



UNFCCC ITL Administrator

**Standard Independent Assessment Report**  
**Assessment Report**  
**Part 2 - Substance**

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<b>Version</b>	<b>Date</b>	<b>Description</b>
0.1	13/08/2010	First draft
0.2	13/08/2010	Reviewed draft – further in put required from assessor or consultant.
0.3	13/08/2010	Second assessor's assessment of Spanish text in NIR to complete assessment
1.0	16/08/2010	Reviewed draft – v1.0 ready to send to Party.
2.0	27/08/2010	Finalized without Party comment

## Summary

Ref Nr	Description	Value	Comments
P2.0.1	Party name	Spain	
P2.0.2	Reporting period	2009	
P2.0.3	Submission under review	Files provided by the Party: - [SEF] SEF_ES_2010_1_13-46-42 25-1-2010.xls - [NIR] Informe Inventario GEI Espana 1990-2008 (Ed 2010).pdf - [REPORTS] SIAR Reports 2010-ES v1.0.xls -[RESPONSE1] SIAR_Consultation FORM Draft Part1 ESP.doc	Files provided by the ITL Administrator: - [SEFCR] SEF_ES_2010_1_13-46-42 25-1-2010-CR.xls -[RRITL] SIAR_Reports_2009_ES_v1.1.xls
P2.0.4	Previous annual review report reference	FCCC/ARR/2009/ESP (05/03/2010)	

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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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No
P2.1.2	Problem found with Party's national registry?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
P2.1.3	Any unresolved problem with Party's national registry?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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 checked="" type="checkbox"/> Yes <input 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	<p>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, conformance to the technical standards, security, data integrity and recovery measures.</p> <p>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 and recommendations SIAR on the SEF and the SEF comparison report. The SIAR was forwarded to the ERT prior to the review, pursuant to decision 16/CP.10.</p> <p>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.</p> <p>4) Information reported by Party on records of any discrepancies and on any records of non-replacement were found to be consistent with information provided to the secretariat by the international transaction log (ITL).</p> <p>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.</p> <p>6) Party has reported its commitment period reserve in its 2009 annual submission.</p> <p>7) The national registry has not fulfilled the requirements regarding the public availability of information in accordance with section II.E of the annex to decisions 13/CMP.1.</p> <p><u>Recommendations:</u></p> <p>8) The SIAR assessor recommends that the Party make publicly available all required information and to provide a direct reference to the location of this information in its annual submission. If any information is considered confidential, the Party should state this in its annual submission and on its public website along with the relevant regulation supporting this confidentiality. In particular, Spain should make account information as required by 13/CMP.1 Annex paragraph 45(b) and (c) publicly available.</p> <p>9) The Party should provide a version of its annual submission in the English language. If it is not possible to provide a complete submission in</p>

Ref Nr	Summary of findings
	English, the information relevant to the SIAR assessment should be submitted in English.

## 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.

Ref Nr	Requirement	Assessment	Comment
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.
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No	No discrepancies occurred for the Party and no problem has been identified with regard to its transaction procedures related to ERUs, CERs, AAUs and RMUs.
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	No discrepancies occurred for the Party and no problem has been identified with regard to its transaction procedures related to tCERs and ICERS.
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	

Ref Nr	Requirement	Assessment	Comment
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	
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? <b>[ ] Yes [ x ] No</b>	No discrepancies occurred for the Party
Repeat for each discrepancy type (include Type Number)	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; <b>[ ] Yes [ ] No [ x ] N/A</b>	No discrepancies occurred for the Party
	P2.2.10.2	22/CMP.1 paragraph 88.(j)(ii) Assess whether the same type of discrepancy has occurred previously for that Party; <b>[ ] Yes [ ] No [ x ] N/A</b>	No discrepancies occurred for the Party
	P2.2.10.3	22/CMP.1 paragraph 88.(j)(iii) Assess whether the transaction was completed or terminated; <b>[ ] Yes [ ] No [ x ] N/A</b>	No discrepancies occurred for the Party
	P2.2.10.4	22/CMP.1 paragraph 88.(j)(iv) Has the Party corrected the problem that caused the discrepancy? <b>[ ] Yes [ ] No [ x ] N/A</b>	No discrepancies occurred for the Party



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 type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No discrepancies occurred for the Party

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? <b>[ ] Yes [ x ] No</b>	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? <b>[ ] Yes [ ] No [ x ] N/A</b>	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? <b>[ ] Yes [ ] No [ x ] N/A</b>	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? <b>[ ] Yes [ ] No [ x ] N/A</b>	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? <b>[ ] Yes [ ] No [ x ] N/A</b>	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? <b>[ ] Yes [ ] No [ x ] N/A</b>	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.

<b>Ref Nr</b>	<b>Requirement</b>	<b>Has the Party reported a change?</b>	<b>Problem Identified with the Change?</b>	<b>Comment</b>
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Party sufficiently reported changes to technical conformance
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Party sufficiently reported changes to procedures to minimize discrepancies
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 to preventative measures taken against operator error

<b>Ref Nr</b>	<b>Requirement</b>	<b>Has the Party reported a change?</b>	<b>Problem Identified with the Change?</b>	<b>Comment</b>
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 checked="" type="checkbox"/> Yes [ ] No	[ ] Yes <input checked="" type="checkbox"/> No	The party sufficiently reported minor changes made to safeguard data integrity.
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 checked="" type="checkbox"/> Yes [ ] No	[ ] Yes <input checked="" type="checkbox"/> No	The Party sufficiently reported changes to test results due to software upgrades and changes to technical standards.

## 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? [ x ] Yes [ ] No	Comment
P2.4.1.1	FCCC/ARR/2009/ESP paragraph 108(h): "Further improve the measures put in place in its registry to minimize operator errors, in accordance with paragraph 115 (e) of the annex to decision 22/CMP.1"	[ x ] Yes [ ] No	<p>The party addresses previous ERT recommendations in Section 14.3 of [NIR] and also addresses the issue in Section 14.2.6 of the report.</p> <p>Additionally, in [RESPONSE1] the Party reiterates that a new check has been introduced into the Registry to prevent categorising transfers to other countries as domestic transfers and vice versa. This change in the Registry consists of the implementation of automated internal validation checks of response code 4007 in DES (Technical Standards for data exchange) prior to transaction proposals to ITL.</p> <p>These steps were taken in order to minimise possible errors among operators' actions as well as to assure efficient interoperability between ES Registry and other registry systems, including the ITL.</p>
P2.4.1.2	FCCC/ARR/2009/ESP paragraph 108(i): "Put in place as soon as possible measures to mitigate and reduce the internal fragmentation of unit blocks and report on progress made in implementing these measures in its next annual submission, including any relevant implementation plan, test plans and test reports following the changes applied to its registry"	[ x ] Yes [ ] No	<p>The party addresses previous ERT recommendations in Section 14.3 of [NIR] and also discusses the results of their fragmentation investigation in Section 14.2.4 and 14.2.6 of the report. The Party references their work on this issue and the results of their investigation. They also note that a working group has been established and is working towards a solution that will improve the situation for all parties.</p>

## 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	P1.4.1, P1.4.1.2, P1.4.1.3	The SIAR assessor recommends that the Party make publicly available all required information and to provide a direct reference to the location of this information in its annual submission. If any information is considered confidential, the Party should state this in its annual submission and on its public website along with the relevant regulation supporting this confidentiality. In particular, Spain should make account information as required by 13/CMP.1 Annex paragraph 45(b) and (c) publicly available.	The SIAR assessor identified that the following required public information was missing: <ul style="list-style-type: none"> <li>• Government accounts were not available (i.e. Cancellation, Retirement, and Cancellation accounts) [13/CMP.1 Annex paragraph 45(b)]</li> <li>• For the government accounts, the Party should provide information on the commitment period associated with each account [13/CMP.1 Annex paragraph 45(c)]</li> </ul>
P2.4.2.2	P2.2.1 # 9	The Party should provide a version of its annual submission in the English language. If this is not possible for the entire submission, the information relevant to the SIAR assessment should be submitted in English.	<ul style="list-style-type: none"> <li>• This will facilitate thorough, prompt and accurate SIAR assessments by non Spanish speaking assessors.</li> </ul>