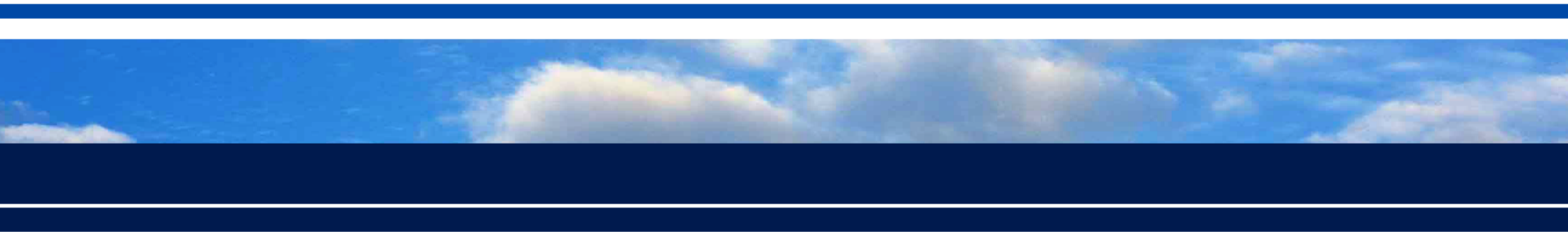


MRR: Validation experiences

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470 installations need approved MP for EU-ETS 2013-2020:

- ✓ 240 already submitted
- ✓ 35 approved

Experiences with guidance/templates

- ✓ Uniformity & traceability of information in MP highly improved
 - ...but MP-template doesn't read like a book
 - ...and some parts (like procedures) are hard to validate
- ✓ Complex information cannot always be recorded in template → Reference Document (e.g. calculations, unreasonable costs)
- ✓ EC-Guidances integrated in national guidances and validation process
- ✓ Many essential errors in MP and supporting documents → thorough validation needed
- ✓ Validation tools are of great value (e.g. checklist)

Validation experiences

- ✓ Limited proof for quality of supplier data in accordance with MRR
 - Activity data
 - Calculation factors (e.g. gas analyzers)

- ✓ Uncertainties in activity data
 - Legal metr. control not always appropriate for meeting tiers
 - Uncertainty not easily derived from specs/certificates
 - Discouragement of use of default values ('IMPEL')

- ✓ Flares and solvents cannot always be monitored properly

- ✓ Mass balance would be a more suitable approach for some combustion installations

- ✓ Major gap in MPs: connection between sample and batch (representativeness)

Post 2012 issues

Operators need time to adapt current practices:

- ✓ Uncertainty assessment
- ✓ Supplier data
- ✓ Sampling procedures

Sharing of experiences between CA's is of great importance!