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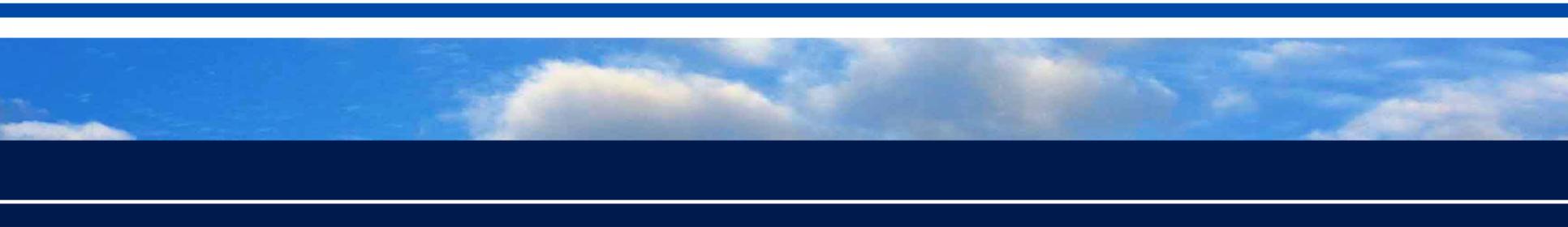
Nederlandse Emissieautoriteit

Dutch Emissions Authority

Allocation of free Allowances

Experience NIMS 2013-2020

Impact of FAR



NIMs preparation 2013-2020

Challenges in Phase 3

- New concept : Benchmarking
- New concept : Sub-installations
- Complex and new data collection process
- Short time frame
- Limited expertise at CA and operators
- Great financial interest

Results

- ➔ Delay in submitting NIMs-list (all MSs)
- ➔ Delay in transfer of allowances at start

NIMs preparation 2013-2020

NL: Risk based approach checking data

- No time/capacity for in-depth checking of all installations
- Priority for complex and large installations
- Focus on checking methodology
- Data checked (historical data, performance towards benchmarks)
- Minor issues saved for inspections

Inspection on data afterwards

- Priority for installations with potential issues
- Legal provision in national law to correction initial allocation

→ Only adjustment downwards possible

Implementing FAR

Same challenges

- Same time frame: short!
- Complex data collection process (benchmark setting)
- Financial interest (rising ETS-price)

Positive elements

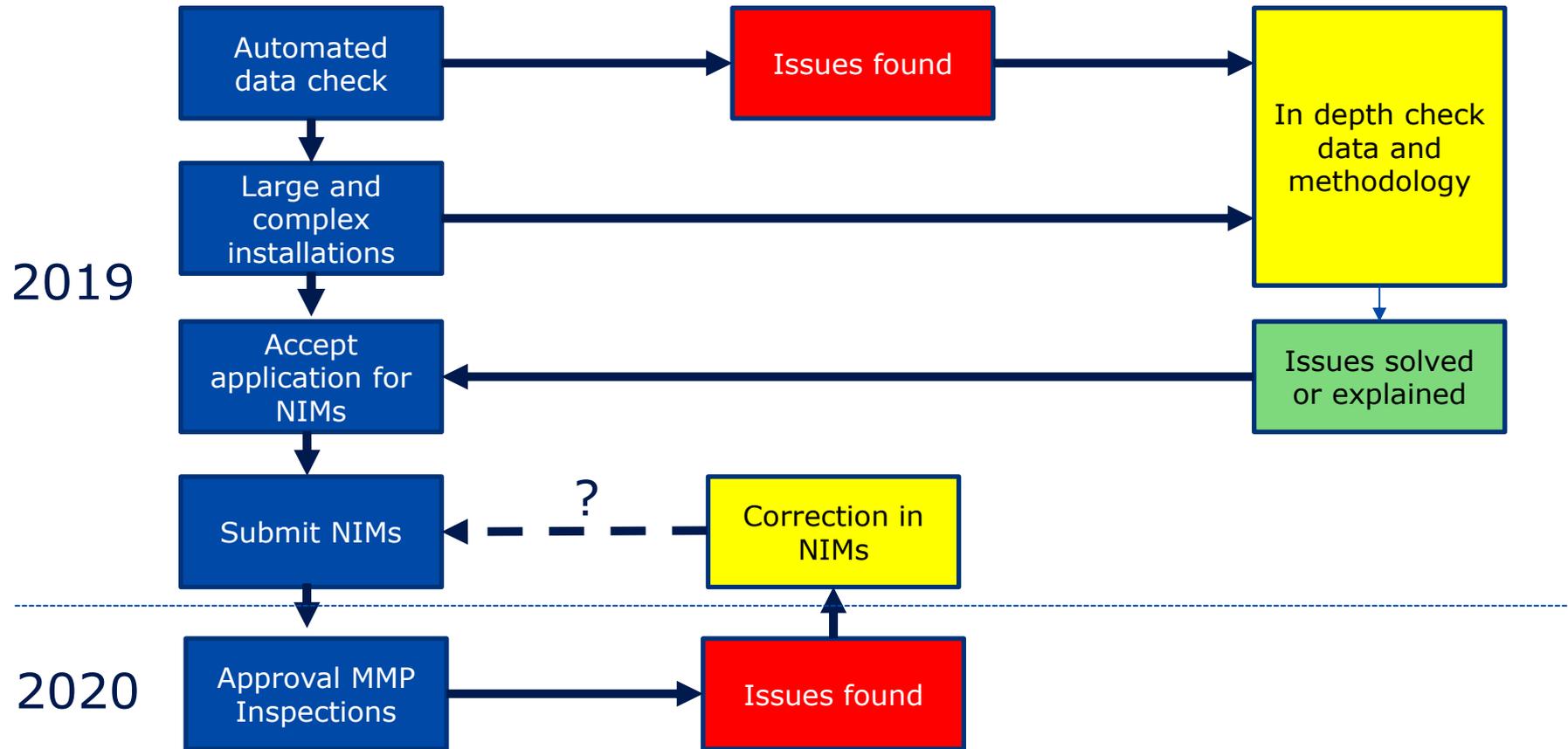
- CA's and operators have experience
- More requirements on monitoring methodology plan (MMP)
- More historical data available for cross checking:
 - Emissions data
 - NIMs data 2013-2020
 - Partial cessations, reductions, extensions

New challenges

- approval of MMP → after NIMs notifications

Implementing FAR

Risk based approach checking applications



Implementing FAR

Items for discussion

Question: What mechanisms do we need to adjust NIMs when errors are detected in a later stage (MMP approval)

- adjustments downwards?
- include also adjustments upwards ?

Question: What could be done to facilitate MSs to prevent delays?

- a common developed tool for automated plausibility checks ?
 - same historical data available in every MS
 - prevent overlap in checks by MSs and commission
- flexibility in notification process?