

# EU ETS

## Improvement reporting experiences in Sweden



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# EU ETS in Sweden

750 EU ETS installations + 13 aircraft operators  
Total emissions 2015: 22 Mt CO<sub>2e</sub>

## Swedish EPA responsible for:

- Allocation decisions
- Enforcement; reviewing emission reports (AER), sanctioning fees etc
- Approval of monitoring plans (MP) for aircraft operators
- Approval of improvement reports (IR)

## The County Administrative Boards responsible for:

- EU ETS permits and approval of MPs for installations

## The Swedish Energy Agency responsible for:

- Administrative authority for the Union registry

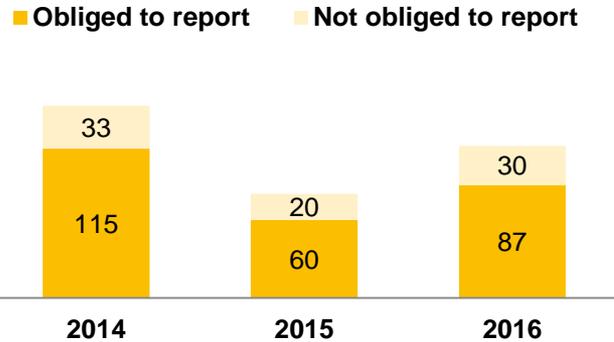
SWEDISH ENVIRONMENTAL  
PROTECTION AGENCY



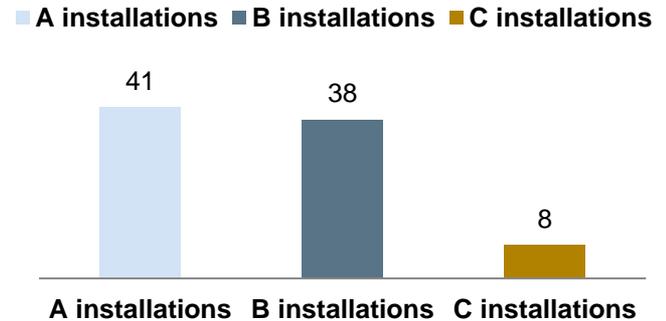


# Improvement reporting in Sweden

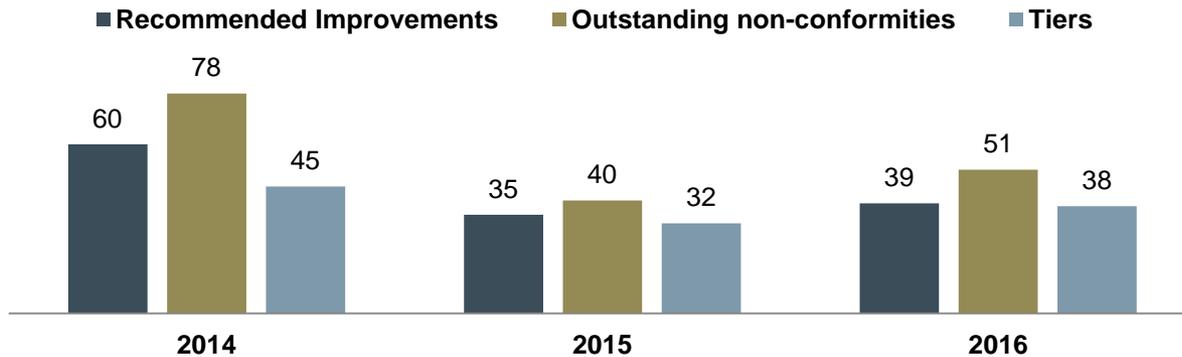
## Obligation to report (IR)



## Total IRs per installation category, 2016



## Reason for obligation to report improvements



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## Common non-conformities and recommendations:

- Internal review according to MP was not performed
- Incorrect calculation factor is given in the MP, although the correct one is used in the emission report
- Procedures are not described properly in the MP

## Experiences:

- Operators have difficulties to interpret if and when they are obliged to report improvements → 20-25% of the IR were not required
- Swedish EPA spends a lot of time approving IRs that suggest MP modifications that are not substantial (time that could be spent on other enforcement activities such as site visits)
- Moreover, once the modifications of the MP are made, another approval of the CA is required.
- Non-conformities and correct application of tiers can be followed-up during the EPA review of AERs, VRs and MPs.



# MRR and IR 2021-2030

*What changes could be made in the MRR to make the principle of improvement more efficient?*

## **Some current proposals presented in Task Force M&R:**

Remove the requirement to report recommended improvements (Art 69.4) given in the VR (NL)

Remove the requirement to report non-conformities (Art 69.4) if it has already been solved by a notification (NL)

Remove the requirement to submit improvement report concerning monitoring methods and tiers (Art 69.1) (NO).

To be discussed: Remove the requirement to submit IR as a whole (Art 69) (SE)

## **Questions:**

Do the improvement reports lead to actual improvements?

Could the improvements be achieved by focusing on other enforcement activities such as inspections, reviewing MPs and by the verifier follow-up on non-conformities and improvements according to requirement in Art 29-30, AVR?

***Please share your views!***