



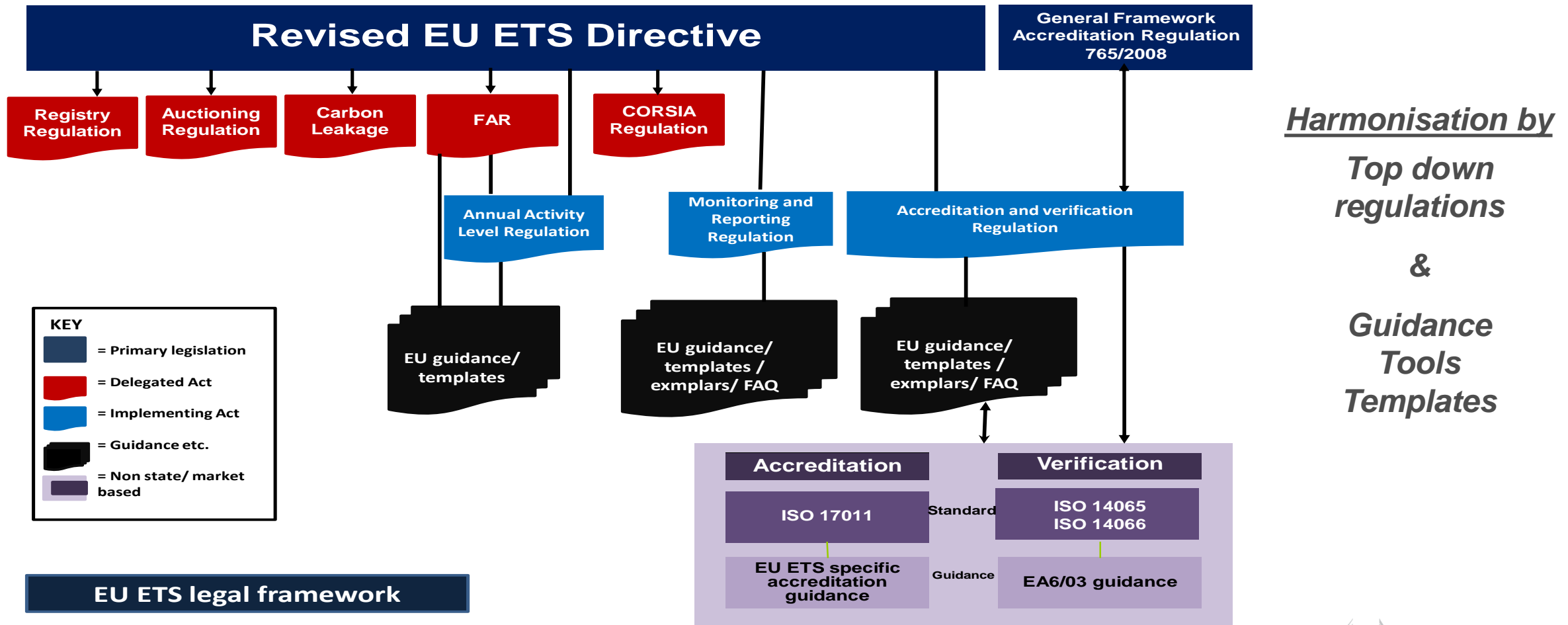
Compliance Conference

UPDATE OF GUIDANCE MATERIAL

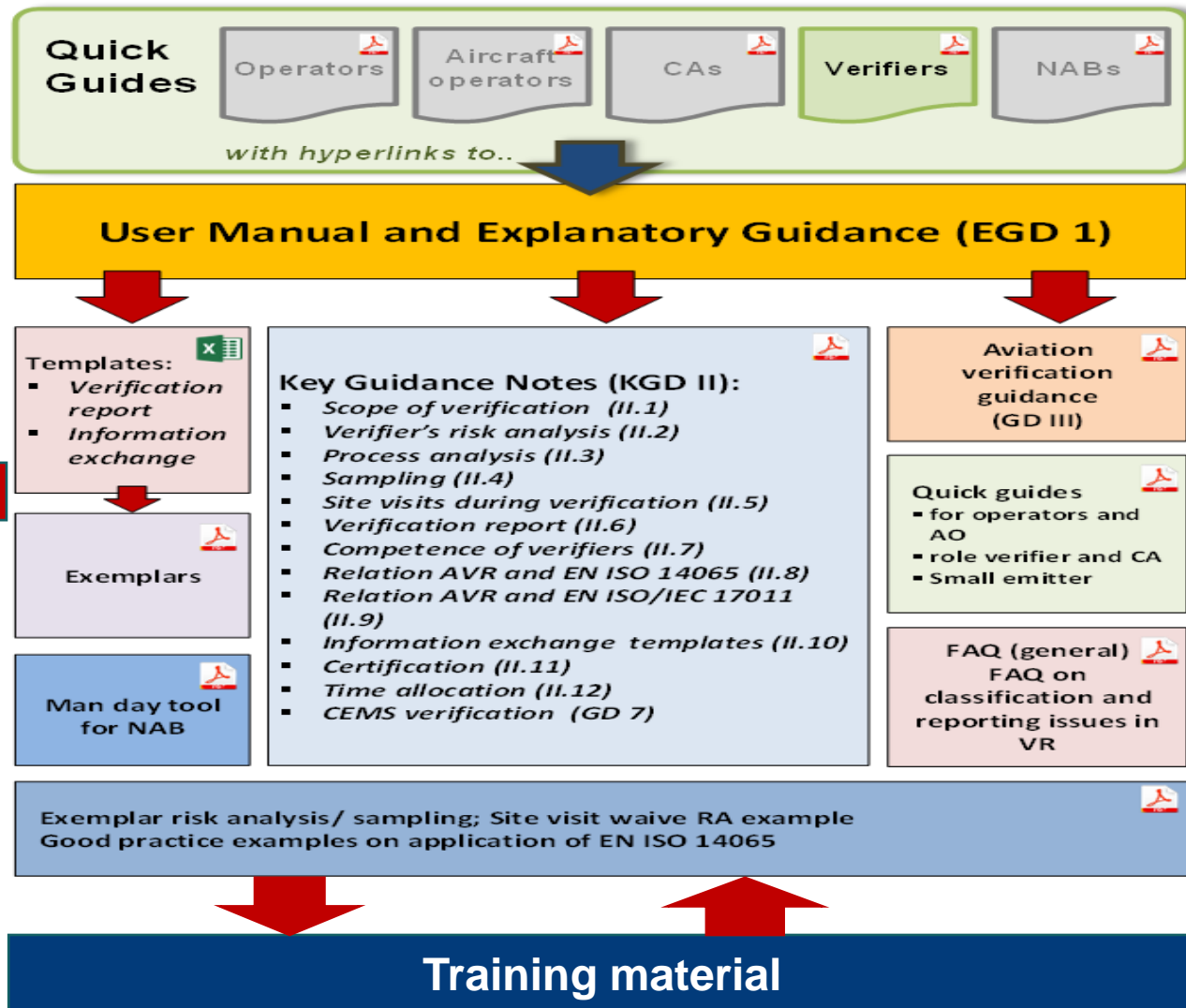
Machtelt Oudenés
Hubert Fallmann

Compliance Conference
25 November 2021

EU ETS framework for A&V in phase IV



Existing A&V Guidance material



GD 4 on verification of Allocation Data & VR Template

Compliance Cycle Evaluation Report 2019 showed that MRR & AVR guidance material was one of the main reasons MRVA has improved across Europe

Why updating guidance material?

- Revisions of MRR and AVR for the fourth trading period
- Better alignment with other legislation such as FAR and ALCR
- Improving consistency with regulations and between guidance documents
- Clarification of issues that caused interpretation problems
- New developments such as CORSIA, Swiss Linking, COVID implications
- Update links and references, correction of typos

Key new concepts in guidance

Key concepts in AVR

Virtual site visits (force majeure)

Rotation of lead auditors

Revisions & new harmonised standards
ISO 17011, ISO 17029, ISO 14064(3) & 14065

Verification of allocation data

New MRR rules
(biomass, improvement reports, biofuels,
transfer of N2O, simplifications)

CORSIA Implementation/ Swiss Linking

Update information exchange rules

Impact on guidance

KGN II.5 on site visits & verification report
(interpretation conditions, reporting, documentation)

Section 5 EGD I & section 8 GD III
(when to rotate, what to consider, small verifiers)

KGN II.8 & 9 and verification report

GD 4 on verification of BDR & ALCR

Time allocation: KGN II.12
Verification checks & process: KGN.3, EGD I and GD III
MR specifics: GD III, CEMS guidance, KGN II.3, VR

GD III
Completeness, verifier checks, scope, MR specifics

KGN.10 & information exchange templates

Status of update

Final

EGD I

GD III

KGN II.5

KGN II.9

KGN II.10
Templates

KGN II.12

Draft in December - January

KGN II.8

KGN II.6

VR template

KGN II.3 & Man day Tool
Dependent on MRR GD 3 on biomass

Draft in November – January (minor updates, editorial issues)

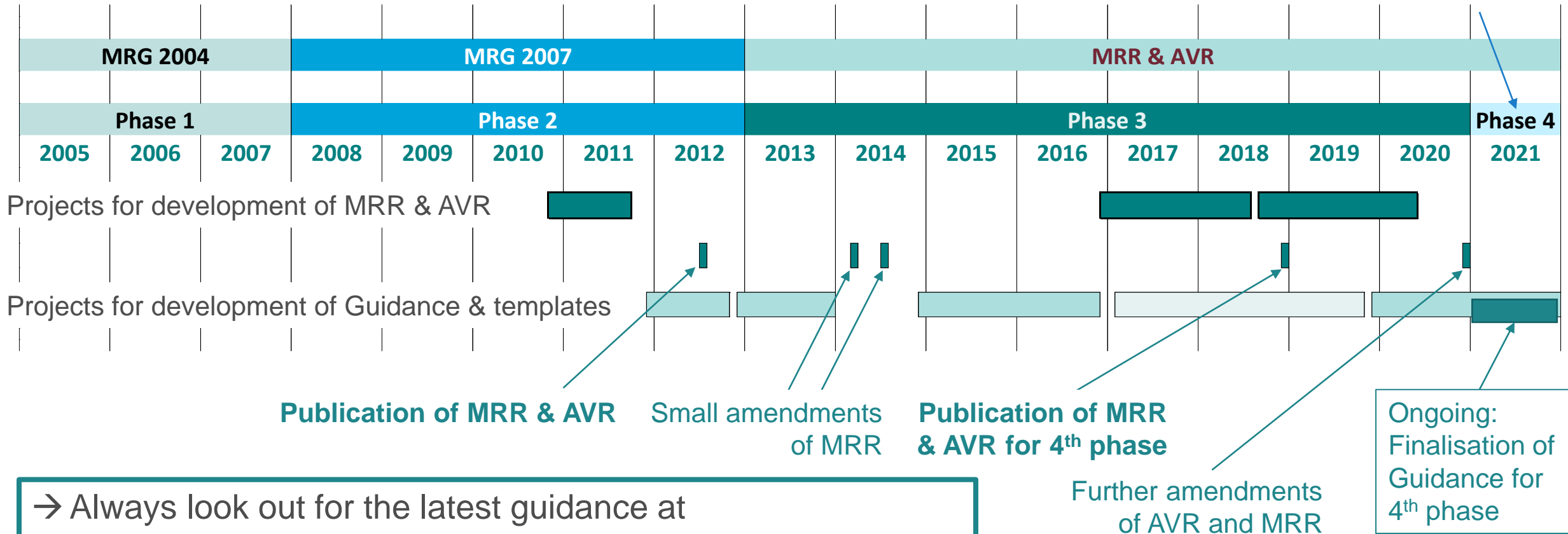
KGN II.1, KGN II.2, KGN II.4, FAQs,
Tools and Good practices

Future guidance needs in Phase 4

- Majority of participants in AV training event mentioned that the role of the verifier will become more complex in Phase 4
- Future guidance or clarification is needed on complex issues such as:
 - ✓ How to understand the new rules for biomass and the role of the verifier
 - ✓ Some specific elements on verification of annual activity level data, e.g. heat BM
 - ✓ Clarification on verifier's sampling
 - ✓ Roadmap through all guidance material
- AV training events showed that guidance on how to apply rules can in some cases best be given in trainings with practical case studies

Timeline EU ETS MRVA







“Fit for 55%”
package (including
update of EU ETS)



→ Always look out for the latest guidance at
https://ec.europa.eu/clima/eu-action/eu-emissions-trading-system-eu-ets/monitoring-reporting-and-verification-eu-ets-emissions_en

Guidance helps across the whole compliance cycle (II)

- Preparing the monitoring plan:

- [GD1](#) (General guidance) 
- [GD3](#) – Biomass issues 
- [GD4](#) – Uncertainty 
- [GD5](#) – Sampling and Analysis 
- [GD6](#) – Data flow activities & control system 
- [GD7](#) – CEMS (continuous emission measurement systems) 

- [MP template](#) 

- Approval of MP:





- [Checklist for CAs](#) 

- Prepare annual emissions report ([AER](#)) 

- Prepare verification report ([VR](#)) 

- Prepare improvement report ([IR](#)) 

- CA tasks:

- Carry out inspections – [GD8](#) 
- [Guidance](#) for AER & VR checking 
- [Checklist](#) for AER & VR acceptance 
- Information exchange with NAB 

- NAB tasks

- E.g. checking time allocation 

- Etc.

Guidance is supplemented by further tools

- Exemplars
 - Monitoring plan (MP)
 - Simplified MP (Art. 13 MRR)
 - Improvement report
 - MP update
 - Uncertainty assessment
 - Sampling plan
 - Verification report (installation)
 - Verification report (aircraft operator)
- Tools:
 - Determination of unreasonable costs
 - Assessment of uncertainties
 - Determination of the frequency of analysis
 - Operator's risk assessment
 - CA's risk profiling for AER assessment
- Training material, e.g.:
 - A roadmap through M&R guidance (2020)
 - Uncertainty assessment (2019)
 - Data gaps (2019)
 - Coming soon: *Monitoring and Reporting of free allocation issues (2021)*

MRR update state of play

- **Update finalised and published:**

- MP template
- GD 4 – Uncertainty
- GD 4a – UA exemplar
- GD 5 – Sampling and analyses
- GD 5a – Sampling plan exemplar
- GD 6 – data flow and control system
- GD 6a – Risk assessment exemplar
- GD 7 – CEMS

- **Update finalised:**

- AER template (translation being finalised)
- IR Template Installations (ready for endorsement)

- **Final draft:**

- GD 1 – General MRR guidance for installations
- GD 2 – General MRR guidance for AO

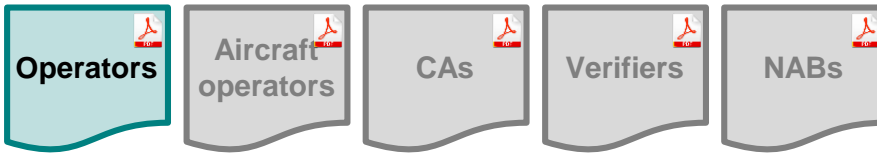
- **Coming Soon:**

- GD 3 – Biomass issues

MRR update state of play (II)

- **Update to be sent to MS in coming days:**
 - GD 8 - Inspections
 - Article 13 Simplified MP
 - Tool GD1 Unreasonable costs
 - Tool GD4 Uncertainty
 - Tool GD6 Risk assessment
 - Checklist MP assessment
 - AER/VR Risk profiling tool
 - AER/VR Checklist tool
- **Coming in December:**
 - Quick guide – Operator
 - Quick guide – AO
 - Quick guide – CA
 - User Manual AER
 - User Manual IR

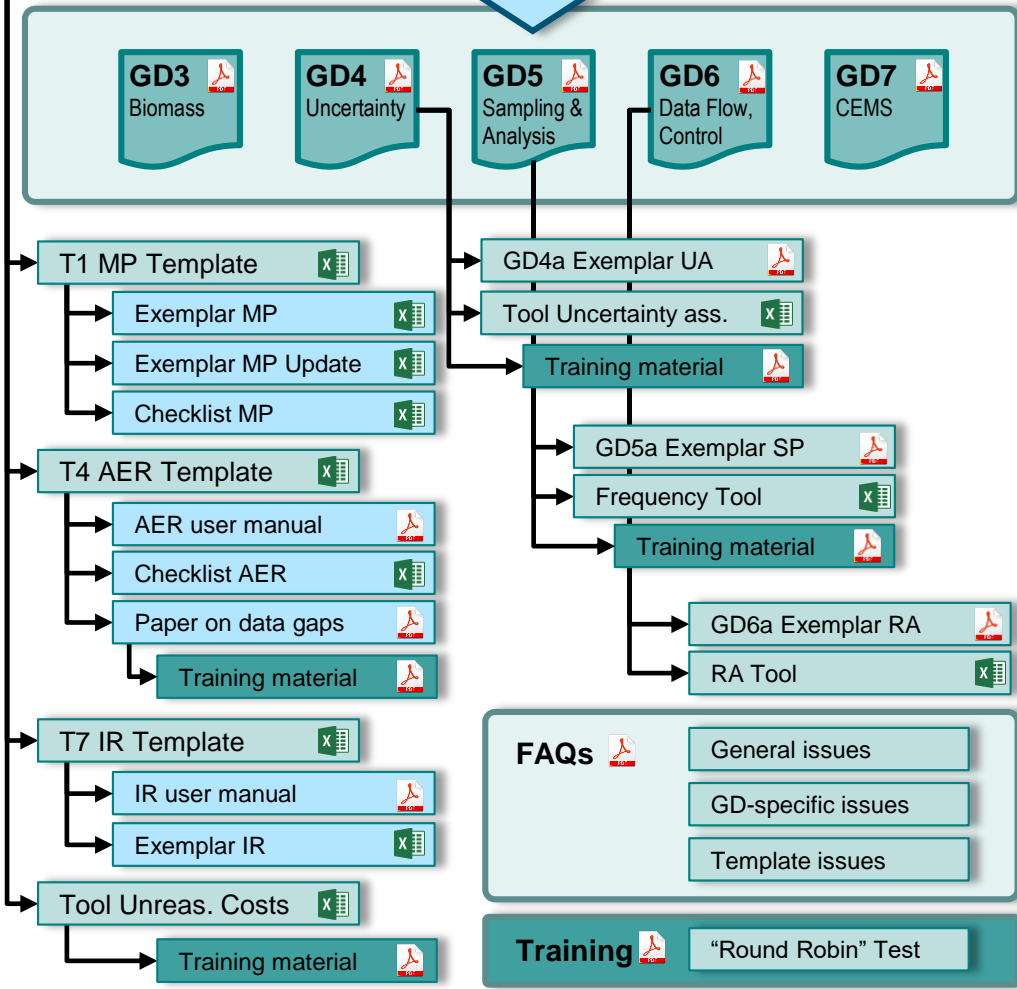
Quick Guides



with hyperlinks to..



Guidance Document 1 – General guidance (stationary installations)



Overview (focus on installations)

- By the end of the project, all documents will be revised
 - Except training material (is a “snapshot” at the time of the training)
 - FAQs will disappear (integrated in GD 1–7)
- GD3 (biomass) may require another update next year (after more experience has been gained)

Thank you for your attention

Consultant core team contacts:

M.Oudenes@SQConsult.com;

M.Voogt@SQConsult.com (project lead)

Christian.Heller@Umweltbundesamt.at

Hubert.Fallmann@Umweltbundesamt.at



Commission contact:

CLIMA-MRVA@ec.europa.eu

© European Union 2021

Unless otherwise noted the reuse of this presentation is authorised under the [CC BY 4.0](https://creativecommons.org/licenses/by/4.0/) license. For any use or reproduction of elements that are not owned by the EU, permission may need to be sought directly from the respective right holders.

