

Drafting legislation on Climate Change

ALBANIA

Laureta Dibra
Head of Policies and Strategies on Energy and Industry
Ministry of Infrastructure and Energy

The latest Progress Reports on Albania, until 2015 - pointed out that legislation in the climate area is at an early stage of preparation.

2014 -

- **developing and adopting a comprehensive climate policy and strategy in line with the expected EU 2030 policy framework on climate and energy.**

▪ 2013 -

- **Significant efforts are still required to enhance the country's monitoring, reporting and verification capacity.**

- Climate awareness at all levels remains low and cooperation between all relevant stakeholders requires further strengthening

Why a **LAW** on Climate Change?

- Accession of the UNFCCC on 3 Oct 1994 - entered into force for RoA on 1 January 1995
- Accession of the “Kyoto Protocol in 1 April 2005 - entered into force for RoA on 30 June 2005”
- A law aiming the implementation of the UNFCCC and Kyoto Protocol is missing
- RoA needs to transpose:
 - EU climate *Acquis*,
 - different national implementation acts required / recommended under UNFCCC, decisions of the COPs or Kyoto Protocol

EU climate related legislation to be aligned with



- REGULATION 525/2013 on a mechanism for monitoring and reporting greenhouse gas emissions and for reporting other information at national and Union level relevant to climate change and repealing Decision No 280/2004/EC
- At least **8 acts on Greenhouse Gas Monitoring and Reporting**
- At least **24 acts on EU Emissions Trading System**
- At least **1 act on Carbon Capture and Storage**
- At least 5-6 acts on **Transport/Fuels**
- At least 11 acts on **F-gases**
- At least 1 act on **Forests and Agriculture**



Need for a sound legal bases

- No specific legislation to serve as legal bases for the acts on climate change.
- Interinstitutional cooperation needs to be legally set up for the clear responsibilities for the implementation of the UNFCCC
- monitoring, reporting and verification capacity need to have a sound legal bases
- NDC needs to have a sound legal bases
- Climate awareness at all levels
- A comprehensive climate policy and strategy



This law transposes partially

- DIRECTIVE 2003/87/EC establishing a scheme for GHG emission allowance trading within the Community ...
 - From the Directive 2003/87/EC and its amendments only the requirements related to **monitoring and reporting** have been **transposed**. Emission trade can be arranged by specific legislation after RoA has become a MS.
 - Directive 2004/101/EC amending Directive 2003/87/EC in respect of the Kyoto Protocol's project mechanisms...
 - Directive 2008/101/EC amending Directive 2003/87/EC so as to include aviation activities in the scheme for GHG emission allowance trading within the Community...
 - Directive 2009/29/EC amending Directive 2003/87/EC so as to improve and extend the GHG emission allowance trading scheme of the Community...
 - REGULATION (EU) No 525/2013 on a mechanism for monitoring and reporting GHG emissions and for reporting other information at national and Union level relevant to climate change and repealing Decision No 280/2004/EC
- Creates the legal bases for:**
- numerous Decisions of the Council of Ministers and Ministerial Guidelines



Structure of the law

CHAPTER I - General Provisions: Purpose, Scope and Definitions

CHAPTER II - National climate change policy

- Objectives and principles
- National Climate Change Strategy Document and Plans
- Mainstreaming climate change to other sector strategies
- Nationally Determined Contribution (NDC)

CHAPTER III- Emissions from stationary, mobile sources, products and substances

Section 1: GHG emissions from stationary installations

- Monitoring, reporting and verification of GHG emissions from stationary sources
- Criteria for the inclusion of GHG emissions in the environmental permit
- Application for environmental permits involving GHG emissions
- Conditions in the environmental permit regarding the GHG emissions
- Changes relating to installations

Section 2: GHG emissions from mobile sources/GHG emissions from transport sector (passenger cars, ships, aircraft)

Section 3: GHG emissions from other sectors/Energy and construction sector



Structure of the law

Section 4: GHG emissions from the use of certain substances and products

- Emissions from fuels
- Ozone depleting substances (ODS)
- Fluorinated gases

Section 5: Removal of GHG emissions by sinks

- Land use, land-use change and forestry
- Carbon dioxide capture and geological storage

Section 6: Measurement, reporting and verification (MRV)

- Monitoring and reporting GHG emissions and other information relevant to climate change
- Reporting under the Convention

CHAPTER IV Competent authorities

- Institutional setup and inter-ministerial coordination
- International cooperation



Structure of the law

CHAPTER V - Capacity building, education, training, public awareness and participation

CHAPTER VI - Green investments and Financing

- Promoting environment/climate friendly investments
- Technology transfer/ low carbon-technology
- Private Sector initiative/involvement
- International and national funds on climate change

CHAPTER VII -Final provisions

- Information Management
- Compliance with this Law
- Reporting on implementation of section 1 and 2 of this Law

Annex I - Greenhouse gases

Annex II - Categories of activities and gases subject to GHGs inclusive env. Permit requirements/conditions

Annex III - List of aviation activities excluded from the obligations of under this Law

Annex IV - The non exhaustive list of issues to be covered in the LCDS

Annex V - The non exhaustive list of issues to be covered in the other sectorial strategies



GHGs under this law

CO₂ emissions from certain activities – included in the environmental permit

N₂O emissions from certain activities – included in the environmental permit

PFCs emissions from certain activities – included in the environmental permit

Methane (CH₄)

Sulphur Hexafluoride (SF₆)

Nitrogen trifluoride (NF₃) (**Doha**)

Hydrofluorocarbons (HFCs)



Purpose of the law

The purpose of this act is:

- to contribute to the mitigation of greenhouse gas emissions,
- to foster adaptation thereto the moderation of the adverse effects of climate change
- to contribute to global efforts to tackle climate change through the fulfilment of the obligations of the RoA under the United Nations Framework Convention on Climate Change
- to foster convergence with the climate change legislation of the European Union through the establishment of a comprehensive policy and institutional framework for national climate action.



Definitions and principles

Definitions

- UNFCCC
- Kyoto protocol
- EU directives
- Law on “Environmental Protection”, “Environmental permitting”

Principles

- Principle of common but differentiated responsibilities.
- Precautionary principle.
- Principle of efficiency.
- Principle of integration.
- Principle of sustainable development.
- Principle of international cooperation and funding.



NATIONAL CLIMATE CHANGE POLICY

Provisions on adoption and reporting on the implementation of:

- **National Strategy on Climate Change**
- **Nationally Mitigation Plan**
- **National Adaptation Plan (NAP)**
- **Nationally Determined Contribution (NDC)**
- **Mainstreaming climate change to other sector strategies.**

Obligation to:

- mainstream climate change mitigation and adaptation into their legislation, strategies, plans, programs and projects.
- cooperate for the implementation of legislation, strategies, plans, programs and projects to address climate change in the context of sustainable development.
- cooperate for the monitoring and reporting of the implementation of the strategies, plans, programs and projects that address climate change and other related issues.



ETS/Env. Permit inclusive of GHG emissions

Apply for a greenhouse gas emissions permit: as integral part of environmental permit

Industries involved: certain combustion plants, oil refining, metallurgical plants, cement factories, glass, ceramics, insulation materials, pulp and paper, chemicals, CCS.

Information related to GHG emissions to be included in an application for environmental permit

- the raw and auxiliary materials, the use of which is likely to lead to emissions CO₂, N₂O, PFCs;
- the sources of emissions of gases from certain installations; and
- the **measures planned to monitor and report emissions** as well as to **verify emission reports** in accordance with the relevant regulation



ETS/Env. Permit inclusive of GHG emissions

Requirements/conditions in the environmental permit regarding GHG emissions

- Operators listed in the annex of the law cannot carry on with their activities unless being issued conditions/requirements for GHG emissions
- an installation carrying out any of the activities listed in Annex II **has the obligation to monitor the emissions** from that installation during each calendar year, and **submit the report to the NEA**
- NEA accepts the GHG emission monitoring report, only if the **report is verified by an accredited verifier.**
-

Conditions for the granting environmental permit inclusive of the GHG emissions:

- **Operator is capable of** monitoring and reporting emissions, as per the requirements of the regulations

Verification and accreditation

CoM, upon proposal of the minister, shall approve the regulation for the verification of emission reports and the accreditation of verifiers.



CO₂ emissions from International aviation/ international shipping

Each aircraft operator with a valid operating license granted by the ministry in charge of transport for the flights,

- which depart from, or
- arrive in an aerodrome situated in the territory of the RoA,
- shall submit to NEA a monitoring plan for the CO₂ emissions
- setting out measures to monitor and report
- emissions and tonne-kilometre data.

Measures to control and/or reduce CO₂ emissions from international shipping include those for:

- Monitoring, Reporting and Verification of CO₂ emissions and of other relevant information from ships
- Ship Operational Energy Efficiency
- Ship Energy Efficiency Management Plan
- Ship Fuel Management Plan



CO₂ emissions from road transport activities

Decisions of CoM on the:

- monitoring and reporting of data on the registration of new passenger cars, relevant for the estimate of reduction of CO₂ emissions from light-duty vehicles
- monitoring and reporting of CO₂ emissions from new passenger cars, and new light commercial vehicles
- on carbon dioxide performance of new passenger cars and light commercial vehicles and the availability of consumer information on fuel economy and CO₂ emissions in respect of the marketing of new passenger cars;



GHG emissions from other sectors and products

■ GHG emissions from other sectors: Energy & Construction

- Energy Efficiency Law,
- Renewable Energy Source Law,
- Energy performance in buildings and other specific legislation

■ GHG emissions from the use of certain products:

➤ Emissions from fuels

- Suppliers of liquid fuels included biocarburants are responsible for monitoring and reporting life cycle greenhouse gas emissions per unit of energy.
- The report is subject of verification before submitting to NEA.

➤ ODS

- Rules on production, import, export, placing on the market and use of ozone depleting substances as well as for import, export, placing on the market and use of products and equipment containing such substances

➤ F-gases

- The Council of Ministers, upon the proposal of the Minister, shall approve the decision to reduce and stabilize the emissions of fluorinated greenhouse gases;



Removal of GHG emissions by sinks

■ Forest and agriculture (Land use, land-use change and forestry)

- The LGUs shall inform annually the MoE about deforestation and forest degradation.
- MoE shall keep record of areas subject to deforestation and forest degradation due to agricultural expansion, conversion to pasture, infrastructure development, destructive logging and fires.
- DCM on the accounting rules for afforestation, reforestation, deforestation and forest management, as well as for the activities of grazing land management and cropland management.

Carbon dioxide capture and geological storage

- reduce such emissions by capturing and storing carbon dioxide in geological formations underground which fulfill the criteria
- DCM on the geological storage of carbon dioxide.



Measurement, reporting and verification (MRV)

- domestic measurement or estimation,
- reporting at both national and international level and
- verification at both national QA/QC and international oversight of emissions/removals or other performance metrics set in:
 - data contained in the National Inventory,
 - National Communication, the Biannual Update Reports, the NDC Report and the National Inventory Report,
 - greenhouse gas emissions reports of installations subject to a greenhouse gas emission permit,
 - analyses of the effects of the National Strategy and other national policies and measures to tackle climate change,
 - projections of anthropogenic emissions of greenhouse gases and their removal by sinks,
 - Investment and financial support for climate change
- MRV for:
 - emissions,
 - action, and
 - support.
- A bottom up system
- DCM on Monitoring and reporting GHG emissions and other information relevant to climate change at the national level: specific responsibilities in the MRV system of the line ministries.
- Reporting under the Convention:
 - National Communications (NC) and Biennial Update Reports (BURs)
 - NDC implementation report



Competent authorities

The **Ministry is the focal point to the Convention** and the institution responsible for the overall coordination and management of the MRV system, including the process of and the preparation of National Communications and BURs.

NEA is the National Competent Authority for all the activities related to the establishment and maintenance of the **GHG National Inventory System**, as part of the Environmental Information System.

All the **line Ministries** whose competences fall in areas of state responsibility that impact or are impacted by the climate changes, have the obligation to collect and keep their activity data, specific/thematic aggregated indicators and climate related information, as appropriate, and to prepare and share with the Ministry their written contribution, pursuant to the requirements of the regulation and procedure referred in this law. They cooperate effectively till the finalization and approval of all documents.

INSTAT has the obligation to make available to the ministry all socio-economic, population and other related data.

All the **public and private institutions**, whose activities fall in the areas of state responsibility referred in paragraph 2 shall collect, organize and keep their own climate related data together with the relevant reports, as appropriate and share them with the relevant line ministry.

Other line ministries and public and private institutions, not engaged with the areas of state responsibility shall contribute, as appropriate, upon request of the Ministry.

IGWE/IGJEUM and other public or private research institutes and academia that carry out climate related measurements, research or studies, share their data with the ministry/NEA.

LGUs shall collect, organize and keep their own climate related data together with reports on the measures taken or planned to be taken for mitigation and adaptation to climate change, as appropriate, and share them with the ministry and the relevant line ministry.



The areas of state responsibility

- energy industries,
- manufacturing industries,
- construction,
- mining and geology,
- forests, agriculture and husbandry,
- water management,
- waste management,
- health,
- transport,
- infrastructure (including road and railroad infrastructure, ports, airports, pipelines, dikes, water and sewerage),
- urban planning, land management, tourism, education, natural emergencies and disasters.



DCM on monitoring and reporting...

- National procedures for
 - collecting, processing, reporting and archiving
 - required data and information
 - that are operational in a sustainable manner and on a continuous basis.
- Such document may elaborate in more details the duties and responsibilities of the line ministries.



I - SCOPE OF THE DCM

To establish a mechanism for monitoring and reporting on GHGs and other climate change information at the national level (Non Annex I) to the Convention.

To establish the

- National Inventory System for GHGs: “National Inventory System” means a system of institutional, legal and procedural arrangements established within the RoA for estimating anthropogenic emissions by sources and removals by sinks of greenhouse gases listed in Annex I, and for reporting and archiving inventory information

- National System for projections for GHGs: ‘System for policies and measures and projections’ means system of institutional, legal and procedural arrangements established for reporting policies and measures and projections of anthropogenic emissions by sources and removals by sinks of greenhouse gases listed in annex I of the Law



I - SCOPE OF THE DCM

The DCM applies to:

1. reporting on the LCDs and updates at the national level
2. reporting on the achievement of the INDC goal
3. emissions of greenhouse gases listed in Annex I of the Law from sectors and sources and the removals by sinks covered by the national greenhouse gas inventory and emitted within the territory of the RoA;
4. projections of anthropogenic emissions by sources and removals by sinks of greenhouse gases listed in annex I of the Law, and the Country policies and measures relating thereto;
5. Aggregate financial and technological support from State budget and developed countries in accordance with requirements under the Convention;
6. Actions to adapt to climate change



STRUCTURE OF THE DCM

<i>CHAPTER I - GENERAL PROVISIONS</i>	Purpose, Scope, Definitions
<i>CHAPTER II - The GHG inventory</i>	Preparing the GHGs inventory / Inventory activities, GHGs data, reviewing GHGs inventory
<i>CHAPTER III – Policies, measures, and projections of anthropogenic GHGs emissions by sources and removals by sinks</i>	Reporting on policies and measures, calculating projections
<i>CHAPTER IV – Other information relevant to CC</i>	National adaptation actions, Financial and technology support provided for CC
<i>CHAPTER V - National Communications (NC) and Biennial Update Reports (BURs)</i>	National Communications (NC) and Biennial Update Reports (BURs)
<i>CHAPTER VI – Institutional set up, duties and responsibilities</i>	Role of MoE, NEA, AKBN, Line Ministries, other relevant institutions
<i>CHAPTER VII – Transitional and Final provisions</i>	Repealing, entry into force
<i>ANNEX 1</i>	Main activity data and sources for the national GHGs emission inventory
<i>ANNEX II</i>	List of annual indicators
<i>ANNEX III</i>	The non exhaustive list of issues to be covered in the NC - Referred in section 11, paragraph 3
<i>ANNEX IV</i>	The non exhaustive list of issues to be covered in the BURs - Referred in in section 11, paragraph 4
<i>ANNEX V</i>	Greenhouse gas source and sink categories



II - The GHGs inventory system

- Mandatory reporting for Non Annex I countries Parties of the Climate Convention (UNFCCC) – **National Communication**

- Gases:** CO₂, CH₄, N₂O, SF₆, NF₃, HFCs, PFCs

- Sectors:** Energy, Industrial Processes, Agriculture, Land Use, Land-Use Change and Forestry (LULUCF), Waste, Solvent and Other Product Use

- Inventory activities:**

1. Collecting activity data
2. Selecting the assessment methods, emission factors and uncertainty, etc.
3. Estimating anthropogenic GHG emissions by sources and removals by sinks
4. Implementing uncertainty assessment and quality assurance/quality control (QA/QC) activities
5. Provide for a basic review of the inventory
6. Carrying out procedures for the verification of the inventory data at the national level, by accredited entities or qualified expert identified by the Ministry....



II - The GHGs inventory system

DATA	To / From	LEGAL REF.
Anthropogenic emissions of GHGs from operators ex Annex II	NEA	Law CC
CO2 emissions from aviation activity with a valid operating license	ANTA/MoT	Law CC
CO2 emissions and other relevant information from international shipping activities	MoT	Law CC
CO2 emissions from road transport activities	MoT	Law CC
Information on national fuel quality, including biofuels	MoT	Law CC
Measures to protect ozone layer from thinning including phasing out of ozone depleting substances	MoEN, MoE	Law CC
Data collected through the reporting systems on fluorinated gases in the various sectors	MoEN, MoE	Decision Nr. 865, dated 10.12.2014
Information from the cadaster of forestry, about the use of fertilizers and areas subject to fires	MoA, LSGUs	Law CC
Information about LULUCF actions , reflecting all emissions and removals resulting from the activities on the national territory	MoE, MoA	Law CC
Data on energy efficiency	MoEN/AKBN	Law on energy efficiency Art. 13



III- THE NATIONAL PROJECTION SYSTEM

Sectors: Energy, Industrial Processes, Agriculture, Land Use, Land-Use Change and Forestry (LULUCF), Waste, Solvent and Other Product Use

Information:

1. Information on updates of low-carbon development strategies, mitigation and adaptation measures adopted, referred to in Article 30 of the Law
2. Information on policies, measures and projections of anthropogenic GHGs emissions by sources and removals by sinks, including their objectives, with the purpose of evaluating policy and making projections of anthropogenic greenhouse gas emissions by sources and removals by sinks
3. The National projection System shall include detailed information on emission figures and procedural arrangements, for the evaluation of the policies and for making projections of anthropogenic GHGs



III - THE NATIONAL PROJECTION SYSTEMS

Calculation on Projections:

1. Every two years starting from XX NEA shall calculate the projections of anthropogenic greenhouse gas emissions by sources and removals by sinks, organized by gas or group of gases (HFCs and PFCs) listed in Annex I of the Law and by sector.
2. Those projections shall include quantitative estimates for a sequence of four future years ending with 0 or 5 immediately following the reporting year. National projections shall take into consideration any policies and measures relevant for the reduction of GHGs and shall include:
 - projections without measures where available
 - projections with measures,
 - projections with additional measures'
 - total greenhouse gas projections and estimates for the projected greenhouse gas emissions for the emission sources covered by the Law;
 - the impact of policies and measures identified. Where such policies and measures are not included, this shall be clearly stated and explained;
 - results of the sensitivity analysis performed for the projections;
 - all relevant references to the assessment and the technical reports that underpin the projections



IV - OTHER RELEVANT INFO

National Adaptation actions: Ministry shall collect and made available to the stakeholders and public information on the existing national adaptation planning and strategies, outlining their implemented or planned actions to facilitate adaptation to climate change.

Information shall include the main objectives and the climate change impact category addressed, such as flooding, sea level raise, extreme temperatures, draughts, and other extreme weather events

Financial and technology support provided for climate change: NEA shall shall collect and keep record of the financial and technological support provided (See Chapter V of the Law) identifying/distinguishing among actions to support mitigation, adaptation, capacity-building and technology transfer and, if possible, including information as to whether financial resources are new and /or additional



VI - Institutional set-up - MoE

GHG inventory:

- Endorse and adopt technical guidelines and by-laws
- Selection and adoption of appropriate emission factors and estimating methodologies supported by NEA and/or experts, scientific institutions;
- Supervise and ensure the correct functioning of the data and information flow from line ministries and other bodies to NEA
- Endorse the inventory
- Endorse the report on the results on assessment performed about the consistency of data, prepared by NEA
- Communicate to the Secretariat of the Framework Convention on Climate Change and the Kyoto Protocol

Coordination and management of the System

- Preparation of NCs and BURs
- Plan and conduct all coordination and consultation activities
- Oversee the implementation by NEA of a quality assurance/quality control plan for the entire spectrum of the reports
- Based on the information provided by the line ministries the Ministry shall prepare the National Report on the LCDS and deliver it to the CoM for approval before 9 January 20xx or in accordance with any timetable defined by the UNFCCC secretariat [....]



VI - Institutional set-up - NEA

NEA is identified as National Competent authority

GHG inventory:

- Carry out a key source category analysis
- Prepare an annual QA/QC plan
- Develop appropriate emission factors and estimating methodologies
- Co-ordinate participation in reviews, and publish and archive inventory results
- Provide, upon request, to the Ministry the information about data archived in the system and any other information related to the functioning of the system
- NEA will be also responsible for collecting and processing the data related to anthropogenic emissions of greenhouse gases, from: the industrial processes (Annex 2 Law CC), waste and, LULUCF sectors
- Collect data, Check compliance and calculate the totals of emissions from all the sectors
- Performs an assessment on the consistency of the data used to estimate emissions with NEC, FGHs, Energy Statistics AND report to MoE (with AKBN)
- Provide a quantitative estimate of the uncertainty for each source category reported and for the inventory in total (with AKBN)

Projections:

- Elaborate projections

Reporting to MoE:

- Inventory of the activities for the years X-2 starting from the date of entry into force of this decision...
- By the 30 of October each year the inventory of the last two reference year..
- By the 30 November each year is reporting to the Ministry the projections for the year....and for the following year.....



VI - Institutional set-up – Line Ministries

- **Collect, keep and process their activity data**, specific/thematic aggregated indicators and climate related information
- **Support NEA** in the process of implementation of the Data QA/QC plan
- **Prepare and share** with the NEA and the MoE information their LCDS, mitigation and adaptation measures
- Provide to the NEA with the category and sub-categories data and information relevant to climate change upon request and / or in accordance with the timeline defined in the Law and in this decision and the necessary support for the interpretation of data and information provided
- By 31 of March.....and each year, for the purpose of preparing the GHGs inventory system provide the NEA with the data according to the specific sector of competences, for the years X-2
- Provide NEA and the Ministry information on updates of their LCDSs, mitigation and adaptation measures adopted



VI - Institutional Set up – Other Institutions

INSTAT :

- Provide NEA, AKBN and the Ministry all socio-economic, population and other related data
- If needed contribute to the development of technical guidelines related to the functioning of the system and provide professional support to the NEA and the Ministry in the establishment, maintenance and review of the National Inventory and projection system

IGWE/IGJEUM and other public research institutes and academia that carry out climate related measurements, research or studies:

- share their data with the ministry/NEA and
- upon request of the Ministry, contribute to the development of technical guidelines related to the functioning of the system and provide professional support to the NEA and the Ministry in the establishment, maintenance and review of the National Inventory and projection system.



TIME - SCHEDULE

Task DCM	Data flow From To	Proposed timing DCM	REF. R. 525/2013
Art. 5.1 – GHGs Inventory data to be provided month for the years X-2, starting from	Line Ministries to NEA	By 31 March each year From: entry into force of the DCM	Art. 7 - By 15 January each year (year X)
Art. 6.1 – Review of the GHGs inventory	--	Annual / Biannual	Annual
Art. 7.2 – Policy and measures data to be provided	Line Ministries to MoE / NEA	By ...March 20.....and every two years data for the years X-2 From: entry into force of the DCM	Art. 13 - By 15 March 2015, and every two years thereafter (MS to Commission)
Art. 8.1 - calculate the projections of anthropogenic greenhouse gas emissions	NEA to MoE	Every two years starting from the adoption of this decision (<u>OR</u> as defined in transitional and final provisions, to postpone its entry into force)	Art. 14 - By 15 March 2015, and every two years thereafter
Art. 9.1 - Data on National Adaptation actions	Line Ministries to MoE / NEA	Every four years starting from the adoption of this decision (<u>OR</u> as defined in transitional provisions)	Art. 15 - By 15 March 2015, and every four years thereafter, aligned with the timings for reporting to the UNFCCC,
Art. 10.1 - Financial and technology support provided	NEA compile	--	Art. 16 – Annual reporting by 30 September



TIME - SCHEDULE

Task DCM	Reporting From To	Proposed timing DCM
Art. 12 - National Report on the LCDS	MoE to CoM	Before 9 January 20xx or in accordance with any timetable defined by the UNFCCC secretariat
Art. 13 - The inventory of the last two reference year	NEA to MoE	By the 30 of October each year the inventory of the last two reference year
Art. 13 - the projections for the year....and for the following year		By the 30 November each year
.....



THANK YOU VERY MUCH FOR YOUR KIND ATTENTION!

