### **UNFCCC ITL Administrator**

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

SIAR/2016/BGR/2/2 Reference:

Version 2.0 State: Final

number:

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Document change record

Version	Date	Description
0.1	30/06/2016	Initial Draft
0.2	08/07/2016	Review of initial draft
1.0	08/07/2016	Draft 1.0 ready for distribution to the Party
2.0	15/08/2016	Final report

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# Summary

Ref Nr	Description	Value	Comments
P1.0.1	Party name	Bulgaria	
P1.0.2	Reported Year	2015	
P1.0.3	Submission under review	- [SEF] RREG1_BG_2015.xls RREG1_BG_2014.xls - [NIR] BG_NIR_2016_27052016 Annex_A_CSEUR_DB_MODEL_2015011 3.PDF Annex_B_Changes_From_6.3.3.2_to_6.7. 3.xlsx Annex_H_Test_results_EU07March2016.docx - [REPORTS] R2-R5 Not submitted - [RESPONSE] Consultation_form_P12_BGR - [INITIAL REPORT] initial_report-bulgaria II	Information from the ITL Administrator: - [SEFCR] CR_RREG1_ BG_2014 CR_RREG1_ BG_2015 -[RRITL] ITL R2-R5 v1.xls workbook, RITL2_BG_2015 RITL3_BG_2015 RITL4_BG_2015 RITL5_BG_2015
P1.0.4	Previous annual review report reference	The 2015 ARR is not yet published. For purposes of this assessment FCCC/ARR/2014/BGR (14/04/2015) will be used: <a href="http://unfccc.int/documentation/documents/advanced_search/items/6911.php?priref=600008441#beg">http://unfccc.int/documentation/documents/advanced_search/items/6911.php?priref=600008441#beg</a>	

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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?	[x]Yes [ ]No
P2.1.2	Problem found with Party's national registry?	[ ]Yes [x]No
P2.1.3	Any unresolved problem with Party's national registry?	[ ]Yes [x]No
P2.1.4	Problems identified with the significant changes to the Party's national registry?	[ ]Yes [x]No
P2.1.5	National registry related recommendations from previous annual review were fully addressed?	[x]Yes []No
P2.1.6	Is there any recommendation that needs to be addressed by the Party?	[x]Yes []No
		P2.4.2.1, P2.4.2.2, P2.4.2.4

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# 1.2. Summary of findings

Ref Nr		Summary of findings
P2.2.1	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 continuous to fulfill the 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.
	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 included in 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/CMP.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 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.
	5.	Party has reported its commitment period reserve in its 2015 annual submission.
	6.	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.
	Recom	mendations
	None	

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# 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)	Assessed in SIAR Part 1.			
	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;	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? [ ] Yes [x] 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? [ ] Yes [x] 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? [ ] Yes [x] No	Party submitted a SEF which is consistent with the ITL records.		

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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? [ ] Yes [x] 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? [ ] Yes [x] No	The Party has not held tCERs and ICERS during the reported year.
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? [ ] Yes [x] 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	

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	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:		A discrepancy has been identified by the transaction log relating to transactions initiated by the Party,	Has the discrepancy been identified by the transaction log?  [ ] Yes [x] No	No discrepancies have been identified for the Party.
nber)	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 have been identified for the Party.
each discrepancy type (include Type Number)	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 have been identified for the Party.
ype (includ	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 have been identified for the Party.
crepancy t	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 have been identified for the Party.
Repeat for each dis	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 carryover of ERUs, CERs and AAUs	Discrepancy relates to the capacity of the national registry to ensure the accurate accounting?  [ ] Yes [ ] No [ x ]N/A	No discrepancies have been identified for the Party.

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	Ref Nr	Requirement	Assessment	Comment
P2.2	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,		Any tCERs or ICERs subject to non-replacement held by Party?  [ ] Yes [x] No	No non-replacements have been identified for the Party.
		and if so the expert review team shall:		
	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 have been identified for the Party.
Type numbe	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 have been identified for the Party.
type (incl	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 have been identified for the Party.
-replacement	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 have been identified for the Party.
Repeat for each non-replacement type (incl Type number	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 have been identified for the Party.

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# 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.

		Has the Party reported a	Problem Identified with	
Ref Nr	Requirement	change?	the Change?	Comment
P2.3.1	15/CMP.1 paragraph 32.(a)	Not a significant		
	The name and contact information of the registry administrator designated by the Party to maintain	change, left here for completeness		
	the national registry			
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	[ ]Yes [x]No	[ ]Yes [ ]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.	[ ]Yes [x]No	[ ]Yes [ ]No	No changes occurred for the Party for this item.

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Ref Nr	Requirement	re	por	e Party ted a ige?		Problem Identified with the Change?		with	Comment
P2.3.4	15/CMP.1 paragraph 32.(d)	r 1 V		F vz 1 Ma		1 V a		1 Na	No changes occurred for the Party for this item.
	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)	[ ] 1	es	[ x ] No		[ ]Yes	<b>5</b> [	] ио	
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	[]Y	es	[ x ] No		[ ]Yes	is [	] No	No changes occurred for the Party for this item.
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	[ ]Y	es	[ x ] No	• [	[ ]Yes	\$ [	] No	No changes occurred for the Party for this item.

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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	[]Yes [x]No	[]Yes []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.	[x]Yes []No	[]Yes [x]No	In [NIR] Section 14, para 10, page 532 the Party states the changes that have been made to the results of its test procedures, which were successfully carried out. The Party also makes references to the relevant test report, which has been attached to the [NIR].

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### 4. Recommendations

### 4.1. Previous Expert Review Team recommendations

This section assesses Party's response to the previous annual review recommendations.

	Recommendation from previous Annual	Has Party	
	Review	acted on	
Ref Nr	report (with ref)	recommendation?	Comment
P2.4.1.1	The 2015 ARR is not yet published. For purposes of this assessment FCCC/ARR/2014/BGR (14/04/2015) will be used: <a href="http://unfccc.int/documentation/documents/advanced_search/items/6911.php?priref=600008441#beg">http://unfccc.int/documentation/documents/advanced_search/items/6911.php?priref=600008441#beg</a>		None
P2.4.1.2	FCCC/ARR/2014/BGR para 95 – the ERT recommended the Party to implement recommendations contained in the Standard Independent Assessment Report.	[]Yes [x]No	In [NIR], Section 14, page 532, the final row in the table indicates to "see below" for information on the previous annual review recommendations from FCCC/ARR/2014/BGR. There is no information found. The Party should state any actions taken in response to the previous annual review recommendations relevant to the SIAR.

### 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.

	Recommendation		
Ref Nr	Ref	Recommendation description	Comment
P2.4.2.1	P1.4.1 - P1.4.1.5,	In review of the publicly available	The assessor suggests the Party to provide reference to
	P1.4.2 - P1.4.2.2,	information, the assessor identified that	http://eea.government.bg/bg/r-r/r-te/registry/main3 rather than
	P1.4.3, P1.4.4	the information in accordance with	http://eea.government.bg/bg/r-r/r-te/registry/main2 and
		Decision 13/CMP.1 Annex paragraphs	http://eea.government.bg/bg/r-r/r-te/registry/main.
		[45], [46], [47], [48] was not reported	

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		properly in the Party's [NIR]. The relevant information could not be accessed directly due to inaccurate URL. The assessor recommends that the Party include public information directly on the website of the national registry or via link from the registry website to another website controlled by the Party.	Alternatively, the Party may provide reference in its submission to the relevant data published via the EC site. <a href="https://ets-registry.webgate.ec.europa.eu/euregistry/BG/public/reports/publicReports.xhtml">https://ets-registry.webgate.ec.europa.eu/euregistry/BG/public/reports/publicReports.xhtml</a> In [RESPONSE] the Party states that the information in accordance with Decision 13/CMP.1 Annex paragraphs [45], [46], [47], [48] was not reported properly in the NIR, because the public information and the link were updated on 16.06.2016. The new links will be included in the next submission of the NIR.
P2.4.2.2	P.1.4.1.4-5	In fulfillment of the requirements under Decision13/CMP.1 Annex paragraph 45 (d) and (e), the assessor recommends the Party include in [NIR] an explanation or a hyperlink to the relevant legislation stating such data to be classified as confidential.	Alternatively, the Party may provide reference in its submission to the relevant data published via the EC site. <a href="https://ets-registry.webgate.ec.europa.eu/euregistry/BG/public/reports/publicReports.xhtml">https://ets-registry.webgate.ec.europa.eu/euregistry/BG/public/reports/publicReports.xhtml</a> In [RESPONSE] the Party states that in the next submission of the NIR, Bulgaria will include an explanation to the relevant legislation stating such data to be classified as confidential.
P2.4.2.3	P1.4.1, P1.4.1.1-3	In review of the publicly available information, 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 on a monthly basis).	Alternatively, the Party may provide reference in its submission to the relevant data published via the EC site. <a href="https://ets-registry.webgate.ec.europa.eu/euregistry/BG/public/reports/publicReports.xhtml">https://ets-registry.webgate.ec.europa.eu/euregistry/BG/public/reports/publicReports.xhtml</a> In [RESPONSE] the Party states that the publicly available information on the following link: <a href="https://eea.government.bg/bg/r-r/r-te/registry/main3">https://eea.government.bg/bg/r-r/r-te/registry/main3</a> was updated on 16.06.2016.
P2.4.2.4	P1.4.3	In fulfillment of the requirements under Decision13/CMP.1 Annex paragraph 47, the Party declares this information to be confidential. However, for the purpose of this assessment the assessor was not able to locate the SEF report for 2015 in [NIR]. It is recommended that the Party provide public URL for viewing holding and transaction information.	Alternatively, the Party may provide reference in its submission to the relevant data published via the EC site. <a href="https://ets-registry.webgate.ec.europa.eu/euregistry/BG/public/reports/publicReports.xhtml">https://ets-registry.webgate.ec.europa.eu/euregistry/BG/public/reports/publicReports.xhtml</a> In [RESPONSE] the Party states that in the NIR, Section 12.4 Bulgaria declares only Paragraph 47(a), 47(d), 47(f) and 47(l) under Decision13/CMP.1 to be confidential. The information and the link about SEF reports were updated on 16.06.2016. Bulgaria will provide the link and the information in the next submission of the NIR.

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