

# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

I am responding on behalf of: myself, as a private individual

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Germany

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No opinion

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? constantly

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

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Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Austria

Are you familiar with European Union's policies regarding climate change? I am somewhat familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

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Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

## Overall

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Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

1. Die Grundlagen für die Zuteilung und Abrechnung müssen gleich sein. 2. Es sollen etwaige Emissionsminderungsmaßnahmen anerkannt werden. 3. In allen Mitgliedstaaten müssen die Abrechnungsmethoden gleich sein.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

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Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No opinion

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

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Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

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Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) France

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Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly disagree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly disagree

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The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Strongly disagree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? No

Which of the following do you think best defines the intended role of the verifier: to check and confirm that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? No opinion

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

## Overall

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Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Le principe même de la SEQE est spécieux. C'est, fondamentalement, un miroir aux alouettes. Donner l'impression de faire quelque chose alors que l'on ne fait rien et que ça n'empêche certainement pas les émissions d'augmenter ( 2010 est un record pour ça). Le principe de quota et de revente de ceux-ci est d'ailleurs des plus hypocrites.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

A part les interdictions sèches et drastiques et le relèvement des barrières douanières qui diminueraient, ainsi, les couts de pollution du fait de la revalorisation du commerce et entrepreneariat local, il n'y pas de solutions satisfaisantes. Là, on ne fait que rajouter des couches de normes et de règlements qui sont autant de pertes de temps et de manière de se creuser le cerveau pour pouvoir continuer à polluer encore quelques années avant d'avoir une catastrophe écologique majeure...



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Country (please indicate your current country of residence) Germany

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Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No opinion

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

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The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? No

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Disagree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? No

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No opinion

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

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Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) United Kingdom

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No opinion

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Disagree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? No opinion

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? No

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Disagree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? No opinion

Which of the following do you think best defines the intended role of the verifier: to check whether the operator has submitted a report to the Competent Authority

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? not at all

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme  
no opinion on this as its not uk government law,its european law

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme  
No opinion on this as it hasnt been democratically brought before the UK electorate but from the EU commision which is not democratically elected.Until it has been democratically voted on i will not see it as acceptable

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Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Italy

Are you familiar with European Union's policies regarding climate change? I am somewhat familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am not familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? No opinion

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? No

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No opinion

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Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? constantly

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme  
Sorry, I'm not a specialist. What I know is that as more complicate the law is as easier is to find a bug to be used to skip the adoption. For sure on a national level, despite the same EU legislation, the situation changes, where in the North Europe the respect is strict, in the South the approach is more flexible.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme  
Simple and clear legislation, fines!

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Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? No

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? No

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? constantly

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

I am responding on behalf of: myself, as a private individual

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Germany

Are you familiar with European Union's policies regarding climate change? I am somewhat familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am somewhat familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No opinion

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Disagree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? No opinion

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Disagree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? No

Which of the following do you think best defines the intended role of the verifier: to check whether the operator has submitted a report to the Competent Authority

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? No opinion

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme  
Warum müssen Unterlagen doppelt verschickt werden, wenn diese schon bei den Behörden sind? Das ist purer Papier-sammel-aktionismus, der nichts bringt, außer Frust auf allen Seiten. Die Arbeit der Behörden wird nicht besser, wenn man dort unendlich viel Papier hinterlegt, was eh schon vorhanden ist. Man nimmt den Leuten dort die Zeit sich mit wirklich wichtigen Angelegenheiten zu befassen.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme  
So einfach wie möglich.

# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

I am responding on behalf of: myself, as a private individual

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Ireland

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No opinion

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme  
Greater use of graphics in conveying information on workings of system. Reduced use of complex language, where possible and relevant, to increase stakeholder engagement in the process.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme  
Currently verification and accreditation is carried out by large global auditors. The system should be designed to encourage suitable local SMEs to participate in the verification and accreditation process for sites. The competent authority for GHG emissions should be required to double check submissions, even though they have certified verification.



# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

I am responding on behalf of: myself, as a private individual

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) France

Are you familiar with European Union's policies regarding climate change? I am somewhat familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am somewhat familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No opinion

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? No

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? No

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

I am responding on behalf of: myself, as a private individual

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Austria

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

the monitoring and reporting reg. should provide to the extent possible the acknowledgement of abatement measures such as carbon capture in products, sinks and such. Further, it should guarantee that monitoring is equal in all MS, differences exist e.g. in the calculation of process emissions from production of lime. Finally it should be consistent with the allocation rather than with the directive to avoid double assessment and potential errors.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

Legall spoken, the emission trading scheme is far to complicated to be able to be an efficient system. The huge amount of paper, directives, decisions, guidance papers, regulations and again guidelines is unreadable. A law which is unreadable is as good and legitimate as a non existing law. This does not support the EU as legal body of all Europeans in generall neither the ETS in particular.

# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

I am responding on behalf of: myself, as a private individual

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) France

Are you familiar with European Union's policies regarding climate change? I am somewhat familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am not familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? No

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Strongly agree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? No

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? by occasional meetings/updates

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme  
allez l'om

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme  
allez le psg

# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

I am responding on behalf of: myself, as a private individual

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Outside the EU

Are you familiar with European Union's policies regarding climate change? I am somewhat familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am somewhat familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? constantly

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme



# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

I am responding on behalf of: myself, as a private individual

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) France

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? No

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? constantly

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

I am responding on behalf of: myself, as a private individual

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) France

Are you familiar with European Union's policies regarding climate change? I am somewhat familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am somewhat familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No opinion

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly disagree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No opinion

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Strongly disagree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? No

Which of the following do you think best defines the intended role of the verifier: to check whether the operator has submitted a report to the Competent Authority

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? not at all

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No opinion

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme  
Arrêtez de nous pondre de nouvelles législations lourdes et coûteuses à tout bout de champ.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme  
Arrêtez de nous surveiller et de vouloir nous faire rentrer dans un cadre que nous ne voulons pas.

# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

I am responding on behalf of: myself, as a private individual

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) France

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Disagree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? No opinion

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? No

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? No opinion

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

A quoi sert toute cette usine à gaz (!) puisque le "réchauffement climatique" s'est arrêté il y a plus de 10 ans et que même des représentants du GIEC nous disent que l'on va vers une diminution de la température moyenne ? Et que l'on de toutes façons jamais établi de lien de cause à effet entre les "gaz à effet de serre" et les variations de température. A quoi cela sert-il sinon à permettre à certains spéculateurs de faire beaucoup d'argent ?

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

I am responding on behalf of: myself, as a private individual

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) France

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No opinion

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly disagree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No opinion

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? No opinion

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Strongly disagree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No opinion

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? No opinion

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? No opinion

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No opinion

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No opinion

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Il faut dissoudre le SEQE et mettre fin à ce système irrationnel propice à toutes les escroqueries imaginables. Il est absolument délirant de s'acharner à diminuer les émissions de GES en Europe pendant que les pays émergents ont légitimement recours de plus en plus fortement aux énergies fossiles pour accompagner leur développement. L'Europe se tire tout simplement une balle dans le pied en agissant ainsi.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme



# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

I am responding on behalf of: myself, as a private individual

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) France

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly disagree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Strongly disagree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? not at all

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme  
La seule "amélioration" acceptable du Système de Quotas d'Emissions est sa suppression. SEQE ne peut avoir aucun effet global sur la température de la terre et ne peut que gêner l'activité économique sans apporter aucun bénéfice mesurable au plan global.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme  
En supprimant le SEQE, on économise la vérification, l'accréditation, des milliers de postes administratif inutiles. On rend sa liberté à l'économie, et on peut consacrer les crédits du SEQE à des actions utiles, aussi bien au plan économique que social.

# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

I am responding on behalf of: myself, as a private individual

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) France

Are you familiar with European Union's policies regarding climate change? I am somewhat familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am somewhat familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly disagree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Strongly disagree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No opinion

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check whether the operator has submitted a report to the Competent Authority

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? No opinion

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No opinion

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No opinion

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme  
L'europe va encore nous créer des règlements supplémentaires et des fonctionnaires inutiles, que nous paierons grassement, pour nous compliquer la vie! Merci l'europe.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

I am responding on behalf of: myself, as a private individual

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) France

Are you familiar with European Union's policies regarding climate change? I am somewhat familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am somewhat familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly disagree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No opinion

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Strongly disagree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? No opinion

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No opinion

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

I am responding on behalf of: myself, as a private individual

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) France

Are you familiar with European Union's policies regarding climate change? I am somewhat familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am somewhat familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No opinion

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? No opinion

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No opinion

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? No opinion

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? No

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of the reported emissions

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? by occasional meetings/updates

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No opinion

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme  
Les usines à gaz consomment de l'énergie, il faut en tenir compte!

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

Si vous y regardez attentivement le RCA s'est organisé comme un péché de l'homme moderne, un mythe écolo-scientiste coupé de la réalité. La réalité est que la vie est la seule façon de stocker de l'énergie solaire grâce à la chlorophylle. Le pétrole est géologiquement formé à partir des algues. Travaillons l'aquaculture des algues dans les chenaux de marée tropicaux par exemple et nous aurons résolu notre problème sans usine à gaz.



# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

I am responding on behalf of: myself, as a private individual

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Luxembourg

Are you familiar with European Union's policies regarding climate change? I am somewhat familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am somewhat familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly disagree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Disagree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check whether the operator has submitted a report to the Competent Authority

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? not at all

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

I am responding on behalf of: myself, as a private individual

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) France

Are you familiar with European Union's policies regarding climate change? I am somewhat familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am somewhat familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Disagree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? No opinion

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? No

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Disagree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? No

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? not at all

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No opinion

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme  
Je pense que l'Europe ferait mieux de regarder ce que fait le reste du monde et d'en tirer toutes les conséquences

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

I am responding on behalf of: myself, as a private individual

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) France

Are you familiar with European Union's policies regarding climate change? I am somewhat familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am somewhat familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly disagree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No opinion

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Strongly disagree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No opinion

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? not at all

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No opinion

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme  
Une formidable usine à gaz et outil à délocalisation sont en route.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

I am responding on behalf of: myself, as a private individual

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) France

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am somewhat familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly disagree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? No

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Strongly disagree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? not at all

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme



# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

I am responding on behalf of: myself, as a private individual

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) France

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly disagree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Strongly disagree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? not at all

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme  
La seule "amélioration" acceptable du Système de Quotas d'Emissions est sa suppression. Il n e peut avoir aucun effet global sur la température de la terre et ne peut que gêner l'activité économique sans apporter aucun bénéfice mesurable au plan global.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme  
En supprimant le SEQE, on économise la vérification, l'accréditation, des milliers de postes administratifs inutiles. On rend sa liberté à l'économie, et on peut consacrer les crédits du SEQE à des actions utiles, que ce soit dans les domaines économiques ou sociaux.

# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

I am responding on behalf of: myself, as a private individual

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) France

Are you familiar with European Union's policies regarding climate change? I am somewhat familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am somewhat familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly disagree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? No opinion

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No opinion

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? No

Which of the following do you think best defines the intended role of the verifier: to check and confirm that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? by occasional meetings/updates

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme  
Cette histoire de quotas d'émissions de carbone sont aberrants et inutiles pour l'environnement et le climat ; leur seule utilité serai fiscale et statistique, mais ce ne sont pas les enjeux annoncés.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

Il ne peut s'agir que d'utiliser des outils statistiques informels mais sans coercition ni visée environnementale au sujet du CO2 : celui-ci n'étant pas un polluant et n'ayant pas d'effet démontré sur la modification du climat, il ne convient pas de dépenser ou faire dépenser de l'argent à ceux qui l'émettent ni de mobiliser des fonctionnaire à cet effet.

# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

I am responding on behalf of: myself, as a private individual

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) France

Are you familiar with European Union's policies regarding climate change? I am familiar

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Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No opinion

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? No opinion

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No opinion

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? No opinion

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No opinion

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? No opinion

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? No opinion

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No opinion

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? No opinion

Which of the following do you think best defines the intended role of the verifier: to check and confirm that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? No opinion

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No opinion

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No opinion

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Ce système est à la fois une usine à gaz (en enrichissant certains...), pour modérer ce qui est considéré à tort comme un risque de catastrophe climatique, alors que toutes les descriptions du soi-disant phénomène violent les lois de la physique et sont contredites par les observations. Le seul résultat est de mettre des boulets supplémentaires aux pieds de l'économie Européenne qui n'en manque déjà pas.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

I am responding on behalf of: myself, as a private individual

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) France

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No opinion

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Disagree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No opinion

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No opinion

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? No opinion

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Strongly disagree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No opinion

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? No opinion

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of the reported emissions

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? No opinion

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No opinion

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No opinion

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

Je suis tout à fait hostile à cette politique. Je pense qu'elle s'appuie sur un constat erroné et qu'il n'y a pas de réchauffement climatique anthropique. Je pense que "l'effet de serre" n'est absolument pas démontré et que l'objectif de faire diminuer les émissions de gaz à effet de serre n'est pas pertinent. Je pense qu'il résulte de ces erreurs une véritable "usine à gaz" qu'il est urgent de démanteler. Je pense que les interventions de l'Europe et des Etats qui la composent vont conduire à des erreurs dramatiques et risquent de nous imposer un modèle d'économie et de société dont finalement les citoyens ne voudront pas. Il est urgent de repenser l'Europe!



# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

I am responding on behalf of: myself, as a private individual

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) France

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly disagree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No opinion

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Strongly disagree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? No

Which of the following do you think best defines the intended role of the verifier: to check whether the operator has submitted a report to the Competent Authority

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? not at all

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

I am responding on behalf of: myself, as a private individual

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) France

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly disagree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

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The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Disagree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Ce questionnaire comme ceux que j'ai déjà vus suppose que les idées, mécanismes et objectifs sont bons. Ils ne le sont pas. La prétendue lutte contre le changement climatique est une foutaise pour deux raisons. 1) L'augmentation du <CO2 dans l'air est une garantie de meilleures récoltes et de diminution de la faim. 2) L'augmentation des températures, hélas arrêtée depuis plus de 10 ans, aurait été bénéfique pour tous.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

Laissez tout tomber, ce sera mieux pour le monde.

# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

I am responding on behalf of: myself, as a private individual

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) France

Are you familiar with European Union's policies regarding climate change? I am somewhat familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am somewhat familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly disagree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No opinion

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

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Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Strongly disagree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? No

Which of the following do you think best defines the intended role of the verifier: to check whether the operator has submitted a report to the Competent Authority

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? not at all

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No opinion

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme  
Il faut arrêter ces idioties. Le réchauffement climatique anthropique est une escroquerie non scientifique utilisée à des fins partisans. L'Europe se ridiculise et se détruit en s'adonnant à cette stupidité majeure.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme  
Arrêtez de dépenser l'argent des Européens pour des idioties

# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

I am responding on behalf of: myself, as a private individual

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

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Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly disagree

## Monitoring and Reporting

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The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No opinion

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## Accreditation and Verification

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Which of the following do you think best defines the intended role of the verifier: to check whether the operator has submitted a report to the Competent Authority

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? No opinion

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme



# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

I am responding on behalf of: myself, as a private individual

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Belgium

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No opinion

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Strongly agree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? constantly

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

I am responding on behalf of: myself, as a private individual

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Portugal

Are you familiar with European Union's policies regarding climate change? I am somewhat familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

## Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No opinion

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Strongly agree

## Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? No

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? constantly

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

## Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

# EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

## General

I am responding on behalf of: myself, as a private individual

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Outside the EU

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? Yes

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

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Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

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## Overall

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