



UNFCCC ITL Administrator

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

Reference:	IAR/2011/FRA/2/2	State:	Final
Version number:	2.0	Date:	30/07/2012
Prepared by:	Pieter Baeten/FPS of Public Health, Food Chain Safety and Environment - Belgium		
Reviewed by:	John Bedard/SRA International, Inc.		
Approved by:	Heidi McKenna/Independent Consultant		

Circulation list

Name/Role	Organization	Info/Action
Pieter Baeten / Assessor	FPS of Public Health, Food Chain Safety and Environment - Belgium	Info
Heidi McKenna / Assessor Coordinator	SIAR Coordinator Consultant to the UNFCCC	Action
Yves Andre / RSA France	Public Mandates Department	Action

Document change record

Version	Date	Description
0.1	13/07/2012	Initial draft
0.2	13/07/2012	Review of initial draft
1.0	13/07/2012	Approved draft 1.0
1.1	25/07/2012	Update to v1.0 with consideration of Party comments to draft.
1.2	30/07/2012	Review of draft 1.2
2.0	30.07/2012	Approved Final version of report

Summary

Ref Nr	Description	Value	Comments
P2.0.1	Party name	France	
P2.0.2	Reporting period	2011	
P2.0.3	Submission under review	Files provided by the Party: - [SEF1] SEF_FR_2012_1_14-35-45 2-4-2012.xls - [SEF2] SEF_FR_2012_1_17-11-40 27-4-2012.xls - [NIR1] ccnucc_france_2012_part1.pdf - [NIR2] ccnucc_france_2012_part2.pdf - [REPORTS] SIAR_Reports_2011_FR_v1.0.xls - [RESPONSE 1] FR_Consultation Form Part 1.doc - [RESPONSE 2] FR_Consultation Form Part 2 FRANCE 230712.doc	Files provided by the ITL Administrator: - [SEFCR1] SEF_FR_2012_1_14-35-45 2-4-2012_CR.xls - [SEFCR2] SEF_FR_2012_1_17-11-40 27-4-2012_CR.xls -[RRITL] SIAR_Reports_2011_FR_v1.xls - [SIAR1] FRA_SIAR Part 1 Assessment Report_v2.0.pdf
P2.0.4	Previous annual review report reference	FCCC/ARR/2010/FRA (19/05/2011)	The 2011 review report has not yet been published; the 2010 review report has thus been reviewed instead.

Table of Contents

1. Introduction.....	4
1.1. Overall assessment	4
1.2. Summary of findings.....	5
2. Identification of Problems.....	6
3. Identification of Significant Changes.....	11
4. Recommendations.....	14
4.1. Previous Expert Review Team recommendations	14
4.2. Recommendations to address identified problems.....	15

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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No

1.2. Summary of findings

Ref Nr	Summary of findings
P2.2.1	<ol style="list-style-type: none"> <li data-bbox="360 352 2040 472">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 all requirements related to its reporting and accounting of information on Kyoto Protocol units, transaction procedures, conformance to the technical standards, public availability of information, security, data integrity, and recovery measures. <li data-bbox="360 512 2040 600">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 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. <li data-bbox="360 639 2040 695">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. <li data-bbox="360 735 2040 791">4. Information reported by France 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). <li data-bbox="360 831 2040 919">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. <li data-bbox="360 959 2040 983">6. Party has reported its commitment period reserve in its 2012 annual submission. <li data-bbox="360 1023 2040 1078">7. The national registry has fulfilled all requirements regarding the public availability of information in accordance with section II.E of the annex to decision 13/CMP.1.

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 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 other than the issue described in P2.2.10 which do not relate to the capacity of the French registry to ensure the accurate accounting.
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 other than the issue described in P2.2.10 which do not relate to the capacity of the French registry to ensure the accurate accounting.
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	A discrepancy with error code 5103 occurred for the Party (see [RRITL], Report R-2).	
discrepancy type (5103)	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 ([RRITL], Report R-2) and France ([REPORTS], Report R-2) have reported the same discrepancy.
	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? [X] Yes [] No [] N/A	The 5103 discrepancy has occurred for France previously.
	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 was Terminated.
	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? [X] Yes [] No [] N/A	Error code 5103 states: "The Party of an acquiring national registry must be determined to meet eligibility criteria 1 through 6, except for transfers initiated by the CDM Registry or for transfers to the Excess Issuance Cancellation Account at the CDM Registry." The SIAR Assessor notes that the 5103 discrepancy was due to the acquiring Party, that therefore no corrective actions are required from France and that the discrepancy therefore can be considered as corrected.

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 SIAR Assessor notes that the 5103 discrepancy was due to the acquiring 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? [] Yes [X] No	No non-replacements occurred for the Party.
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 ([NIR1] section 12.1, paragraph 6).
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 ([NIR1] section 12.1, paragraph 9).

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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	In [NIR1] section 12.1, paragraph 12-16, the Party states that they - via their software developer- participate to all tests proposed by the Secretariat and that they participate at particular working groups as well (ex. reconciliation working group). A new version (5.3) has been released in the previous year to cover the requirements in changed European legislation, to cover the security requirements (by the European Commission and the UNFCCC) and to cover the new message flow as proposed by the UNFCCC to increase transaction reliability.
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 ([NIR1] section 12.3, paragraph 2).
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	In [NIR1] section 12.3, paragraph 7-11, the Party states that they changed the access control to the application (HTTPS with annual renewed certificate, login + password + SMS code/USB token to access the system as user/administrator, double validation of transactions,...) as well as the material to increase security (firewall, administrator access limited to secured offices only,...).

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 ([NIR1] section 12.3, paragraph 12-16).
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 <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	In [NIR1] section 12.3, paragraph 17-19, the Party states that they performed vulnerability testing by independent assessors early 2011 in order to fulfill newly imposed European requirements.

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?	Comment
P2.4.1.1	[FCCC] paragraph 183 recommended that France includes the information required by paragraph 88(j) of the annex to decision 22/CMP.1 on discrepant transactions for the whole reporting period in its next annual submission.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	In [NIR1] section 12.3 second paragraph, France notes that there have been no changes since the last submission. In [RRREG] R-2 France reports on discrepancies that have occurred during the reported period.
P2.4.1.2	[FCCC] paragraph 188 the SIAR report recommended that France enhances the interface of its registry by making publicly available the required information referred to in paragraphs 45.47 of the annex to decision 13/CMP.1. A clear statement should be made on its website regarding the components of paragraphs 45.47 of the annex to decision 13/CMP.1 that are confidential, including those that are confidential in accordance with European Union (EU) regulations for a defined time period, if applicable	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	A clear confidentiality statement has been added on the Parties public reporting page. https://www.seringas.caissedesdepots.fr/Edition.aspx?lang=fr&menu=yes The statement includes a reference towards the applicable European Union regulation.
P2.4.1.3	[FCCC] paragraph 189 recommended that France continues to provide the publicly available information on the registry website as presented during the review and provide information in the next NIR that all required information is now publicly available.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	France continues to provide publicly available information on its registry website and has provided information about the availability of publicly available information in its NIR ([NIR1] section 12.4 and [RESPONSE 1]). https://www.seringas.caissedesdepots.fr/Edition.aspx?lang=fr&menu=yes
P2.4.1.4	[FCCC] paragraph 190 recommended that France includes information on its commitment period reserve in its next annual submission.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	In [NIR1] section 12.5, France included information on its commitment period reserve.

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			Following receipt of [RESPONSE 2] from Party, the SIAR assessor notes that the Party has resolved all previously noted technical issues related to availability of Public Information during the assessment process and concludes that there are no additional recommendations to bring to the attention of the Expert Review Team.