

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a regional or local administration

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
Bayer. StMUG

Country (please indicate your current country of residence) Germany

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Strongly agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Notwendig sind insbesondere: - klare Regelungen zur Verhältnismäßigkeit der Kosten bei der Anwendung der Überwachungsmethode (Ebenen), - Klare Regelungen zur notwendigen Anzahl der Analysen (wie in Tabelle 5 der Monitoringleitlinien), - angemessene Erleichterungen für Emittenten mit geringen Emissionen (< 25 kt CO₂/a), da deren Anteil an den THG-Emissionen insgesamt gering ist.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

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Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No opinion

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

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Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? constantly

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

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