moew.government.bg/iaos/contacts.php">http://bg-server1.etr.moew.government.bg/iaos/contacts.php</a></li> <li>➤ 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</li> </ul>	

Figure 1: ExEA capacity for ensuring the function of BGNIS



**Table 2 Collaboration with external Consultants for 2011 submission**

<b>Consultant</b>	<b>Cooperation agreements</b>	<b>Responsibilities and outputs</b>
<b>University of Forest</b>	Support of ExEA staff in preparation of 2011 submission for LULUCF. The contract was signed and completed on 10.12.2010.	<ul style="list-style-type: none"> <li>• Development of CS EF.</li> <li>• Support of ExEA staff in preparation of 2011 submission (CRF tables) for LULUCF.</li> <li>• Training of ExEA's staff</li> </ul>
<b>Denkstatt</b>	<p>1. Preparation of 2011 GHG inventory in Sector Energy. The contract was signed and completed on 10.12.2010.</p> <p>2. Preparation of 2011 F-gases inventory. The contract was signed and completed on 10.12.2010.</p> <p>3. Implementation of model COPERT in 2011 GHG inventory in sub sector "Road transport". The contract was signed in Nov. 2010 and its duration is 4 months.</p>	<ul style="list-style-type: none"> <li>• Prepared CRF tables and respective chapters in NIR</li> <li>• Training of ExEA's staff</li> </ul>
<b>Bulgarian Academy of Science, Geophysical Institute</b>	Non GHG gases reporting obligation - "Recalculations of previously submitted estimates of emissions under UNFCCC and CLRTAP". This project was signed on 1 December 2009 and will be completed by 1 February 2011	<ul style="list-style-type: none"> <li>• The final results of this project will be incorporated in 2011 submission</li> </ul>
<b>University of Chemical technology and metallurgy</b>	Preparation of 2011 GHG inventory in Sector Waste – 6C. The contract was signed and completed on 10.12.2010.	<ul style="list-style-type: none"> <li>• Support of ExEA staff in preparation of 2011 submission (6C CRF tables and NIR).</li> <li>• Training of ExEA's staff</li> </ul>

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