

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a European business/industry association

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
European Industrial Gases Association

Country (please indicate your current country of residence) Belgium

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? No opinion

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No opinion

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? No opinion

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? No opinion

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No opinion

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No opinion

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme
EIGA has developed a position paper on the draft Regulation, and this may be found at www.eiga.eu It is strongly suggested that this is referred to at <http://eiga.eu/index.php?id=180>

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme
No comment

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General

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Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
64879142323-90

Country (please indicate your current country of residence) Belgium

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Regarding “18. PRODUCTION OF BULK ORGANIC CHEMICALS AS LISTED IN ANNEX I TO DIRECTIVE 27 2003/87/EC” the Draft MR Regulation dated April 15, 2011, currently states that emissions from bulk organic chemicals must be measured with a mass-balance approach, unless the operator can show to the satisfaction of the competent authority ... We propose that, when there is physical separation between combustion streams and feed/product stream, it should be the operator’s own choice to determine the CO₂ emissions either on input based combustion fuel stream measurements or on (more complicated) overall carbon mass balance. The input-based approach is at the moment in EU ETS Phase 2 successfully applied for e.g. steam cracking installations. Most bulk organic chemicals units have many hydrocarbon inputs, outputs and storage activities and hence involving very many streams in a mass balance approach. However the number of fuel metering points required for the input methodology is in comparison low

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

None

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Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

The Society of Motor Manufacturers and Traders (SMMT)

Country (please indicate your current country of residence) United Kingdom

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EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a European business/industry association

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
ACEA Peter Kunze ID0649790813-47

Country (please indicate your current country of residence) Belgium

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General Aviation Manufacturers Association (GAMA), Register ID: 49221685491-82

Country (please indicate your current country of residence) Belgium

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In keeping with the EC's principles of balancing the environmental responsibilities of general and business aviation (GA) with proportional rules (COM(2007) 869) we would suggest the following: Given the significant quantity of small emitters within ETS, and the high number of these operators who must purchase credits for the majority of their emissions due to the TK principle, it is vital that a cost-efficient method of monitoring and reporting be made available. We respectfully request that the EC amend the small emitters threshold from 10,000 to 50,000t CO₂ per annum. Thus providing a pragmatic way for GA operators to play a role in ETS by employing the most feasible option available, and ensure a level-playing field for GA operators. This would equally assist competent authorities to deal with the burden of the numerous small emitters who fall under their responsibility. In parallel, the GA community is working with Eurocontrol to improve the accuracy of the ETS support facility.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

If the ETS Support Facility run by EUROCONTROL is validated and verified as an independent source, GAMA strongly believes that any additional separate verification requirements are redundant and place unnecessary financial and administrative burdens on small emitters. We would welcome specific provisions for a specific small emitters verification method, which would include the ability for GA operators to submit reports from the ETS facility directly to the relevant competent authority, whilst remaining fully accountable for their emissions.

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Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Spain

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Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Disagree

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A8. It's more relevant the uncertainty because a theoretical very accuracy methodology could be at the end more uncertain. Therefore aspects like confidence on data sources, reproducibility ... need to be more important than a very detailed methodologies, out of the reality. Quite often to achieve a few increase of accuracy implies higher costs in monitoring. B1. The competent authorities need to take into account the specificities of the plants in the process of defining the general methodology. B3. Calculation methodologies emission factor + mass balance are much more accurate, simple and cheaper than continuous monitoring. B4. The cost-effectiveness and reproducibility are important for all the plants, not only for the smaller. B8. What is really important is the coherence with methodology and certainty of the data more than the excellence in data gathering by thinking that could increase the accuracy. No sense to use hundreds of data rather unreliable.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

To calculate the emission it's more important the certainty of the data and or emission factors than the accuracy of each parameter. The gap between actual emissions and calculated could be higher if emissions are calculated by aggregation of subinstallation instead of considering the whole plant.

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Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
OGP - 3954187491-70

Country (please indicate your current country of residence) Belgium

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Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme
OGP considers that the Second Order Draft of the Regulation on Monitoring and Reporting could be improved. We wish to provide detailed comments on the draft Regulation, in particular on Articles 7, 12, 13, 15 and 32. Detailed OGP comments are provided in a separate submission from OGP, Annex to the OGP responses to the online questionnaire, which has been sent to CLIMA-MRVA@ec.europa.eu .

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme
OGP considers that the First Order Draft of the Regulation on Accreditation and Verification could be improved. We wish to provide detailed comments on the draft Regulation, in particular on Articles 7, 18, 37, and 59. Detailed OGP comments are provided in a separate submission from OGP, Annex to the OGP responses to the online questionnaire, which has been sent to CLIMA-MRVA@ec.europa.eu.

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Association of European Airlines, 4492008176-50

Country (please indicate your current country of residence) Belgium

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Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

M&R requirements should be limited to those strictly necessary for the implementation of the ETS. The data that can be made public must be limited to strict environmental data, i.e. only annual aggregated data. M&R requirements must be streamlined and simplified to avoid unnecessary collection of data: e.g. possibility to use standard values where it does not significantly compromise accuracy. M&R requirements should also not exceed safety requirements. In particular, the determination of the mass of the fuel load/fuel density should be aligned with Regulation 1899/2006, OPS 1.605(e): actual fuel density and, if unknown, density calculated in accordance with operations manual. The future M&R regulation should also be coherent with the EU's policy to foster biofuels in transport. For aviation, only the application of a purchase-based method is a realistic option and this should be stipulated in the M&R regulation with reference to guidance material to be adopted.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

Every effort should be made in order to limit the costs and administrative hurdles resulting from the verification of reports. Verification should be strictly limited to the requirements necessary to verify the accuracy of the emissions data reported. If the accuracy of the reported data can be demonstrated through other means (eg EUROCONTROL data for aircraft operators), the requirement for a report to need verification by a verifier does not appear justified for the strict implementation of the ETS. Where an operator can demonstrate accuracy through other means, and on the condition that such means are independent from the operator, the competent authority should have the possibility to approve such alternative methods.

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Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
Finnish Forest industries Federation, Finni435918344

Country (please indicate your current country of residence) Finland

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? Yes

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No opinion

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? No opinion

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No opinion

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

CONVERTING CO₂ INTO PCC MANUFACTURE MUST BE RECOGNISED AS AN EMISSION-REDUCING MEASURE ALSO IN THE THIRD PERIOD OF EMISSION TRADING. CO₂ can be separated from combustion gases and stored using several different techniques. Why the CCS is the only technique that have been recognised as an emission-reducing measure for the third period of the EU's emission trading scheme? During the first and second periods of the emission trading scheme, the conversion of CO₂ with other techniques also counted as emission-reducing measures. One such CO₂ conversion process is the manufacture of precipitated calcium carbonate (PCC) from CO₂ obtained from combustion gases produced by the forest industry's lime kilns or power plant boilers. Calcium carbonate is widely used as a filling and coating agent in various paper and paperboard products. Converting carbon dioxide into the manufacture of precipitated calcium carbonate has been viewed as a long-term carbon storage.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a European business/industry association

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
7899845424-69

Country (please indicate your current country of residence) Germany

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No opinion

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No opinion

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? No opinion

Which of the following do you think best defines the intended role of the verifier: to check and confirm that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? constantly

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Existing guideline developed for homogenous fuels e.g. oil and coal. For heterogeneous fuels and fuels with a mixture of fossil/biogenic carbon guideline is not suitable. Considering a mixed fuel such as Municipal Waste (same applies for commercial/industrial waste) the guideline's demands on accuracy are not feasible. It is not economically reasonable to sample every 5000t of waste entering a plant. If samples should be taken in a scientific/representative way then costs become very high. Even sampling according to this scheme, will not reach the limit for accuracy/uncertainty. There are methods to sample CO₂ in the flue gas; samples then sent to laboratories for C¹⁴ dating to decide the fossil/biogenic carbon ratio. Considering that uncertainties in the measurements of flue gas flow are 10-15% this will also fail to comply with existing demands on accuracy/uncertainties. Existing guideline only supports continuous measurements of flue gas, not periodic ones. That should be changed.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

Continuation from D.2: A fixed value for fuels (municipal and other waste) should be introduced but with the possibility to measure/calculate. Measurements should then be allowed to have a higher uncertainty level than in the existing guideline. Or as a fallback, give the competent authority the possibility to approve higher uncertainty in measurements/calculations in specific cases. This should only be used when it is not possible to fulfil demands on accuracy due to the fuel's nature. We strongly object to the inclusion of waste incinerators (no matter what kind of waste) in ETS since the measuring guideline/regulation is clearly not developed for that kind of fuel. However, we make the proposal above due to the opt-in possibility for sectors not covered by ETS and as one Member State surprisingly defines waste incinerators as 'co-incinerators' (which is not correct in our opinion) in order to include them in ETS.

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a European business/industry association

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
EUROFER ID93038071152-83

Country (please indicate your current country of residence) Belgium

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of the reported emissions

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? No opinion

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No opinion

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

B.1 The competent authority is best placed to evaluate the appropriateness of the monitoring methodology chosen by the installation given its specific circumstances. B.2 The tier system is justified but priority should be given to having the right balance between accuracy and costs. Resorting systematically to external accredited laboratories and extensive sampling plans often bring no added value for minor flows. The use of emissions factors should be privileged. B.3 Experience has shown that calculation-based methods like the mass-balance approach provide more reliable results at a lower cost. B.6 We see no added value in reporting activity data. The link between activity data and emissions is not straightforward for industries with complex value chains like steel. Such information will be useless. It can definitely not be used to assess process performance (standards under preparation) B.7 From the operator's point of view, there is no value-added in having harmonized IT system.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

C.1 Where the emissions reporting methodology is straightforward, small emitters should be left the possibility to just provide evidence to the competent authority without systematically having to use an independent verifier. C.3 The correct methodology must be understood as the methodology agreed upon between the Competent Authority and the operator in the monitoring plan.

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a European business/industry association

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Ireland

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No opinion

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? No opinion

Is the approach to biomass and biofuels within the current guidelines appropriate? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? by occasional meetings/updates

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No opinion

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

The real impact of the ETS on an installation is determined by the difference between the number of free allowances an installation receives, and its verified emissions. While the amount of free allocation is defined according to EU-wide rules (e.g. the benchmarks), the reporting rules risk being mainly national. Therefore EuLA is very concerned about the current large variety of national reporting rules in the lime sector. In practice, the real burden of the ETS is likely to be very different from one EU Member State to another; which is unacceptable. EuLA asks the Commission that for process emissions coming from the production of lime / dolime, the same rules apply for both reporting and for determining the amount of free allocation (benchmarks). This way any over- or "underallocation" for process emissions is avoided. EuLA has prepared a practical amendment to the Monitoring and Reporting rules which ensure this.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a European business/industry association

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
EULA

Country (please indicate your current country of residence) Belgium

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No opinion

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? No opinion

Is the approach to biomass and biofuels within the current guidelines appropriate? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? by occasional meetings/updates

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No opinion

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

The real impact of the ETS on an installation is determined by the difference between the number of free allowances an installation receives, and its verified emissions. While the amount of free allocation is defined according to EU-wide rules (e.g. the benchmarks), the reporting rules risk being mainly national. Therefore EuLA is very concerned about the current large variety of national reporting rules in the lime sector. In practice, the real burden of the ETS is likely to be very different from one EU Member State to another; which is unacceptable. For process emissions coming from the production of lime / dolime, the same rules should apply for both reporting and for determining the amount of free allocation. This way any over -or "underallocation" is avoided. The Monitoring and Reporting Regulation should anyway aim for uniform EU-wide rules for reporting GHG emissions to ensure an equal treatment of all EU lime producers.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a European business/industry association

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Spain

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No opinion

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? No opinion

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Disagree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No opinion

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? by occasional meetings/updates

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

B1. The competent authorities need to evaluate the assumptions and modifications of a general methodology to consider specific circumstances of a plant. B3. We haven't experience about continuous monitoring of carbon dioxide, but we have it about other continuous monitoring emissions. Based in these experience, we can say that to compare this two approaches would be necessary both, measure and calculate carbon dioxide emissions, during a period of time. B5. It is very important in all the plants, not only for small emitters.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

B8. It is better to have a very good straight forward methodology with less highly contrasted data sources, than hundreds of data rather unreliable. To calculate the emission, it is even more important than accuracy of each single parameter to enhance the reproducibility and certainty of the activity data or used emissions factors. The distance between the actual emission and calculated ones could be higher if emission is calculated by aggregation of sub-installation instead of a global plant.

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: Other

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Outside the EU

Are you familiar with European Union's policies regarding climate change? I am somewhat familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Disagree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Disagree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? constantly

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

1. Fuel Specific Gravity is not provided by most fuel suppliers and forced implementation of this requirement would be a significant burden to the airlines. Adopt the use of a standard default value of 0.8 kg/l. 2. Monitoring biofuel consumption is not feasible under the existing standards as biofuels are intermingled with petroleum-based fuel. Currently, there are no means to track which aircraft contain biofuel introduced into common fuel storage. Adopt a "book and claim" approach. 3. Monitoring and reporting guidelines/regulations are issued and enforced by each EU Member State and Competent Authority. Variance in EU Directive interpretations can result in inconsistencies of implementation across the EU states. As such, we suggest that there be one accepted guideline to be used (defined at the International Level) by each EU Member State. This would establish greater consistency, fairness and transparency while reducing risks of misinterpretation by EU States.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a consultancy firm

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) France

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly disagree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Strongly disagree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? No

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of the reported emissions

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? not at all

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Il faut un maximum de guides d'utilisation sur le modèle de foire aux questions. Le plus important dans cette opération dépend du volume des questions explicitement posées par les experts afin que leur lecture incite les lecteurs à faire des réponses détaillées. L'ensemble formé par les questions et les réponses permettra à tout un chacun de mieux comprendre l'importance du problème et la sagacité des contrôleurs sans lesquels il n'y aurait pas de politique répressive possible. Un règlement sans contraintes c'est-à-dire sans répression possible ne présente aucun intérêt pour le contrôleur qui perdrait ainsi le goût à son fromage. mais en aucun cas il ne peut s'agir de le rémunérer en Camembert moulu à la louche à partir de lait crû. Il serait à ce sujet important de prendre contact avec les autres fonctionnaires en charge de la santé publique. Mais il est bien évident qu'une communication transversale entre les services de répression crée encore des besoins en personnel, donc un coût.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a consultancy firm

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Portugal

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Strongly agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? constantly

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a European business/industry association

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
UNESID - Unión762978123

Country (please indicate your current country of residence) Spain

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

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Monitoring and Reporting

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The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Disagree

Accreditation and Verification

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Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

A.8 It's more relevant the uncertainty, since an apparent very accurate methodology could eventually be rather uncertain. Therefore aspects as confidence on data sources, reproducibility, etc, needs to be even more important, than excellence on detailed methodologies. On the other hand, quite often if excellent accuracy wants to be achieved, few %s increase in accuracy imply almost 10 times higher cost in monitoring. B.1. The competent authorities needs to evaluate the assumptions and modifications of a general methodology to consider specific circumstances of a plant. B.4 The cost-effectiveness and reproducibility for monitoring and reporting are not only important for small emitters, but to all the plants.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

B8. This is not about a single tone to be measured at whatever cost. There are lots of irrationalities above measuring. What it is really more important is the coherence with the used methodology and reproducibility and certainty of the used data, more than the excellence in data collection by thinking it could increase the accuracy. Other way around, it is better to have a very good straight forward methodology with less highly contrasted data sources, than hundreds of data rather unreliable. To calculate the emission, it is even more important than the accuracy of each single parameter to enhance the reproducibility and certainty of the activity data or used emission factors. The distance between the actual emission and calculated ones could be higher if emission is calculated by aggregation of subsinstallation instead of a global plant.

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a European business/industry association

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
ECFD

Country (please indicate your current country of residence) France

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

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Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Strongly agree

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Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme
Tous les secteurs d'activités devraient être soumis à cette directive. Certains polluants ayant une interférence sur l'effet de serre pourraient être pris en compte dans les mesures, en équivalence carbone.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme
L'UE pourrait exiger que chaque pays nomme un certain nombre de vérificateurs, qui interviendront sur tous les pays sauf son pays d'origine, afin de se donner les moyens d'avoir des équipes de vérifications indépendantes politiquement.

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a non-governmental organisation

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
ClientEarth

Country (please indicate your current country of residence) Belgium

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

Monitoring and Reporting

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The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

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To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

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Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No opinion

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

GHG emissions from biomass are currently exempted from the Emissions Trading System (ETS) through a zero-emission factor for biomass. As a result, operators who use biomass to produce energy do not have to surrender allowances against their biomass emissions. Treating biomass as zero emission does not reflect its actual emission performance—emissions from biomass combustion are similar to the combustion of coal. Plus, it runs contrary to the principle underlying the ETS that each operator should be responsible for his own emissions. The legislative mandate for the Commission to adopt the Monitoring and Reporting Regulation provides an opportunity to end the zero-emission factor. The Commission is entitled to take measures towards requiring operators using mixed fuels including biomass to surrender allowances against their biomass emissions, as further explained in a legal briefing we have submitted by email in the context of this consultation (see: <http://tinyurl.com/5szdyn6>)

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a non-governmental organisation

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Air Transport Association of America (ATA); ID number 78160685782-84

Country (please indicate your current country of residence) Outside the EU

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No

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Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

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To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No opinion

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

The multiple choice survey approach to this Consultation was inadequate for submitting any meaningful input. Accordingly, today we are submitting a separate letter with specific comments. We recently learned of a separate outreach process to select parties allowing for comment on specific drafts, of which you did not make the public - including ATA - aware. While the EU has made a decision to reach outside its borders in applying the EU ETS to the world's airlines, it has not provided commensurate notice and comment opportunities to non-EU parties, including ATA and its members. The EU's failings in this regard raise additional legal/due process concerns with respect to the application of the EU ETS to our airlines. In addition to process concerns, our separate letter urges charges the EC to make changes to the Emissions Calculations Methods (A & B) and associated paperwork requirements, the fuel density reporting requirement and the approach to crediting biomass-based jet fuel.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

The verification requirements are too onerous and costly. With respect to airline operators, there was a shortage of approved verifiers when pre-verification checks were needed and even up to the 31 March 2011 deadline for submitting verified emissions reports. The EC should work to streamline the verification requirements and reduce costs to the operators.

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a non-governmental organisation

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
68861821910-84

Country (please indicate your current country of residence) Finland

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? Yes

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? No opinion

Monitoring and Reporting

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Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Cost-efficiency shall be the most important criteria when developing M&R. Special circumstances of multi-fuel plants shall be taken better into account. Biomass should be zero-emission also in the future. SD criteria for biofuels and biomass shall be part of RES-directive. Small emitters (<0,2 ktCO₂/a) shall be relieved of M&R (cost-efficiency); at least the following: spare engines that produces power to ensure auxiliaries during power failues; fuels used in start-ups; engines of fire extinguishers. Energy balance will be added into article 9; it fullfills the accuracy requirements. The requirement to measuring humidity of fuels are too heavy requirement for small plans (accreditation shall be not needed). National factors - already used in first ETS period - shall be enough for peat. Calibaration methods in a regular basis is sufficient to safeguard the certainty needed; wider requirements for uncertainty assessment are not needed.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a non-governmental organisation

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Transparency International Liaison Office to the European Union / Register ID no.: 501222919-71

Country (please indicate your current country of residence) Belgium

Are you familiar with European Union's policies regarding climate change? I am somewhat familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am somewhat familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

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Overall

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Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a non-governmental organisation

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
Acção513258141

Country (please indicate your current country of residence) Portugal

Are you familiar with European Union's policies regarding climate change? I am somewhat familiar

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Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
RENAULT SAS

Country (please indicate your current country of residence) France

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? Yes

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No opinion

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Strongly agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No opinion

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
24298121313-54

Country (please indicate your current country of residence) Austria

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? Yes

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No opinion

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? No opinion

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

On Q. B.6: Agree on adding the activity/production related data but only to the extent that this is required to effectively implement the allocation rules when it comes to effectively occurred changes to the operation of an installation. On Q. B.7: Can only be considered as a potential advantage if all stakeholders, including the ETS installation operators, are convinced that it also leads to reporting simplification and reduction of costs and efforts (e.g.it should certainly not invoke double reporting). On Q. D.1: Agree that this might be useful, but only if sufficient resources and validation with stakeholders are considered to ensure consistent & high quality guidance notes & manuals. On page 91 onwards in draft MR Regulation (18. PROD. BULK ORGANIC CHEMICALS): We propose that - when there is physical separation between combustion streams and feed/product stream - using the fuel input method for crackers emissions reporting should be an unconditional choice of the operator.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Spain

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Disagree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No opinion

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of the reported emissions

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No opinion

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Spain

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Disagree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Disagree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No opinion

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of the reported emissions

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? by occasional meetings/updates

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No opinion

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme
I think authorities should have some flexibility about circumstances on M&R

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Total Petrochemicals

Country (please indicate your current country of residence) Belgium

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

"18. PRODUCTION OF BULK ORGANIC CHEMICALS AS LISTED IN " page 91 onwards in the Draft MR Regulation dd 15/4/11 states that emissions from bulk organic chemicals must be measured with a mass-balance approach, unless the operator can show to the satisfaction of the competent authority that a higher cost-effectiveness and a comparable accuracy level is achieved by an input-based approach. Then the competent authority may allow the operator to use the input-based approach. We propose that, when there is physical separation between combustion streams and feed/product stream, it should be the operator's own choice to determine the CO₂ emissions either on input based combustion fuel measurements or on (more complicated) overall carbon mass balance. The input-based approach is in EU ETS Phase 2 successfully applied for e.g. steamcrackers . Imposing to the operator the burden to prove that the fuel input method is more cost-effective, may result in different treatment in EU countries.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Spain

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Disagree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No opinion

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of the reported emissions

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No opinion

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

A.8. It's more important the data sources and its behavior in terms of reproducibility than to try to achieve a high accuracy since this implies high costs. A9. But the competent authorities should have some flexibility according companies with special circumstances. B1. The general methodology should be reviewed by the competent authorities in order to consider modifications in special cases. B3. The Calculation Methodologie is more accurate, simple and cheap than Continuous Monitoring. B4. Not only for small emitters, but the rest of the plants too.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
Singapore Airlines Limited

Country (please indicate your current country of residence) Outside the EU

Are you familiar with European Union's policies regarding climate change? I am somewhat familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am somewhat familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? Yes

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Data Gaps Approach Operators are expected to estimate their annual emissions conservatively based on expert judgement to cover data gaps. As there is no clear direction in the current MRG, different operators might adopt different approach. This could result in wide differences in the estimated emissions, which eventually leads to competitive distortion. There is therefore a need to develop a harmonised approach to provide a good estimate of fuel consumption and emissions. **Density** When the actual density is not available, the current MRG stipulates that a standard density of 0.8 kg/litre shall be used. This may not give a good estimate of density due to variable temperature conditions during fuel uplifts, depending on the seasons or location of airports. For a better estimate of density, the M&R Regulation should allow the use of average density at each airport, e.g. quarterly average density to cater for the different seasons. (Continue to D.3 due to limited characters)

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

Flight Data In validating operators' flight data with Eurocontrol, there could be minor discrepancy since Eurocontrol route charges include overflights and flights that operated to airports outside EU States. Furthermore, Eurocontrol do not capture flights operated to EEA EFTA States. There could also be a disparity in the flight count depending on the timing window selected. As such, there should be an acceptable margin of difference between the operators and Eurocontrol's flight data. **Biofuels** Current MRG adopts a mass-balance approach to account for biofuels at every flight and apply emission factors based on biomass content. This is not appropriate for airlines operations as it is impossible to account for biofuels on a flight basis due to comingling effects with Jet A1 during fueling process. The M&R Regulation should therefore adopt a more practical "book-and-claim" method to account for biofuels on a purchase basis. (Nil comments for D.3)

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

- I am responding on behalf of: a private company
- Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
- Country (please indicate your current country of residence) Outside the EU
- Are you familiar with European Union's policies regarding climate change? I am somewhat familiar
- Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am somewhat familiar
- Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved
- In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? Yes
- Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

- Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes
- The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree
- The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes
- Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes
- Is the approach to biomass and biofuels within the current guidelines appropriate? No
- The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No
- The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion
- Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

- Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes
- Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes
- Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied
- To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops
- Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

- Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
77608353460-77

Country (please indicate your current country of residence) Germany

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? Yes

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Strongly agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

As a power generator we believe calculation should be the standard method as it is robust and verifiable. The CEM method should remain as an option, as it has yet to be demonstrated that the top tier uncertainty is achievable on power plant using CEMs. We have concerns with the change in definition of biomass to include sustainability as defined in the Renewable Energy Directive (RED). We do not object in principle to zero-carbon status being removed from non-sustainable biomass. However, the definition of biomass sustainability has yet to be agreed and the appropriate point of regulating that classification is the Renewable Energy Directive (RED). We do not wish to see double regulation and unnecessary bureaucracy by incorporating additional sustainability arguments into the EUETS as they are developed. We are concerned that a lifecycle penalty may be applied to carbon emissions from biomass. This would create enormous complexity and uncertainty in the verification process.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
IBERDROLA

Country (please indicate your current country of residence) Spain

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? Yes

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Strongly agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Austria

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Die Bilanzgrenzen für die Zuteilung und das Monitoring müssen ident und für jede Tätigkeit EU-weit einheitlich festgelegt werden. Die Anwendung des ETS muss sich exakt auf die Tätigkeiten des Anhangs I ETS beschränken. Jede andere "Interpretation des Anhangs I" oder gar die Anwendung von "Kumulierungsregeln" führt unweigerlich zu Wettbewerbsverzerrungen, da Tätigkeiten unterschiedlich behandelt werden abhängig davon, an welchem Standort sie durchgeführt wird. Emissionsminderungsmaßnahmen müssen anerkannt werden. Es muss sichergestellt werden, dass nur für tatsächlich emittierte Treibhausgase Zertifikate zu entrichten sind - in Österreich ist dies derzeit nicht der Fall, auch im letzte Entwurf der MRGs nicht mehr. Der Zwang die tatsächlichen Emissionen teilweise um ein vielfaches zu überschätzen konterkariert jede Bestimmung über zu erzielende Genauigkeiten. Der Kapitalfehler des ETS-Systems ist die Zuteilung auf Basis historischer Daten - im Jahr 2020: 10-15 Jahre alt!!!

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

Auf die Gültigkeit des Genehmigungsbescheids muss sich der Betreiber verlassen können. Basis für die Emissionsmeldung und die Prüfung der Emissionen kann nur das genehmigte Überwachungskonzept sein! Andernfalls würde der Betreiber bzw. der Verifier hierarchisch über der Genehmigungsbehörde stehen und deren Entscheidungen korrigieren. Die von einer unabhängigen Prüfeinrichtung positiv verifizierte Emissionsmeldung muss anerkannt werden! Das österreichische Umweltministerium verweigert derzeit die Annahme von positiv verifizierten Emissionsmeldungen, wenn sie die Meinung der zuständigen Genehmigungsbehörde nicht teilt. Dadurch verliert der Betreiber jegliche Rechtssicherheit.

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Spain

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Disagree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Disagree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No opinion

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of the reported emissions

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? by occasional meetings/updates

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No opinion

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

A.8 It is more relevant the uncertainty, since an apparently very accurate methodology could eventually be rather uncertain. Therefore aspects such as confidence on data sources, reproducibility, etc., need to be even more important than excellence on detailed methodologies. On the other hand, quite often if excellent accuracy wants to be achieved, few %s increase in accuracy imply almost 10 times higher cost in monitoring. A.9 The competent authorities should have some flexibility specially about specific circumstances on M & R. B.1. The competent authorities need to evaluate the assumptions and modifications of a general methodology to consider specific circumstances of a plant. B.2 Increases the certainty with the emissions is something reasonable. It is still justified to maintain a reasonable level of cost-efficiency. B.3. calculation methodologies emission factor+mass balance much more accurate simple and cheap than continuous emission monitoring.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

B.4 The cost-effectiveness and reproducibility for monitoring and reporting are not only important for small emitters, but to all the plants. B.8 This is not about a single tone to be measured at whatever cost. There are lots of irrationalities above measuring. What is really more important is the coherence with the used methodology and reproducibility and certainty of the used data, more than the excellence in data collection by thinking it could increase the accuracy. Other way around, it is better to have a very good straight forward methodology with less highly contrasted data sources, than hundreds of data rather unreliable. To calculate the emission, it is even more important than the accuracy of each single parameter to enhance the reproducibility and certainty of the activity data or used emission factors. The distance between the actual emission and calculated ones could be higher if emission is calculated by aggregation of subsinstallation instead of a global plant.

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Spain

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Disagree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No opinion

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of the reported emissions

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? by occasional meetings/updates

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No opinion

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

A.8 The confidence in data sources, reproducibility, and other aspects should be more important than excellence on detailed methodologies. Uncertainty is more relevant. Frequently, to increase accuracy, the rising cost of control is far superior to increasing the precision. A.9. I agree, but the competent authorities should have flexibility, especially as regards specific circumstances of the M & R. B.1. The Competent Authority has to evaluate the assumptions and modifications of a general methodology to consider the specific circumstances of a plant. B.2. I agree with the "tier system" to increase the certainty regarding emissions. The level of cost-efficiency is still justified. B.3. The methodology based on emission factor+mass balance has a higher accuracy and is more simple and cheaper than continuous emission monitoring.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

B.4. The cost-effectiveness and reproducibility for monitoring and reporting should be necessary for all the plants, including small emitters. B.8. To calculate the emission, it is more important the methodology used, reproducibility and certainty of the activity data, or used emission factors, than the excellence in data collection by thinking it could increase the accuracy. The distance between the actual emission and the calculated one could be bigger if emission is calculated by aggregation of sub-installation instead of a global plant.

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Tekniska Verken i Linköping AB (publ) orgnr:556004-9727

Country (please indicate your current country of residence) Sweden

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No opinion

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? constantly

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

We strongly object to the inclusion of waste incinerators (no matter what kind of waste) in the EU-ETS since the measuring guideline/regulation so clearly is not developed for that kind of fuel. However, we make the proposal below due to the opt-in possibility for sectors not covered by the EU-ETS and as one Member State surprisingly defines waste incinerators as 'co-incinerators' (which is not correct in our opinion) in order to include them into the EU-ETS. The existing guideline is developed for homogenous fuels such as oil and coal. For heterogeneous fuels and fuels with a mixture of fossil/biogenic carbon is not suitable. If you consider a mixed fuel such as MSW (also valid for commercial/industrial waste), the demanded accuracy are not feasible. It is not economically motivated or reasonable to sample every 5000 tonnes of waste entering a plant. Even if you do take samples according to this scheme, you will not reach the limit for accuracy/uncertainty. Continue in D3

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

cont from D2. In the existing guideline there is only support for continuous measurements of flue gas, not periodic ones and that should be changed. There should be introduced a fixed value for fuels (both municipal and other waste) like this (see D.2), but with the possibility to measure/calculate. Those measurements should then be allowed to have a higher uncertainty level than what is given in the existing guideline. Or as a fallback, give the competent authority the possibility to approve a higher uncertainty in the measurements/calculations in specific cases. This should only be used when it is not possible to fulfil the demands on accuracy due to the nature of the fuel.

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Spain

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Disagree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Disagree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No opinion

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of the reported emissions

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? by occasional meetings/updates

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No opinion

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

A.8 It's more relevant the uncertainty, since an apparent very accurate methodology could eventually be rather uncertain. Therefore aspects as confidence on data sources, reproducibility, etc, needs to be even more important, than excellence on detailed methodologies. On the other hand, quite often if excellent accuracy wants to be achieved, few %s increase in accuracy imply almost 10 times higher cost in monitoring. A.9 The competent authorities should have some flexibility specially about specific circumstances on M & R B.1 The competent authorities needs to evaluate the assumptions and modifications of a general methodology to consider specific circumstances of a plant. B.2 Increases the certainty with the emissions is something reasonable. It is still justified to maintain a reasonable level of cost-efficiency B.3 Calculation methodologies emission factor+mass balance much more accurate simple and cheap than continuous emission monitoring.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Austria

Are you familiar with European Union's policies regarding climate change? I am somewhat familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

1) Ganz wichtig! Konsistenz zwischen Zuteilungs- und Abrechnungsmethodik 2) Gleiche Abrechnungsmethoden in den MS. 3) Anerkennung von Emissionsminderungsmaßnahmen

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Austria

Are you familiar with European Union's policies regarding climate change? I am somewhat familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
INEOS Olefins and Polymers

Country (please indicate your current country of residence) Belgium

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? Yes

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No opinion

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? No opinion

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Regarding “18. PRODUCTION OF BULK ORGANIC CHEMICALS AS LISTED IN ANNEX I TO DIRECTIVE 27 2003/87/EC” from page 91 onwards in the Draft MR Regulation dated April 15, 2011, which currently states that emissions from bulk organic chemicals must be measured with a mass-balance approach, unless the operator can show to the satisfaction of the competent authority that a higher cost-effectiveness and a comparable accuracy level is achieved by an input-based approach, then the competent authority may allow the operator to use the input-based approach. We propose that, when there is physical separation between combustion streams and feed/product stream, it should be the operator’s own choice to determine the CO₂ emissions either on input based combustion fuel stream measurements or on (more complicated) overall carbon mass balance. The input-based approach is at the moment in EU ETS Phase 2 successfully applied for e.g. steam cracking installations. Most bulk organic chemicals units have many

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
Servizi Aerei S.p.A.

Country (please indicate your current country of residence) Italy

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am somewhat familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No opinion

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No opinion

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No opinion

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? constantly

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No opinion

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme
Please provide a unique template for all small emitter in aviation field.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Spain

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Disagree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No opinion

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of the reported emissions

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? by occasional meetings/updates

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No opinion

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

A.8 It's more relevant the uncertainty, since an apparent very accurate methodology could eventually be rather uncertain. Aspects as confidence on data sources, reproducibility, etc, needs to be more important, than excellence on detailed methodologies. On the other hand, quite often if excellent accuracy wants to be achieved, few %s increase in accuracy imply higher cost in monitoring. A.9 Nevertheless, the competent authorities should have flexibility specially about specific circumstances on M & R B.1 The competent authorities needs to evaluate the assumptions and modifications of a general methodology to consider specific circumstances of a plant. B.2 Increases the certainty with the emissions is something reasonable. It is still justified to maintain a reasonable level of cost-efficiency B.3. calculation methodologies: emission factor+mass balance are much more accurate simple and cheap than continuous emission monitoring.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

B.4 The cost-effectiveness and reproducibility for monitoring and reporting are not only important for small emitters, but to all the plants. B8. This is not about a single tone to be measured at whatever cost. There are lots of irrationalities above measuring. What it is really more important is the coherence with the used methodology and reproducibility and certainty of the used data, more than the excellence in data collection by thinking it could increase the accuracy. Other way around, it is better to have a very good straight forward methodology with less highly contrasted data sources, than hundreds of data rather unreliable. To calculate the emission, it is even more important than the accuracy of each single parameter to enhance the reproducibility and certainty of the activity data or used emission factors. The distance between the actual emission and calculated ones could be higher if emission is calculated by aggregation of subsittallation instead of a global plant

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Fortum Heat Scandinavia

Country (please indicate your current country of residence) Sweden

Are you familiar with European Union's policies regarding climate change? I am somewhat familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am somewhat familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No opinion

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? No opinion

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No opinion

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? No opinion

Which of the following do you think best defines the intended role of the verifier: to check and confirm that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? constantly

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

The existing guideline is developed for homogenous fuels such as oil and coal. For heterogeneous fuels and fuels with a mixture of fossil/biogenic carbon the guideline is not suitable. If you consider a mixed fuel such as Municipal Waste (the same for commercial/industrial waste), the demands in the guideline on accuracy are not feasible. It is not economically reasonable to sample every 5000 tonnes of waste. If samples should be taken in a scientific/representative way then the costs become very high. Even if you do take samples according to this scheme, you will not reach the limit for accuracy/uncertainty. There are methods to sample CO₂ in the flue gas and then send the samples to laboratories for C¹⁴ dating. Considering that the uncertainties in the measurements of flue gas flow are in the range of 10-15 % this will also fail to comply with the existing demands on accuracy/uncertainties. Periodic measurements shall be possible.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

There should be introduced a fixed value for fuels (both municipal and other waste) like this (see D.2), but with the possibility to measure/calculate. Those measurements should then be allowed to have a higher uncertainty level than what is given in the existing guideline. Or as a fallback, give the competent authority the possibility to approve a higher uncertainty in the measurements/calculations in specific cases. This should only be used when it is not possible to fulfil the demands on accuracy due to the nature of the fuel. We strongly object to the inclusion of waste incinerators (no matter what kind of waste) in the EU-ETS since the measuring guideline/regulation so clearly is not developed for that kind of fuel. However, we make the proposal above due to the opt-in possibility for sectors not covered by the EU-ETS and as one Member State surprisingly defines waste incinerators as 'co-incinerators' (which is not correct in our opinion) in order to include them into the EU-ETS.

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) United Kingdom

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No opinion

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? No opinion

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? constantly

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Annex V. 18 B of the SOD M&R regulation provides that Bulk Organic Chemical units auto-generating fuels and not integrated with refineries would be obliged to use a mass balance approach to emissions determination unless they secure dispensation from the regulator to continue with an input-based approach. Large Bulk Organic units will typically have a large number (many tens) of hydrocarbon inputs, outputs and storage pipelines/tanks/cavities, all of which would require metering to EU ETS accuracy standards if they had to implement a mass balance approach. Even with major investment in the highest accuracy metering (potentially many €10Ms across the industry), it is very unlikely this number of individual measurements would allow emission determination to the same accuracy as the existing input-based approach, while it would certainly not lead to a better standard. It is therefore proposed that operators should be allowed to select either method without the need for regulator approval.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Austria

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of the reported emissions

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

B.1. The competent local authority is best placed to evaluate the appropriateness of the monitoring methodology. B.2. The “tier system” is justified but priority should be given to having the right balance between accuracy and costs. The use of emissions factors should be privileged. B.3. Experience has shown that calculation-based methods like the mass-balance approach provide more reliable results at a lower cost. B.4 Cost-effectiveness is a matter of concern for all installations, not only small emitters. B.6. We see no added value in reporting activity data. The link between activity data and emissions is not straightforward for industries with complex value chains. It can definitely not be used to assess the performance of a process because because of the insufficient level of disaggregation. B. 8. Goal of the Regulation should be to increase confidence in the emissions reported. 100% of accuracy is not required.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

C.1. Where the emissions reporting methodology is straightforward, emitters should be left the possibility to just provide evidence to the competent authority without systematically having to use an independent verifier. C.3. The correct methodology must be understood as the methodology agreed upon between the Competent Authority and the operator in the monitoring plan. The duty of the verifier should be to provide evidence of the correct usage of this methodology and the accuracy of the emissions data determined on this basis. C.4. National authorities should ensure consistent and harmonized use of the monitoring and reporting requirements throughout the EU. D.1. These materials should help the users and authorities to implement the provisions but strictly have to stick to the provisions set legally. No interpretation of the legal provisions is relevant here, only practical examples and explanations. The amount should be kept to the absolute minimum to ensure consistent applicability

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
All Nippon Airways 89092275828-15

Country (please indicate your current country of residence) Outside the EU

Are you familiar with European Union's policies regarding climate change? I am somewhat familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am somewhat familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? No opinion

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Disagree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

1. Frequency of revaluating of TKM data should be more frequently than once in 10 years. Maybe once in 3 years. Otherwise it would discourage growing third country airlines to invest with new routes to fly to/from Europe. 2. Alternate fuel (ex. Biofuel) should be counted just by purchasing invoice, not by fuel delivery notes, because alternate fuel would be highly presumed to be used as "drop in" and it is impossible to separate added alternate fuel from conventional fossil fuel in a same tank.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

1. According to ANNEX I, section 10.3.6 of MRG, document should be kept for 10 years, but 10 Years are too long. It would need a huge space for storing piles of paper or big capacity for servers of computers, which means airlines should spend more cost just for keeping documents. The term should be 3 Years.

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Portugal

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? Yes

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme
Monitoring and reporting should follow as close as possible benchmark rules

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme
The entity in charge of the verification should also act as an adviser of the operator.

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
The Boeing Company, 62505293737-81

Country (please indicate your current country of residence) Belgium

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No opinion

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No opinion

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? No opinion

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Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Disagree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? constantly

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

We believe that the current approach to biofuels is not workable for aviation given the specificities of the aviation fuel distribution system. In this respect, in order to account for the use of aviation biofuels in the ETS, we respectfully propose a purchase-based accounting methodology instead of a consumption-based methodology. We urge the Commission to recognize in the Monitoring and Reporting Regulation a purchase-based methodology as a valid estimation method that the competent national authorities can accept, and to develop guidance material for EU-wide consistent implementation of such methodology by the member states. We welcome the Commission's FAQ on aviation ETS on how the biomass fraction of a blended aviation fuel can be determined. However, we believe in the need for further guidance by the Commission on a purchase-based methodology. This would reassure member states that there will be consistency of application at national level. Specific recommendations will be sent.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Spain

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Disagree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No opinion

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of the reported emissions

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No opinion

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

A.8 It's more relevant the uncertainty, since an apparent very accurate methodology could eventually be rather uncertain. Therefore aspects as confidence on data sources, reproducibility, etc, needs to be even more important, than excellence on detailed methodologies. On the other hand, quite often if excellent accuracy wants to be achieved, few %s increase in accuracy imply almost 10 times higher cost in monitoring. B.1. The competent authorities needs to evaluate the assumptions and modifications of a general methodology to consider specific circumstances of a plant. B.3. calculation methodologies emission factor+mass balance much more accurate simple and cheap than continuous emission monitoring.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

B.4 The cost-effectiveness and reproducibility for monitoring and reporting are not only important for small emitters, but to all the plants. B8. This is not about a single tone to be measured at whatever cost. There are lots of irrationalities above measuring. What it is really more important is the coherence with the used methodology and reproducibility and certainty of the used data, more than the excellence in data collection by thinking it could increase the accuracy. Other way around, it is better to have a very good straight forward methodology with less highly contrasted data sources, than hundreds of data rather unreliable. To calculate the emission, it is even more important than the accuracy of each single parameter to enhance the reproducibility and certainty of the activity data or used emission factors. The distance between the actual emission and calculated ones could be higher if emission is calculated by aggregation of subsinstallations instead of a global plant

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Belgium

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No opinion

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? No opinion

Is the approach to biomass and biofuels within the current guidelines appropriate? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? by occasional meetings/updates

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No opinion

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

The real impact of the ETS on an installation is determined by the difference between the number of free allowances an installation receives, and its verified emissions. While the amount of free allocation is defined according to EU-wide rules (e.g. the benchmarks), the reporting rules risk being mainly national. Therefore our company is very concerned about the current large variety of national reporting rules in the lime sector. In practice, the real burden of the ETS is likely to be very different from one EU Member State to another; which is unacceptable. Our company asks the Commission that for process emissions coming from the production of lime / dolime, the same rules apply for both reporting and for determining the amount of free allocation (benchmarks). This way any over -or "underallocation" for process emissions is avoided. Our company has prepared with EuLA a practical amendment to the Monitoring and Reporting rules which ensure this.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
GPN

Country (please indicate your current country of residence) France

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? Yes

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? by occasional meetings/updates

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

We strongly recommend to open the possibility to take into account the real level of production increase or decrease instead of the change in capacity level to decide if an installation is able to ask for a new level of allocation. The current system prevents companies to improve installations particularly when they have had technical difficulties. We consider that the SCUF for new entrants does not represent the reality particularly when a company is investing to improve its installations. Taking into account the real new production level of the installation with its real new coefficient would be much more in line with the reality and would push companies to invest to improve installations efficiency.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Spain

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Disagree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No opinion

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of the reported emissions

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? by occasional meetings/updates

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No opinion

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

A.8: if an excellent accuracy wants to be achieved, the cost of monitoring in the companies increase many times. Must be agreed a methodology based in the system knowledge and not to check any inlet and outlet. A.9: Must be considered the cost supported by the European Companies, is not paid by the global market. B.1: Specific circumstances of any plant must be considered. B.3: Continuous emission monitoring is not reachable, calculation methodologies emission factor+mass balance are much more accurate simple and cheap. B.4: Not only is important for small emitters!, all the plants need lower cost for monitoring. B.8: It's better to have a very good straight forward methodology with less highly contrasted data sources, than hundreds of data rather unreliable.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

The activity data and factor emission used to calculate the emissions, must be better to enhance the reproducibility and certainty than the accuracy of each single parameter. The distance between the actual emission and calculated ones could be higher if emission is calculated by aggregation of subinstallation instead of a global plant.

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Spain

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Disagree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No opinion

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of the reported emissions

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? by occasional meetings/updates

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No opinion

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

A.8 Aspects as confidence on data sources, reproducibility, etc, needs to be even more important, than excellence on detailed methodologies. On the other hand, quite often if excellent accuracy wants to be achieved, few percentages increase in accuracy imply almost 15 times higher cost in monitoring. B.1. The authorities need to evaluate the assumptions and modifications of a general methodology to consider specific circumstances of a plant. B.3. calculation methodologies emission factor+mass balance much more accurate simple and cheap than continuous emission monitoring. B.4 The cost-effectiveness and reproducibility for monitoring and reporting are not only important for small emitters, but to all the plants. B.8. This is not about a single tone to be measured at whatever cost. There are lots of irrationalities above measuring. It is better to have a very good straight forward methodology with less highly contrasted data sources, than hundreds of data rather unreliable.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

To calculate the emission, it is even more important than the accuracy of each single parameter to enhance the reproducibility and certainty of the activity data or used emission factors. The distance between the actual emission and calculated ones could be higher if emission is calculated by aggregation of subinstallations instead of a global plant.

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Austria

Are you familiar with European Union's policies regarding climate change? I am somewhat familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

1) Die Konsistenz zwischen Zuteilungs- und Abrechnungsmethodik muss unbedingt gewahrt sein. 2) Gleiche Abrechnungsmethoden in den MS. 3) Emissionsminderungsmaßnahmen sollen anerkannt werden. 4) Im Falle einer Werkschließung und Verlagerung der Produktion in ein energetisch effizienteres Werk soll eine Übertragung der Emissionszertifikate möglich sein

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
Eni s.p.a

Country (please indicate your current country of residence) Italy

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? Yes

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? constantly

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Comment referring to question n. B.6: Within the existing Monitoring and Reporting guidelines, there are already information requested on reporting emissions associated with activity / production related data. Enhancing or amplifying request in data number and type could introduce much higher complexity and it should be avoided. On the other hand, the regulator could consider the possibility to integrate available information from several compliance reporting, such as PRTR, IPPC in line with art.55 of the proposed regulation.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
Drax Power Limited

Country (please indicate your current country of residence) United Kingdom

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? Yes

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

There is a legitimate requirement that all biomass should be sustainable in order to receive the benefits of carbon-neutrality under ETS. However, the appropriate point of regulating that classification is the Renewable Energy Directive (RED) and we do not wish to see double regulation and unnecessary bureaucracy by incorporating additional sustainability arguments into the ETS.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Austria

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

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The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? No opinion

Accreditation and Verification

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Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? No opinion

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Austria

Are you familiar with European Union's policies regarding climate change? I am somewhat familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

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Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

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Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

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Country (please indicate your current country of residence) Austria

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Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

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To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Austria

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? Yes

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

Monitoring and Reporting

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The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Strongly disagree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No opinion

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
Virgin Atlantic Airways

Country (please indicate your current country of residence) United Kingdom

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? No opinion

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No opinion

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Monitoring and verification requirements should be limited to those specifically required for the implementation of the scheme. An example of an unjustified requirement for aviation is the obligation to report per 'aerodrome pair' data. The current rules need to be simplified to the highest extent possible in order to avoid unnecessary costs and administrative burdens that do not deliver environmental benefits. An example of a disproportionate requirement for aviation is the obligation to measure actual fuel density instead of systematically using a standard density factor. The future M&R regulation should be consistent with the EU's ambitions for biofuels in transport. It should incentivise aviation biofuels by providing for a workable accounting method. Only a purchase-based method is a realistic option for aviation. This should be clearly stipulated in the regulation and further defined in guidance material.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

The costs and administrative hurdles resulting from the verification of reports should be limited. Verification should be limited to the requirements necessary to verify the accuracy of the emissions data reported. If the accuracy of the reported data can be demonstrated through other means (e.g. EUROCONTROL data for aircraft operators), the requirement for a report to need verification by a verifier is not necessary. Where an operator can demonstrate accuracy through other means (and the means are independent from the operator), the competent authority should have the possibility to approve such alternative verification methods.

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
E.ON AG

Country (please indicate your current country of residence) Germany

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Strongly agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? by occasional meetings/updates

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

- EU-wide identical approval for application of oxidation factor to avoid competitive distortion (see question A.8.) - It should be possible to use default-values for the oxidation factor - Significant digits after the decimal point should be laid down in such a way as to ensure that the principle "a ton must be a ton" is also observed within the EU and that a tonne of CO₂ is calculated in a uniform manner. - The regulation for small emitters has to be simplified - While plant operators have to meet their obligations within specified periods of time, no specific time intervals have been stated within which the competent authorities have to grant approvals or process files. It should therefore be laid down that plant operators are entitled to obtain positive responses from authorities within specified periods provided that the conditions stipulated have been met.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

-There exists neither a deadline for authorisation nor for processing regarding the verification and accreditation for the competent authority. Therefore, the plant operator should be vested the right to be granted a positive decision within pre-defined timelines if all mentioned preconditions are fulfilled. - The regulation for small emitters has to be simplified - Modifications/amendments of default software (FMS/VPS) should be realised earlier than today by the competent authority.

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Italy

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? Yes

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

Monitoring and Reporting

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Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

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The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? constantly

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
Mainova AG

Country (please indicate your current country of residence) Germany

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? Yes

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? by occasional meetings/updates

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Germany

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am somewhat familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? Yes

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? No

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Disagree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

- wesentliche Vereinfachung und erhöhte Kosteneffizienz ließe sich mit Einführung einer CO₂-bezogenen Brennstoffsteuer erzielen (nationale Emissionsfaktoren) - schnellere und unkompliziertere Klärung von Unstimmigkeiten, Fokus auf fachliche Gegebenheiten - Formel zur Berechnung der unverhältnismäßig hohen Kosten ist bei Anlagen mit größeren Zwischenspeichern (Kohlelager) falsch und führt zu wesentlich zu hohen Kosten - Konzentration auf das Wesentliche

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

- mehr Zeit für Berichterstattung

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
RWE AG

Country (please indicate your current country of residence) Germany

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? Yes

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? No

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? No opinion

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of the reported emissions

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

in die Monitoringverordnung ist unbedingt aufzunehmen: - Berücksichtigung von Heizöl S als kommerziellen Standardbrennstoff (Art. 3, Nr. 22) - Aufnahme der CO₂-Emissions-Berechnung über den C-Anteil im Brennstoff alternativ zur Berechnung über Hu und EF - die Berechnungsmethodik von Messunsicherheiten für Aktivitätsdaten ist EU-einheitlich vorzugeben - die Tabelle 5 in Anhang I, Abschnitt 13.6, der Monitoringleitlinien 2007 ist aufzunehmen - es sind ausschließlich die prozessbedingten CO₂-Emissionen infolge des Einsatzes von gekauften Karbonaten in der SO₂-Wäsche berichtsrelevant - CCU ist in der Form aufzunehmen, dass an Dritte weitergeleitetes CO₂ im Bericht auszuweisen ist und von der Gesamt-CO₂-Emission abgezogen wird (Art. 33 (1), 4 Spiegelstrich) - Verzicht auf Anzeige von nicht signifikanten Änderungen im 'monitoring plan' bei der Überwachungsbehörde - CO₂-Emissionsberichte müssen für mengengewichtete Hu, EF, C-/biogener Anteil min. 9 Nachkommastellen zulassen

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

da die Verordnung noch nicht öffentlich vorliegt, kann hierzu noch keine Stellungnahme abgegeben werden zu Rückfragen können Sie sich gerne an uns wenden: Dr. Jürgen Altenburg RWE Power AG Unternehmensentwicklung Genehmigungen und Umweltschutz
Huyssenallee 2, 45128 Essen T extern +49 201 / 12-24472 mobil +49 162 / 28 45 432 juergen.altenburg@rwe.com

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
EnBW Kraftwerke AG

Country (please indicate your current country of residence) Germany

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? Yes

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of the reported emissions

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
IKA243

Country (please indicate your current country of residence) Austria

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme
Konsistente, in der gesamten EU geltende Regeln, Zuteilung und Abrechnung dürfen nicht divergieren.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
IKA122

Country (please indicate your current country of residence) Austria

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme
Konsistente, in der gesamten EU geltende Regeln, Zuteilung und Abrechnung dürfen nicht divergieren.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
IZE0238

Country (please indicate your current country of residence) Austria

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme
Konsistente, in der gesamten EU geltende Regeln, Zuteilung und Abrechnung dürfen nicht divergieren.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
IZE075

Country (please indicate your current country of residence) Austria

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme
Konsistente, in der gesamten EU geltende Regeln, Zuteilung und Abrechnung dürfen nicht divergieren.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
IZE076

Country (please indicate your current country of residence) Austria

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

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The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme
KOsistente, in der gesamten EU geltende Regeln, Zuteilung und Abrechnung dürfen nicht divergieren.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
Royal Jordanian Airlines - PLC (CRCO Code 2297)

Country (please indicate your current country of residence) Outside the EU

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? Yes

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Strongly agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? constantly

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

- The directive does not allow the operator to change his bench marking plan, i.e., if you choose Tier 1 & you want to change to Tier 2 it is not allowed? 2- In the UK GHG EU ETS Aviation Law, you are allowed to change your emission plan but there is no procedure, mechanism or forms to apply for a change. 3- The deadline of 31 March each year is set by the directive, were in some cases & as a result of the competent authority error an operator may submit the reports after that, the competent authority should have been given the authority to extend the deadline accordingly, also if the verifier submits his report before the deadline & the operator does not recall the report then even if there was a delay it should not be considered passing the date since there is a proof of good well especially when some of the competent authorities website or portal fail, stop or dose not respond properly.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

1- Encourage remote verification. 2- Check all data against Eurocontrol list on line using the competent authority IT platform especially for exempted flights.

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
Bombardier Aerospace

Country (please indicate your current country of residence) United Kingdom

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No opinion

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? constantly

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Austria

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am somewhat familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Disagree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? No opinion

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of the reported emissions

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? not at all

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
eins energie in sachsen GmbH&Co.KG

Country (please indicate your current country of residence) Germany

Are you familiar with European Union's policies regarding climate change? I am somewhat familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? Yes

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) France

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly disagree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Strongly disagree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check whether the operator has submitted a report to the Competent Authority

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? not at all

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme
SEQE Usine à gaz ridicule, onéreuse et pourvoyeuse de misère humaine.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Spain

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? Yes

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Strongly agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? constantly

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
Hidroeléctrica del Cantábrico, S.A.

Country (please indicate your current country of residence) Spain

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? No

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Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

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To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? constantly

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme
In Spain, all Competent Authority (17 Communities) would have to use the same report formats.

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Germany

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? Yes

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? No opinion

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No

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To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a private company

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
08767705444-53

Country (please indicate your current country of residence) Italy

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? Yes

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Strongly agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? constantly

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: a research/educational institution

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).

Country (please indicate your current country of residence) Germany

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? No

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme
Due to the required transparency, there is no reason to allow a conversion factor. To determine the conversion factor the operator has to apply a mass balance. => A conversion factor imply verification problems. Biomass: The emission factor for biomass is zero. This definition is not in line with the IPCC guidelines. Therefore the emissions by biomass burning/using has to be reported but w/o surrender obligation. Consistency: The sector specific annexes are not consistent, like hydrogen production in the refinery sector and stand alone hydrogen plants. Also the use of conversion factor and mass balance (see above).

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme
There is a high conflict potential between verifier and operator due to the fact that the operator engaged the verifier.

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: Other

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
British Lime Association

Country (please indicate your current country of residence) United Kingdom

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No opinion

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? No opinion

Is the approach to biomass and biofuels within the current guidelines appropriate? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? by occasional meetings/updates

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No opinion

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

BLA support the following EuLA position: The real impact of the ETS on an installation is determined by the difference between the number of free allowances an installation receives, and its verified emissions. While the amount of free allocation is defined according to EU-wide rules (e.g. the benchmarks), the reporting rules risk being mainly national. Therefore EuLA is very concerned about the current large variety of national reporting rules in the lime sector. In practice, the real burden of the ETS is likely to be very different from one EU Member State to another; which is unacceptable. EuLA asks the Commission that for process emissions coming from the production of lime / dolime, the same rules apply for both reporting and for determining the amount of free allocation (benchmarks). This way any over- or "underallocation" for process emissions is avoided. EuLA has prepared a practical amendment to the Monitoring and Reporting rules which ensure this. The Monitoring and R

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: Other

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
Avfall Sverige, 71973526001

Country (please indicate your current country of residence) Sweden

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No opinion

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? No opinion

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? No opinion

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? constantly

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

We strongly object to the inclusion of waste incinerators (no matter what kind of waste) in the EU-ETS since the measuring guideline/regulation so clearly is not developed for that kind of fuel. However, we make the proposal below due to the opt-in possibility for sectors not covered by the EU-ETS and as one Member State surprisingly defines waste incinerators as 'co-incinerators' (which is not correct in our opinion) in order to include them into the EU-ETS. The existing guideline is developed for homogenous fuels such as oil and coal. For heterogeneous fuels and fuels with a mixture of fossil/biogenic carbon is not suitable. If you consider a mixed fuel such as MSW (also valid for commercial/industrial waste), the demanded accuracy are not feasible. It is not economically motivated or reasonable to sample every 5000 tonnes of waste entering a plant. Even if you do take samples according to this scheme, you will not reach the limit for accuracy/uncertainty. Continue in D3

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

cont from D2. In the existing guideline there is only support for continuous measurements of flue gas, not periodic ones and that should be changed. There should be introduced a fixed value for fuels (both municipal and other waste) like this (see D.2), but with the possibility to measure/calculate. Those measurements should then be allowed to have a higher uncertainty level than what is given in the existing guideline. Or as a fallback, give the competent authority the possibility to approve a higher uncertainty in the measurements/calculations in specific cases. This should only be used when it is not possible to fulfil the demands on accuracy due to the nature of the fuel.

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: Other

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
Karlskoga Combined heat and powerplant

Country (please indicate your current country of residence) Sweden

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? No opinion

Which of the following do you think best defines the intended role of the verifier: to check and confirm that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? constantly

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Existing guideline is developed for homogenous fuels such as oil & coal. For heterogeneous fuels & fuels with a mixture of fossil/biogenic carbon guideline is not suitable. If you consider a mixed fuel such as Municipal Waste, the demands in the guideline on accuracy are not feasible. Firstly, it's not economically reasonable to sample every 5000t of waste. If samples should be taken in a scientific/representative way then the costs become very high. Even if you do sampling according to this scheme, you will not reach the limit for accuracy/uncertainty. There are methods to sample CO₂ in the flue gas & then send the samples to laboratories for C14 dating to decide the ratio of fossil & biogenic carbon. Considering that uncertainties in the measurements of flue gas flow are in the range 10-15% this will also fail to comply with the existing demands on accuracy/uncertainties. Also from what we can see, in the existing guideline there is only support for 4 continuous measurements of flue gas, not periodic ones. Change needed!

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

There should be introduced a fixed value for fuels (both municipal and other waste) like this (see D.2), but with the possibility to measure/calculate. Those measurements should then be allowed to have a higher uncertainty level than what is given in the existing guideline. Or as a fallback, give the competent authority the possibility to approve a higher uncertainty in the measurements/calculations in specific cases. This should only be used when it is not possible to fulfil the demands on accuracy due to the nature of the fuel. We strongly object to the inclusion of waste incinerators (no matter what kind of waste) in the EU-ETS since the measuring guideline/regulation so clearly is not developed for that kind of fuel. However, we make the proposal above due to the opt-in possibility for sectors not covered by the EU-ETS and as one Member State surprisingly defines waste incinerators as 'co-incinerators' (which is not correct in our opinion) in order to include them into the EU-ETS

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: Other

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
Association Française des Entreprises Privées (AFEP) - 953933297-85

Country (please indicate your current country of residence) France

Are you familiar with European Union's policies regarding climate change? I am very familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am very familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been directly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Strongly agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

Général : Il convient de conserver les exigences applicables à la phase II de la directive ETS, ni plus, ni moins, mais en assurant la cohérence de mise en place entre États membres dans le cadre d'un règlement communautaire (en lieu et place de simples lignes directrices). Il convient toutefois d'appliquer les nouvelles dispositions applicables sur les transferts de CO₂ pour éviter les cas de double comptage. Remarques relatives aux questions de la section A et B : A8. Certaines méthodes de calcul ont varié d'un État membre à l'autre, pendant la phase 2 (ex : méthodes de calcul sur les transferts de CO₂), car les lignes directrices ont été interprétées de façon différente. B2. Il convient de conserver le niveau d'exigence actuel de surveillance et de déclaration pour les petites et moyennes installations, selon le principe de proportionnalité, pour ne pas décrédibiliser le système de quotas européen.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

B4. Avant toute proposition, il convient d'établir un diagnostic évaluant le caractère acceptable ou excessif des exigences de déclaration/surveillance pour les petits émetteurs. B6. Les données d'émissions semblent suffisamment corrélées au niveau production/activité pour ne pas nécessiter de nouvelles exigences de surveillance/déclaration sur les données de production/activité. B7. Il importe d'appliquer les éventuels formats électroniques uniquement à l'échelon de l'installation titulaire de l'autorisation et allocataire de quotas, et non de chaque sous-installation, afin d'éviter une trop grande complexité d'utilisation. C4. Il convient que les autorités compétentes informent les sites en retour (ex : validation de réception de documents/données). C5. Les entreprises sont d'accord avec le début de la phrase et en désaccord avec la fin. Les vérificateurs peuvent proposer des mesures correctives mais pas les imposer. C'est à l'autorité compétente seule de décider d'imposer ces mesures.

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of: Other

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your organisation and your Register ID number).
Chamber of Commerce, Industry and Navigation of Cantabria (Spain)

Country (please indicate your current country of residence) Spain

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have not been involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No opinion

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? Yes

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Strongly agree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? No opinion

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? Yes

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? constantly

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? Yes

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? Yes

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme

First, to remark that we agree with both regulations evaluated in this survey. On the other hand, we would like to highlight that all measured emissions should be exactly equivalents and 100% guaranteed and verified. After that, we think that it is necessary to develop a better and detailed information programme. In that sense, it would be useful to create clear manuals and implementation guides and send them directly to the enterprises in order to aware them about this subject. For example, regarding the Reach Regulation we noticed that the enterprises are not aware about that matters.

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

We think that, in highly decentralized countries with weak regional governments, it will be necessary to strengthen support from the state.

EU ETS Monitoring & Reporting Regulation and EU ETS Accreditation & Verification Regulation

General

I am responding on behalf of:

Other

Organisation/company (if your organisation is registered in the EU register of interest representatives, please indicate the name of your

organisation and your Register ID number).
Fachverband der Stein- & keramischen Industrie Österreichs

Country (please indicate your current country of residence) Austria

Are you familiar with European Union's policies regarding climate change? I am familiar

Are you familiar with the European Union Emissions Trading Scheme (EU ETS) which entered into force in 2005, and in particular its revision in 2009 with new rules to become applicable as of 2013? I am familiar

Have you been involved in the implementation of the Monitoring and Reporting Guidelines under the EU Emissions Trading Scheme? I have been indirectly involved

In your opinion have the Monitoring and Reporting Guidelines been implemented in a consistent way? No opinion

Do you agree that monitoring, reporting, verification and accreditation in relation to the EU Emissions Trading Scheme should be based on a common approach defined at European level to establish consistency and transparency and improve cost-effectiveness? Strongly agree

Monitoring and Reporting

Do you support the need for a Competent Authority to approve formally the monitoring methodology used to measure and report emissions? No

The Monitoring and Reporting Guidelines implement a "tier system" approach for selection of appropriate monitoring methodology from a hierarchy according to technical feasibility and reasonable costs (the higher the attained tier, the higher the monitoring quality). Do you agree the "tier system" approach is still justified as a means to ensure sufficient proportionality and cost effectiveness? Disagree

The current Monitoring and Reporting Guidelines allow for determination of emissions according to either a calculation-based or a measurement-based (Continuous Emissions Monitoring) methodology. Do you agree that either approach should be allowed on an equal basis? Yes

Do you agree with special consideration being given to ensure appropriately cost effective requirements for monitoring and reporting in relation to small emitters? Yes

Is the approach to biomass and biofuels within the current guidelines appropriate? Yes

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for reporting emissions associated with activity/production related data. Are you in favour of this development? No

The revised Emissions Trading Directive provides an option for the Monitoring and Reporting Regulation to include additional requirements for more harmonised use of information technology. Do you see this as a potential advantage? No opinion

Do you agree that a Regulation for monitoring and reporting could improve confidence in operation of the EU Emissions Trading Scheme in terms of a tonne emitted being reported? Agree

Accreditation and Verification

Considering this introduction, do you agree with the requirement for all emission reports under the EU Emissions Trading Scheme to need verification by an independent and accredited verifier before final submission to a regulator? Yes

Are you aware that all emission reports under the EU Emissions Trading Scheme will need to be verified by an independent and accredited verifier before final submission to a regulator? Yes

Which of the following do you think best defines the intended role of the verifier: to check and confirm the accuracy of reported emissions and that the correct monitoring methodology has been applied

To what extent do you feel EU Emissions Trading Scheme Competent Authorities and Accreditation Bodies need to cooperate? according to formal feedback loops

Do you support the need for ongoing supervision of verifiers by the accreditation body and ability for them to impose corrective measures? No

Overall

Do you think the two regulations need to be accompanied by relevant user manuals, guidance, templates and frequently asked questions to further ensure consistent interpretation and implementation? No

Please offer your key ideas/suggestions for making improvements to monitoring and reporting within the regulatory requirements for the EU Emissions Trading Scheme
Konsistenz Zuteilung und Abrechnung: Emissionen, für die Zertifikate abgegeben werden müssen - müssen (mit Ausnahme der Stromerzeuger) das Anrecht auf Gratiszuteilung haben. Keine Wettbewerbsnachteile - Einheitliche Methoden in den Mitgliedsstaaten
Anerkennung von Emissionsminderungsmaßnahmen und Emissionsssenken

Please offer your key ideas/suggestions for making improvements to verification and accreditation within the regulatory requirements for the EU Emissions Trading Scheme

