

# Specific M&R challenges and issues

Naomi Walker

Technical Advisor, EU ETS MRV, UK

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# Overview

➔ Activity within the M&R TF

➔ Examples

➔ Improvement reports

➔ Aluminium industry

➔ Use of exclusive biomass

➔ Transfer of CO<sub>2</sub>

➔ Use of CEMS in refineries

➔ Summary

# Activity within the M&R TF 2013/14

- ⇒ 70+ questions discussed by M&R TF
- ⇒ 16 Competent Authorities
- ⇒ 35 topics, including 7 sector-specific questions
  - ⇒ Transfer of CO<sub>2</sub>
  - ⇒ Unreasonable costs
  - ⇒ Using exclusive biomass
  - ⇒ Sampling and analysis
  - ⇒ Improvement principle and reporting
  - ⇒ CEMS
  - ⇒ Article 21 (Chapter 5)

# Example 1: Improvement reports

Q: Does Art. 69(2) apply to major source streams only or both major and minor source streams?

A: Applies to both major and minor source streams where their applied monitoring tier does not meet the requirements of the first sub-paragraph of MRR Article 26(1)

## Example 2: aluminium industry

Q: Do primary aluminium producers in your country use accredited laboratories to analyse the anodes? If so, what analyses are being carried out?

A: A mixture of both accredited and non-accredited laboratories are used to analyse for carbon content, sulphur and ash. Where non-accredited laboratories are used, equivalency has been demonstrated

## Example 3: use of exclusive biomass

Q: How do you ensure that a representative sample is and how do you decide on the required frequency of analysis to determine that the fossil fraction is below 3%?

A: It is for the operator to demonstrate that they have complied with Articles 38 and 39

## Example 4: transfer of CO<sub>2</sub>

Q: An operator has installed specialised technology for capturing the CO<sub>2</sub> and using it for plant growth. He claims that operators in other MS are not required to report the CO<sub>2</sub> used for plant growth. Can the operator exclude the captured emissions from the total annual emissions? What do you allow?

A: MS supported the belief that this was not allowed under the clear requirements of the MRR

# Example 5: use of CEMS in refineries

Q: Article 42 requires CEMs to undergo EN14181 testing to prove the uncertainty. This is backed up by guidance note 7 - Continuous Emissions Monitoring Systems (CEMS). Our refinery industry report that they cannot meet tier 4 for their FCCUs(fluidised catalytic cracker units). What are your refineries achieving?

A: (MS) EN 14181 is applied and on the basis of technical feasibility, the highest achievable is tier 3



# Summary: exchanging experiences in the real-life application of the MRR

- ➔ A range of topics, some of which are ongoing (e.g. CEMS)
- ➔ Some topics are technically complex; others are not
  - ➔ Sharing experience, expertise and knowledge
  - ➔ Pooling resource where there may be only one installation of that sector in your MS
  - ➔ Reassurance to respond to claims that 'other MS do things differently'
- ➔ Hint:
  - ➔ What do you think is the answer?
  - ➔ What does the MRR say (legally binding!)?

# Where to go for help

➔ MRR and guidance:

[http://ec.europa.eu/clima/policies/ets/monitoring/documentation\\_en.htm](http://ec.europa.eu/clima/policies/ets/monitoring/documentation_en.htm)

➔ M&R TF manager: Doris Tharan  
doris.tharan@uba.de

➔ List of questions on SharePoint:

<https://anubis.uba.de/websites/EU-CF/Monitoring/FAQs/Forms/AllItems.aspx>