

Compliance Conference



Simplifications for simple emitters

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Art. 13 MRR: Standardized and simplified MP

Before approval of simplified MP

- CA **shall carry out a simplified risk assessment** as to
 - whether **proposed control activities and procedures for control activities** are commensurate with the **inherent risk and control risks identified**, and
 - justify the use of such a simplified monitoring plan.
- Or MS may require the operator to carry out such risk assessment itself, where appropriate.

➔ **Art. 13 hardly used by MS**

- maybe due to MS' interpretation, that an installation-by-installation risk assessment is necessary

MRR revision: Rephrasing of Art. 13 necessary?

Clarification in terms of, e.g.

- No change of Art. 13, because everything is clear **or**
- MS may identify a group of simple installations and carry out a simplified risk assessment for this group **or**
- An indication of relevant characteristics as basis for the identification of simple installations by MS **or**
- A concrete definition for simple installations.

Consideration, whether

- fulfilling standardized control activities and procedures for control activities is the only adequate requirement for approving simplification

Simple emitter installation: possible installations

Installations

- a) with less or equal 1,000 t CO₂/year (are equally treated as de-minimis source streams using conservative estimations instead of tiers) and/or
- b) using natural gas as the only major source stream for which
 - calculation factors base on standard factors or on a standardized national system and
 - activity data base on invoice data or on measurements subject to national legal metrological system.


Apart from that only de-minimis source streams are used

Numbers:

DE: ca. 900-950 installations (50% of total number of installations in DE)

NL: ca. 270 installations (60% of total number of installations in NL)

Possible Simplifications

- 1) Simplify the MP e.g. by implementing check-boxes for certain issues (e.g. *use of national standard factors* )
- 2) Exemption from submitting supporting documents according to Art.12(1) MRR (uncertainty and risk assessment)
- 3) Waive requirement to describe certain procedures according to Art.12(2) MRR i.c. with Annex I MRR
- 4) Exemption from submitting improvement report (Art. 69(1) to (4)).
- 5) Allowing an initial verification, and after that every third year if the MP was not reapproved.

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Thank you for your attention!

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