



UNFCCC ITL Administrator

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

Reference:	IAR/2014/BGR/2/2	State:	Final
Version number:	2.0	Date:	July 11, 2014
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Document change record

Version	Date	Description
0.1	15/05/2014	Initial Draft
1.0	15/05/2014	Reviewed draft ready to send to Party
1.1	02/07/2014	Reviewed draft updated taking into account the Party's responses
2.0	11/07/2014	Final

Summary

Ref Nr	Description	Value	Comments
P2.0.1	Party name	Bulgaria	
P2.0.2	Reporting period	2013	
P2.0.3	Submission under review	Files submitted: - [NIR] BG_NIR_2014_15_April .pdf - [ANNEXES] ANNEXES_Confidential.zip - [SEF] SEF_BG_2014_1_10-56-26 14-1-2014.xls - [CONSULT] BGConsultation_form_P1&2-3.doc	Information from the ITL Administrator: - [SEFCR] SEF_BG_2014_1_10-56-26 14-1-2014.xls - [RRITL] SIAR-Reports_2013_BG_v.1
P2.0.4	Previous annual review report reference	- [ARR2013] FCCC/ARR/2013/BGR (10/14/2014)	

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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 checked="" 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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No P2.4.1.1, P2.4.1.2 & P2.4.1.3
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, P2.4.2.2, P2.4.2.3 & P2.4.2.4

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 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. 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. 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. However, the SIAR assessor has identified no statement on changes in the name and contact information of the registry administrator reported by the Party. The SIAR assessor recommends that Party address this problem and to report the results in its next annual submission. The SIAR assessor recommends that the Party in its next annual submission report any and all change(s) in its national registry in accordance with section I.G of the annex to decision 15/CMP.1. 5. Party has reported its commitment period reserve in its 2013 annual submission. 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 the Party to provide on its public website up to date public information. The SIAR assessor recommends the Party to publish complete, non-aggregated, article 6 project information, as well as non-confidential up to date holding and transaction information in its publicly available information.. <p><u>Recommendations</u></p> <ol style="list-style-type: none"> 7. The SIAR assessor reiterates the previous ERT recommendation regarding the public availability of information in accordance with section IIE of the annex to decisions 13/CMP.1 and recommends that the Party fulfills all requirements regarding the public availability of information. The SIAR assessor recommends the Party to provide this required publicly available information preferably in English and to

Ref Nr	Summary of findings
	<p>clearly identify and list each element of the information that the Party classifies as confidential (including an explanation and hyperlink to the relevant legislation that dictates or allows the information to be classified as confidential on its publicly available information).</p> <p>8. The SIAR assessor recommends the Party to provide up-to-date complete, non-aggregated, article 6 project information and holding and transaction information in accordance with section II.E of the annex to decisions 13/CMP.1.</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.
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.
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	
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? [] Yes [x] No	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;	Has the discrepancy been identified by the transaction log? [] Yes [] No [x] N/A	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;	Has the same type of discrepancy occurred previously for that Party? [] Yes [] No [x] N/A	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;	Was the transaction completed or terminated? [] Yes [] No [x] N/A	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?	Problem that caused the discrepancy corrected? [] Yes [] No [x] N/A	No discrepancies occurred for the Party
	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, AAs and RMs, the replacement of tCERs and ICERs, and the carry-over of ERUs, CERs and AAs	Discrepancy relates to the capacity of the national registry to ensure the accurate accounting? [] Yes [] No [x] 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? [] 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.
	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.
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.

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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>No changes occurred for the Party for this item.</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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>No changes occurred for the Party for this item.</p>
P2.3.6	<p>15/CMP.1 paragraph 32.(f)</p> <p>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</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>No changes occurred for the Party for this item.</p>

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.
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	Changes occurred for the Party for this item, however the changes were not deemed significant.

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	<p>Also reported as P1.5.1</p> <p><i>Reference [ARR2013] paragraph 108</i> Include additional information in response to the SIAR findings in its NIR in accordance with decision 15/CMP.1, annex, chapter I.G</p> <p><i>[IAR2013_1] P1.4.1, P1.4.4 & P1.5.1</i> <i>[IAR2013_2] P2.4.2.1 & P2.4.2.3</i> 13/CMP.1 Annex paragraph 45 Following consultation the Party has marked information on account representatives' contact information as confidential, and published information on the commitment period to which a cancellation or retirement is related. The assessor recommends that the publicly available information on accounts and list of legal entities has a time stamp (date) and is up to date (i.e. updated as close to real time as possible, but at least updated on a monthly basis).</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The Party provides reference to this publicly available information in [NIR] section 12.4 and states that this information had been made available on the former Registry's website.</p> <p>The SIAR assessor noted that the provided link (http://bg-server1.etr.moew.government.bg/iaos/contacts.php) in [NIR] section 12.4 is broken.</p> <p>The SIAR assessor noted as well that the provided link in the previous IAR (the document "Accounts" at http://eea.government.bg/bg/bg/rr/R-te/registry/main2.html as referenced in [RESPONSE 1] to [IAR2013_2]) is not available either.</p> <p>In [CONSULT] the Party provides a new link (http://eea.government.bg/bg/r-r/r-te/registry/main2).</p> <p>The assessor notes however that the publicly available information provided is still not up to date (i.e. updated as close to real time as possible, but at least updated on a monthly basis).</p> <p>The assessor reiterates the recommendation to the Party to update the publicly available information and to indicate a validity date (i.e. the full date on which it was generated, not only the year).</p>

P2.4.1.2	<p>Also reported as P1.5.2</p> <p><i>Reference [ARR2013] paragraph 108 Include additional information in response to the SIAR findings in its NIR in accordance with decision 15/CMP.1, annex, chapter I.G</i></p> <p><i>[IAR2013_1] P1.4.2 & P1.5.2 [IAR2013_2] P2.4.1.2, P2.4.2.1 & P2.4.2.2</i></p> <p>13/CMP.1 Annex paragraph 46</p> <p>On the MoEW.s new website:</p> <p>(i) The years in which emission reduction units have been issued as a result of the Article 6 projects;</p> <p>(ii) Downloadable electronic versions of all publicly available documentation relating to Article 6 projects.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The Party provides two references to this publicly available information in [NIR] section 12.4.</p> <p>The SIAR assessor notes that the first link provided (http://bg-server1.etr.moew.government.bg/iaos/projects.php) is broken. The second link provided (http://www3.moew.government.bg/?show=top&cid=357&lang=en) does give access to information on Article 6 projects.</p> <p>The SIAR assessor notes that part of the required information is only available in aggregated form (years of ERU issuance).</p> <p>The SIAR assessor recommends the Party to clearly state the years of ERU issuance per project or alternatively to provide a link to the JI project details page maintained at http://ji.unfccc.int (direct link: http://ji.unfccc.int/JI_Parties/DB/5EH2UF1UOGCEO6HKKAKY8PHE4I9WX6/vi ewDFP) to satisfy its project details reporting.</p>
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<p>P2.4.1.3</p>	<p>Also reported as P1.5.3</p> <p><i>Reference [ARR2013] paragraph 108</i> Include additional information in response to the SIAR findings in its NIR in accordance with decision 15/CMP.1, annex, chapter I.G</p> <p><i>[IAR2013_1] P1.4.3</i> <i>[IAR2013_2] P2.4.1.1 & P2.4.2.1</i> 13/CMP.1 Annex paragraph 47 Make available on the registry's public website the information required in accordance with paragraphs 44-48 of the annex to decisions 13/CMP.1</p> <p>The ERT recommends that Bulgaria include:</p> <p>(a) In the account information section:</p> <p>(i) An index with numerical identifiers for account types;</p> <p>(ii) An index with numerical identifiers for commitment period information in the account information section;</p> <p>(iii) A statement regarding the confidentiality of holding and transaction information;</p> <p>(iv) An identification of legal entities authorized by the Party.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The Party provides reference to this publicly available information in [NIR] section 12.4 and states that this information had been made available on the former Registry's website.</p> <p>The SIAR assessor noted that the provided link (http://bg-server1.etr.moew.government.bg/iaos/contacts.php) in [NIR] section 12.4 is broken.</p> <p>In [CONSULT] the Party provides a new link to this publicly available information (http://eea.government.bg/bg/r-r-te/registry/main2).</p> <p>The assessor notes however that the publicly available information provided is still not up to date (i.e. updated as close to real time as possible, but at least updated on a monthly basis).</p> <p>The assessor reiterates the recommendation to the Party to update the publicly available information and to indicate a validity date (i.e. the full date on which it was generated, not only the year).</p> <p>The assessor notes that holding and transaction information is still missing.</p>
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P2.4.1.4	<p>Also reported as P1.5.4</p> <p><i>Reference [ARR2013] paragraph 108</i> Include additional information in response to the SIAR findings in its NIR in accordance with decision 15/CMP.1, annex, chapter I.G</p> <p><i>[IAR2013_2] 2.3.3, P2.4.2.4 & P2.4.2.5</i> 15/CMP.1 paragraph 32.(c) 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><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>In [NIR] section 14, the Party states that no changes related to Kyoto functionality have been made to the database and capacity of its national registry.</p> <p>A diagram of the database structure is provided in [ANNEXES].</p>
P2.4.1.5	<p>Also reported as P1.5.5</p> <p><i>Reference [ARR2013] paragraph 108</i> Include additional information in response to the SIAR findings in its NIR in accordance with decision 15/CMP.1, annex, chapter I.G</p> <p><i>[IAR2013_2] 2.3.10, P2.4.2.4 & P2.4.2.6</i> 15/CMP.1 paragraph 32.(j) 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.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>In [NIR] section 14, the Party states that changes have been introduced in release 5 and 6 of the national registry were limited and only affected EU ETS functionality.</p> <p>However, each release of the registry is subject to both regression testing and tests related to new functionality. These tests also include thorough testing against the DES and were successfully carried out prior to the relevant major release of the version to Production (see [ANNEXES]).</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, P1.4.1.1-P1.4.1.5, P1.5.1, P2.4.1.1	13/CMP.1 Annex paragraph 45 Account information	<p>The Party provides reference to this publicly available information in [NIR] section 12.4 and states that this information had been made available on the former Registry's website.</p> <p>The SIAR assessor noted that the provided link (http://bg-server1.etr.moew.government.bg/iaos/contacts.php) in [NIR] section 12.4 is broken.</p> <p>In [CONSULT] the Party provides a new URL to this publicly available information.</p> <p>The assessor notes however that this publicly available information provided is not up to date (i.e. updated as close to real time as possible, but at least updated on a monthly basis).</p> <p>The assessor recommends the Party to update this publicly available information and to indicate a validity date (i.e. the full date on which it was generated, not only the year).</p>
P2.4.2.2	P1.4.2, P1.4.2.3, P1.5.2, P2.4.1.2	13/CMP.1 Annex paragraph 46 Article 6 project information	<p>The Party provides two references to this publicly available information in [NIR] section 12.4.</p> <p>The SIAR assessor notes that the first link provided (http://bg-server1.etr.moew.government.bg/iaos/projects.php) is broken. In [CONSULT] the Party states a new link (http://eea.government.bg/bg/r-r/r-te/registry/main2).</p> <p>The second link provided in [NIR] (http://www3.moew.government.bg/?show=top&cid=357&lang=en) does give access to information on Article 6 projects.</p> <p>The SIAR assessor notes that via both URLs part of the required information is only available in aggregated form (years of ERU issuance). The SIAR assessor hence recommends the Party to clearly state the years of ERU issuance per project or alternatively to provide a link to the JI project details page maintained at http://ji.unfccc.int (direct link: http://ji.unfccc.int/JI_Parties/DB/5EH2UF1UOGCEO6HKKAKY8PHE4I9WX6/viewDFP) to satisfy its project details reporting.</p>

P2.4.2.3	P1.4.3, P1.4.3.1-P1.4.3.12, P2.4.1.3	<p>13/CMP.1 Annex paragraph 47 Holding and transaction information</p>	<p>The Party provides reference to this publicly available information in [NIR] section 12.4 and states that this information had been made available on the former Registry's website.</p> <p>The SIAR assessor noted that the provided link (http://bg-server1.etr.moew.government.bg/iaos/contacts.php) in [NIR] section 12.4 is broken; hence the SIAR assessor was unable to find the required information.</p> <p>The Party did not provide a response to this issue in [CONSULT].</p> <p>The SIAR assessor recommends the Party as well to clearly identify and list each element of the information that the Party classifies as confidential. If the Party deems the information to be confidential, they should preferably add an explanation and hyperlink to the relevant legislation that dictates or allows the information to be classified as confidential on its publicly available information.</p>
P2.4.2.4	P1.4.4	<p>13/CMP.1 Annex paragraph 48 List of legal entities authorized by Party</p>	<p>The Party provides reference to this publicly available information in [NIR] section 12.4 and states that this information had been made available on the former Registry's website.</p> <p>The SIAR assessor noted that the provided link (http://bg-server1.etr.moew.government.bg/iaos/contacts.php) in [NIR] section 12.4 is broken.</p> <p>Via the link provided in [CONSULT] the assessor was able to find this publicly available information.</p> <p>The assessor notes however that this publicly available information provided is not up to date (i.e. updated as close to real time as possible, but at least updated on a monthly basis).</p> <p>The assessor recommends the Party to update this publicly available information and to indicate a validity date (i.e. the full date on which it was generated, not only the year).</p>