



MRVA Simplifications

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Overview

- *Reminder of what is already available under the current MRR and AVR*
- *Example: MRR Article 13 simplified MP*
- *Next: the search for further improvements and simplifications*

Compliance Forum Event Feb 2012

- *Main developments under the MRR and AVR and priorities for guidance*
 - Guidance to support simpler, more efficient and effective implementation "good Regulation half the story – good guidance equally important"
- *Session III "Making Compliance Simpler"*
http://ec.europa.eu/clima/events/articles/0050_en.htm
- *"Introduction: MRR and AVR Simplifications"*
http://ec.europa.eu/clima/events/docs/0050/session_iii_introduction_mrr_avr_en.pdf
- *Promoting clarification, consistency, efficiency, fairness, cost-effectiveness, less duplication, clearer identification of responsibilities and retention of good practice*



Selected Examples: M&R

- *Article 13: Provision for standardised and simplified MPs*
- *Article 15(1): Flexibility notification of non-significant changes*
- *Articles 28 and 29: Simplifications uncertainty assessment*
- *Article 33: Sampling plans (designed to accommodate non-homogenous source streams in particular)*
- *Article 34: Conditions for non-accredited laboratories*
- *Article 39: Biomass EF/fraction allowed by estimation*
- *Article 46: Corroboration of CEMS by no-tier calculation*
- *Articles 47 and 55: Provisions for small emitters*
- *Article 58: Control system (good controls facilitate easier compliance and verification)*
- *Etc.*



Selected Examples: A&V

- *Article 4: Presumption of conformity*
- *Article 12: Risk analysis*
 - Risk-based system facilitates proportionality/targeted approach
- *Articles 19: UA -reduced verifier requirement*
- *Article 21: Site visits facilitate verification*
- *Article 23: Materiality level (offering proportionality)*
- *Articles 31, 32, 33: Simplified verification for installations, AOs and, simplified verification plans*
- *Article 34: Sector scopes of accreditation*
- *Article 55: Cross border accreditation*
- *Article 66: Mutual recognition of verifiers*
- *Article 69: Formal information exchange*



Simplification (MRR Article 13)

- *Provision to apply standardised or simplified monitoring plans (not fully used)*
- *WPE recognition of need for further MS consideration*
- *Commission requested to develop example monitoring plan to demonstrate potential*
- *Circulated to MRVA Support TWG 13.10.2016, presented 14.10.2016, comments by 26.10.2016*
- *Applicable to installations (of all categories) as long as justified by simplified risk assessment*



Exemplar Gas Fired Combustion

- *Main fuel: natural gas. De minimis source streams: gas oil and propane*
- *Consumption available from purchase records and emission factors from national GHG inventory*
- *Two short procedures proposed as standard (generic) and to cover all risks (not requiring further installation-specific development)*
 - Commensurate to the inherent risks and control risks of the simple activity/M&R involved



Advantages

- *Very short and succinct MP (4 sections, 3 pages)*
 - No need to make more complicated
- *'Off the shelf' for installations of type concerned*
 - Bespoke adaptations not necessary
- *Justified by generic simplified risk assessment*
 - Generic (no need for more complicated operator RA)
- *Straightforward standard procedures mitigate risks*
- ***Should reduce operator, CA and verification costs***

Main Feedback

- *Exemplar helpful and welcomed*
- *Only applicable to Cat A Installations? **No***
- *Possible for other activities? **Yes** (subject to simp. RA)*
- *Other ways of implementing possible? **Yes**, the current proposal is only an example*
- *Can Article 13 MP be more complicated (e.g. more inst. specific details)? **Yes** (if simplified RA still met)*
 - **but why complicate if not necessary**
- *Do the two standard procedures in the example add value? **Yes**, cover (i) residual risks, (ii) the installation becoming ineligible, (iii) wider MRR requirements - **very concisely and simply!***

Conclusions Article 13 Exemplar

- *Article 13 already available to MS*
- *Remains MS choice to implement subject to a satisfactory simplified risk assessment*
- *The exemplar indicates how 'simple' the monitoring plan can be for a relevant activity*
- *Significant potential to reduce implementation costs*

- *Exemplar publication planned based on support of the EU ETS MRVA TWG, Compliance Forum M&R Task Force, WG3 and CCC*

NEXT!

- *Third Trading Period (current MRR and AVR)*
 - Continued search for further improvements, more efficient and effective implementation and possible simplifications
 - Reconsider/embrace what is already available
- *Fourth Trading Period (update of MRR and AVR?)*
 - Possible improvements to the MRR and AVR?
 - Where are clarifications required?
 - What gaps need to be filled?
 - Further simplifications for low risk activities/small emitters?
 - Important to keep the bigger picture in mind
 - Major role for the Compliance Forum TFs to identify and filter first ideas

Thank you for your attention

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