



Future simplifications under the MR & AV Regulations

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Potential future simplifications

Please note:

- *Simplifications discussed in this presentation are based on the current state of discussions in the MRVA RegRev project; the list is not complete.*
- *Not all simplifications discussed will necessarily be included in final revision of the regulations or at least not in the way discussed in this presentation.*

Potential future simplification MRR

- *Potential simplifications of the tier system include:*
 - **Increase threshold** between category A and B (50k → 100k)
 - **Remove one inst. category**
(e.g. remove differentiation between B and C)
 - **Increase low emitter threshold** (25k → 50k)
 - **Simplify Art. 26** (e.g. relax tier deviation requirements)
- **General support for simplifications** of the tier system by MS, however more concrete proposals needed for further detailed discussion
- Discussion on thresholds depends on **exclusion criteria in Art. 27 EU ETS Directive** and has **verification implications** (e.g. materiality level))
- Any changes might have **implications on other proposals** (e.g. reporting improvements)

Potential future simplification MRR

- *Potential simplifications of the **uncertainty assessment**:*
 - Relax requirement for de-minimis source streams
 - Uncertainties related to stock levels
 - Uncertainties related to small parts of source streams
- *Potential simplification of **MP approvals***
 - Significant vs non-significant changes and CA follow-up
 - Simplification of procedures
 - Clarification of requirement for improvement report
- *Further **enhance equal treatment** of CEMS and calculation-based, tier-based and fall-back approaches*
- *Clarifications related to **biomass for CEMS***

Potential future simplification AVR

- *Potential simplification by **removing certification** of natural person verifiers from AVR*
- *Potential simplification of **site visits** in relation to significant changes to the MP*
- *Potential simplifications by making **certain procedures** function more effectively*
 - Greater involvement of verifier in information exchange
 - Clarify feedback needed from NAB on information reported by CA
 - Treating non-compliance issues similar to non-conformities

Potential future simplification templates

- *For example:*
 - **MP:** provide harmonised simplified MP
 - **AER:** remove/relax requirement of
 - waste code and CRF reporting,
 - tailored approach for source streams for simple installations
 - separate reporting where deviating from approved tier
 - **IR:** 'checkbox' to indicate MP update to address issue
 - General: further improve **user-friendliness** (automatisation, conditional formatting,...)
 - General: **tools for data extraction** from accounting sheets
→ compiling into database, facilitate checking

Further potential simplification

- *Further capacity building such as **training events and peer-reviews**, e.g.*
 - Approving and updating MPs (significant/non-significant changes)
 - How to deal most efficiently with simplified requirements for simple installations (CA's + verifier's perspective)
 - **Any further needs?**
- *Development of **further exemplars**, e.g.*
 - Unreasonable costs
 - **Any further needs?**
- *Development of **further tools**, e.g.*
 - Uncertainty assessment
 - **Any further needs?**

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