



**Flanders**  
State of the Art

# **MRV of data relevant for allocation**

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# ***“Data relevant for allocation”***

## **= Activity level**

- Production data for product BM sub-installations
- Heat consumption data for heat BM sub-installations
- Fuel consumption data for fuel BM sub-installations
- Emission data for process emissions sub-installations

## **= Data needed for the BM update**

- Specific emissions per sub-installation

2017

2021

**Carbon Leakage List** (IA, data collection, prelim assessments + additional assessments, EC Decision)

**Update free allocation rules** (MS mtgs, EC Decision)

Basis for data collection

CL status

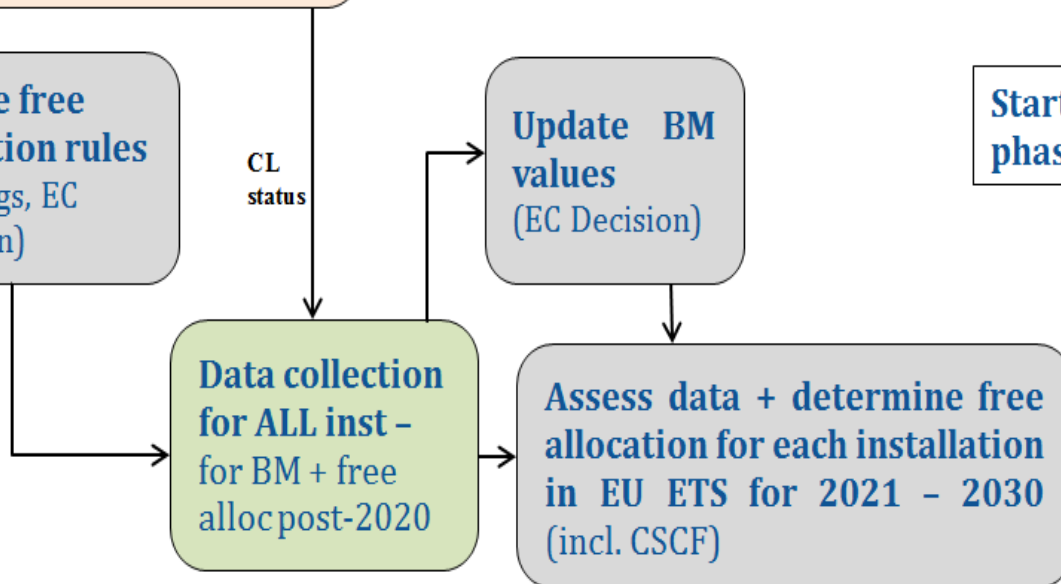
**Update BM values** (EC Decision)

**Data collection for ALL inst - for BM + free alloc post-2020**

**Assess data + determine free allocation for each installation in EU ETS for 2021 - 2030 (incl. CSCF)**

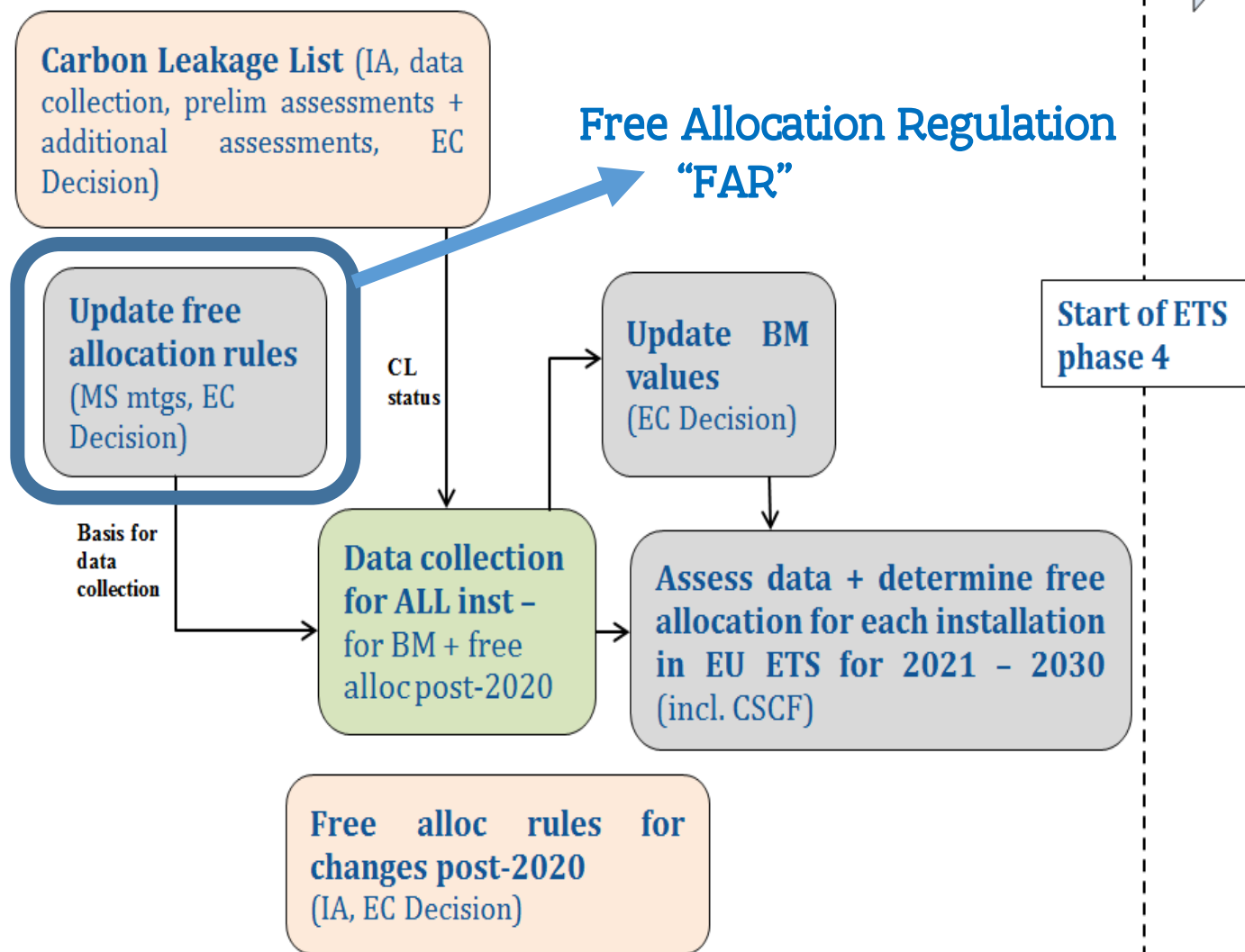
**Start of ETS phase 4**

**Free alloc rules for changes post-2020** (IA, EC Decision)



2017

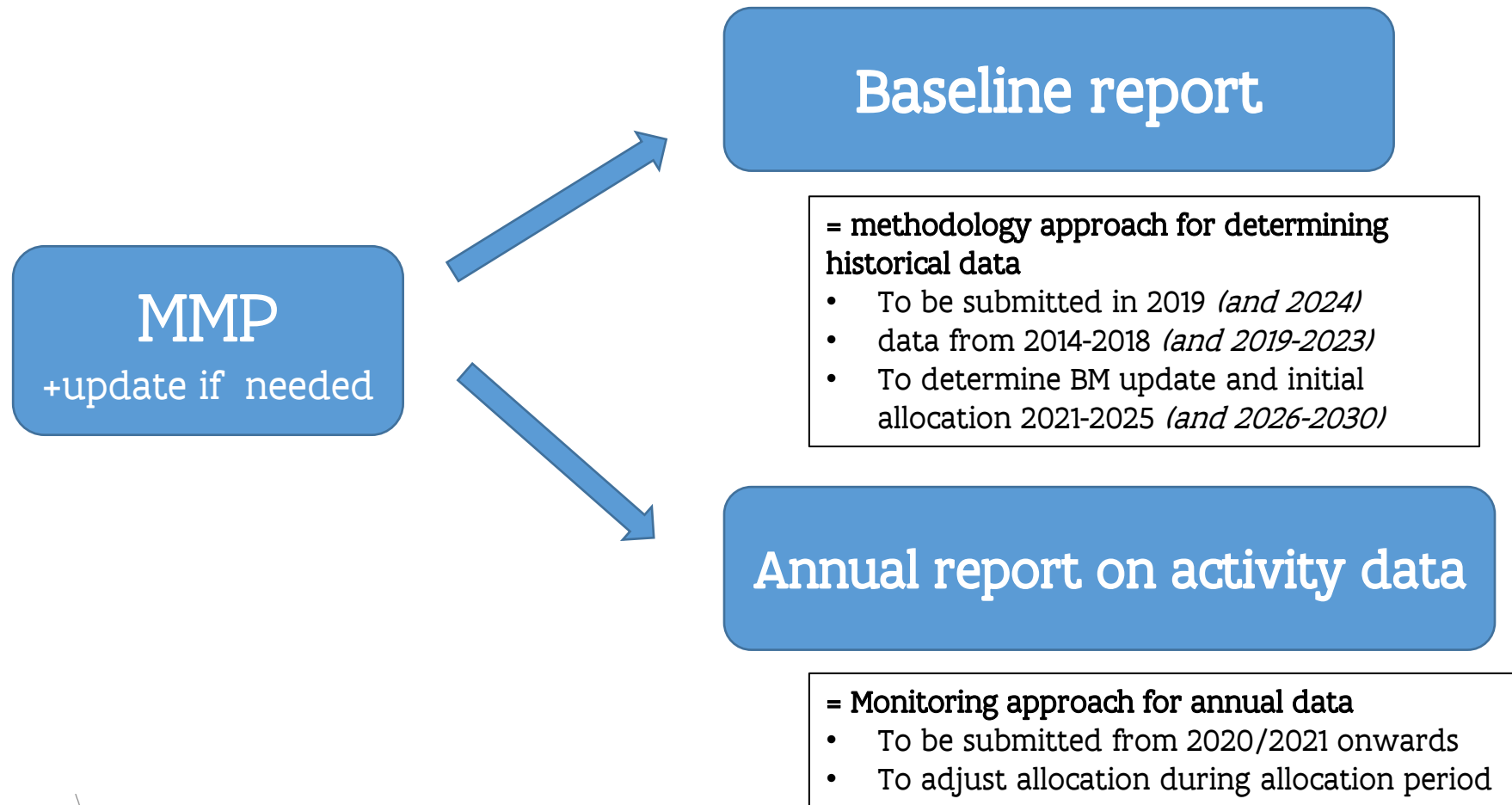
2021



# Impact of FAR on Monitoring of data relevant for allocation

	2013-2020 (CIMs)	2021-2030 (FAR)
	Methodology report	Monitoring Methodology Plan (MMP)
<b>content</b>	<ul style="list-style-type: none"> <li>Methodology to calculate the activity level per sub-installation</li> </ul>	<ul style="list-style-type: none"> <li>Methodology to calculate the activity level per sub-installation</li> <li>Methodology to calculate specific emissions per sub-installation</li> </ul>
<b>scope</b>	<ul style="list-style-type: none"> <li>Baseline data collection (05-08) or (09-10)</li> </ul>	<ul style="list-style-type: none"> <li>Baseline Data collection 14-18</li> <li>Baseline Data collection 19-23</li> <li>Annual report of activity levels</li> </ul>
<b>Approval by CA</b>	No approval required	Approval is required (but optional before baseline data collection 14-18)

# Impact of FAR on Reporting of data relevant for allocation



# Impact of FAR on Verification of data relevant for allocation

	2013-2020 (CIMs)	2021-2030 (FAR/AVR)
scope	<ul style="list-style-type: none"><li>• Activity level</li><li>• Methodology report</li></ul>	<ul style="list-style-type: none"><li>• Activity level</li><li>• Specific emissions per subinstallation</li><li>• MMP (if not approved by CA before the verification)</li></ul>
requirements	<ul style="list-style-type: none"><li>• Annex V to Directive 2003/87/EC</li></ul>	accreditation by a NAB: <ul style="list-style-type: none"><li>• for activity group 98;</li></ul> and <ul style="list-style-type: none"><li>• for the scope of the activity for which the verifier is carrying out the verification.</li></ul>

# Implementation in the Flemish Region

Oct. '18

- Workshop for operators - Information on:
  - ETS review
  - draft FAR
  - data collection in Flemish Region

15/11/18

- Homework before the drafting of the MMP – operators have to report to CA:
  - Boundaries of the installation
  - Split of the installation into sub-installations
  - Relevant NACE and Prodcom codes

- Feedback from CA on the operators “homework”

31/01/19

- Operators have to submit MMP to CA





# Implementation in the Flemish Region

31/01/19

- Operators have to submit MMP to CA

31/03/19

- Approval of MMP by CA

30/06/19

- Deadline for submission of verified baseline report 14-18

30/09/19

- Submission of BE NIMs



# Pro's and Con's of the Flemish approach

- Flemish CA will approve MMP before first baseline data collection
- This approval is optional according to draft FAR

## Pros

- Verifier has a reference document to perform verification
- Key elements for data collection are clarified in an early stage
- MMP baseline data collection = MMP annual report
- Better spread of the workload for verifiers (first they can focus on AER, then on the allocation data)

## Contra

- Tight deadline to approve MMP
- Still many uncertainties when MMP is drafted by operators
- Operators have to do 'homework' in several steps

# Implementation in the Walloon Region

Jan. 2019

- Workshop for operators and verifiers - Information on:
  - FAR, guidance documents
  - MMP and Nims Template
  - data collection in Walloon Region

February –  
end May 2019

- Operators are completing their MMP and baseline data report 14-18 with the support of a helpdesk
- Accredited verifiers are verifying baseline data report 14-18 and MMP (no approval of the CA before the verification)
- Operators submit their verified baseline data report and MMP to the CA

end August  
2019

- Feedback from CA on the baseline data report and correction if needed

30/09/19

- Submission of BE NIMs



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# Pro's and Con's of the walloon approach

- Walloon CA will not approve MMP before first baseline data collection
- The verifier will need to check the MMP against the FAR

## Pros

- All requirements (legislation, guidances, templates) are known by the operators when they start working on their MMP and baseline data report
- The operators work on NIM's in only one step

## Contra

- More work for the verifier and thus higher costs for the operator
- Risk to detect errors late in the process
- Time constraints for verifiers as verification of AER and NIMs will partially occur at the same time

# Food for thought

- Approval of the MMP before the first baseline data collection (2014-2018): good idea or mission impossible?
- Do we need further measures to improve the harmonisation within the EU regarding the MRV of allocation data (FAQ, guidance, helpdesk, Task force allocation,...)?
- Allocation rules remain rather complex: according BE there is a need for training for operators/verifiers/CA. What do you think?
- Which IT tool will you use for the data collection?
- Do we need an additional audit/verification of those data that determine the BM values (10% best installations)?
- How to involve CA/inform NAB to guarantee an efficient accreditation process and qualified verifiers?