

<PMR Project Implementation Status Report (ISR)

The PMR Project Implementation Status Report should be prepared by the Implementing Country or Technical Partner, with the support of the Delivery Partner and/or the PMR Secretariat. For any questions related to the preparation of the PMR Project Implementation Status Report, please contact the PMR Secretariat at: pmrsecretariat@worldbank.org.

1. SUMMARY INFORMATION

Implementing Country/Technical Partner:	Republic of Turkey
Reporting Period:	From 12/17/2013 to 05/25/2015
Report Date:	<i>Date of submission of the report the PMR Secretariat.</i> 05/13/2015
Implementing Agency:	Ministry of Environment and Urbanization General Directorate of Environmental Management
Contact Person:	<ul style="list-style-type: none"> • Expert- Tuba Seyyah (tuba.seyyah@csb.gov.tr) • Expert- Yakup Ayan (yakup.ayan@csb.gov.tr) • PMR Technical Coordinator- Zeren Erik Yaşar (zeren.erikyasar@csb.gov.tr) • PMR Project Assistant- Sertaç Berber (sertac.berber@csb.gov.tr)
Grant Executed By:	Recipient (Ministry of Environment and Urbanization – General Directorate of Environmental Management)
Grant Effectiveness and Closing Dates:	12/17/2013 – 06/30/2017
Grant Amount (USD):	USD 3,000,000

2. OVERVIEW

After the adoption of Turkey's MRP in May 2013, and signature of the PMR Grant Agreement in December 2013, the PMR Turkey Project successfully transitioned from the "Preparation Phase" to the "Implementation Phase". A project team (i.e. Project Implementation Unit or PIU) consisting of a Project Coordinator, a Project Assistant, a Financial Expert and a Procurement Expert hosted by the Ministry of Environment and Urbanization (MoEU) was established in April 2014. The Project Launch Event was carried out in October 2014 in Istanbul with the participation of about 100 attendees from industries, consultancies, universities and ministries. It was a remarkable event for the MoEU to inform stakeholders about our project's goals and activities, and ask for their collaboration throughout and beyond the PMR process.

The PMR activities were defined as having two main objectives, which are 1) Piloting of the MRV system in the electricity sector, and 2) Submission of a Carbon Markets Policy Options Document to the Coordination Board on Climate Change – as further described and updated below.

Project Development Objective Indicator 1- Piloting of the MRV system in the electricity sector

The indicator measures whether Turkey's greenhouse gas monitoring, reporting and verification (MRV) system is piloted among installations within the electricity sector by the end of 2015.

This indicator is on track with the expectation to complete the pilot activities by the end of December 2015.

In May 2014, Turkey issued a Bylaw on the Monitoring, Reporting and Verification of GHG Emissions mandating for the establishment of a nation-wide installation-level MRV system. Installations¹ falling under this “MRV Regulation” had to submit GHG emissions Monitoring Plans to the MoEU by September 2014, monitor their GHG emissions throughout 2015, and finally submit their verified emissions report to the MoEU by April 2016.

The purpose of this first set of activities under the PMR project (i.e. the MRV pilots) is to provide a trial-run of the full monitoring, reporting, and verification cycle, in order to facilitate learning by all stakeholders involved and accompany the launch of the mandatory government program on MRV. Although it was planned to only cover installations in the electricity sectors, it was decided to cover also the cement and refinery sectors in the piloting activities. In the electricity sector, 18 electricity installations – including 10 state-owned generators and 8 private – mostly composed of coal-fired power plants have engaged in the MRV pilots. In addition, 1 installation in refinery and 5 in the cement sector have also been piloted.

Under each of these 3 sectors, piloting activities mainly consist of supporting; i) the preparation and assessment of monitoring plans (MPs) and Emissions Reports (ERs) engaging both the piloted entities and the MoEU; and ii) the verification of the emission reports also in interaction with local verifications businesses and agencies. This road testing is also intended to generate lessons learnt to be shared beyond those parties directly involved in the pilots.

As of May 2015, activities related to the preparation of the MPs and ERs have started for the three piloted sectors the MoEU, after completing the contracting of consultants supporting these activities. The procurement process related to the verification activities are at the contracting phase, and it is expected that activities will start in June 2015 for the refinery and cement sectors, and in July for the electricity sector.

It is also important to note that the PMR project also included intensive stakeholder engagement and capacity building activities prior to the commencement of the MRV pilots. The project team, including

¹ Same as the EU ETS.

MoEU staff, indeed had a number of meetings with the representatives from all 3 piloted sectors in the run up to the start of the piloting projects.

Further, an intensive training for sector representatives and to MoEU staff within the framework of the “PMR Preparation Grant”. The goal of the training was to start building capacity with some sector representatives who could then support their own colleagues in developing their MPs. This training proved to be very helpful in establishing a common understanding and language between the industry and the MoEU well-ahead of the September 2014 submission deadline for MPs. Participants also reported that the training helped them assist their team members on how to prepare the MPs.

Project Development Objective Indicator 2- Submission of a Carbon Markets Policy Options Document to the Coordination Board on Climate Change (CBCC)

The indicator measures whether a policy options document on carbon market policy instruments is submitted to the CBCC for its consideration by March 2017.

The activities related to this component are expected to start in early Autumn 2015. The Project Implementation Unit (PIU) is currently finalizing the preparation of ToRs for hiring consulting firms and experts to support the MoE with these activities.

Turkey is at a “pre-decision” phase when it comes to policy choices on the possible use of market-based mechanisms. Therefore, the purpose of this second component of the PMR project aims to inform decision making on the use of market based instruments through a series of analytical studies looking at policy options and making recommendations for the consideration of policy makers. The study will be complemented by a series of consultation and training workshops for relevant stakeholders (e.g., government, private sector) as well as other public awareness activities.

The PMR project consists of developing three main studies on i) consideration of ETS for the MRV sectors with a detailed analysis into piloting ETS within the electricity sector; (ii) recommendations for selection of MBIs and modeling for sectors covered and uncovered by the MRV regulation; (iii) GHG Market Modeling Outcomes for selected sectors covered and uncovered by the MRV regulation. In addition, a synthesis report “Market-Based Instruments – Policy Options” of the above studies will be prepared for consideration by policy makers, and be submitted Coordination Board on Climate Change (CBCC).

As most activities related to MRV piloting are now on track, the PIU has started working on these detailed analytical studies on carbon pricing mechanisms. As of May 2015:

- Study on consideration of ETS for the MRV sectors with a detailed analysis into piloting ETS within the electricity sector: we are finalizing the preparation of the ToR to hire consultants to support the MoEU with this activity. . It is planned to issue the call for Expression of Interest (EoI) in May.
- Study on recommendations for selection of MBIs and modeling for sectors covered and

uncovered by the MRV regulation: To prepare the ToR for this activity, we have decided to carry out a series of consultations with other Ministries and stakeholders in various sectors until mid-June 2015.

- GHG Market Modeling Outcomes for selected sectors covered and uncovered by the MRV regulation: we intend to issue the related ToR over the course of 2015, depending on the outcomes of the preparation of Turkey's GHG Emissions Projections which also includes the development of a macro-economic model and testing of certain policy scenarios.
- The synthesis report "Market-Based Instruments – Policy Options" will be presented to the CBCC by March 2017, after appropriate consultations with stakeholders.

It is important to highlight that in order to refine the scope of these activities and develop appropriate TORs, the PIU has been performing in-depth in-house research and consultations with relevant stakeholders such as colleagues within the MoEU, other governmental agencies (e.g. Ministry of Energy), local and international experts including the private sector – with the support of the World Bank as appropriate. In particular, the project has already benefited from the engagement of the CBCC and its Working Group on Emission Reductions (WGER). For example, on April 29th 2015, we held a meeting together with the WGER where the team provided an update on the PMR project to representatives of the MoEU, as well as important industry representatives. More importantly, feedback was collected on the upcoming analytical studies, and the recommendations and concerns received will be considered going forward, in particular for the preparation of the related ToRs and in future meetings with stakeholders.

3. IMPLEMENTATION REPORT BY COMPONENT

Differences between the Objectives/Activities in the Market Readiness Proposal and the Grant Agreement

Are there any important and material differences between the objectives/activities proposed in the Market Readiness Proposal and endorsed by the Partnership Assembly of the PMR and those agreed to in the Grant Agreement with the Delivery Partner and described in the Project's Results Framework?	No
N/A	

Implementation Progress by Component

A. Component 1: Piloting MRV procedures and practices in the electricity, cement and refinery sectors, seeking broader engagement with other relevant stakeholders (e.g. accreditation bodies, verifiers etc.). This component specifically targets the preparation of Monitoring Plans, Emissions Reports, and Verification Reports in the three piloted sectors in order to identify data discrepancies and other readiness issues in the whole MRV cycle.

Status:	<p>On-going</p> <p><i>Preparation of monitoring plans (MPs) and emission reports (ERs)</i></p> <ul style="list-style-type: none"> - Cement Sector: the consultancy contract for the MRV pilot in the cement sector was signed on 29 September 2014 with the JV consisting of LifEnergy (Turkey) and FutureCamp (Germany). The JV shortly started the assignment quickly after; The MPs and the ERs of the 5 installations were completed and submitted to MoEU at the end of 2014. - Refinery Sector: because the consortium which was ranked first at the end of the selection was not able to incorporate the JV as a legal entity in Turkey, it was decided not to conclude the tender with this consortium. The second ranked JV, Carbon Limits (Norway) and GAIA Carbon Finance (Turkey), was therefore awarded the contract on 27/02/2015 after establishing a legal entity. The JV has recently submitted the MPs to the MoEU, and is now finalizing the ERs which should be submitted on the 1st week of June. - Electricity Sector: The first ranked consultants decided not to incorporate their JV and to drop out of the tender process. The second ranked JV's technical and financial proposals were assessed as not meeting the requirement of the RFP. After considering the other proposals received, the Evaluation Committee decided to reward the contract to the third ranked JV composed of INERCO (Spain) and IO Environmental Solutions R&D Co. (Turkey). Since the signing of the contract on 04/02/2015, the JV quickly has completed the site visits to the 18 plants and has almost completed their MPs. Data collection for the preparation of the ERs is also on-going. <p><i>Verification of the three MRV pilots</i></p> <ul style="list-style-type: none"> - Verification of the prepared ERs is expected to start in June for the refinery and cement sectors, and in July for electricity. TUV Rheinland (Germany) was selected for both assignments. For the cement and refinery sectors, we are about to finalize the contracting phase. For the electricity sector, we are currently signing the Contract Negotiations MoU and expect to sign the contract in May 2015.
---------	--

Comments:	<ul style="list-style-type: none"> - As explained above, procurement issues arose from the obligation in the Turkish law to establish a JV in the form of a legal entity (i.e. incorporated JV). This requirement proved to be time- consuming for the selected firms and resulted in lengthening the contracting process. Learning from these issues, the MoEU now strongly refers to this requirement in the calls for EoIs and RFPs, and applicants are also notified of this requirement during the contract negotiation process and provided with the appropriate guidance.
<p>B. Component 2: Conducting analytical studies to inform decision making on the use of market based instrument(s) (MBI), including inter alia, (i) study on consideration of ETS for the MRV sectors with a detailed analysis into piloting ETS within the electricity sector; ii) recommendations for selection of MBIs and modeling for sectors covered and uncovered by the MRV regulation; (iii) GHG Market Modeling Outcomes for selected sectors covered and uncovered by the MRV regulation. In addition, a synthesis report “Market-Based Instruments – Policy Options” of the above studies will be prepared for consideration by policy makers, and be submitted Coordination Board on Climate Change (CBCC).</p>	
Status:	<p>Under preparation</p> <ul style="list-style-type: none"> - The Project Team is currently preparing ToRs for the studies (i), (ii) and (iii). To this end, the team is carrying out conference calls and meetings with local and international experts. The team aims to advertise the ToRs of Tasks (i) and (iii) in June –August 2015. - Stocktaking analysis of MBIs and non-MBIs: We have started to identify the MBIs and non-MBIs which have been enforced in Turkey by different ministries and have impact on GHG emissions directly or indirectly. As mentioned above, we will hold several meetings with the relevant public authorities and sector associations to complete the list of instruments Turkey has been utilizing. This will help us not only steer our activities to create an additional value, but also, to show that Turkey has (indirectly or directly) robust experience in formulizing and implementing those instruments.
Comments:	<ul style="list-style-type: none"> - The preparation of the activities under this component has required substantial support from and engagement with other Ministries and key sector representatives – and thus time and efforts. We are accelerating the consultation meetings with those key stakeholders to collect their feedback and assess the capacity needs on both MBIs and non-MBIs.
<p>C. Component 3: Carrying out stakeholder training, consultation engagement and public awareness activities, including: (i) conferences and workshops to support the activities under Parts 1 and 2; (ii) consultation meetings with stakeholders; and (iii) public awareness activities (media, high level public/private meetings, etc.).</p>	

Status:	<p>On-going</p> <ul style="list-style-type: none"> - The kick-off meeting of the PMR Project jointly took place with a workshop for stakeholders on 24th October 2014 in İstanbul with the participation of about 100 representatives from the public and private sectors. The meeting reached its objective in terms of conveying the objectives of the PMR project and collecting first feedback from various stakeholders on its activities. - In addition to the meetings taking place regularly between the Ministry and key stakeholders, we intend to organize a number of seminars and conferences in 2015, bringing together both international and national stakeholders. The definition of the agenda and timing is on-going. We expect to receive support from the World Bank, PMR Secretariat, and other PMR Participants to identify the relevant experts and their areas of expertise. - Hiring a Communication Expert: The ToR is finalized and the assignment is planned to start in 2016 after Component 2 has delivered its outcomes.
Comments:	<ul style="list-style-type: none"> - None
<p>D. Component 4: Establishment of the Project Implementation Unit (PIU) to coordinate and support to the implementation of PMR project's activities.</p>	
Status:	<p>Completed</p> <ul style="list-style-type: none"> - The initial PMR Project Coordinator decided to leave her assignment in November 2014 due to personal reasons. A new Project Technical Coordinator was assigned in March 2015 after wide advertisement of the vacant position (e.g. MoEU website, UNDB online, Hurriyet Insan Kaynakları newspaper) and selection by the Evaluation Committee. - The initial Procurement Expert decided to leave his assignment at the end of 2014 also due to personal reasons. The Ministry selected and assigned a new Procurement Expert in March 2015.
Comments:	<ul style="list-style-type: none"> - None

4. PROGRESS, CHALLENGES, AND LESSONS LEARNED

Important policy or regulatory developments related to the Grant's objectives and activities:

Developments:

Turkey has been preparing its National Communication and Biannual Report, under which GHG emission projections and reductions scenarios have also been studied with a hybrid model (TIMES MACRO). The first interim results will be finalized soon, and are expected to guide the development of the national INDCs and supporting domestic climate policies. While efforts will mainly concentrate on identifying the overall national climate strategy, the PMR project is of strategic importance to inform decision-makers on the practicalities of the design and implementation of carbon pricing instruments and to assist the help various stakeholders build capacity on such policies. The MRV pilots, for example, have been a major support to the industries falling under the MRV regulation, and have helped easing their dialogue with the MoEU. These activities have also been a learning and capacity building exercise for the MoEU. The GHG emissions data collected will also support Turkey to identify emissions reduction policies and strategies.

As a result of the enforcement of the MRV Regulation in 2015, around 600 installations have submitted their monitoring plans to the MoEU. The table below provides an overview of the installation categories and the corresponding volume of reported emissions.

Installation Category	Threshold for Installation Categories	No. of Installation submitted Monitoring Reports	Total Volume of Reported Emissions (million tCO _{2eq})
A	≤ 50k tCO _{2eq}	325	≈ 6
B	50k – 500k tCO _{2eq}	155	≈ 24
C	≥ 500k tCO _{2eq}	100	≈ 230

The MoEU is expecting reports from about 2000 installations in total. Although, these account for about 30% of the total number of installations, they nevertheless represent almost half of the national emissions.

Challenges:

National climate policies are decisions which are made at the political level. While managing the PMR project in a way that it delivers the expected outcomes, it has been challenging to address the concerns and needs of the various stakeholders involved— on both the government and private sector side. Our main approach to this issue has been to ensure that the PMR project is used to support decision making and not to make decisions. This stance has helped us significantly.

Preparing and advertising ToRs in line with the PMR project timeline has proved to be a challenge due to the INDC preparation process and upcoming COP in Paris which may induce certain changes in the current national outlook. Therefore, in our ToRs, we will make sure to include that certain elements might be subject to revisions in light of new developments in the near future.

Lessons learned: Not yet

Important changes in the technical design or approach related to the Grant's activities:

Developments:

As per the activities listed in the MRP, it was originally planned to study the milestones and design elements of ETS in the electricity sector, while only exploring modalities for expansion to other sectors. Based on an internal coordination meeting held on 11/05/2015, we have decided that this activity should look at ETS implementation in all the sectors falling under the MRV Regulation, and not only electricity. The main topics will cover (but, not limited to):

- Design elements of ETS
- Analysis of technical, institutional and legislative gaps, as well as policy interactions
- Lessons learned from other ETS, and country-specific options deploy to avoid/minimize such risks.

Decisions as to either pilot ETS in the electricity sector only or in all MRV sectors from the beginning will be considered in light of the results of this study.

Challenges:

A number of quality reports on the design elements and challenges of ETS are now available. We also understand that the PMR Secretariat is currently preparing an ETS Handbook on the practicalities of establishing an ETS and capturing the latest experience in a number of jurisdictions. Therefore, we would like to avoid duplicating existing literature and efforts and work on more country specific components of ETS design. For this reason, we would like to ensure that the PMR activities will involve an interactive process bringing together the consultants and the MoEU (with the inclusion of other stakeholders) to understand the opportunities or challenges arising from different ETS design features. After these capacity building seminars, we would expect the consultants to also help policy makers identify the design elements which are most suitable to Turkey. It might be possible that participants are shared over 2 different ETS design scenarios to be tested during the piloting stage.

We expect the major industries to express concerns on adverse impacts on their competitiveness, and thus show resistance in regards to the decision of studying ETS for all MRV sectors. To address such concerns, we would seek to include an analysis of the "mechanisms to help major industries adapting to ETS" as part of the report.

Lessons learned:

The study on “the recommendations for selection of MBIs and modeling for sectors covered and uncovered by the MRV regulation” is unique in the sense that it provides Turkey with the flexibility to study any instrument(s) in any relevant sector(s). In the run-up-to the development of the INDCs, this opportunity is invaluable. Thus, we seek to collect feedback from the other Ministries in order to decide on the tools and their sectoral applications in a collective manner. Although it might at first be time-consuming, we nonetheless very firmly believe that considering the feedback, knowledge, and strategies of other Ministries will be of great value to ensure that the resulting TORs will lead to project activities which also inform them on different options for emission reduction policy tools.

Key capacity issues (implementation, technical, financial management, procurement) related to the Grant’s activities:**Developments:**

With regards to the procurement process, the team experienced that the obligation for companies teaming-up to form a formal Joint Venture (JV) (i.e. incorporated) caused difficulties.

Challenges:

Although the World Bank Group procurement guidelines accept the JV declaration as sufficient, the Turkish legislation requires the partners to incorporate the JV as legal entity in Turkey. This process however takes a significant amount of time for companies particularly, in particular if the consortium leader is a foreign firm.

Lessons learned:

In order to avoid this issue going forward, the team now clearly highlights such requirement in both in the EoI and RFP documents.

In addition to this, the below elements might also be useful insights to share:

- Accessing to local expertise has proved challenging given that the MRV Regulation has only recently been introduced and thus hands-on experience on the consultancy side is limited. We actually faced some issues during the MPs and ERs preparation activities due to the lack of experience of the local consultants. Therefore, we made sure to strengthen the experience requirement in the TORs for the activities that followed, i.e. the piloting of verification. We also collected feedback from the facilities which were included in the list of experiences. Having said that, running the MRV pilots in parallel to the enforcement of the actual Regulation nonetheless presented the advantage of being able to benefit from a favorable environment where companies had been going through the process of preparing monitoring plans and sought support.

- The level of local experts' understanding of the Regulation and hands-on experience is important not only for smooth project operations but also to build confidence between them and the piloted facilities.
- The MRV capacity of some the piloted facilities is limited which caused delay in data collection. This issue has been addressed thanks to capacity building workshops such as those supported under the GIZ project – as further detailed below under section on “other projects on carbon pricing”). These were very useful to have prior to the start of the pilots.

Coordination with other carbon pricing initiatives, including those funded by other donors:**Developments:**

The PMR and GIZ projects are the most recent projects which support Turkey in building capacity on MRV and carbon pricing instruments. These two projects were developed in a common set-up to avoid any duplication of effort and maximize synergies. The GIZ project is complementary to that of the PMR's. The aim of the GIZ project is to help Turkey set up the underlying infrastructure of the MRV system. It has sought to establish the data management system (registry systems to upload the required reports), preparation of a number of guidelines on how to prepare MPs and ERs. It also aims to build the internal capacity of the MoEU on how to assess those reports, as well as how to set the eligibility criteria for accreditation body and the accredited verifiers. It also seeks to improve the MRV Regulation and to develop the supporting implementing legislation.

Regarding the coordination of the two projects, as these were formulated to complement each other from the planning stage, and given the clear focus of the GIZ project on the development of the MRV infrastructure, there have not been any overlapping activities. Both projects have been managed by the Department of GHG Monitoring and Trading which has limited the risk for such issues to occur. In addition, the PMR Turkey Technical Coordinator and the GIZ Project Coordinator meet regularly to coordinate between the two projects.

EBRD has also been providing support to Turkey to enhance (voluntary) carbon markets and renewable energy investments through the Mid-size Sustainable Energy Financing Facility² (MidSEFF). MIDSEFF provides a credit line of over EUR 975 million in loans through 7 Turkish banks for renewable energy, waste-to-energy and industrial energy efficiency investments. The program aims at building the Turkish Carbon Market by providing technical assistance to sub-borrowers for developing, registering and monetizing emissions reduction projects; building capacity of the Turkish Banks to start offering Carbon Market Services; and facilitating the dialogue between the public and private sectors. Given this focus, the MidSEFF Program and the PMR Project do not require regular coordination; nonetheless, they are complementary in nature as both work toward enabling the implementation of different carbon pricing mechanisms.

² <http://www.ebrdpeter.info/en/turkey/>

Challenges:

Although stakeholders are building on knowledge and capacity in terms of MRV and carbon pricing mechanisms, based on the Q&A sessions held in the different workshops and meetings with stakeholders we assessed that there still is a need for further awareness for MRV and carbon pricing.

Lessons learned:

The MRV piloting activities under the PMR Project started in parallel to the implementation of the MRV Regulation. This has proved to be a successful and dynamic process, since the piloted installations had to take the work seriously as the MRV requirements had become enforced. Our experience is that carrying out such piloting activities in support to the legislation implementation may be more productive than if these were taking place before the legislation actually enters into force. Indeed, before the regulation enters into force, there is a risk that stakeholders expect delays and as a result do not fully engage in the piloting exercise.

Stakeholder engagement related to the Grant's activities:**Developments:**

The MoEU established 2 different working groups to collaborate on the preparation of Communiqués related to the implementation of the MRV Regulation, i.e. "Communique on monitoring and reporting" and "Communique on Verification and Accreditation". The participants under the first were composed of at least one representative from each sector. The participants under the latter were composed of representatives from TURKAK (Turkish Accreditation Body), TSE (Turkish Standards Institute) and verification bodies. The MoEU worked together with these representatives on the draft Communiqués word-by-word, gathering comments and reflecting their expertise. This practice significantly helped raising awareness and building a common understanding and language of the MRV Regulation. These are same experts who received the initial training in 2014, organized under the "PMR Preparation Phase" and intended to build technical capacity in monitoring and reporting. After this, these experts were able to train colleagues on the preparation of the MPs and ERs in their own sectors.

As mentioned above, the project team has been meeting with key stakeholders regularly both on a one-on-one basis and in the context of the CBCC. The project team will accelerate the occurrence of those meetings especially to seek feedback on the activity aiming at studying different MBIs or non-MBIs for selected sectors. We will also carry out a number of round-table meetings with the relevant sectors to start building their capacities on carbon pricing mechanisms.

Challenges:

Although stakeholders are building on knowledge and capacity in terms of MRV and carbon pricing mechanisms, based on the Q&A sessions held in the different workshops and meetings with stakeholders we assessed that there still is a need for further awareness for MRV and carbon pricing.

Lessons learned:

In order to increase the level of understanding on MRV and carbon pricing, the Ministry decided to provide the public and stakeholders with more detailed information, case studies and applicable implementation examples from other countries. To address such needs, the MoEU translated the World Bank's report "State of the Carbon Pricing 2014" and disseminated to the appropriate audience, and is now considering translating other relevant reports.

Other issues related to the Grant's activities

N/A

5. ADDITIONAL INFORMATION

In this Section, please provide any additional information that may be relevant for the achievement of the Grant's objectives and/or the implementation of the Grant's activities. Please also provide any relevant information related to carbon pricing and the use of market-based instruments for climate change mitigation.

N/A