



Compliance Conference



Changes to the MP (examples of significant and non-significant changes)

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Art. 15 MRR: Approval of modifications of the MP

Notification:

- Modifications → without undue delay
- Non-significant modifications → by 31 December of the same year (up to MS to decide)

Approval:

- Any significant modification is subject to approval
- If CA considers notified modification not significant → inform operator without undue delay

Examples

Change of the categorisation of a source stream

Due to process changes in a Category C installation, consumption of a particular material increases (minor → major)

Operator uses officially verified measuring instrument and default value for EF

→ change of approved tier necessary (EF)

→ **significant modification**

Installation of new measuring instrument

Old calibrated measuring instrument replaced, no tier change

Different situations possible:

Situation 1: Installation of a different, calibrated (not officially verified) measuring instrument

- change of individual uncertainty assessment
- significant modification?

Situation 2: scheduled exchange of measuring instrument with only different serial number

- no change of individual uncertainty assessment
- significant modification?

Situation 3: Installation of officially verified measuring instrument

- simplified uncertainty assessment: take MPE in service
- significant modification?

Change of default value

Different situations possible:

Situation 1: operator wants to change the default value based on historical analyses (Art. 31 (1) e) MRR)

→ Change of default value in the MP

→ significant modification

Operator 2: there is a change of a default value for a fuel in the national list published by the CA (Art. 31 (1) c) MRR)

→ Change of default value, but not based on operator's claim

→ significant modification?

Experience

Experience (I)

Definition and publication of a more concrete list of all kind of modifications with examples on the CA website

- clarifies picture of **significant modifications** and reduces unnecessary “traffic” between operator and CA
- make clear that **non-significant** modifications
 - lead only to formal corrections of already described issues in the MP
 - don't lead to higher tier requirements in comparison to the approved MP

➔ Significant modifications: notification without undue delay and approval

➔ Non-significant modification: Gathering and notify them together with next significant change or latest till the end of the reporting period

Experience (II)

- Add a definition of modifications which don't have to be notified for practical reasons because
 - don't lead to a change in the MP
 - don't lead to a change in documents proving compliance with the tier requirement
- Have still to be documented by operator (not in the MP)
- Make documentation available for verifier (and for CA on request)

Implementation approach for examples with (?)

- Installation of a different, calibrated (not officially verified) measuring instrument, no tier change but change of individual uncertainty assessment
→ Significant modification
- Installation of new officially verified measuring instrument, no tier change
→ Non-significant modification
- Change of a default value in the national list published by CA
→ Non-significant modification (implemented in IT-tool)
- Scheduled exchange of measuring instrument with only different serial number
→ Non-notifiable modification

Thank you for your attention!

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