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A compilation of questions to - and answers by – Bulgaria
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UNITED NATIONS FRAMEWORK CONVENTION ON CLIMATE CHANGE

[Question by](#) Brazil at Tuesday, 31 March 2015

[Category:](#) All emissions and removals related to its quantified economy-wide emission reduction target

[Type:](#) Before 31 of March

[Title:](#) Accounting of emissions trading

Section on Progress in achievement of QEWER targets and relevant information (page 324) reads “In 2011 Bulgaria's greenhouse gas emissions totaled 66 133.28 Gg CO₂ without reporting of sequestration from LULUCF sector. The emissions decreased by 45.8% compared with the base year and on 45.8% below the level of 122000 Gg CO₂ to which Bulgaria should limit its emissions during the Kyoto Protocol's first commitment period between 2008 and 2012.” It also reads “28 JI projects have been approved in Bulgaria and 21 of them have already achieved and verified emission reductions. The implementation of those projects leads to greenhouse gases emission reduction around 8 million tons carbon dioxide equivalent for the period 2008-2012.” Nevertheless, there is no information on sales of these verified units and how the double counting of emissions was avoided in the quantification of the GHG emissions in 2011 of 66.1 MtCO₂e. Please clarify.

[Answered by:](#) Bulgaria at Wednesday, 27 May 2015

Information on sales of the verified units:

The Ministry of Environment and Water of Bulgaria is responsible for the issuance and transfer of Emission Reduction Units (ERUs) generated by Joint implementation projects, implemented in Bulgaria, after the project proponent submits monitoring and verification reports prepared by an independent verifier.

The Letters of Approval of projects under the Joint Implementation Mechanism contains information on the exact quantity of ERUs to be transferred to the buyer of the ERUs, generated by a project. The Letters of Approval are available on the official website of the Ministry of Environment and Water of Bulgaria.

The Ministry of Environment and Water of Bulgaria is not responsible for the sale-trade of ERUs, generated by a project under the Joint Implementation mechanism. The sale-trade of ERUs is subject to an “Emission Reduction Purchase Agreement” which is a contract between the project executor/supplier and the buyer of the emission reductions generated by a certain Joint Implementation project.

Avoidance of double counting of emission reductions.

In the Bulgarian National Allocation Plan for allocation of allowances for greenhouse gas emission trading (2008 – 2012) is provided Reserve of allowances for avoiding double counting of greenhouse gas emission reductions for Joint Implementation (JI) projects that submitted Project Design Document (PDD) in Ministry of Environment and Water before 30 June 2008).

According to the “INSTRUCTION FOR APPROVAL OF PROJECTS GENERATING EMISSION REDUCTION UNITS UNDER TRACK I OF THE JOINT IMPLEMENTATION

MECHANISM” in order to obtain a Letter of Approval to a project leading to double counting of emission reductions, the project proponent shall submit calculations establishing the necessary annual emission quantities, which are due to be cancelled in the Bulgarian National registry in order to avoid a double counting effect as per Directive 2003/87/. Letters of Approval issued to projects with a double counting effect contains information for the quantity of allowances envisaged in the reserve for Joint Implementation projects in the National allocation plan for the period 2008 – 2012. A quantity of allowances equal to the transferred emission reductions generated by the JI projects was cancelled from the Bulgarian National Registry for Greenhouse Gas Emission Allowance Trading, therefore the double counting of emission reductions was avoided.

Question by China at Monday, 30 March 2015

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

Type: Before 31 of March

Title: mitigation potential

According to the TRR, Bulgaria will achieve a emission reduction of 44.5% and 51.1% in 2020 compared to the 1990 level in WM and WAM scenarios respectively. However, this is far beyond the target that EU committed as a whole, as well as what Bulgaria committed under the ETS and ESD. Has Bulgaria considered to enhance their emission reduction target regarding the high mitigation potential?

Answered by: Bulgaria at Wednesday, 27 May 2015

For the second commitment period under the Kyoto Protocol, the European Union, its Member States and Iceland have inscribed a joint emission reduction commitment of 80 (reducing average annual emissions by 20% compared to base year emission levels during the years 2013 – 2020) in an amended Annex B to the Kyoto Protocol based on the understanding that these commitments will be fulfilled jointly.

In addition to its 20% reduction commitment, the EU and its Members States stand by their conditional offer to move to a 30% reduction by 2020 compared to 1990, as part of a global and comprehensive agreement for the period beyond 2012 and provided that other developed countries commit themselves to comparable emission reductions and that more advanced developing countries contribute adequately according to their responsibilities and respective capabilities. This offer remains on the table.
