



Revision of GD 2

General guidance for aircraft operators

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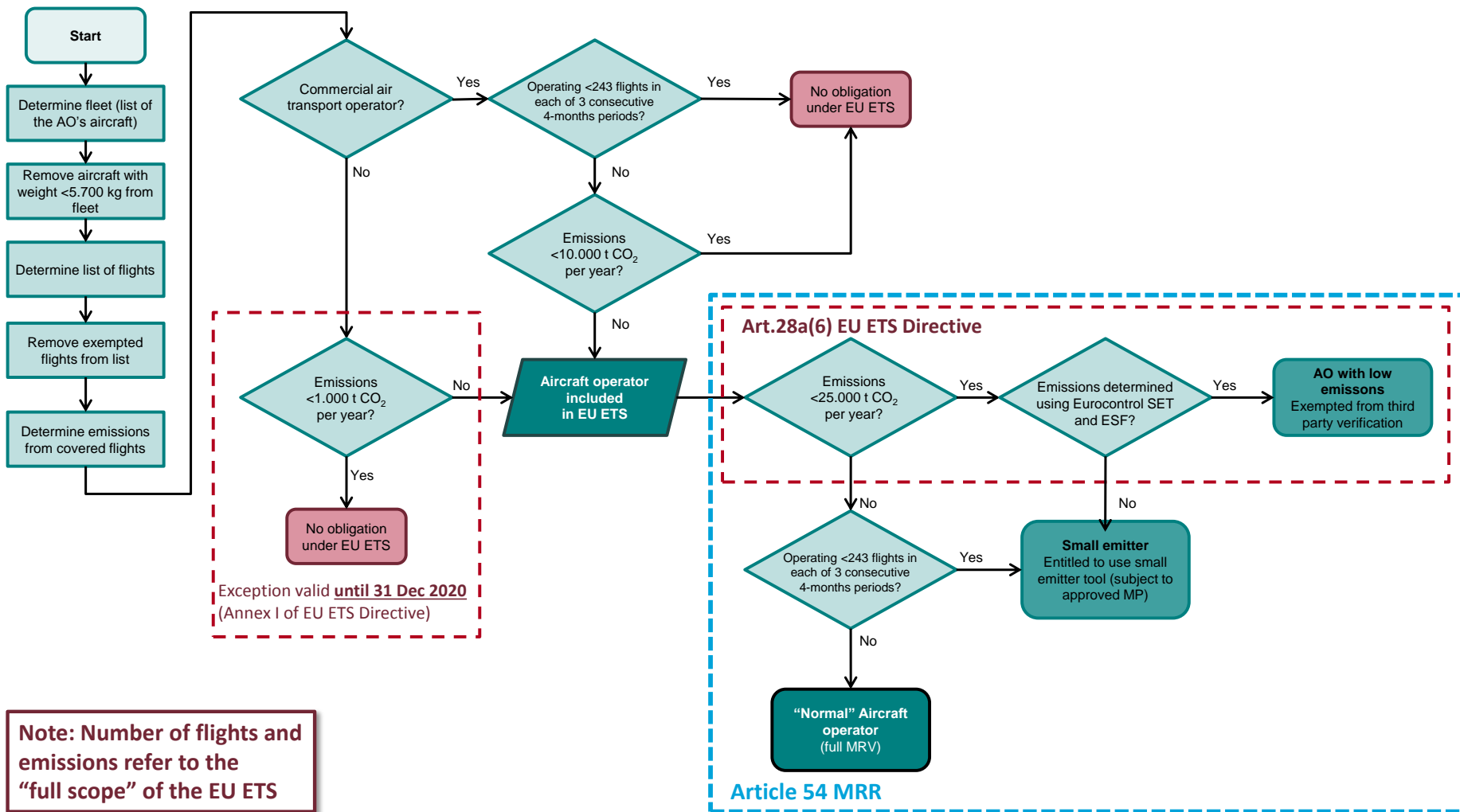
Update of GD 2 for Aircraft Operators

- *Addition of decision tree for including AOs and deciding on small emitter approach (Regulation 421/2014)*
- *Updated section on biofuel use:*
 - Inclusion of former section 6.2 of GD 3
 - Several improvements which make this part more applicable in practice (e.g. dealing with end of year purchases, no restrictions to flights departing from the airport of purchase)
 - GD 3 section on sustainability copied in as Annex → GD 2 as self-standing document for AO
- *Various small updates (e.g. Web links)*

Update of GD 2 for Aircraft operators

- *1st Draft was sent to TWG on 14 Sep 2016*
 - Feedback received from EE, UK (no comments), PT, NL, ES, DE
 - 47 comments in total (mostly requesting minor clarifications). Some bigger changes → see following slides
- *2nd draft sent out to TWG on 7 November, requesting comments by 28 November*

Decision tree



Note: Number of flights and emissions refer to the "full scope" of the EU ETS

Biomass issues

- *Starting point is section 6.2 of GD 3 (i.e. guidance pursuant to Article 53 MRR), which allows a kind of “book and claim” approach*
- *Discussed in TWG 16 March 2016*
- *Developed more practical approaches based on information obtained during “Flightpath 2020” meeting of 6 July 2016*

GD 3, section 6.2 – Background

- *Due to the technical reality at aerodromes, it is virtually impossible to uplift a defined physical amount of biofuels to a defined aircraft → Book and claim can resolve this*
- *Method must be applicable not only in all MS, but in principle all around the world (under “full scope” of the Directive)*
- *Double counting of biofuel must be avoided, not only within EU ETS, but also under any other RES support scheme around the world*
- *Physical biofuels are virtually assigned to aircraft operators/EU ETS flights (i.e. quantities are assigned)*
- *Verifiers must be able to achieve reasonable level of assurance, while avoiding undue admin burden*

GD 3, current section 6.2 – aerodrome-centered approach

- *GD 3 assumes that physical biofuel trade is taking place at **one aerodrome**, where potentially **several fuel suppliers** share storage facilities, and **several aircraft operators** (using **different verifiers**) may purchase the biofuel*
- *For that purpose, section 6.2 lays down how the proof for the eligible quantity of biomass can be organised for limiting admin burden (but does not prescribe everything)*
- *EU ETS usually deals with direct emissions only
→ GD3 requires that biofuel must be consumed on **EU ETS flights departing from that aerodrome***

Why limit biofuel accounting to EU ETS flights?

- *Scope of the EU ETS Directive: Art. 2(1): "This Directive shall apply to emissions from the activities listed in Annex I" → Accounting for biofuels can only refer to EU ETS flights*
- *Other flights might fall under other regulations (e.g. the upcoming GMBM under ICAO) → aircraft operator could claim the biofuel reward under that other regulation (need to prevent double counting)*

Accounting for biofuel in GD 2

- *Option to determine biomass fraction of blended biofuel or treat biofuel and fossil fraction as separate source streams*
- *Attribution of biofuels to flights:*
 - Propose to have a database in place at each aerodrome where biofuel is available, which ensures that each tonne biofuel sold is accounted exactly only once
 - If physical uplift is tracked, assign biofuel fully to following flight. If “tankering” → suitable attribution method required

Accounting for biofuel in GD 2 (2)

- *If no physical tracking is possible:
Ensure that the amount of biofuel purchased is attributed to any flights departing from that aerodrome, as long as physical or technical limits are not exceeded:*
 - Total EU ETS flights of that aircraft operator from that aerodrome
 - Technical limit for biofuel use (certified maximum percentage of biofuel in fuel blend)
 - Match with amount which is proven to comply with sustainability criteria
 - Demonstrate absence of double counting with other GHG regulations
- *How this can be achieved is given in section 5.5 (former section 6.2 of GD3)*

Changes compared to GD3

- *Biofuel use of an aircraft operator limited by*
 - Technical possibilities of flights under EU ETS of that aircraft operator in the reporting year (not: sum of fuel uplifts at a specific aerodrome)
 - Sum of biofuel purchase minus sale to 3rd parties (not limited to specific aerodrome)
- *Biofuel purchase may be attributed to more than one calendar year if physical delivery also takes place in more than one year*

Changes made in 2nd draft

- *Some wording improvements (in particular regarding reduced/full scope, distinguish "small emitters" vs. "AO with low emissions" in context of Article 28a(6) of the Directive)*
- *Regarding Article 28a(6) clarification: Not exception from verification requirement, but "considered as verified"*
- *Clarification that decision tree is not a once-for-all-times exercise*
- *Slight revision of section 4.4.2 (more general preparation for a new trading phase, not only 3rd phase)*
- *Section 5.6.1: Clarification for t-km data (distance): "aerodrome reference points (ARP)"*

Changes made in 2nd draft (2)

Biomass issues:

- *For attribution of biofuel to subsequent flights without fuel uplift ("tankering") → allow any realistic approach if based on a written procedure (GCD, flight time, fuel consumption,...)*
- *Proposed 10th February (instead of 28th) for result of "centralised verification" for the book and claim system*
- *Clarification of "delivery point" when attributing biofuels to more than one calendar year*

Thank you for your attention

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