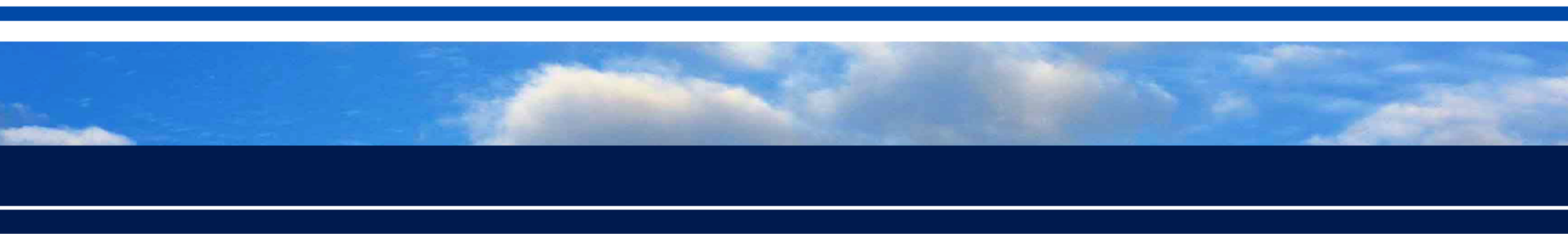


# Improvement reporting

Member state input for the  
improvement of the MRR



## NL strongly supports continuous improvement



- Therefore:
- Adjust MRR because current IR obligations under the MRR (Art 69) lead to unnecessary workload



## **Case 1: No formal decision competent authority on improvement report needed**

- Verification report
  - There has been a non-conformity with the MP relating to gas consumption monitoring methodology.
- Improvement report operator
  - When the site visit was performed, there was no key to access the gas cage to read the meter. This key is now found.
- Improvement report useful
- No formal decision competent authority on IR needed



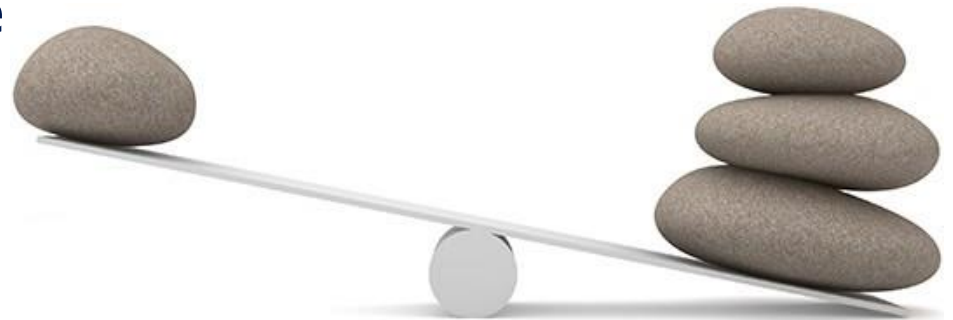
## Case 2: Verifier can assess own recommendations

- Verifier identifies inconsistencies and makes recommendations in the verification report:
  - Procedures and description of the process outdated
  - Tag numbers and units of meters do not match
- Operator copy/pastes recommendations in improvement report and fixes shortcomings with notification to CA
- Next year verifier checks previous recommendations
- Works well without CA involvement
- No improvement report needed



## Case 3: Determine whether unreasonable costs should be reported annually

- Justify unreasonable costs to apply the required tiers
  - Annual costs: investment for new equipment/lifetime
  - Annual benefits: emission reduction (average emission\*improvement factor) \* 20 €/ton
- Difference costs/benefits up to a factor of 50
- Outcome stays the same
- No annual IR required
- Case by case approach:
  - Unreasonable costs
  - Technical feasibility



# Thank you for your attention!!

- Start discussion:
  - What is the experience in your Member State?

