

# KOBiZE view on the new MR regulation and guidance documents

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# Adequacy of the MRR guidance:

- KOBiZE organized workshops on the new MRR and MP guidance
- Participation by almost 500 operators, 120 regional competent authorities and 50 verifiers
- KOBiZE introduced changes in law, guidance documents and step by step preparation of new MPs based on EC template
- To ensure harmonized approval process of MPs by regional CAs, KOBiZE provided further detailed info on checks and how to do it
- KOBiZE stressed importance of meeting uncertainty level and proper risk analyses

# Adequacy of the MRR guidance:

## Main outcomes of the workshops:

- PL will be using MP templates provided by EU;
- In general positive view templates, guidances, automatic checks and examples, user friendly format

## Comments:

- Lack of national versions of MP template on EC website;
- Still some „bugs” in EN version of MP template;
- Need for translation of general guidance;
- Need for finalisation of specific guidance (risk analyses particularly needed);
- Lack of guidance dedicated to process of acceptance of MP (checklist);
- Guidance's needs to be updated with country specific information (national metrological control, source of maximal permissible error in service)

# Way forward

Process of preparation and acceptance of new MP will start from the beginning of October;

To achieve higher harmonization between regional CAs  
KOBiZE:

- introduced new channel for technical support (dedicated email account and phone numbers) for both operators and CA
- plans to add country specific information to EC guidance
- plans to publish FAQ&A paper based on Workshop questions
- plans to provide exemplars of MP (maybe also exemplars of internal procedures);
- will organize dedicated workshops for aviation operators;

New ETS law under preparation in Poland: it will address coordination requirement related to Art. 10 of MRR (coordination of CAs responsible for acceptance of MP).

# Calculation vs CEMS:

- **First phase (2005 – 2007)** – only **3** installation used CEMS;
- **Second phase (2008- 2012)** – **none** of the installations are using CEMS;
- **Third phase (2013 – 2020)** – CEMS will be obligatory for **3** installations for monitoring N<sub>2</sub>O emissions (production of nitric acid);

## Main reasons:

- cost of implementation of new technology;
- emissions calculated using CEMS technology might be a little bit higher;
- previous rules related to using CEMS were too complicated;
- uncertainty related to first CEMS technology equipment were high;

Rest of the installations (**around 800**) are using the standard calculation methodology.

# Calculation vs CEMS:



## Problems:

- high costs related to sampling and analyses (quality of coal differs depending on supplier) – frequency of sampling and analyses should be adjusted in time;
- uncertainty related to stocks (in the case of PL, stocks are obligatory if energy or heat is produced) – usually high and hard to calculate;
- measurement instrument vulnerable for errors – high cost of proper maintenance and control and problems with achievement of highest tiers (+/- 1,5%);

## Solution:

- recommendation from verifiers;
- guidance with explanation of benefits from using CEMS;
- ?

Problematic but possible.

# 2013 and beyond:

- work on guidance and templates should be **continued** – clear work plan is needed;
- some of guidance should be updated in time:
  - **general guidance – unreasonable costs** - type of cost that could be taken into account (not only investment costs?);
    - **internal procedures** – content of procedures in the case of outsourcing services (external laboratory)
  - **biomass – standard factors** of biomass content;
    - **estimation methods**
- introduction of new and exchange of existing **exemplars** (monitoring plans, sampling plans, risk assessment, internal procedures);
- guide on **cross-cutting issues** – correction of verified report after end of April (how to apply it into Registry? what to do when reported emission is under or overestimated? )
- need to establish proper **information exchange channel** with Commission in the case of problems with interpretation of specific MRV rules – similar to helpdesk during NIMs exercise.
- **FAQ&A paper** – with common questions gathered during the process of acceptance of MPs.

Thank you for your attention

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