

enea

Nederlandse Emissieautoriteit

Dutch Emissions Authority

- **Place and function of monitoring plan**
- **Aviation vs. stationary installations**
- **Proposed templates**
- **Inspection in allocation process**

Place and function of monitoring plan

MRG definition of monitoring plan:

"detailed, complete and transparent documentation of the monitoring methodology of a specific installation, including documentation of the data acquisition and data handling activities, and the system to control the trueness thereof"

Place and function of monitoring plan

Directive



Monitoring & Reporting Guidelines



Act of Parliament



Government rules



Ministerial rules



Permit incl. monitoring plan

Place and function of monitoring plan

Individualization of general rules:

- nature of the installation (industrial sectors)
- boundaries
- category
- etc.



- **Sets of obligations and conditions applicable in the individual case**
- **Stationary installations: permit itself may add individualized conditions to monitoring plan**

Place and function of monitoring plan

MRG definition of monitoring plan:

"detailed, complete and *transparent* documentation of the monitoring *methodology* of a specific installation, including documentation of the data acquisition and data handling activities, and the *system* to control the trueness thereof"



Documentation of a methodology and of a system

Place and function of monitoring plan

MRG on transparency:

Monitoring data, including assumptions, references, activity data, emission factors, oxidation factors and conversion factors shall be obtained, recorded, compiled, analysed and documented in a **manner that enables the reproduction** of the determination of emissions by the **verifier** and the **competent authority**.



Need of insight to the data processing system

Place and function of monitoring plan

MRG, par. 10.1:

The operator shall establish, **document**, implement and maintain effective data acquisition and handling activities [...]. These data flow activities include measuring, monitoring, analyzing, **recording**, **processing** and **calculating** parameters in order to be able to report on the greenhouse gas emissions.



Part B of Dutch MP's: description of procedures "from measuring to reporting"

Aviation vs. stationary installation

Aviation:

- no emissions permit
 - > individualized conditions in monitoring plan only
- fleet composition and operations more dynamic than stationary installations
 - > large amounts of data to collect, handle and report
- possibility of site visits is inherently limited

Aviation vs. stationary installation

Aviation: greater need of

- individualized obligations
- description of the *system* of data collection and data handling and reporting

Proposed templates

- Tonne-kilometre monitoring plan:

- **Examples:**

- Administration, 3a
list of aircraft anticipated to be used
 - Calculation, B (a): monitoring
list of flight routes

- **Snapshots.**

- **Rather: description of the way lists are maintained (how, where, who, etc.).**

Proposed templates

- Tonne-kilometre monitoring plan:
 - **Administration, 5b:** list of arrangements;
only procedure titles
 - These do not tell much.
 - Rather: description of procedures and data flow.
 - **Calculation, B (e):** monitoring > list of weighing instruments
 - Practically impossible for many operators.
 - Alternative: description of determining device uncertainty and overall uncertainty

Proposed templates

- Annual emissions monitoring plan:
similar problems as with TK MP:
 - **Administration, 3a:**
 - list of aircraft anticipated to be used
 - Snapshot.
 - Rather: description of the way a list of aircraft is maintained (how, where, who, etc.).
 - **Administration, 5b:** list of arrangements;
only procedure titles
 - These do not tell much.
 - Rather: description of procedures and data flow.

Inspection in allocation process

- See German answer on question 45 of consultation document:
The year 2010 is the base year for allocation of allowances for the first two periods. "Therefore, distortions in the data of this year would have far-reaching consequences".
- Dutch experience: inspections bring errors and omissions to light

Inspection in allocation process

- Why rely solely on (private) verification of TK data?
- Chance of inspections by competent authorities may promote discipline among operators and verifiers
- Findings may take form of advisory notes by competent authorities to EC