12. INFORMATION ON ACCOUNTING OF KYOTO UNITS

Background Information

Annex I parties are required to be reported from the national registry holding of and transaction of Kyoto Protocol units and inform about related issues as specified in Decision 15/CMP.1 Section E. Information about the transactions of the Kyoto-units is attached in to this document.

Summary Of Information Reported In The Sef Tables

Information from the national registry on acquisition, holding, transfer, cancellation, retirement and carry-over of AAUs, RMUs, ERUs, CERs, tCERs and lCERs for 2021 have been reported as separate file in xlsx and xml format each by separate upload.

Discrepancies And Notification

Further information on Kyoto Protocol units referning to the respective paragraphs on decision 15/CMP 1 will be reported.
Paragraph 12: Discrepancies identified by the transaction log;
No discrepant transaction for the reporting period, pursuant of 15/CMP.1 annex I.E paragraph 12.
Paragraph13 & § 14: No CDM notifications occurred in 2021;
No CDM notifications were received by the National Registry during the reporting period, pursuant of 15/CMP.1 annex I.E paragraph 13 & 14.
Paragraph 15: No non–replacements occurred in 2021;
No non-replacements occurred during the reporting period, pursuant of 15/CMP.1 annex I.E paragraph 15.
Paragraph16: No invalid units exist as at 31 December 2021;
No invalid units exist for the reporting period, pursuant of 15/CMP.1 annex I.E paragraph 16
Paragraph 17: Actions necessary to correct any problem causing a discrepancy.
No actions were taken or changes made to address discrepancies for the period under review.

Information With Publical Access

Section E of the annex to decision 15/CMP.1 outlines provisions for the national registry to support, via a user-interface, non-confidential information being made available to the public. Bulgaria has made this information available on the Executive Environmental Agency's website:
http://eea.government.bg/
The actual internet address of the Bulgarian registry in the Union registry is:
https://unionregistry.ec.europa.eu/euregistry/BG/index.xhtml
The following information has been made accessible to the public in line with the requirements. This information is non-confidential. Bulgaria considers all information to be confidential that is determined to be confidential according to article 110 of the Commission Regulation (EU) No 389/2013. Accounts' holding's publicly accessible information:
http://eea.government.bg/bg/r-r/r-te/registry/main3
The registry terms and conditions, operators guide, forms and guidance for opening the holding accounts are available at the website of Executive Environmental Agency:
http://eea.government.bg/bg/r-r/r-te/registry/main7
http://eea.government.bg/bg/r-r/r-te/registry/main8
http://eea.government.bg/bg/r-r/r-te/registry/main9
http://eea.government.bg/bg/r-r/r-te/registry/main10
Joint implementation (JI) projects' publicly accessible information:
http://eea.government.bg/bg/r-r/r-te/registry/main3

The information of approved Joint Implementation projects and their documentation is added on the website of the competent authority (Ministry of the Environment and Waters) of JI projects and can be downloaded from the following link:

https://www.moew.government.bg/en/approved-joint-implementation-projects/

Information according to paragraph 45 - 48 of the annex to decision 13/CMP.1:

(a) Account name: the holder of the account;

(b) Account type: the type of account (holding, cancellation or retirement);

(c) Commitment period: the commitment period with which a cancellation or retirement account is associated;

(d) Representative identifier: the representative of the account holder, using the Party identifier (the two-letter country code defined by ISO 3166) and a number unique to that representative within the Party's registry;

(e) Representative names nominated by the account holder and authorized to work with the account.

The Information includes the following Article 6 project information, for each project identifier if the Party has issued ERUs for a project:

(a) Project name: a unique name for the project;

(b) Project location: the Party and town or region in which the project is located;

(c) Years of ERU issuance: the years in which ERUs have been issued as a result of the Article 6 project;

(d) Reports: downloadable electronic versions of all publicly available documentation relating to the project, including proposals, monitoring, verification and issuance of ERUs, where relevant, subject to the confidentiality provisions in decision 9/CMP.1.

The information includes the following holding and transaction information relevant to the national registry, by serial number, for each calendar year:

(a) The total quantity of ERUs, CERs, AAUs and RMUs in each account at the beginning of the year (displayed in the year X+5, according to the Commission Regulation (EU) No 389/2013 the information is confidential until the year X+5);

(b) The total quantity of AAUs issued on the basis of the assigned amount pursuant to Article 3, paragraphs 7 and 8 (displayed in the year X+1);

(c) The total quantity of ERUs issued on the basis of Article 6 projects (displayed in the year X+1);

(d) The total quantity of ERUs, CERs, AAUs and RMUs acquired from other registries and the identity of the transferring accounts and registries (displayed in the year X+5, according to Commission Regulation (EU) No 389/2013 the information is confidential until the year X+5);

(e) The total quantity of RMUs issued on the basis of each activity under Article 3, paragraphs 3 and 4 (displayed in the year X+1)

(f) The total quantity of ERUs, CERs, AAUs and RMUs transferred to other registries and the identity of the acquiring accounts and registries (displayed in the year X+5, according to Commission regulation (EU) No 389/2013 the information is confidential until the year X+5)

(g) The total quantity of ERUs, CERs, AAUs and RMUs cancelled on the basis of activities under Article 3, paragraphs 3 and 4 (displayed in the year X+1)

(h) The total quantity of ERUs, CERs, AAUs and RMUs cancelled following determination by the Compliance Committee that the Party is not in compliance with its commitment under Article 3, paragraph 1 (displayed in the year X+1)

(i) The total quantity of other ERUs, CERs, AAUs and RMUs cancelled (displayed in the year X+1)

(j) The total quantity of ERUs, CERs, AAUs and RMUs retired (displayed in the year X+1)

(k) The total quantity of ERUs, CERs, and AAUs carried over from the previous commitment period (displayed in the year X+1)

(l) The Information does not include current holdings of ERUs, CERs, AAUs and RMUs in each account because this is confidential according to Commission Regulation (EU) No 389/2013.

Calculation Of The Commitement Period Reserve Cpr

Parties are required by decision 11/CMP.1 under the Kyoto Protocol and paragraph 18 of Decision 1/CMP.8 to establish and maintain a commitment period reserve as part of their responsibility to manage and account for their assigned amount. The commitment period reserve (CPR) equals the lower of either 90% of a Party's assigned amount pursuant to Article 3(7bis), (8) and (8bis) or 100% of its most recently reviewed inventory, multiplied by 8.
The national commitment period reserve is calculated in accordance with paragraph 6 of the Annex to decision 11/CMP.1 as 90% of the proposed assigned amount or 100% of eight times its most recently reviewed inventory, whichever is the lowest.
The first method calculation as 90% of the proposed assigned amount of Bulgaria gives the estimate:

CPR = 0,9 x 222 945 983 = 200 651 385 Mg CO_2 equivalent

The second method calculation as 100% of the most recently reviewed inventory (emission level 2021) of Bulgaria times eight gives the estimate:

CPR = 8 x 53 917 265= 431 338 121 Mg CO_2 equivalent

Bulgaria has interpreted the 'most recently reviewed inventory' as the year 2020, which was reviewed in October 2022.
Therefore Bulgaria's estimated CPR is **200 651 385** Mg CO_2 equivalent.

13. INFORMATION ON CHANGES IN NATIONAL SYSTEM

No changes in national system were carried out in 2023.

14. INFORMATION ON CHANGES IN NATIONAL REGISTRY

The following changes to the national registry of XX have occurred in 2022. Note that the 2022 SIAR confirms that previous recommendations have been implemented and included in the annual report.

Reporting Item	Description
15/CMP.1 annex II.E paragraph 32.(a) Change of name or contact	A new registry administrators have been appointed since 20th October 2022: Ms. Zornitsa Nikolaeva Ruseva e-mail: z.ruseva@eea.government.bg Ms. Lyudmila Ventsislavova Veneva e-mail: l.veneva@eea.government.bg Tel.:+359 2 9406416 Executive Environment Agency Address: 136 Tzar Boris III Blvd., P.O. Box 251 1618 Sofia Bulgaria
15/CMP.1 annex II.E paragraph 32.(b) Change regarding cooperation arrangement	No changes.
15/CMP.1 annex II.E paragraph 32.(c) Change to database structure or the capacity of national registry	There has been 3 new EUCR releases (versions 13.6.1, 13.7.1 and 13.8.2) after version 13.5.2 (the production version at the time of the last Chapter 14 submission). No changes were applied to the database, whose model is provided in Annex A. No change was required to the application backup plan or to the disaster recovery plan. No change to the capacity of the national registry occurred during the reported period.
15/CMP.1 annex II.E paragraph 32.(d) Change regarding conformance to technical standards	The changes that have been introduced with versions 13.6.1, 13.7.1 and 13.8.2 compared with version 13.5.2 of the national registry are presented in Annex B. It is to be noted that 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 are carried out prior to the relevant major release of the version to Production (see Annex B). No other change in the registry's conformance to the technical standards occurred for the reported period.
15/CMP.1 annex II.E paragraph 32.(e) Change to discrepancies procedures	No change of discrepancies procedures occurred during the reported period.
15/CMP.1 annex II.E paragraph 32.(f) Change regarding security	No changes regarding security were introduced.
15/CMP.1 annex II.E paragraph 32.(g) Change to list of publicly available information	No change to the list of publicly available information occurred during the reported period.

Reporting Item	Description
15/CMP.1 annex II.E paragraph 32.(h) Change of Internet address	No change to the registry internet address during the reported period.
15/CMP.1 annex II.E paragraph 32.(i) Change regarding data integrity measures	No change of data integrity measures occurred during the reported period.
15/CMP.1 annex II.E paragraph 32.(j) Change regarding test results	No change during the reported period.

15. INFORMATION ON MINIMIZATION OF ADVERSE IMPACTS IN ACCORDANCE WITH ARTICLE 3, PARAGRAPH 14

According to the Article 3, paragraph 14 of the Kyoto Protocol, Annex I countries shall provide information on how is striving to implement commitments in such a way as to minimize potential adverse social, environmental and economic impacts on developing country Parties, particularly those identified in Article 4, paragraphs 8 and 9, of the Convention.
Impacts on third countries are mostly indirect and frequently cannot be directly attributed to a specific policy. Therefore we cannot consider that there is an adverse social, environmental and economic impact on developing countries due to our national climate change policy.
The application of the Joint Implementation mechanism in our country aims to renew the old tehnologies and improves energy efficiency, with no transboundary effects, as well as the implementation in Bulgaria of the European Union Emission Trading Scheme.
Nonetheless Bulgaria is of the view that taking the actions on mitigation, adaptation, development technology and transfer and capacity building in developing countries is very important for international climate change policy.
In this regard, in 2012 completed the project "Bulgarian contribution to the "short-term financing" 2011-2012: Sharing Bulgarian experience of monitoring, reporting and verification of greenhouse gas in the Republic of Macedonia for participation in the European Union Emission Trading Scheme of greenhouse gases". Through this project, Bulgaria has fulfilled its obligation, which made at the summit of the European Union in December 2009, to provide short-term financing of climate activities.
According to the Article 3, paragraph 14 of the Kyoto Protocol, Annex I countries shall provide information on how give priority, in implementing the commitments under Article 3, paragraph 14, to specific actions.
The majority of Bulgarian legislation measures in the climate change area, are connected mainly with transposing of the European legislation, as well as other activities on implementation of directives, connected with the politics on climate change.

The table below summarizes how the Party gives priority to selected actions, identified in paragraph 24 of the Annex to Decision 15/CMP.1.

Table 1 Selected actions, identified in Para 24 of the Annex to Decision 15/CMP.1.

Action	Implementation by the Party
The progressive reduction or phasing out of market imperfections, fiscal incentives, tax and duty exemptions and subsidies in all greenhouse-gas-emitting sectors, taking into account the need for energy price reforms to reflect market prices and externalities.	**Market imperfection** The Climate Change Mitigation Act and Clean Ambient Air Act and related secondary legislation, including a permit system for meeting minimum standards in accordance with EU regulation on Large Combustion Plants (LPS), participation in the EU ETS and technical inspection (e.g. for cars) etc; The Energy Act, in its part on combined heat and power generation introduces the requirements of the related EU directives and the use preferential feed-in tariffs and mandates the state regulations to the licensed activities in the power sector and purchase obligations for the Transmission and Distribution Companies to buy all electricity produced from high efficient cogeneration, and for district heating companies to buy all utilized waste thermal energy. The Energy from Renewable Sources Act introduces the requirements of the related EU directives and the use of instruments such as green certificates and preferential feed in tariffs, mandates the state regulations to the licensed activities in the power sector and purchase obligations for the Transmission and Distribution Companies to by all electricity produced from renewable sources. It regulates the acceptance and realization of national indicative targets for consumption of bio fuels and other renewable fuels in the transport sector as a part of the total consumption of transport fuels;

Action	Implementation by the Party
	The Energy Efficiency Act and related secondary legislation, including obligation to adopt municipal energy efficiency programs, requirements for energy efficiency labelling, the use of minimum standards resulting from the EU directive on energy efficient appliances, regulations for energy efficiency labelling of various types of products (appliances, cars), obligatory audits and amendments of the Energy Performance Standards for existing buildings; The Waste Management Act and the related secondary legislation including the obligation for collecting, management and usage (or combustion) of the omitted gases from the new waste deposits; **Fiscal policy** A number of stimulating measures for the subjects of taxation were introduced in the Act on amendment and supplement of the Corporate Income Tax Act and also in the Act on amendment and supplement of the Income Taxes on Natural Persons Act ; The on-going liberalization of energy market is in line with EU policies and directives; The main instrument addressing externalities is emission trading under the EU ETS.