



UNFCCC ITL Administrator

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

Reference:	IAR/2013/GRC/2/2	
Version number:	2.0	State: Final
Prepared by:	Miroslav Hrobak/ICZ Slovakia a.s.	Date: 29/07/2013
Reviewed by:	Chris Collins/SRA	
Approved by:	Markwin Pieters/UNFCCC	

Circulation list

Name/Role	Organization	Info/Action
Miroslav Hrobak/ Assessor	ICZ Slovakia a.s.	
Ling Ling Federhen/ Assessor Coordinator	UNFCCC	
Ioannis Charalampis/RSA	Greek GHG Registry	

Document change record

Version	Date	Description
0.1	30/05/2013	Initial draft
1.0	03/06/2013	Final
1.1	19/07/2013	Party's response incorporated
2.0	29/07/2013	Final

Summary

Ref Nr	Description	Value	Comments
P2.0.1	Party name	Greece	
P2.0.2	Reporting period	2012	
P2.0.3	Submission under review	Files provided by the Party: - [SEF] SEF_GRC_2013_2_10-1-6 10-4-2013.xls - [NIR] 2013_NIR_GRC.pdf - [RESPONSE] Consultation_form_v5 0-Greece.doc ch_14_addendum.pdf ch_14_addendumV1.pdf	Files provided by the ITL Administrator: - [SEFCR] SEF_GRC_2013_2_10-1-6 10-4-2013_CR.xls -[RRITL] SIAR_Reports_2012_GRC_RITL_v1.xls
P2.0.4	Previous annual review report reference	FCCC/ARR/2011/GRC (16/03/2012)	2012 Inventory Review Report not available at the time of an assessment.

Table of Contents

1. Introduction.....	4
1.1. Overall assessment.....	4
1.2. Summary of findings.....	5
2. Identification of Problems.....	7
3. Identification of Significant Changes.....	13
4. Recommendations.....	17
4.1. Previous Expert Review Team recommendations.....	17
4.2. Recommendations to address identified problems.....	17

1. Introduction

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

1.1. Overall assessment

Ref Nr	Requirement	Assessment
P2.1.1	Is the information submitted by Party, in relation to its national registry, complete?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No P1.2.4, P1.3.7
P2.1.2	Problem found with Party's national registry?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P2.2.5, P2.2.10
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No P2.3.3, P2.3.10
P2.1.5	National registry related recommendations from previous annual review were fully addressed?	<input type="checkbox"/> Yes <input type="checkbox"/> No There were no recommendations from previous annual review.
P2.1.6	Is there any recommendation that needs to be addressed by the Party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P2.4.2.1 - P2.4.2.5

1.2. Summary of findings

Ref Nr	Summary of findings
P2.2.1	<ol style="list-style-type: none"> 1. The information on Kyoto Protocol units has been reported in accordance with section I.E of the annex to decision 15/CMP.1 and is accurate. The national registry continues to fulfill the requirements related to its reporting and accounting of information on Kyoto Protocol units, transaction procedures, conformance to the technical standards, security, data integrity and recovery measures. 2. Party has reported information on its accounting of Kyoto Protocol units in the required SEF tables, as required by decisions 15/CMP.1 and 14/CMP.1. The SIAR assessor reviewed the findings included in the SIAR on the SEF and the SEF comparison report.1 The SIAR was forwarded to the ERT prior to the review, pursuant to decision 16/CP.10. 3. Information on the accounting of Kyoto units has been prepared and reported in accordance with section I E of the annex to decision 15/CMP.1, and reported in accordance with decision 14/CMP.1 using the SEF tables. 4. Information reported by Party on records of any discrepancies and on any records of non-replacement were not found to be consistent with information provided to the secretariat by the international transaction log (ITL). 5. The SIAR assessor finds that the national registry continues to perform the functions set out in the annex to decision 13/CMP.1 and the annex to decision 5/CMP.1, and continues to adhere to the technical standards for data exchange between registry systems in accordance with relevant Conference of the Parties serving as the meeting of the Parties (CMP) to the Kyoto Protocol decisions. 6. 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. The SIAR assessor recommends that Party includes Article 6 project information and holding and transaction information on a website under the control of the Party. 7. Party has reported its commitment period reserve in its 2012 annual submission. <p><u>Recommendations</u></p> <ol style="list-style-type: none"> 8. The assessor notes that Greece is relying upon public information per 13/CMP.1 Annex paragraph 44, with specific reference

Ref Nr	Summary of findings
	<p>to paragraph 45, 47, 48, which is not under the party's direct control. The assessor recommends that Greece includes public information directly on the website of the national registry or via a link from the registry website to another website controlled by the Party. The assessor recommends that the publicly available information be up to date (i.e. updated as close to real time as possible, but at least updated on a monthly basis).</p> <p>9. The assessor notes that Greece did not report on discrepancies identified by the ITL in official report. The assessor recommends that the Party fully reports any discrepancies in official reports.</p> <p>10. The assessor notes that Greece is not fully reporting changes in the national registry related to the description of database structure. While the Party has resubmitted a simplified data model during the assessment cycle, the information contained within the model is not sufficient. This is evidenced by the lack of descriptions of each entity in the diagram and the omission of some diagram entities mandated in the Data Exchange Standard. The assessor recommends that following major changes, the party provide a data model which contains all DES required entities complete with descriptions in its annual NIR.</p> <p>11. The assessor notes that Greece is not fully reporting changes in the national registry related to change of test results. While the Party has resubmitted these items during the assessment cycle, the provided test report reveals a test plan which was of insufficient scope. This is evidenced by the limited number of Kyoto processes covered and absence of DES compliance demonstration through Annex H testing. Compliance with the DES requirements is essential to maintain confidence that 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. Therefore, the assessor strongly recommends that the Party test each release thoroughly against the DES as part of each major release cycle and provide the complete results in its annual NIR.</p>

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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Discrepancies occurred for the Party and problem has been identified in report R-2 of [RRITL] 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.

Ref Nr	Requirement	Assessment	Comment
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	
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	The ITL identified 3 discrepant transactions with response code 5103 during the reported period (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	Discrepancies have been identified by the ITL (see [RRITL], report R-2). However, the Party reported in paragraph 11.2 of [NIR] that no discrepancies occurred during the reported period. The information does not match with the ITL records. It should be investigated whether information provided by the Party in NIR is correct.
	P2.2.10.2 22/CMP.1 paragraph 88.(j)(ii) Assess whether the same type of discrepancy has occurred previously for that Party;	Has the same type of discrepancy occurred previously for that Party? [] Yes [X] No [] N/A	The ITL identified zero occurrences prior to reported year in [RRITL], Report R-2.

Ref Nr	Requirement	Assessment	Comment
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? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	The ITL identified all 3 transactions as "All Terminated" in [RRITL], Report R-2.
P2.2.10. 4	22/CMP.1 paragraph 88.(j)(iv) Has the Party corrected the problem that caused the discrepancy?	Problem that caused the discrepancy corrected? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	The Party stated in [RESPONSE] that no corrective actions were necessary because the problem causing the discrepancies was outside of the Party's registry.
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 discrepancy is not assumed as related to capacity of the national registry to ensure the accurate accounting of Kyoto units.

Ref Nr	Requirement	Assessment	Comment
P2.2.11	22/CMP.1 paragraph 88.(k) Any record of non-replacement has been sent to the Party by the transaction log in relation to tCERs or ICERs held by the Party, and if so the expert review team shall:	Any tCERs or ICERs subject to non-replacement held by Party? [] Yes [X] No	No non-replacements occurred for the Party.
Repeat for each non-replacement type (incl type number)	P2.2.11.1 22/CMP.1 paragraph 88.(k)(i) Verify that the non-replacement has occurred and been correctly identified by the transaction log;	Has the transaction log identified the non-replacement? [] Yes [] No [X] N/A	No non-replacements occurred for the Party.
	P2.2.11.2 22/CMP.1 paragraph 88.(k)(ii) Assess whether non-replacement has occurred previously for that Party;	Has this type of non-replacement previously occurred for that Party? [] Yes [] No [X] N/A	No non-replacements occurred for the Party.
	P2.2.11.3 22/CMP.1 paragraph 88.(k)(iii) Assess whether the replacement was subsequently undertaken;	Was the replacement subsequently undertaken? [] Yes [] No [X] N/A	No non-replacements occurred for the Party.
	P2.2.11.4 22/CMP.1 paragraph 88.(k)(iv) Examine the cause of the non-replacement and whether the Party has corrected the problem that caused the non-replacement;	Has the Party corrected the problem that caused the non-replacement? [] Yes [] No [X] N/A	No non-replacements occurred for the Party.

Ref Nr	Requirement	Assessment	Comment
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? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The EU Member States who are also Parties to the Kyoto Protocol (25) plus Iceland, Liechtenstein and Norway have decided to operate their registries in a consolidated manner operated by the European Commission. The Consolidated System of EU registries was certified on 1 June 2012 and went to production on 20 June 2012.
P2.3.3	15/CMP.1 paragraph 32.(c) A description of the database structure and capacity of the national registry.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Party submitted a description of the current database structure of the consolidated registry as provided by the European Commission. (file "Ch_14_addendum_V1"). The description does not relate to database capacity. Party reports that changes in the current consolidated registry software were not related to Kyoto functions and did not affect the database capacity.

Ref Nr	Requirement	Has the Party reported a change?	Problem Identified with the Change?	Comment
P2.3.4	<p>15/CMP.1 paragraph 32.(d)</p> <p>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)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>During certification, the consolidated registry was notably subject to connectivity testing, connectivity reliability testing, distinctness testing and interoperability testing to demonstrate capacity and conformance to the DES. All tests were executed successfully and lead to successful certification on 1 June 2012.</p>
P2.3.5	<p>15/CMP.1 paragraph 32.(e)</p> <p>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</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>A description of the procedures employed in the Consolidated System of EU Registries to minimize discrepancies is provided in discrepancies procedures, as reflected in the updated manual intervention document and the operational plan provided by the Party.</p>

Ref Nr	Requirement	Has the Party reported a change?	Problem Identified with the Change?	Comment
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	An overview of the security measures employed in the Consolidated System of EU Registries is provided in security plan provided by the Party.
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 <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	An overview of the security measures employed in the Consolidated System of EU Registries is provided in disaster recovery plan provided by the party.

Ref Nr	Requirement	Has the Party reported a change?	Problem Identified with the Change?	Comment
P2.3.10	<p>15/CMP.1 paragraph 32.(j)</p> <p>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.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>In NIR Chapter 13 page 360, the Party states that there have been changes to the results of its test procedures. Due to the consolidation of the EU registries, test results have changed during this period.</p> <p>Party states that tests have been performed in the frame of the test environment, including creation of holding accounts and connection of representatives to those accounts. No additional test plans or test results related to the most recent version of registry software have been provided by the party.</p>

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	<i>(No recommendations from previous Annual Review report)</i>		2012 Inventory Review Report not available at the time of an assessment.

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	P1.4.2, P1.4.3	The assessor recommends that Greece includes public information directly on the website of the national registry or via a link from the registry website to another website controlled by the Party. The assessor recommends that the publicly available information be up to date (i.e. updated as close to real time as possible, but at least updated on a monthly basis).	The Party states in [RESPONSE] that publicly available information has been largely improved and the assessor can confirm this but some information like Article 6 project information or holding and transaction information is not provided on the registry website or a website controlled by the Party.
P.2.4.2.2	P.2.2.5, P2.2.10	The SIAR assessor recommends that the Party fully reports all discrepancies in official R2 report.	The Party acknowledged three discrepancies in [RESPONSE] but did not provide official R2 report.
P2.4.2.3	P2.3.3, P2.3.10	The assessor notes that Greece is not fully reporting changes in the national registry related to change of test results and change of database structure. The assessor recommends that Greece provides this	The assessor notes that Greece partly provided this information in [RESPONSE]. However, additional analysis of the provided documentation reveals an insufficient database structure was provided. Based on this information two additional recommendations

		information related to the most current implemented version of the consolidated registry software.	have been added.
P2.4.2.4	2.3.3	The assessor recommends that following major changes, the party provide a data model which contains all DES required entities complete with descriptions in its annual NIR.	
P2.4.2.5	2.3.10	The assessor strongly recommends that the Party test each release thoroughly against the DES as part of each major release cycle and provide the results of such tests in its annual NIR.	