

**The EU ETS Compliance Conference 2012
Task Force II (Aviation)**

Review of Aircraft Operators' emission reports

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Compliance requires reporting of emissions ...

Article 14 of the EU ETS Directive states:

“Member States shall ensure that each ... aircraft operator reports the emissions during each calendar year from ... the aircraft, which it operates to the competent authority after the end of that year in accordance with the [monitoring and reporting] guidelines.”

Article 14 - Monitoring and reporting of emissions

Compliance requires verification of reports ...

Article 15 of the EU ETS Directive states:

“Member States shall ensure that the reports submitted by ... aircraft operators ... are verified ...

“Member States shall ensure that an ... aircraft operator whose report has not been verified as satisfactory ... cannot make further transfers of allowances until a report from that ... aircraft operator has been verified as satisfactory.”

Article 15 - Verification and accreditation

Draft guidelines on administration of AOs ...

Section 12 of the draft guidelines states:

“Member States should assess the emission reports received and check for potential irregularities.”

Section 12 - Checking of reports

Are we getting quality, or simply numbers?

Competent authorities are facing issues with:

- Quality of reports submitted by AOs;
- Quality of verification by (duly-accredited!) verifiers.

Mistakes by AOs range from “simple” incorrect use of templates to fundamental errors in reported scope, methodology/data management, and reported data.

The work carried out by verifiers is not always up to the standard expected! This includes missing out on obvious mistakes (e.g. 95km not added to GCD!).

**What are the reasons for lack of quality in verification?
To what extent should CAs check AOs/verifiers?**

“Tool-kit” - it exists

Preparing monitoring plan	Operator	<ul style="list-style-type: none"> • M&R Guidelines/new Regⁿ • Annotated templates • Guidance document
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Are these “tools” being used? If not, why?

Are they enough? Or too much?

Are they good enough? Do they need revisiting?

Are they user-friendly? How can we make them more so?

How do competent authorities view these “tools”?

Verification of report(s) + Checking of report(s)	Verifier Competent authority	<ul style="list-style-type: none"> • ECTL Support Facility • M&R Guidelines/new Regⁿ (+ new A&V Regⁿ) • Guidance document • ECTL Support Facility
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What level of checks are CAs doing?

It seems that different competent authorities have different views on, and approaches to, checking of reports submitted by AOs.

A number of CAs go for the highly detailed and sophisticated approach (e.g. DE).

Others lack the resources to do so, thus limited in scope (e.g. MT).

And there may be those who do not carry out any checks at all!

What and how can we learn from each other (share tools e.g. DE system)?

Are existing tools (e.g. ECTL SF) useful?

Do certain facilities complicate matters (e.g. ECTL Small Emitters' tool)?

Inter-comparison of indicative parameters (e.g. emissions/unit distance)?

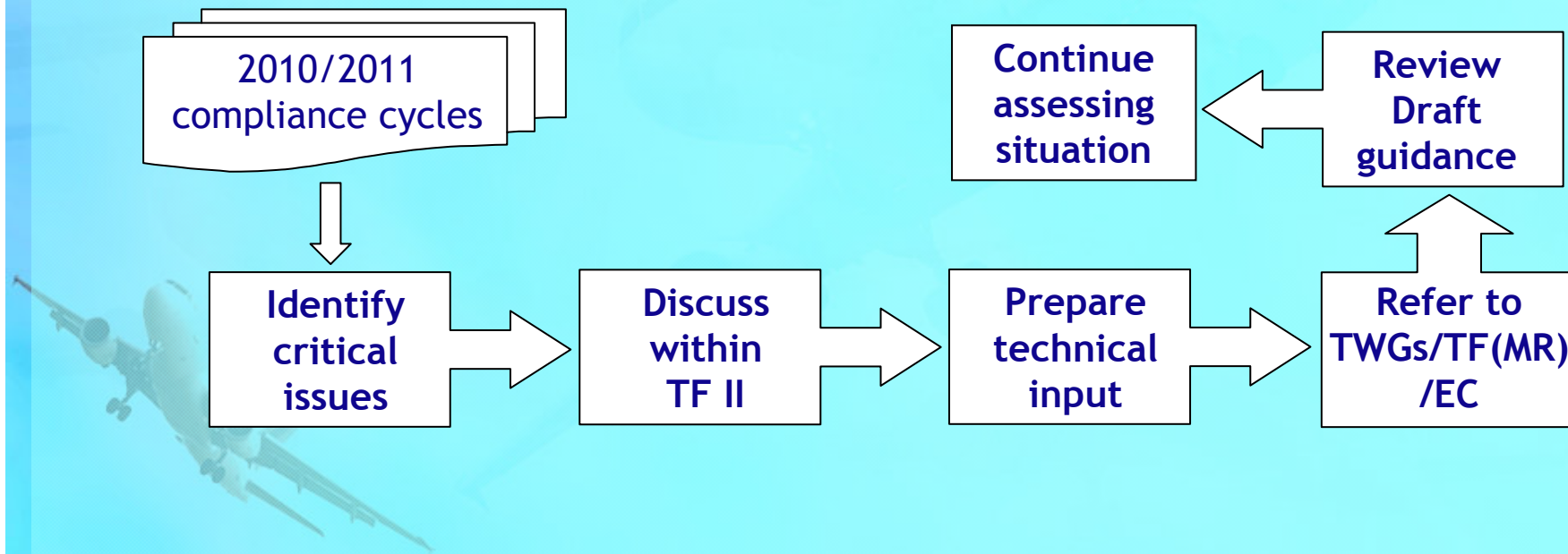
Should CAs agree on a “minimum” level of checks?

Do the numbers (i.e. no. of AOs administered) justify investing resources?

TF II (Aviation) input to M&R/A&V guidance

Building on 2010/2011 experience and lessons learnt:

- to identify critical M&R and A&V issues;
- discuss between EU ETS(aviation) and aviation-sector experts;
- and provide relevant input to TWGs/ TF I (MR) and EC as necessary.



- Thank You -

