



Existing simplification under the MR & AV Regulations

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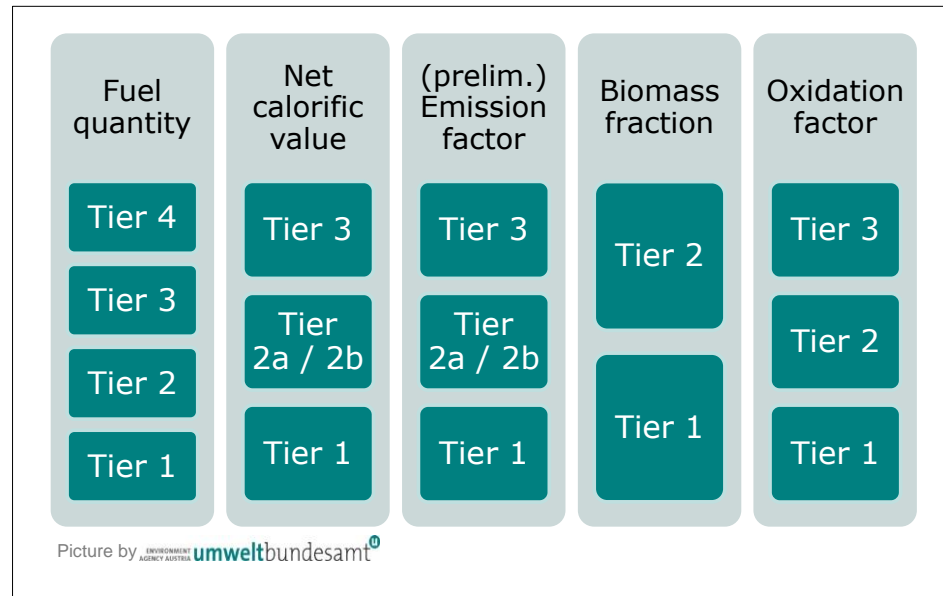
**Compliance Conference
Brussels, 7 November 2017**

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 is only half the story – good guidance equally important"
- *Session III "Making Compliance Simpler"*
https://ec.europa.eu/clima/events/articles/0050_en
- *"Introduction: MRR and AVR Simplifications"*
https://ec.europa.eu/clima/sites/clima/files/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*

Existing simplifications in the MRR (1)

- *EU-wide applicable Regulations supplemented by large suite of guidance*
- *Full freedom of choice of monitoring methodology (building block system), CEMS on equal footing to calculation*



- *Source stream and installation categorisation in connection with tier system for maximum cost-efficiency*
- *Tier system: clarified hierarchy for derogation from highest tier / definition of unreasonable costs*

Existing simplifications in the MRR (2)

- *Making use of national legal metrological control to extent feasible*
- *Simplified approach for commercial standard fuels & Article 31(4) [note: CA can use pragmatic approach here]*
- *EF in form of $t\text{CO}_2/t$ allowed (Art. 36(2)), tier 1 for OxF*
- *Simplified Monitoring Plan allowed (Art. 13)*
- *Article 15 – only significant MP changes need approval (flexibility on non-significant changes)*
- *Data flow & control activities / risk assessment simplify verification*
- *Sampling plan and equivalence criteria for non-accredited laboratories*
- *Biomass – allowed estimation methods*
- *CEMS – formulae and standards given; easier corroboration*

Existing simplifications in the MRR (3)

Simplifications for installations with low emissions (Article 47)

- *No obligation to submit supporting documents with MP*
- *No obligation for improvement report on verifier recommendations pursuant to Art. 69(4)*
- *Use of purchase records & estimated stock changes allowed without providing uncertainty assessment to CA*
- *General use of tier 1 allowed (unless tier possible without additional effort)*
- *Lower threshold for unreasonable costs (18(4))*
- *Simpler requirements for non-accredited laboratories*
- *“Low emitter” status may be maintained if threshold is exceeded only once in five years*

Existing simplifications in the MRR (4)

Small emitters (Aviation) – Art. 54

- *Use of Eurocontrol small emitter tool for estimating fuel consumption*
- *Art. 54(3) defines a simplified MP*
- *No supporting documents required*

Further Simplification in the EU ETS Directive (since Regulation (EU) No 421/2014):

- *If exclusively Eurocontrol Support Facility is used, the AER is considered verified.*

Simplification in the AVR (1)

- *Article 12: Risk analysis*
 - Risk-based system facilitates proportionality/targeted approach
 - Simple installations require simple verification plans (Article 33) – see also EGD I (chapter 4)
 - However, small is not necessarily simple
- *Article 19: Uncertainty Assessment by operator – reduced verifier requirement*
- *Article 21: Site visits facilitate verification*
 - Clear rules for waiving site visits (Art. 31, 32)
- *Article 23: Materiality level (offering proportionality)*

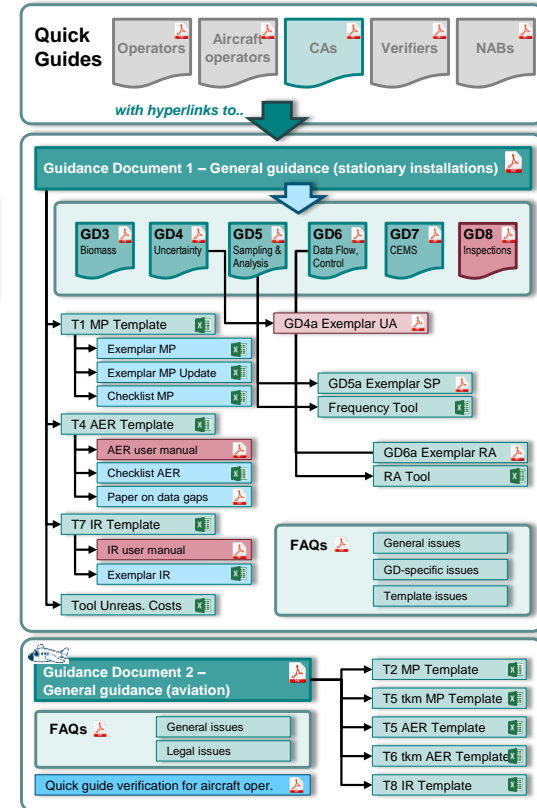
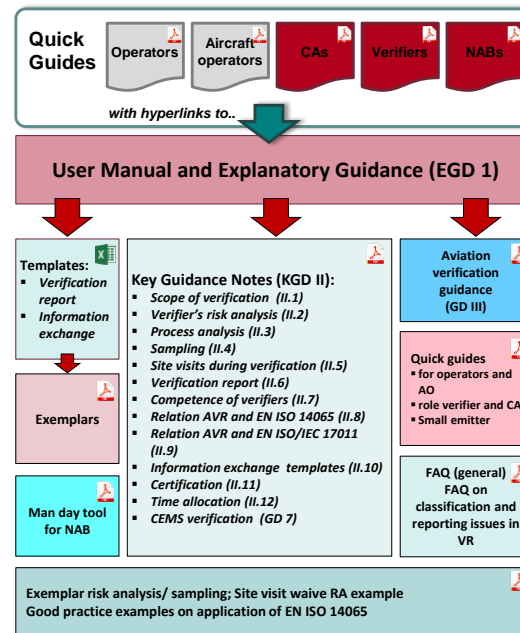
Simplification in the AVR (2)

Clarifications leading to simplifications:

- *Article 4: Presumption of conformity*
- *Article 34: Sector scopes of accreditation*
- *Verification team as a whole has to meet competence requirements*
- *Article 55: Cross border accreditation*
- *Article 66: Mutual recognition of verifiers*
- *Article 69: Formal information exchange*

Further simplification (1)

- *Five quick guides*
 - Operators
 - Aircraft operators
 - Verifiers
 - CAs
 - NABs



- *Short guidance (10 pages) containing hyperlinks to guidances, templates and tools available*

Further simplification (2)

- *Harmonised electronic templates (monitoring, reporting, verification, info exchange,..)*

(d) **Estimated annual emissions:**
 Please enter here the average annual emissions of your installation. This information is required for categorisation of the installation in accordance with Article 19 of the MRR. Use the average verified annual emissions of the previous trading period data OR if this data is not available, or is inappropriate, a conservative estimate of annual average emissions, including transferred CO₂, but excluding CO₂ from biomass.
 The resulting category is used for identifying minimum tier requirements in section 8 (Source stream)

Estimated annual emissions	200.000	t CO ₂ e	<input type="checkbox"/>
Installation category in accordance with Article 19	B		

(e) **Installation with low emissions?**
 Entering "TRUE" here means that the installation satisfies the criteria for installations with low emissions as defined in Article 19 of the MRR.
 According to that Article, the operator may submit a simplified monitoring plan for an installation where no nitrous oxide emitting activities are carried out and it can be demonstrated that:

- the average verified annual emissions of the installation during the previous trading period were less than 25 000 tonnes CO₂(e) per year, or
- a conservative estimate of annual average emissions is less than 25 000 tonnes CO₂(e) per year, where the verified emissions are not available or inappropriate.

Note: the above data shall include transferred CO₂ from biomass.
 If your selection here contradicts the data entered in point (d), the system will highlight this fact. Please give an appropriate justification below.
 If your installation is an installation with a simplified monitoring plan, the simplified monitoring plan apply.

(f) **Justification for estimation value**
 If your input regarding being an installation with low emissions is "TRUE", your entry in point (d), or if that figure is not based on verified emissions, but on a conservative estimate, please give a short justification below.

Green boxes:
automatically
determined results

Questions/boxes that
become irrelevant are
automatically marked grey

- *Extraction macro for AERs (installations)*
- *Tools (frequency of analyses, unreasonable costs,..)*
- *Training events on A&V and M&R issues*

Further contact on supporting the revision of MRVA regulations:

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