Session SBI51 (2019)

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Multilateral Assessment
A compiliation of questions to - and
answers by - Bulgaria, exported 1 December 2019,
by the UNFCCC secretariat

Question by Japan at Monday, 30 September 2019

Category: Progress towards the achievement of its quantified economy-wide emission reduction target

Type: Before 30 September

Title: The estimate of mitigation impacts of policies and measures of the waste sector

In Table 4.19 Summary of policy and measures with direct effect on the reduction of GHG emissions in the NC7, the estimate of mitigation impact with regards to the policies and measures of the waste sector for 2020, 2025 and 2030 are reported.
1) What is the comparison target for the estimate of mitigation impact? Is it BAU? or base year?
2) The amount of mitigation impact in 2020, 2025, and 2030 are constant. Does Bulgaria have any plans to strengthen policies and measures for the waste sector after 2020?

Answer by Bulgaria, Thursday, 28 November 2019

1. The comparison target for the estimate of mitigation impact is the base year.
2. Before 2020 and in view of the commitments made by the Republic of Bulgaria at the EU and international level to limit greenhouse gas emissions is applies a Third National Action Plan on Climate Change (TNAPCC) for the period 2013-2020.

   The policies and measures for all sectors are defined in the TNAPCC and they are implementing during the period 2013-2020. There is a reporting procedure of the progress from all the engaged institutions.

   In 2017, the official report, approved by the Council of Ministers, has been published with the results of the implementation of the policies and measures from the TNAPCC. The policies and measures in the 7th National Communications are based on the reported results of progress.

   Some of the policies and measures no longer exists because they have been already implemented based on the reported results of progress.

   According to the new rules laid out in the Governance Regulation (EU) 2018/1999, EU Mamber States are required to develop Integral National Energy and Climate Plans until 2030.

   In 2018, for the first time, Bulgaria prepared draft integrated national energy and climate plan. The draft plan shows that Bulgaria make significant progress in defining the path to reaching the 2030 climate and energy targets. Bulgaria must finalise the plan by the end of 2019.

   With implementation of the planned measures in the draft NECPs, the overall GHG reduction of the EU is estimated to reach the at least 40% reduction target.

Question by Japan at Monday, 30 September 2019

Category: Progress towards the achievement of its quantified economy-wide emission reduction target

Type: Before 30 September

Title: Institutional arrangements for the preparation of NC/BR

Could Bulgaria provide the information on institutional arrangements for the preparation of NC/BR, including schedule for preparation and roles of relevant ministries and agencies?

Answer by Bulgaria, Thursday, 28 November 2019

The institutional arrangements for the preparation of NC/BR of Bulgaria have been prepared and ensured by the national system for reporting on policies, measures and projections under the Regulation (EU) ? 525/2013.

According to Council Decision ? 274/2014 the Ministry of the Environment and Water (MOEW) is responsible for the climate change policy in Bulgaria, which is empowered to implement, coordinate, monitor and evaluate the policies and the measures in order to mitigate the environmental consequences of climate change at national level. The Climate Change Policy Directorate holds the functional competence for activities related to the development and the implementation of national policies and measures in the field of climate change.

The MOEW has been identified as the responsible institution for preparation of Bulgaria's National Communications and Biennial Report under the UNFCCC and the European legislation.

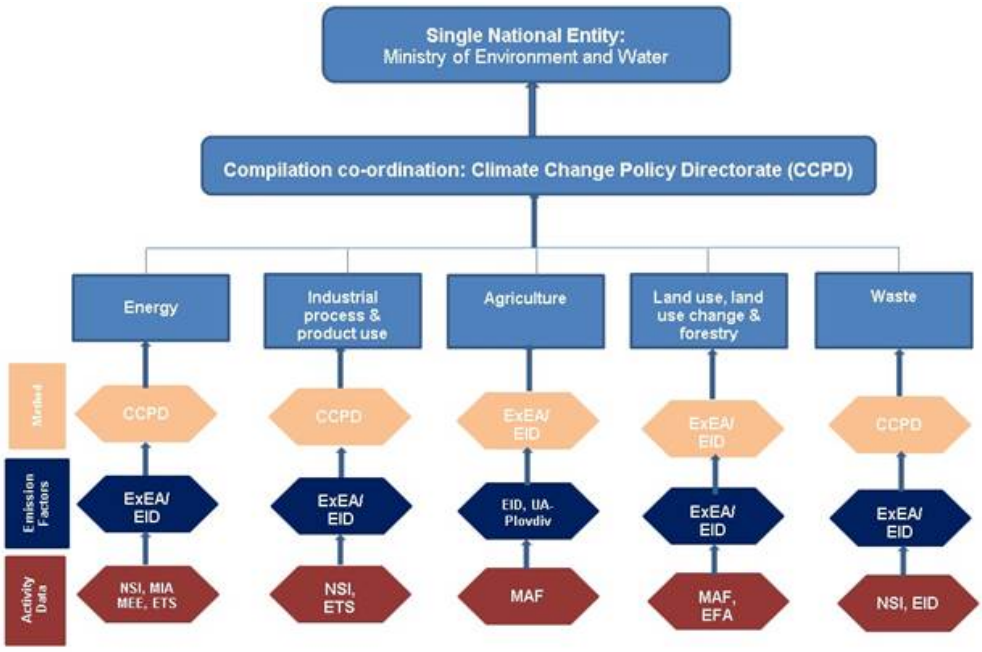
In order to fulfil the reporting requirements, the MOEW has the following responsibilities:

- Ensuring official submission of the country reports to the UNFCCC and the European Commission;
- Development and management of any institutional, legal and procedural arrangements for evaluating policy and for making projections of anthropogenic greenhouse gas emissions by sources and removals by sinks;
- Implementation of the quality assurance and quality control (QA/QC) activities and providing records and archiving;
- Compilation of the reporting tables and ensuring appropriate delivery of the projected estimates in a timely manner;
- Setting up data supply agreements with key data providers including handling of confidential data;
- Coordination and management of the Interinstitutional Committee on Climate Change (ICCC) on all issues and aspects of the management activities related to reducing greenhouse gas emissions across all sectors.

In accordance with Article 20 (a) and (b) of the Implementing Regulation (? 749/2014) Bulgaria has established its relevant institutional, legal and procedural arrangements which

are described below. The National System's structure is presented in Figure 1.

Figure 1: Bulgaria's National System for Projections



Abbreviations: CCPD – Climate Change Policy Department, ExEA/EID – Executive Environment Agency/Emission Inventory Department, UA – Plovdiv –University of Agriculture in Plovdiv, NSI - National Statistical Institute, MIA – Ministry of Internal Affairs, ME – Ministry of Energy, ETS – Emission Trading Scheme, MAF – Ministry of Agriculture, Food and Forestry, EFA – Executive Forest Agency

Many state institutions have a specific role and responsibilities in implementing measures related to the climate change and support the climate change activities of the MOEW, they are as follows:

- Ministry of Energy (ME);
- Sustainable Energy Development Agency (SEDA);
- Ministry of Agriculture, Food and Forestry (MAFF);
- Ministry of Finance (MF);
- Ministry of Regional Development (MRD);
- Ministry of Education, Youth and Science (MES);
- Ministry of Foreign Affairs (MFA);
- National Statistical Institute (NSI);
- Executive Environment Agency (ExEA);
- Bulgarian Academy of Sciences etc.

The ExEA within MOEW performs the implementation of climate change-related measures. The Agency is responsible for the preparation of the GHG inventories. It carries out the procedures on issuing GHG emission permits – considers the operators' application forms and drafts the permits. ExEA is the National Administrator of the National Registry for issuance, possession, transfer and cancellation of GHG emission allowances.

The Sustainable Energy Development Agency within the Ministry of Energy organizes the implementation of projects and measures in accordance with the national long- and

short-term energy efficiency programs; approves projects for energy efficiency and controls their implementation; participates in the preparation of legal regulations in the field of energy efficiency; proposes development and improvement of energy efficiency standards in order to achieve approximation to the EU norms and to encourage energy efficiency at the demand side.

Representatives of the public sector in the working groups are: Bulgarian Chamber of Commerce and branch organizations of the industrial branches that are covered by ETS – Bulgarian Association of the Cement Industry, Bulgarian Branch Chamber of the Power Engineers, Branch Chamber of the Pulp and Paper Industry, Branch Chamber of the Glass Industry, Branch Chamber of the Iron and Steel Industry, Branch Chamber of the Chemical Industry, Bulgarian Union of the Ceramics.

The coordination and review of climate change activities is carried out within the Interinstitutional Committee on Climate Change on all issues and aspects of the management activities related to reducing greenhouse gas emissions across all sectors and the adaptation to climate change.

The committee is presided by the MOEW, while the Climate Change Policy Directorate at the Ministry act as a coordinating unit that keeps the whole information, monitors the performance of the commission and initiates actions in order to implement its functions. Depending on the requirements of the regulations governing the national policy on climate change and the corresponding needs of coordination between institutions and organizations, the committee may operate in different forms (sub-commissions), but remain a single body for interinstitutional coordination with a central executive unit – the Climate Change Policy Directorate at the MOEW. The mode of operation, the specifics of the structure and the regulations of this committee is defined in the Climate Change Mitigation Act. One of its functions is intended to be the coordination of the reporting on the implementation of the National Action Plan on Climate Change. The ICCC functions regarding the implementation of the Plan are defined by an Ordinance of the Minister of Environment and Water. Thus the efforts of all concerned Governmental Agencies, business and NGOs are united.

Bulgaria's National System has established a series of procedural arrangements which ensure the timeliness, transparency, accuracy, consistency, comparability and completeness of information reported on projections. These include:

1. The establishment of basic data quality objectives by which data is prepared (by data suppliers and in compiling the projections).

2. A process (Interinstitutional Committee on Climate Change) to help co-ordinate the high level QA and prioritisation of improvements.

3. Clear timetable for preparation, review and delivery of projections.

Table 1. Timelines for preparing the projections

Main players	Activities	Timing
GHG projection experts	Data collection including new data agreements: •€€€€€€€€ Collecting new raw data •€€€€€€€€ Revision of methods •€€€€€€€€ Updating Parameters	10 months and 3 months prior to submission

PAMs experts	Projection Compilation: •€€€€€€€€ Incorporating PAMs •€€€€€€€€ Assessment of projection estimates •€€€€€€€€ Compiling domestic totals •€€€€€€€€ Compiling PAMs	5 months and 2 months prior to submission
GHG projection experts & PAMs experts	Submission checks: •€€€€€€€€ Filling data into the reporting formats; •€€€€€€€€ Description of the methods, assumptions and data sources;	1-2 month prior to submission (by January-February)

The responsibility for overall collection and use of data are with MOEW and ExEA. The ExEA coordinates the agreements for data supply and data collection activities for the preparation of the GHG inventory. The sectoral experts (ExEA and other agencies) manage the collection of data, choice of methods, data checking and compilation of estimates that conform to the data quality objectives of the historical time-series. The ExEA ensures there are adequate resources for the collection and use of the data. The MOEW compiles the required outputs necessary for Bulgaria's projections reporting.

The institutional arrangements between MOEW and the main data providers for GHG inventory were signed in 2010:

- National Statistical Institute (RD ?21-35/12.02.2010);
- Ministry of Agriculture and Food and its body Executive Forest Agency (? 04-00-517/26.02.2010 and RD ? 50-47/15.03.2010);
- Ministry of Economy, Energy and Tourism (14/06/2010);
- Ministry of Interior (MI) (08/06/2010).

The agreements ensure the support from these organisations regarding the choice of the activity data, EFs and methods in the compilation of emission estimates and QA/QC for these estimates.

The information is collected on the annual basis by letters with request for provision of the necessary activity data to every of the information sources, including the response deadline.

All type of the necessary data, as well as the deadlines for submissions to ExEA is regulated by the abovementioned official agreements as well as by the Regulation of the Council of Ministers ?261/05.09.2014 (S.G. 76/2014, last update S.G. 87/2017).

The methodologies and models used in the policy evaluation and in the projections are selected by the PAMs expert and the GHG projection experts.

The evaluation of the effects of policies and measures was performed on the basis of available data and information as follows:

Energy sector:

- National energy model derived from the GHG projection guidance Long-range Energy Alternatives Planning System ("LEAP") model

Industrial processes:

- activity level of the sectors and sub-sectors – as sources of GHG emissions;
- products and/or materials used for the manufacturing process or from which GHG emissions result;
- share of the product/quantity of material used in the activity data of the sub-sector;
- growth or decrease factor of the activity data at the activity sub-sector level;
- GVA for industries.

Agriculture sector:

- Animal number data;
- Fertiliser input data;
- Crop area;
- GVA for agriculture.

LULUCF:

- National forest model derived from the inventory guidance;

Waste sector:

- 2006 IPCC Waste Guidelines;
- waste data;Recycled
- generation data;Waste
- pen burning and incineration of waste data;?
- GDP growth rate data;
- Population data.

The methodology for GHG emission projections is based on EU GHG projection Guidelines.

QA/QC activities should be applied to the projections and projection parameters used in planning, preparing and reporting in order to provide clear assurances about the quality of the data being compiled, reported and used for analysis and policy decisions.

Bulgaria uses projections for national policy making, reporting to the EU MMR as well as to underpin National Communications and Biannual reporting to the UNFCCC.

The MOEW implements quality assurance and quality control processes (QA/QC) throughout the phases of projection preparation. The QA/QC processes are designed such that the data quality objectives are met.

The GHG inventory experts and PAMs experts at MOEW/ExEA work with data suppliers to assess and understand sensitivities in the data provided for the projections – the key input parameters on energy prices, population, GDP, GVA etc.

Question by Japan at Monday, 30 September 2019

Category: Progress towards the achievement of its quantified economy-wide emission reduction target

Type: Before 30 September

Title: Frequency of revision or update of projections

How often are GHG projections of Bulgaria revised? Also, could Bulgaria describe the institutional arrangement and process for the revision or update of projections?

Answer by Bulgaria, Thursday, 28 November 2019

The GHG projections have been revised for each reporting cycle and submissions to the EU and the UNFCCC due to the changes of the historical trend and key economic and social drivers as GDP growth rate, population, and energy prices of oil, gas and coal etc. The methodology for GHG projections are based on the EU GHG projection Guidelines. The mitigation impact is estimated based on the key factors and assumptions in the main strategic documents for different sectors developed and implemented until 2020. The assumptions are updated for “baseline scenario” and other sector specific scenarios.

The institutional arrangement and process for the revision or update of projections are the same as during the preparation of the new projections. Please find in the attached file “Institutional arrangements for NC_BR” the description of the institutional arrangement and process.

Attachment: Institutional arrangements for NC_BR.pdf

Question by New Zealand at Monday, 30 September 2019

Category: Assumptions, conditions and methodologies related to the attainment of its quantified economy-wide emission reduction target

Type: Before 30 September

Title: Base years

In its BR3 CTF tables, we note that Bulgaria uses 1988 as its base year (in line with Article 4.6 of the Convention and subsequent COP decisions). With Bulgaria being part of the EU, are there any issues with Bulgaria having a different base year from the EU (1990)?

Answer by Bulgaria, Thursday, 28 November 2019

In accordance with Article 4, paragraph 6, of the Convention and decision 9/CP.2, Bulgaria, as a Party with an economy in transition, may use 1988 as its base year.

For the second commitment period of the Kyoto Protocol, from 2013 to 2020, Bulgaria, as a member State of the EU, committed to a joint EU economy-wide emission reduction target to reduce GHG emissions by 20.0 per cent below the 1990 level.

Question by New Zealand at Monday, 30 September 2019

Category: Progress towards the achievement of its quantified economy-wide emission reduction target

Type: Before 30 September

Title: Development of market mechanisms and incentives

Bulgaria's BR3 states that the country expects to develop market mechanisms and incentives to reduce fuel and energy consumption. If possible, can Bulgaria elaborate further on what types of market mechanisms and incentives it intends to implement?

Answer by Bulgaria, Thursday, 28 November 2019

Climate Change Mitigation Act (CCMA) entered into force on 11th March 2014 (last amended on 16th February 2018). CCMA outlines the overall policy to be followed in order to mitigate climate change and its impacts and fulfil international obligations under the UNFCCC and Kyoto Protocol, as well as the EU legal framework.

Subject to regulation by CCMA is the implementation of voluntary schemes, the reduction of greenhouse gas emissions from liquid fuels supplied to the transport sector, as well as the implementation of the obligations under Decision 406/2009/EC on the effort of Member States to reduce their greenhouse gas emissions in order to meet the Community's greenhouse gas emission reduction commitments up to 2020.

In April 2009, Directive 2009/30/EC was adopted which revises the Fuel Quality Directive (98/70/EC). It amends a number of elements of the petrol and diesel specifications as well as introducing a requirement on fuel suppliers to reduce the greenhouse gas intensity of energy supplied for road transport (Low Carbon Fuel Standard). In addition the Directive establishes sustainability criteria that must be met by biofuels if they are to count towards the greenhouse gas intensity reduction obligation.

Article 7a of the Fuel Quality Directive sets out reporting requirements concerning the volume and type of fuels (including fossil fuels, other non-biofuels and biofuels) supplied for road transport and non-road mobile machinery, as well as their life cycle greenhouse gas (GHG) emissions (from their extraction, processing and distribution), including the emissions resulting from indirect land use change (ILUC) for biofuels. The FQD sets a reduction target for fuel suppliers to reduce the GHG intensity of transport fuels by a minimum of 6 % by 2020 compared with 2010 levels.

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