



M&R: Setting the Scene

**MRR current challenge, the role of
guidance, priorities for 2013**

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Overview

- *The current challenge: Approval of MPs*
- *Background to MRR guidance and objectives*
- *Priorities for 2013 guidance follow-on project*

Guidance is available to support simpler, more efficient and more effective application of the MRR

GOOD GUIDANCE SUPPORTING GOOD REGULATION

The Current Challenge

***APPROVED MONITORING PLANS IN PLACE BY
1st JANUARY 2013***

Meeting:

- Compliance with Commission Regulation (EU) No. 601/2012
- Completeness
- Consistency, comparability, transparency
- Integrity and accuracy of methodology balanced against cost-effectiveness and efficiency

Monitoring Plans (MRR Arts. 11&12)

- *All operators/AOs require CA approved MPs*
 - “a detailed, complete and transparent documentation of the monitoring methodology”
 - “at least the elements laid down in Annex I”
- *Supplementary requirements:*
 - Written procedures
 - Evidence of compliance with uncertainty thresholds
 - Risk assessment – evidence of control activities appropriate to the risks identified

ALL BY 1st JANUARY 2013

MRR Annex I: MP Minimum Content

- *Part I: Installations:*
 - General information: description of installation, activities, source streams, emission sources, procedures
 - Details of calculation-based methodology: formulae, tiers, measurement systems, calculation factors, analysis methods, sampling plan (procedures), laboratories
 - And/or details of fall-back methodology, measurement-based methodology, N₂O methodology, PFC methodology, inherent and transferred CO₂ methodology
- *Part II: Aviation emissions*
- *Part III: Aviation tonne-kilometre data*

MRR Article 12(2): Procedures

- *Operator/AO shall establish, document, implement and maintain procedures (full details)*
- ***Only summary details required in the MP:***
 - Title
 - Traceable and verifiable reference
 - Identification of responsible posts/departments
 - Brief description
 - Location of relevant records and information
 - Identity of relevant IT system
 - List of relevant ENs/other standards

MRR Article 13: Standardised MPs

- *MSs may allow use of standardised or simplified MP templates based on templates and guidelines published by the Commission*

N.B. Experience has shown the huge advantage of standard templates for delivering greater completeness, harmonisation, efficiency, etc.

Objectives MRR Guidance

- ***To ensure availability of relevant guidance and tools to support common understanding and efficient implementation of the MRR***
- *To cover optional requirements/further detail*
- *Advantages of endorsed guidance:*
 - Avoid need for re-invention/duplication
 - “Assurance” of MRR compliance
 - Harmonisation (MSs, operators/AOs)
 - Administrative efficiency due to familiarity (IT compatible)
 - Added confidence in ETS data integrity/ETS credibility

MRR Article 26: Required Tiers (**NEW hierarchy compared to MRG**)

- *Highest tier default for Category B and C installations*
- *At least the minimum tiers specified in Annex V for Category A installations/commercial standard fuels*
- *Subject to technical feasibility and unreasonable costs (and CA approval), one level lower for Category C installations and up to two tier levels lower for Category A and B installations*
- *If still technically not feasible/unreasonable cost, the CA may allow an even lower tier to a minimum of tier 1, subject to a suitable plan for necessary improvement within three years*

MRR Articles 27-29: Activity Data UA

- *Recital No.7: Requirements for uncertainty assessment should be minimised without reducing accuracy where instruments are used under type conform conditions (in particular under NLMC)*
- *Uncertainty assessment (Article 28):*
 - Specified uncertainty, calibration, conditions of use
 - Stock changes > 5%
 - Uncertainty over full reporting period (cf. tier thresholds)
 - May simplify to MPEs in service, or where lower the uncertainty obtained by calibration + conservative adjustment factor including uncertainty in service (where installed in an appropriate environment)

MRR Articles 32-35: Analyses

- *Article 32: EN>ISO/national>draft>industry best practice*
- *Article 32(3): Batch specific, representative and no 'cherry-picking' of results*
- *Article 33: Sampling plan (written procedure for each source stream)*
- *Article 34: EN ISO/IEC 17025 accredited labs unless technically not feasible/unreasonable costs, and non-accredited labs meet equivalence reqs.*
- *Article 35: Frequency for analyses*

MRR: Biomass

- *Definitions: Article 3(20), (21) and (22)*
- *Recital 2: Article 17 Directive 2009/28/EC applies to bioliquids and biofuels (as defined)*
- *Article 38 simplifications:*
 - No-tier for exclusively biomass streams (activity data)
 - No-tier methodology to determine factors for fossil fractions < 3% (unless relevant to CEMS)
- *Article 39 determination of fraction: Default/ specific analysis > use of standard EFs/fractions/ estimation methods (where published by COM) > assumed 0% or CA approved estimation method*
- *Article 53: Aviation*

MRR Chapter V: Data Management and Control

- *Article 57: Data flow activities*
- *Article 58: Control system*
- *Article 59: Quality assurance*
- *Article 60: Quality assurance of information technology*
- *Article 61: Segregation of duties*
- *Article 62: Internal reviews and validation of data*
- *Article 63: Corrections and corrective action*
- *Article 64: Out-sourced processes*
- *Article 65: Treatment of data gaps*
- *Article 66: Records and documentation*

Priorities for 2013 Guidance Project

- *Completion of intended suite **of documents** (as relevant): User manual/general guidance; Specific Guidance Notes; Templates; 'Exemplars'; FAQ*
- *Improvement of existing guidance based on further issues arising*
- *Development of relevant materials for on-going MRR enforcement, e.g. changes to MPs, improvement reports, CA determination of emissions*

Task Force and MS recommendations regarding priorities and inputs now requested.

Thank you for your attention!

And, thank you for the contributions already made to the 2012 guidance!

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