

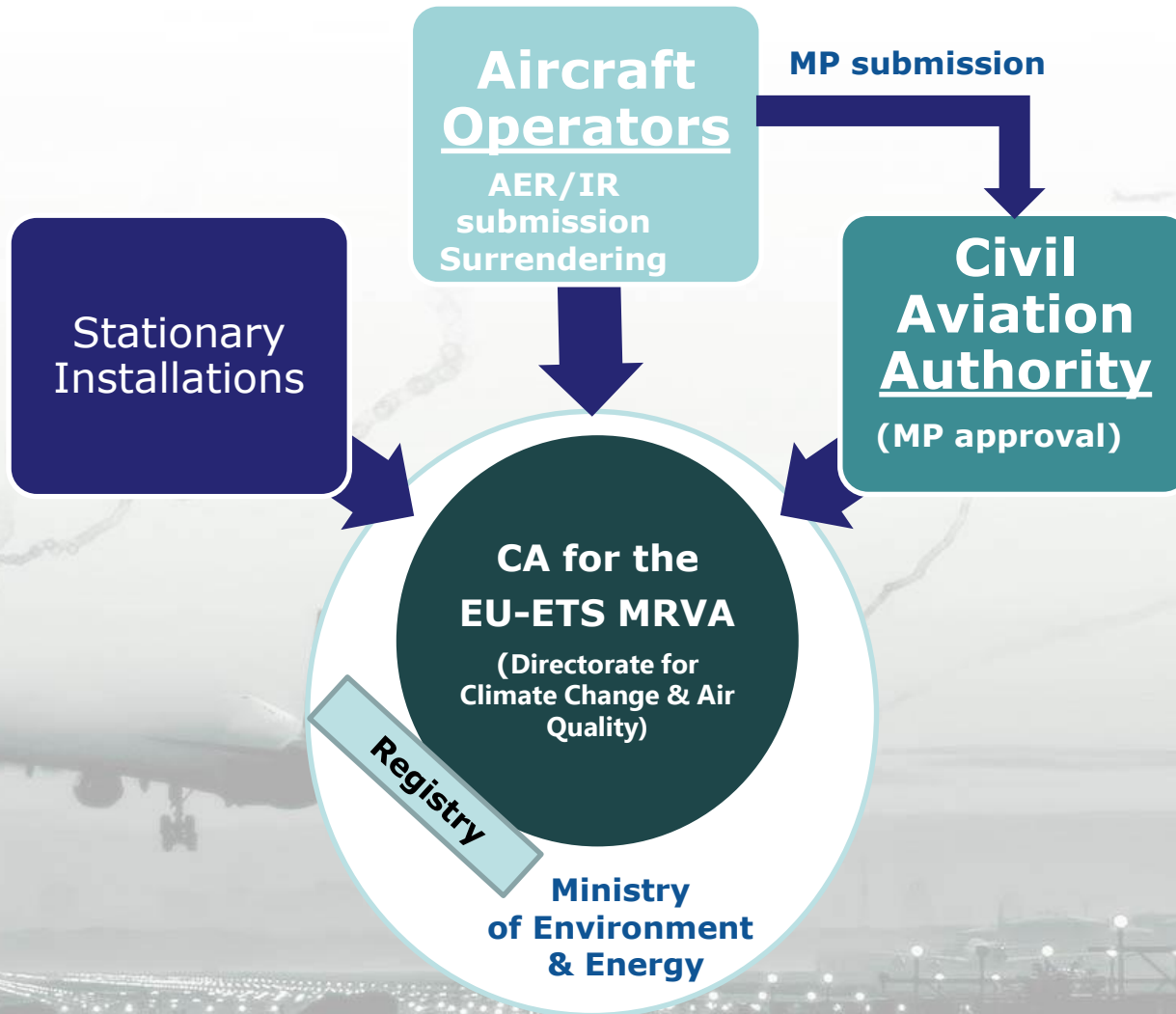


ETS/CORSIA Aircraft Operator Monitoring Plan Approval Procedures & Issues

Yiannis Markoudakis
MRV Administrator

NA for the Hellenic Part of the Union Registry

J.MARKOUDAKIS@prv.ypeka.gr





For a more efficient administrative process, Aircraft Operators have been separated in the following categories, according to their reporting obligations:

EU ETS & CORSIA

- AOs under the requirements of EU ETS AND ICAO CORSIA
- The submission of Annual Emissions MP had been requested, used for combined reporting under the EU ETS and ICAO CORSIA until 28 FEB 2019*
- *as described in Appendix 1
"Administration procedures of ICAO ANNEX 16 Vol IV SARPs."

EU ETS ONLY

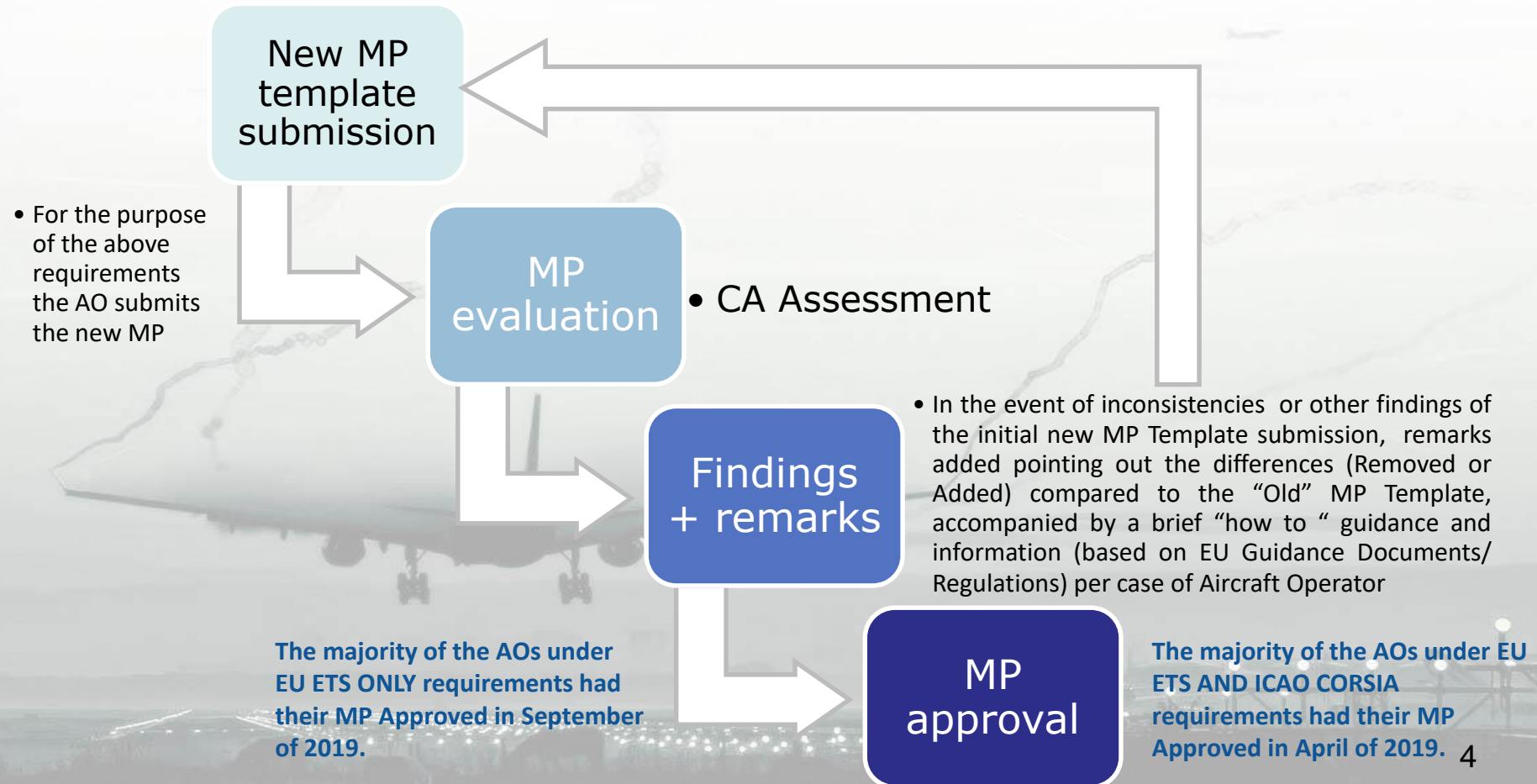
- AOs under the requirements of EU ETS ONLY
- The submission of Annual Emissions MP had been requested, used for combined reporting under the EU ETS and ICAO CORSIA as soon as possible since there wasn't ample timeline for the submission of the template at that time; (*based on Regulation 2012/601/EU and according to the provisions of Articles 12, 14, 15, 51)

Non-Commercial AOs under EU ETS

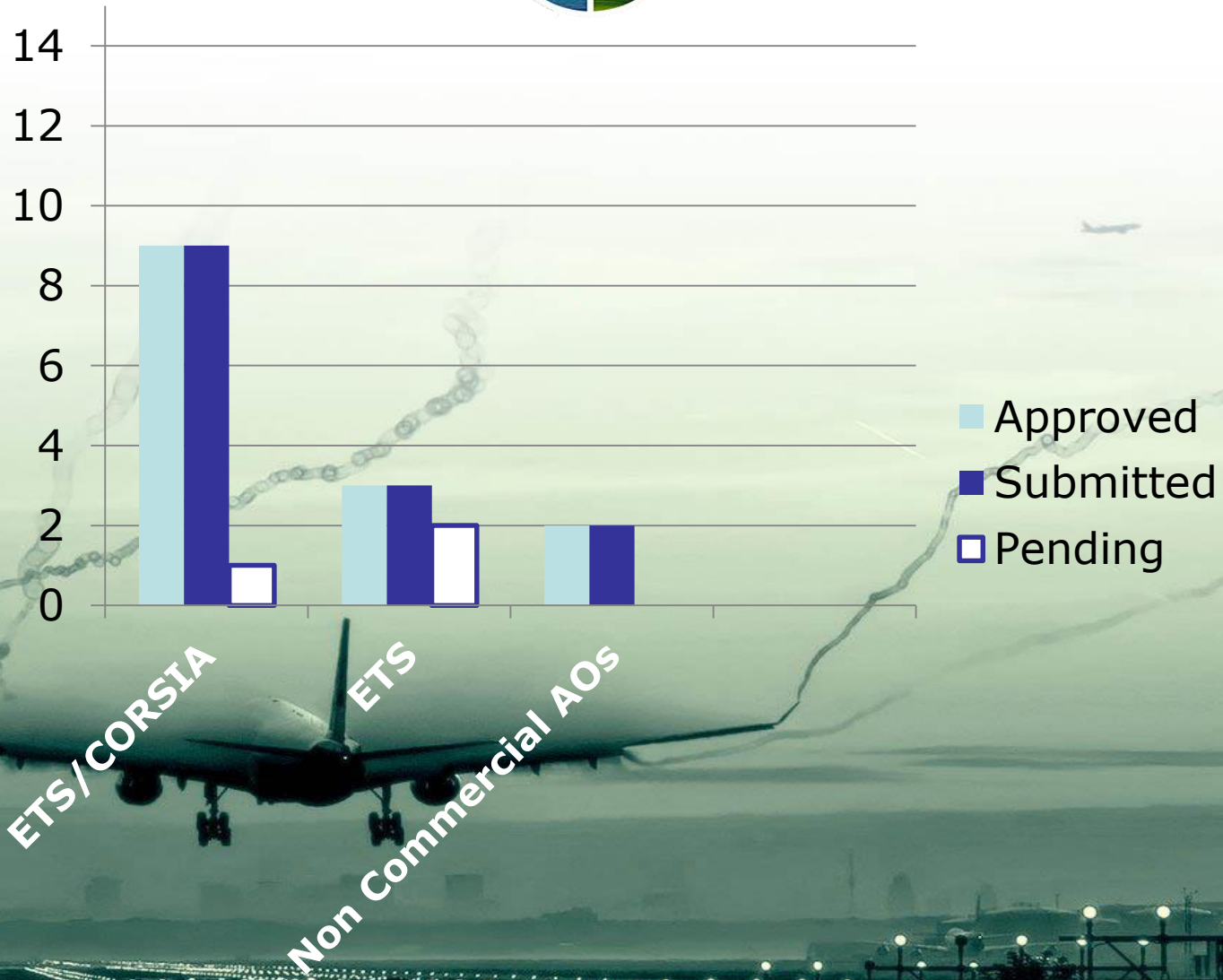
- NON Commercial AOs under the requirements of EU ETS ONLY below 1000tCO₂
- The utilization of "small emitters tool" has been requested from the AOs, in order to support their eligibility of the <1000tCO₂ threshold, since according to Regulation 421/2014: "*NON Commercial AOs emitting less than 1000tCO₂ ,are exempted to submit MPs for emissions*"



The “MP Assessment Process” followed, was in accordance with requirements of Monitoring and Reporting Regulation (EU) No 601/2012 and the provisions of Article 76 of Implementing Regulation (EU) No 2066/2019 that are applicable from 01/01/2019.

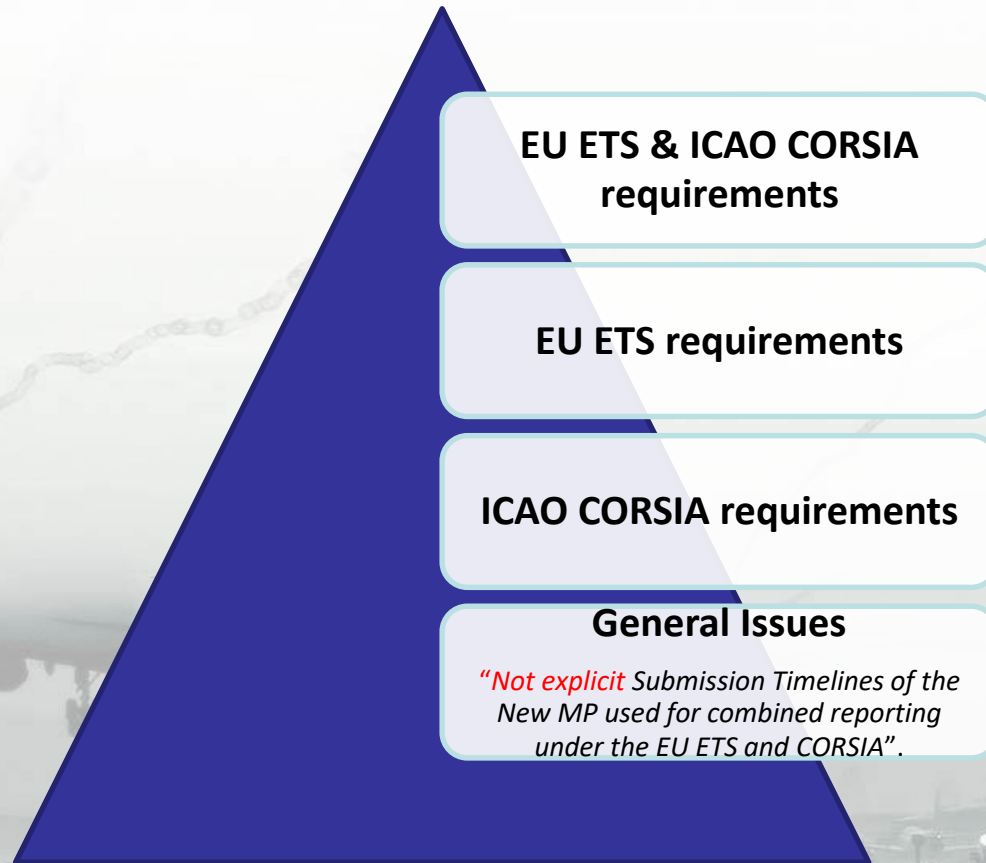


MONITORING PLAN STATISTICS





MONITORING ISSUES (summary per requirement raised by the Aircraft OPERATORS):





Flights

- Which flights considered international (CORSIA) / European (EU ETS)

Airports

- Airport Identification (Codes) and Airport Jurisdiction (to which country belongs to)

Type of flights

- Type of flights included / excluded

Common MP Tables

- Common ETS / CORSIA MP Tables

Key Risks

- Identification of KEY RISKS / CONTROL ACTIVITIES Items

MRV requirements

- Clarification between EU ETS MRV requirements, ICAO CORSIA MRV requirements and ICAO CORSIA Offsetting, towards to Flight Reporting-Verification and the case of double monitoring



Operational/Flight Scope MP → Emission Sources:

- Distinction between Full and Reduced Scope Emissions, in order for the AO to use in a correct manner the Small Emitters Tool for MP tables and provide the adequate EU ETS Emission Estimation

Risk Assessment (RA):

- More clarity on the elements of the RA:
 - e.g. How to perform and integrate a RA process into AO's internal procedures.
 - How to properly use the EU Risk Assessment Tool (excel).
 - Explanation on the meaning and usage of the terms:
"Occurrences per year" or "Probability of occurrence"



Cross Checks

MP → Management

- Queries on which Cross checks are accepted and the type of checks for flights and fuel (logistics, invoices, flight Operational Data, Aircraft Maintenance Data...).

Simplified Approach → Emission Sources

- How the Simplified Approach is applied to Aircraft Operators (Directive 2003/87/EC Article 28a).
- **Terminology confusion** between the Simplified Calculation and Simplified Approach, how they are applied and how to use them in the MP Template.



- Application of the new data gap threshold of 5% in accordance with Article 76 of Reg. 2019/2066/EU and to which table of the MP should. What will be the main features of the procedure

New data gap threshold of 5%
- MP Section 11 (**simplified calculation**)

- How to use the ICAO CORSIA CERT Tool in respect of relevant entered flights in the Tool and to which table of the MP correspond to...

ICAO CORSIA
CERT -
Emission
Sources

- What is the purpose of the CERT Assessment and how to use it.

ICAO CORSIA
CERT
Assessment

- How can the AO make the correct selections in section 2 of the MP, in order to fulfill its compliance requirements.

ICAO CORSIA
CERT MP
compliance
requirements.



Since some
International
Flights are part
of EU Emissions

Suggestions

Issuance of a “step by step “ Guidance Manual for AOs MP Emissions Completion, on how/what to describe in each section/table of the MP, and in what manner. A “Risk Assessment Requirements” section should additionally be included, on how to conduct, issue and use the Risk Assessment.

Emissions MP Compliance Manual for CAs, guiding the CA to assess AO’s MP and accept for approval.

Both aforementioned Manuals should be incessantly updated, in order to include the adaptive changes in Regulations and Guidance Material Documents.

The MP Approval Document should be updated from Approval Letter that is today to Standardized Aviation Emissions Monitoring Certification based on EU ETS Regulations and Guidance Material provisions, which already are in force.

Ministry of Environment & Energy

Directorate of Climate Change & Air Quality

Section of Market Mechanisms & GHG Emissions Registry



ets@prv.ypeka.gr

Thanks for your attention!

Yiannis Markoudakis
Ministry Of Environment & Energy

Ioannis Mimikos
Civil Aviation Authority