

ANNUAL EMISSION REPORTING FOR INSTALLATIONS FOR 2014

8 October 11.30 - 12.30

Climate, Resource and Research Unit
Environmental Protection Agency
Ireland

OVERVIEW – WEBINAR FOR ETSWAP

- Using the webinar
- Compliance with your GHG Permit and the monitoring and reporting regulation.
- ETSWAP and permit variations, notifications and capacity changes.
- ETSWAP Q&A

INTRODUCTION – Using the webinar

- This webinar and any other in our 2014 series, will be available to review through the BrightTALK channel that linked you here today.
- During this talk you can type in questions and we will endeavour to answer them at the end of the presentation.
- If we cannot get to yours, we will follow up after the talk.
- You also have the ETSWAP helpdesk at help.ets@epa.ie and of course your Inspector.

Compliance with your GHG Permit and the Monitoring and Reporting Regulation

Annette Prendergast

Climate, Resource and Research Unit

Environmental Protection Agency

Ireland

Overview

- Legal requirements of the EU ETS
- Process of submission of Annual Emissions (AEM) Report and Improvement Report
- Findings from review of 2013 AEM Reports
- Notification requirements (Temporary changes, data gaps, non compliance, permit variations)
- Capacity/Activity level changes
- Carbon leakage status changes

Legal requirements

All Operators are legally required to comply with the following:

- [S.I. No. 490 of 2012](#)
- [Commission Regulation 601/2012](#) (MRR) monitoring and reporting of greenhouse gas emissions.
- Their GHG Permit (See Regulation 26 of S.I. 490 of 2012 for offences).
- [Commission Decision of 27 April 2011](#), determining transitional Union-wide rules for the harmonised free allocation of emission allowances (For operators in receipt of free allocation).

Annual Emissions (AEM) Report

- ❑ The Operator must submit the AEM Report and enter the verified annual reportable emissions figure into the Registry and ensure it is electronically approved by the Verifier by **31 March**.

- ❑ Check with your Primary Registry Contact (PRC) to ensure required number of users are active on Union Registry.
 - Queries can be addressed at etradmin@epa.ie.
 - **Do so now**, as the appointment of new users can be a lengthy process.

Annual Emissions (AEM) Report

- ❑ The Operator is required to surrender allowances equal to the verified annual reportable emissions in the previous calendar year by **30 April**. Failure to do so will bring penalties of €100 per tonne, increased with European index of Consumer prices. [See Judgment ECJ C-203 12.](#)
- ❑ Allowances surrendered must also cover any previous calendar years where allowances remain outstanding in addition to any penalties.

Improvement reports

- An Operator must submit their improvement report, where required, by 30 June each year.
- When the Verifier raises issues in Annex 1A of the VOS, an uncorrected misstatement, uncorrected non-conformity with the approved monitoring plan or MRR, the Operator will be required to submit an Improvement Report to address it.
- The requirement to do so will appear as a task on your work flow on ETSWAP, with the date for its completion.

Improvement reports

- Where the Verifier recommends improvements, all Operators, except those which are Low Emitters (<25,000 t CO₂/yr), will be required to submit an Improvement Report.

- In addition, where the Operator is currently not meeting minimum tiers, their justification may be based on unreasonable costs/not technically feasible, but it is required every;
 - 4 years for Category A,
 - 2 years Category B.
 - Annually for Category C.

Findings from review of 2013 AEM Reports

- Incorrect NCV, EF and total TJ reported for major source streams.
- Incorrect activity data reported for major fuels.

The final CO₂ emissions were correct in the above cases, but the other reportable parameters were out by a factor of 1,000.

Both issues were as a result of a change to the reporting units used for in Phase III when compared to previous periods and not noticed by the Operator and Verifiers.

Findings from review of 2013 AEM Reports

- Where NCV and EF are determined by periodic analysis, calculation factors were reported as averages rather than weighted averages. It is the weighted average that should be calculated and reported.
- When analysis results show that the heterogeneity of a fuel/material differs from the original sample on which approved MRR plan was based. Then these elements of the sample plan have to be revised and re-submitted to the Environmental Protection Agency for approval. This is to ensure compliance with Article 33.2 of the MRR.

Findings from review of 2013 AEM Reports

- All sampling, analysis procedures and frequencies agreed in the approved monitoring plan should be applied on-site. Any changes have to be agreed in advance with the Environmental Protection Agency.
- The results of analysis should only be used for the batch of material or fuel for which the samples have been taken in accordance with Article 32.3 of the MRR. In some cases the averaged quarterly results were applied to fuel consumed over the year.

Findings from review of 2013 AEM Reports

- Details of the start and end of year stocks and deliveries for activity data were not reported. Activity data was reported as if it were continuously metered.

Q. Is activity data based on aggregation of metering quantities i.e. not on continuous metering?

- The answer to should always be “Yes” when the activity data is determined by deliveries and the start and end of year stock differences.

Findings from review of 2013 AEM Reports

- Not all the NACE codes are listed or NACE codes were listed incorrectly.
 - The correct and complete, Revision 2, 4 digit NACE codes should be listed.
- The codes should correspond to the codes you reported in the Phase III baseline data report where there are no changes in the types of activity on-site.
- The agreed frequency of analysis of bio-liquids, as agreed in the monitoring plan was not met by the Operator.

Findings from review of 2013 AEM Reports

- Bio-liquids must be certified as sustainable to report an emission factor as zero to give zero emissions.
- The sustainability certificate must be current and cover all the batches and each type of sustainable bio-liquid being claimed as zero by the Operator.
- The Operator must attach the certificates relevant to the reporting year to the AEM report.

Findings from review of 2013 AEM Reports

- Q. Does the installation have to report under the EPRTTR Regulation 166/2006?
 - Many Operators selected 'No' to this when 'Yes' should be selected and the details included.
 - **This is not a new issue and is a reoccurrence for many Operators, corrective action procedure?**

- When *de-minimis* source streams such as acetylene, gas oil and propane are not included in the approved monitoring plan, a permit variation application needs to be submitted, so as to update the plan.

Findings from review of 2013 AEM Reports

- The current years calibration and maintenance records should be available on-site for metering equipment to demonstrate compliance with approved tiers. Procedures should be in place to review maintenance and calibration records and take corrective and preventative action where issues are identified.
- In relation to continuous natural gas meters the annual performance assessment report in accordance with ISO10723, must be available on site for review. The findings of the report should be assessed by the Operator upon receipt and corrective actions implemented where required.

Verifier recommended improvements

- Update onsite procedures to comply fully with the MRR.
- Update the monitoring and reporting plan to comply fully with the MRR in terms of procedure descriptions.
- Update meter calibration and maintenance procedures, updating the internal audit procedures.
- In accordance with Article 58 of the MMR, the Operator is required to have specified written procedures in place, such as procedures on corrective actions, internal reviews of data, segregation of duties, quality assurance of measurement equipment, record keeping. Other procedures may also be required as agreed in MP for sampling and analysis, data gaps etc.

Verifier recommended improvements

- The procedure descriptions have been agreed in the permit. The written procedures on site should comply with the requirements of Article 59, 66, 32 and 33 of the MRR **and be followed** by all relevant staff.
- Regular internal audits should include an audit of procedures to ensure that the procedures comply with the MRR and are being applied in practice on-site.
- Update the GHG permit and plan to include omitted emission sources and source streams, mainly the *de-minimis* acetylene, gas oil and propane.

Verifier recommended improvements

- Reclassify *de-minimis* streams in an updated MP where emissions exceed the *de-minimis* threshold.
- Improvements to the monitoring and reporting of emissions.
- In accordance with Article 69 of the MRR each Operator shall regularly check whether the monitoring methodology can be improved.

Notification requirements

Conditions 2 and 3 of the GHG permit deal with Notification requirements.

The option of 'Notification' in the ETSWAP workflow should be used to report on:

- Temporary changes to the permit, such as temporary generators, boilers brought on-site, emissions sources temporarily shutdown.
- Commencement of operation of the activity.
- Factors which may prevent compliance with conditions of the permit. This section is also used to report factors preventing compliance with the agreed monitoring plan.
- Any other factor of a time limited nature that affects your ability to monitor and report.

Temporary changes to monitoring plan

- Condition 3.3 of the permit deals with all of the requirements to be met in relation to any temporary deviations from the monitoring plan due to meter malfunctions, data gaps, non compliance with agreed sampling and analysis procedures etc.
- A notification of the temporary change is required immediately where you cannot comply with the agreed monitoring plan.
- The Operator shall apply the highest achievable tier until compliance is restored.
- The Operator shall take all necessary measures to allow the prompt restoration of the agreed tier.

Data gaps

- In addition for data gaps, a procedure needs to be agreed with the Environmental Protection Agency so as to comply with Article 65 of the MRR.
- The procedure should state that;
 - the Environmental Protection Agency will be notified of the data gaps in accordance with the requirements of the Guidance Document [‘Making Conservative estimates for emissions in accordance with Article 70’](#).

This is to ensure that the estimation methods for determining the conservative surrogate data can agreed with the Environmental Protection Agency.

Permit Variation

- The permit Variation workflow should be used to report:
 - New or changed emission sources, fuels/materials, changes in permitted capacity.
 - *De-minimis* source streams not already included in the permit/plan.
 - Changes in Operator details.
 - Changes in the availability of data, previous data found to be incorrect.
 - To comply with the MRR or in response to recommended verifier improvements.
 - Where it has become technically feasible or a reasonable cost to meet the minimum tiers.

Confidential information

- All information, including attachments submitted to the Environmental Protection Agency (ETSWAP, email etc.) and all correspondence on Emissions Trading is available to the public on request, unless specifically requested otherwise on the grounds of confidentiality.
- Any request for confidentiality must be justified with reference to European Communities (Access to Information on the Environment Regulations 2007 to 2011). The Board of the Environmental Protection Agency will consider if the information can be deemed as confidential and necessary.
- Where possible all information/data should be submitted in a non confidential format.

Capacity /Activity level changes

- To comply with Condition 2.8 of the permit and Article 24 of the CIMS, all Operators in receipt of free allocation must notify the Environmental Protection Agency about planned or effective changes to capacity, activity level and operation of the installation and submit an application form amending amounts allocated free of charge, or confirm there were no changes by 31 December each year.
- Failure to submit the required information will result in allowances not being issued to the installation for the current year.
- The “Capacity/Activity level” workflow should be completed on ETSWAP. This task is available now in your work queue and from September each year.

Capacity/Activity level changes

- The required submission date is 31 December each year.
- Where you are an Operator and not in receipt of free allocation, confirm this in the work flow and submit. If submitting on the 31 December, you can also attach the “Declaration of Operability”.
- All other Operators are required to confirm whether or not there were any changes to the capacity, activity level and operation of the activity in the current year such as cessation, partial cessation, recovery from partial cessation, new partial cessation, significant capacity decrease or significant capacity increase.

Capacity/Activity level changes

- Where there are changes, you are required to complete and attach an application form amending amounts allocated free of charge.
- The application form must be accompanied by a Verified report in the case of new entrants (significant capacity increases and greenfield plants).
- All such operators must also submit details of the current years activity level for each sub-installation compared to your historic activity level, as set out in section K (IV) of your baseline data report for each sub-installation relevant to your installation.

Capacity/Activity level changes

- In addition where you had any physical changes on-site during 2014 affecting capacity of any of your sub-installations please submit the data/calculations which confirm that a significant capacity decrease did not occur.
- The information on capacity and activity level should be readily available on-site in accordance with the procedure agreed with the Environmental Protection Agency in section 12 of your Monitoring Plan.
- Where the form is being submitted on the 31 December you can also attach the “Declaration of Operability” which is due by 21 January. This form will be available in the Phase III section of our website shortly.

Capacity/Activity level changes

- Please refer to our website and the Commission Guidance Documents for further information.
- <http://www.epa.ie/climate/emissionstrading/etscheme/phase/>
- http://ec.europa.eu/clima/policies/ets/cap/allocation/documentation_en.htm

Changes in carbon leakage status; whey, plaster and plasterboard

- [Commission Decision of 18 December 2013](#) added new products to the list of sectors and subsectors deemed to be exposed to a significant risk of carbon leakage.

- Two products are of relevance to Ireland.
 - ❑ Whey and modified whey in powder, granules or other solid forms with the Procom Code 15515533.
 - ❑ The product benchmarks ‘Plaster’ and ‘Plasterboard’.

- Operators who may use whey as listed above were contacted in January and requested to update the baseline data report arrange for verification and resubmit.

Changes in carbon leakage status

- Some reports have been received, but a number are outstanding and need to be submitted urgently. The changes need to be notified to the Commission by the Environmental Protection Agency without delay.
- In relation to Plaster and Plasterboard, all the required information is available in the current baseline data report.
- Once all the reports have been received and reviewed by the Environmental Protection Agency, the updated data will be submitted to the Commission for assessment. Following a Commission agreement any amendment to the allocations can be initiated.

Carbon leakage 2015 - 2019

- A Draft Commission Decision on a new Carbon leakage list for 2015-2019 was voted on by the Climate Change Committee in July and is now undergoing scrutiny in the European Parliament and Council, which ends on the 15 October. Are your products on it?
- The latest documents are at the following link.
<http://ec.europa.eu/transparency/regcomitology/index.cfm?do=search.documentdetail&B+o2Xfg5WFS1RyfF7r8Qphh0ZhKdgj6tTQCNUiNDFGADftvKFOKx2dvStAkgOQoq>
- Please refer to the Commission website for updates.
http://ec.europa.eu/clima/policies/ets/cap/leakage/index_en.htm

Monitoring & Reporting Guidance

- The EU Commission has produced numerous guidance documents on the MRR, such as on biomass, uncertainty, sampling and analysis, data flow activities and control systems, risk assessment and FAQ's.
- In addition detailed EU guidance also available on the Accreditation, Verification Regulation.
- Refer to the guidance documents and FAQs for further interpretation on monitoring, reporting and verification issues.
- http://ec.europa.eu/clima/policies/ets/monitoring/documentation_en.htm
- Please also refer to our previous webinar

Help and queries

- For Stationary Operator queries
email: ghgpermit@epa.ie
- For assistance with ETSWAP email:
help.ets@epa.ie

ETSWAP


Permit Variations, Notifications and
Capacity Changes
Elaine Farrell


ETSWAP

- This presentation describes the workflow in ETSWAP for notifications, permit variation applications and capacity changes.
- You are reminded that the Webinar “Annual Emission Reporting in ETSWAP for 2013” presented on 12 February 2014 includes details of the workflows for completing your Annual Emissions Report.
- This is also available on this channel for your reference.

Channel Channel profile

➤ **Environmental Protection Agency Channel** ▲ ▼

 **ETSWAP, AEM Reporting for Verifiers**
Feb 12 2014 | 25 mins

 **Annual Emission Reporting in ETSWAP for 2013**
Feb 12 2014 | 60 mins

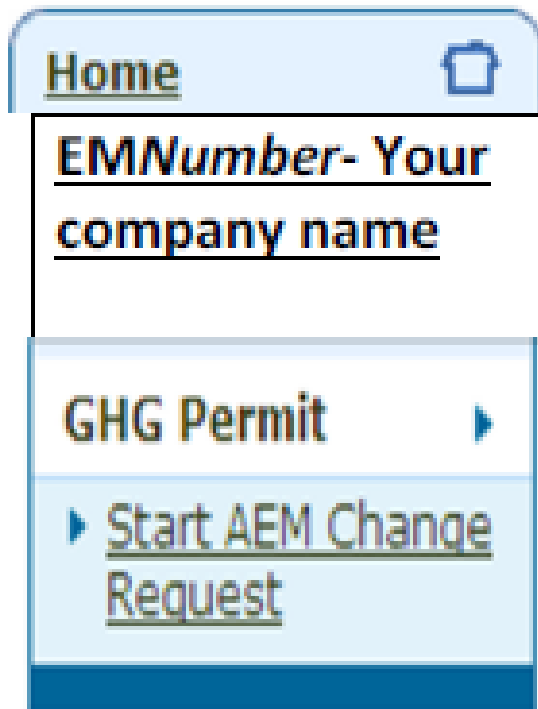
ETSWAP AEM change request Workflow

- There are two types of AEM change requests in ETSWAP.

Notification: To notify the competent authority of a temporary or minor change to the greenhouse gas permit/monitoring plan.

Variation: To submit an application to make a permanent change to the greenhouse gas permit/monitoring plan.

ETSWAP Permit variation application



- To submit a permit variation application the following steps should be carried out.
- Firstly select “GHG permit” on your side bar and then “Start AEM Change Request”

ETSWAP Permit variation application

➤ **When you open “Start AEM Change Request” a number of options will become available to you, including “Start Variation”**

➤ **This option is not available when a permit variation is already in progress.**

Start AEM Change Request

This page allows one of several types of change request to be started. The available options are:

Notification

Notify the competent authority of a temporary or minor change to the permit.

[Start Notification](#)

Variation

Make a permanent change to the permit.

[Start Variation](#)

ETSWAP Permit variation application

- Click on “Start Variation” and then on “Continue” if you are happy that you have selected the correct change request.
- Click on “Open form” to begin making changes to your permit application form prior to submission.
- You have the option to cancel the variation at any time prior to submission if it is no longer relevant.

Start AEM Change Request

This page allows one of several types of

Are you sure you want to continue?

[Continue](#)

[Cancel](#)

Variation

Below is the current status of this variation together with any outstanding actions.

Current Status: Operator Variation

This variation is being completed by the operator.

Task: Complete permit variation

This permit variation change request is available for completion.

» **Submit permit variation**

Use the following button to open the permit form and vary your permit.

[Open form](#)

» **Optional: Cancel variation**

Select this option if you wish to cancel this variation.

[Cancel variation](#)

ETSWAP Permit variation application

- ✓ Guidelines & Conditions
- About the Variation
- ✓ Application Details
- ✓ About the Operator
- ✓ Service Contact
- ✓ Installation Activities
- ✓ Emissions Details
- ✓ Low Emissions Eligibility
- ✓ Monitoring Approaches
- ✓ Calculation
- ✓ Calculation Factors
- ✓ Management
- ✓ Changes in Operation
- ✓ Abbreviations
- ✓ Additional Information
- ✓ Confidentiality
- ✓ Submission

➤ Open the form and select each section of the permit application form which you want to update from the side bar.

ETSWAP Permit variation application

Emission Source Details



Items marked * must be completed

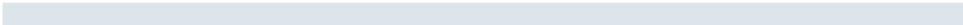
Guidance

Example Emission Source Details

Emission source reference:	S1
Emission source:	Main boiler
Emission source reference:	S2
Emission source:	Cement clinker kiln

Emission Source Details

* Emission Source Reference	<input type="text"/>
* Emission Source Description	<input type="text"/>
* Total Capacity	<input type="text"/>
* Capacity units	<input type="text"/>



- To add a new emission source:
 Select “ add row” in the “Emissions Details Section” for both “Total Emission Sources” and “Regulated Emission Sources” complete as relevant, add and close.

- In most cases you will also need to add a row to the “Emission Points” Table.

ETSWAP Permit variation application

Source Stream Details



Items marked * must be completed

Guidance

A pre-defined list of common fuels is provided in the Source Stream Description drop down. Please select the possible. For materials and products or any fuels not covered by the list, please tick "other" which will then a description.

Example Source Stream Details

Source Stream Reference:	F1
Source Stream Type:	Combustion (other gaseous and liquid fuels)
Source Stream Description:	Heavy fuel oil
Source Stream Reference:	M1
Source Stream Type:	Kiln input based (Method A)
Source Stream Description:	Raw Meal

Source Stream Details

* Source Stream Reference	<input type="text"/>
* Source Stream Type	<input type="text"/>
* Source Stream Description	<input type="text"/>

To add a new source stream, in the “Emissions Details Section”, Click “add row” to the Source Streams Table to complete “Source Stream Details”, complete as relevant, add and close.

ETSWAP Permit variation application

When updating the application form in relation to a new emission source and/or source stream, ensure that it is followed through and referenced in all relevant Tables/Sections. e.g. Emissions Summary Table; Approach Description; Measuring Devices Table, Applied Tiers Table, Default Factors Table etc.

Emissions Summary

Please complete the table below to provide a summary of the emission source and source stream details entered here can be selected from pre-populated lists generated in the above tables. Select multiple references from given list and add or remove the reference as needed.

Source streams (Fuel / Material)	Emission Source Refs.	Emission Point Refs.
F1	S1,S2,S3	EP1,EP2,EP3

ETSWAP Permit variation application

- Go to “About the Variation” and fill in all required items (marked with (*)).
- You should pay particular attention to filling out “Description of the Proposed Change” to ensure it is complete and refers to all relevant changes and updates you have made to the form.

About the Variation

Please indicate why you require a variation.

- * A change in Operation is planned; and/or
 Yes No
- * A change in the measures to be used to monitor and report specified emissions
 Yes No

Description of the Proposed Change

Please provide a succinct description of the proposed change in operation relevant to the permit.

Sufficient information must be provided to allow the regulator to understand the proposed changes. Where appropriate, justification for the changes must also be provided. Information on the location of the installation or of equipment within the installation must be included. According to the permit conditions, the following information would result, if the proposed change in operation were made, in the following:

- description of the installation, including the regulated activities to be carried out and the activities to be discontinued;
- description of the site and the location of the installation on that site;
- the monitoring plan;
- the monitoring and reporting requirements; and
- the start date for your proposed change(s) and relevant end date(s).

*

ETSWAP Permit variation application

When you have completed all relevant sections

- **select “Submission” from the side bar,**
- **and then “Submit” to forward it for assessment.**
- **By clicking submit you are confirming that the information supplied by you in the form is true and accurate.**

- ✓ Guidelines & Conditions
- › About the Variation
- ✓ Application Details
- ✓ About the Operator
- ✓ Service Contact
- ✓ Installation Activities
- ✓ Emissions Details
- ✓ Low Emissions Eligibility
- ✓ Monitoring Approaches
- ✓ Calculation
- ✓ Calculation Factors
- ✓ Management
- ✓ Changes in Operation
- ✓ Abbreviations
- ✓ Additional Information
- ✓ Confidentiality
- ✓ Submission

Permit Variation - Submission

Items marked * must be completed

Once you have completed all the necessary information:
By pressing the Submit button, you are confirming that the information supplied by you in the form is true and accurate.

Submit

ETSWAP notification

- **When you open “Start AEM Change Request” a number of options will become available to you including “Start Notification”.**

Start AEM Change Request

This page allows one of several types of change request to be started. The available options are:

Notification

Notify the competent authority of a temporary or minor change to the permit.

[Start Notification](#)

Variation

Make a permanent change to the permit.

[Start Variation](#)

ETSWAP notification

- After you have selected “Continue” the Notification Workflow will commence.
- Select “ Open Notification Form” to complete details of the Notification.
- “Cancel Notification” can be selected prior to submission if no longer relevant.

Notification

Below is the current status of this notification together with

Current Status: In progress

This notification is being completed by the operator.

Task: Fill in notification form

Fill in the form to notify us of any relevant changes as required.

» **Fill in and submit your notification of change form**

Click the button below to open the notification of change form. At the end of the form to submit the notification to us.

Open notification form

» **Optional: Cancel notification**

Click the button below to cancel your notification form.

Cancel notification

ETSWAP notification

Select the appropriate description of the notification.

About your notification

Notification details

Additional Information

Submission

IN Notification - About your notification

Items marked * must be completed

About your notification

Please identify the reason for your notification by selecting the appropriate option. This is a notification of:

- * a temporary closure of the installation
- a temporary change to the permitted installation
- a change/update to your application to the New Entrant Reserve
- a factor preventing compliance with any permit condition
- commencement of operation
- any other factor

ETSWAP notification, temporary changes

- Notification Details of a temporary change to the permitted installation (e.g. temporary generator being used on site).
- Fill in the start date and end date of temporary change; description of change and justification for not submitting a variation application.

Notification of a temporary change to the permitted installation

* Start date of temporary change

Day	▼	Month	▼	Year	<input type="text"/>	
-----	---	-------	---	------	----------------------	---

* End date of temporary change

Day	▼	Month	▼	Year	<input type="text"/>	
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* Description of change

* Justification for not submitting a variation application

ETSWAP Notification of a factors preventing compliance with permit condition

- Notification Details of a factor preventing compliance with permit condition (e.g. meter temporarily malfunctioning).
- Fill in the predicted or actual start date and end date; description and reason for non compliance and whether it is in respect of M&R Methodology.

Notification of a factor that has prevented or may prevent compliance with permit conditions

• Predicted/actual start of non-compliance

Day Month Year 

• Predicted/actual end of non-compliance

Day Month Year 

• Description of factor(s) preventing compliance

• Reasons why factor(s) has prevented or may prevent compliance

• Is the non-compliance in respect of the monitoring and reporting methodology ?

Yes No

ETSWAP notification of a factor preventing compliance with permit condition

Selecting “Yes” in relation to non-compliance with the Monitoring and Reporting methodology requires additional sections to be filled out, including details of the interim monitoring and reporting methodology and measures been taken to ensure a prompt restoration of compliance.

* Is the non-compliance in respect of the monitoring and reporting methodology ?

Yes No

* Details of interim monitoring & reporting methodology adopted

* Proof of the necessity for a change to the monitoring & reporting methodology

* Details of the measures taken/to be taken to ensure prompt restoration of compliance

ETSWAP notification

- In all cases, there is an option to attach all relevant additional information.

IN Notification - Additional Information

Validate Print Save Form

Items marked * must be completed

If you are providing any other information that you wish us to take into account please tell us here. Please provide this information an electronic format wherever possible. You can provide information as Microsoft Word, Excel, and Adobe Acrobat formats.

Attachment	Description

Add Attachment

Validate Print Save Form

ETSWAP notification

Submit the completed form for assessment when all sections are completed and all relevant documentation attached.

IN Notification - Submission

About your notification

Notification details

Additional Information

Submission

Valid

Items marked * must be completed

Pressing the button below will submit this form directly to the Competent Authority for assessment. Any changes to the contents of this form after pressing this button. If you are not yet ready to submit to the Authority you can save the contents by pressing the Save button and close the form by pressing the Close button.

Following submission of this form you will be returned to the homepage. You will be able to view and delete your submitted form from the history log presented on the homepage.

Submit

ETSWAP notification-rejected

- The Notification will be assessed and either rejected or accepted (with or without additional information being required).
- Reasons for rejection include situations where the change is permanent and a permit variation is more appropriate than a notification. A letter stating these reasons will be sent to the Operator through ETSWAP.

Notification

Below is the current status of this notification together with any outstanding actions.

Current Status: Refused

This notification has been refused by the competent authority.

ETSWAP notification-accepted

Additional information may be required if not supplied in the Notification (e.g. the actual date of end of the non-compliance or temporary change). This will be included in letter from Environmental Protection Agency and also on your workflow.

My Tasks

<u>Priority</u>	<u>Workflow</u>	<u>Task Description</u>
	<p>Active notification (emission plan)</p> <p>29 days remaining</p>	<p>Respond to actions from notifications</p> <p>Fill in the form to update us on the outstand</p>

ETSWAP notification-update

- **Open “Update notification form” and select “Operator Response”.**

Notification

Below is the current status of this notification together with any outstanding actions.

Current Status: Awaiting operator response

This notification is awaiting a response from the operator.

Task: Respond to actions from notifications

Fill in the form to update us on the outstanding actions arising from your previous noti

» **Update actions to notification of change**

Click the button below to open the form and update us on any actions arising from a

Update notification form

- ✓ About your notification
- ✓ Notification details
- ✓ Additional Information
- Operator Response**
- ✓ Submission

ETSWAP notification-update

Update “Operator Response” with actual notification end date if the change notification has been resolved. Any relevant documentation confirming the resolution should be attached here.

* Has the change notified been resolved?

Yes No

Comments

Actual notification end date

Day Month Year 

Additional information

Attachment

Add Attachment

ETSWAP notification-update

If the change notification has not been resolved, you need to state the reason why it has not and give a revised notification end date with supporting documentation attached. A new notification of change form may be required.

Notification - Operator Response

Validate Print Save Form Cl

Items marked * must be completed

* Has the change notified been resolved? Yes No

If the change notified has not been resolved by the agreed date you may be required to submit a new notification of change form

* State the reason why the temporary change has not reverted

Revised notification end date

Day Month Year 

Additional information

Attachment	Description

Add Attachment

ETSWAP- Capacity/activity level changes notification

From 1 September each year the following will appear on your Work Queue. This capacity/activity level change notification is due to be completed and submitted by 31 December.

Work Queue

Below is your list of tasks in order of priority together with recent alerts.

My Tasks

Priority	Workflow	Task Description
	Capacity/activity level changes notification 93 days remaining	Fill in capacity / activity level change notification Fill in the form to notify us of any capacity/activity level changes required to send this to us by the end of the year.

ETSWAP- Capacity/activity level changes notification

All operators should open the capacity/activity level changes workflow and fill it in for submission by 31 December each year. Select “Open capacity/activity level change notification”.

Task: Fill in capacity / activity level change notification

Fill in the form to notify us of any capacity/activity level changes that have occurred during th

› **Fill in and submit your capacity / activity level change notification**

Click the button below to open the capacity/activity level change notification form. Once you submit your notification to us.

All operators are required to submit the form by 31st December each year.

Open capacity / activity level change notification


ETSWAP- Capacity/activity level changes notification - no free allocation

For Operators (e.g. power generators) not receiving free allocation of allowance for Phase III “no” should be selected to the question on the form. The signed Declaration of Operability form (only Section 1 to be completed) should also be attached here if available.




Capacity/Activity Level Changes - Documentation

Validate

Items marked * must be completed

- * Are there any planned or effective changes to the installation's capacity, activity level or operation that installation's free allocation for Phase III of the EUETS or is this a new installation that has started norm Operator that is not receiving free allocation of allowances for phase III "no" should be selected below.
- Yes No 

Please attach any other supporting evidence. For significant capacity decreases, partial cessation or rec please complete and attach the application form amending amounts allocated free of charge located <http://www.epa.ie/pubs/advice/air/climatechange/phase/applicationformforamendingamountsallocated/> guidance is available on the EPA website <http://www.epa.ie/climate/emissionstrading/etscheme/phase/>


	Attachment	
 	Declaration Form 2014.pdf	

Add Attachment

ETSWAP- Capacity/activity level changes notification - no changes

For Operators receiving free allocation of allowance for Phase III, but who have determined that there are no changes to the installation capacity, activity level or operation that have an impact on the allocation “no” should be selected to the question on the form. If the form is being submitted on 31 December, the signed Declaration of Operability form (all sections to be completed including confirmation of the activity level and capacity) should also be attached here.

* Are there any planned or effective changes to the installation's capacity, activity level or operation that have an impact on the installation's free allocation for Phase III of the EUETS or is this a new installation that has started normal operation? If you are an Operator that is not receiving free allocation of allowances for phase III "no" should be selected below.

Yes No 

Please attach any other supporting evidence. For significant capacity decreases, partial cessation or recovery from partial cessation please complete and attach the application form amending amounts allocated free of charge located <http://www.epa.ie/pubs/advice/air/climatechange/phase/applicationformforamendingamountsallocatedfreeofcharge.html> Additional guidance is available on the EPA website <http://www.epa.ie/climate/emissionstrading/etscheme/phase/>

Attachment	Description

Add Attachment

ETSWAP- Capacity/activity level changes notification

For any change a description of the changes must be filled in the text box.

* Are there any planned or effective changes to the installation's capacity, activity level or operation that have an impact on the installation's free allocation for Phase III of the EUETS or is this a new installation that has started normal operation? If you are an Operator that is not receiving free allocation of allowances for phase III "no" should be selected below.

Yes No 

* If so please describe details of the changes/enter details of when the installation started normal operations here.

ETSWAP- Capacity/activity level changes notification - partial cessation

- For Notification of a partial cessation, the operator must identify whether it is a new partial cessation, a continuation of partial cessation or a recovery from partial cessation.
- In the case of partial cessation or recovery from partial cessation the application form amending amounts allocated free of charge must be completed and attached at location marked (*). The application form is available on Environmental Protection Agency website and there is a link on ETSWAP.

* Have you entered a new partial cessation?

Yes No

* Have you returned from a partial cessation?

Yes No

* Are you continuing an existing partial cessation?

Yes No

* Please attach a completed copy of the application form amending amounts allocated free of charge. You can download a copy from the following link

<http://www.epa.ie/pubs/advice/air/climatechange/phase/applicationformforamendingamountsalloatedfreeofcharge.html>

Attach

ETSWAP- Capacity/activity level changes notification - partial cessation


In addition to the attachment of the application form at the location marked as mandatory (*), any other supporting documentation should be attached at the end of the Documentation Section. If the form is being submitted on 31 December, the signed Declaration of Operability form should also be attached here.

* Please attach a completed copy of the application form amending amounts allocated free of charge. You following link

<http://www.epa.ie/pubs/advice/air/climatechange/phase/applicationformforamendingamountsallocate>

GHG1000 applicationformamendingamountsallocatedfreeofcharge.xls

Please attach any other supporting evidence. For significant capacity decreases, partial cessation or r please complete and attach the application form amending amounts allocated free of charge located <http://www.epa.ie/pubs/advice/air/climatechange/phase/applicationformforamendingamountsallocate> guidance is available on the EPA website <http://www.epa.ie/climate/emissionstrading/etscheme/phas>

	Attachment
	Declaration Form 2014.pdf


Add Attachment

ETSWAP- Capacity/activity level changes - significant reduction in capacity

- When an operator with a significant reduction in capacity select “Yes” , the form directs them to also fill in the significant capacity reduction form on ETSWAP and to submit this to Environmental Protection Agency.
- The capacity/activity level changes form must be submitted in order to satisfy the requirement to notify any changes by 31 December. The application form amending amounts allocated free of charge should be attached here.



* Has there been a significant reduction in capacity in this calendar year?

Yes No 

Where you have had a significant capacity reduction, you must fill in the significant capacity reduction form in ETSWAP and submit this to us.

ETSWAP- Capacity/activity level changes - significant reduction in capacity

To submit an application in relation to a significant capacity reduction, select “Significant Capacity Reductions” from the side bar of the work Queue. Complete the workflow if available otherwise contact the Helpdesk, as some workflow development is still in progress at this time.

- ▶ [Organisation Details](#)
- ▶ [GHG Permit](#)
- ▶ [AEM Reports](#)
- ▶ [Improvement Reports](#)
- ▶ [Applications to the New Entrant Reserve](#)
- ▶ [Determination Extension Requests](#)
- ▶ [Further Information Request](#)
- ▶ [Capacity / Activity Level Changes](#)
- ▶ [Significant Capacity Reductions](#)

Actions


Start a significant capacity reduction workflow.

Start a significant capacity reduction

ETSWAP- Capacity/activity level changes significant increase in capacity

- **When an operator with a significant increase in capacity selects “Yes” to this change, the form directs them to fill in the new entrants reserve application form on ETSWAP, if they wish to apply for additional allowances and to submit this.**
- **It is also required that you complete this capacity/activity level changes form in order to satisfy the requirement to notify any changes by 31 December.**

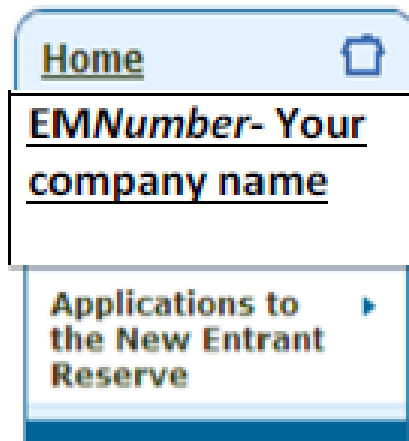
* Has there been a significant increase in capacity in this calendar year or is this a new installation that has started normal operations?

Yes No 

If you have had a significant capacity increase or are a new installation that has started normal operations, you may be eligible for a free allocation of allowances from the Phase III New Entrant Reserve. If you wish to apply for additional allowances, please complete the new entrants reserve application form in ETSWAP.

ETSWAP- Capacity/activity level changes - significant increase in capacity

To submit an application in relation to a significant capacity increase at any time through the year , select “Applications to the New Entrant Reserve” from the side bar of the work Queue.



Applications to the new entrant reserve

This installation has made no applications to the new entrant reserve.

Actions

Start a new application to the new entrant reserve.

[Start a new application to the new entrant reserve](#)

ETSWAP- Capacity/activity level changes - significant increase in capacity

Complete the New Entrant Reserve Application Form attaching the completed and verified New Entrants Template; the Verifier Opinion Statement and any other supporting evidence if applicable. Submit within the required timeframe.

* Please attach your completed New Entrants/Closures Template here.

Attach

* Please attach your Verifier Opinion Statement here.

Attach

Please attach any other supporting evidence.

Attachment	Description

Add Attachment

ETSWAP- Capacity/activity level changes - cessation

To notify of a cessation in the capacity/activity level changes form, Select “yes” to the question are there any planned or effective changes and in the text box record that a cessation has taken place.

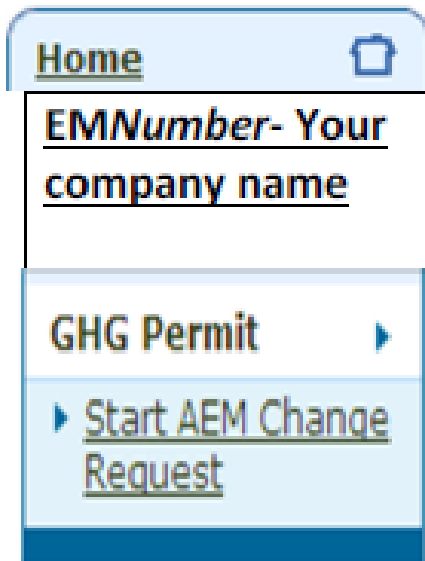
* Are there any planned or effective changes to the installation's capacity, activity level or operation that have an impact on the installation's free allocation for Phase III of the EUETS or is this a new installation that has started normal operation? If you are an Operator that is not receiving free allocation of allowances for phase III "no" should be selected below.

Yes No 

* If so please describe details of the changes/enter details of when the installation started normal operations here.

ETSWAP - notification of cessation

To notify of the Cessation of the regulated activities at the installation at any time through the year (in accordance with your permit conditions), select “Surrender “ under GHG Permit- Start AEM Change Request on side bar.



Surrender

Surrender the permit.

Start Surrender

ETSWAP - notification of cessation

About the Closing Installation

On what date did carrying out of all Regulated activities authorised by the greenhouse gas em

* Day Month Year

* Please describe the change that has resulted in the cessation of all Regulated activities.

Evidence of the change


Please add documents below which provide evidence of the change which has resulted in the

Attachment	D

Add Attachment

Fill in the form with details of the date that the Activities ceased at the installation and attaching evidence of the change.

ETSWAP- Help and queries

- Throughout the forms there are help fields which can be accessed using the  Symbol.
- For Stationary Operator queries email:
ghgpermit@epa.ie
- For assistance with ETSWAP email:
help.ets@epa.ie

Feedback for Verifiers on review of 2013 AEM reports.

Annette Prendergast

Climate, Resource and Research
Environmental Protection Agency
Ireland

OVERVIEW – WEBINAR

- **Content from the Operator webinar will not be repeated here. Some points emphasised from a Verifier point of View.**
- **Information exchange between CA and Verifiers**
- **Addressing misstatements non-conformities**
- **Findings from review of reports**
- **Improvement reports**

Information exchange

- Feedback on the review of 2013 AEM reports has been provided to all Verifiers in the form of the “Verifier Information Exchange template” to be submitted by the Environmental Protection Agency to the Accreditation Bodies.
- Feedback on corrective actions has been received from some Verifiers.
- Feedback is welcomed from all Verifiers.
- All queries in relation to the information exchange and any other queries can be sent to ghgpermit@epa.ie. Please cc me a.prendergast@epa.ie.
- Please take account of the issues raised in the Operator presentation earlier as they have implications for Verification.

Addressing misstatements and non-conformities

- During the verification process any errors, omissions, misrepresentations or non conformities with the MP or Permit found should be brought to the attention of the Operator.
- Misstatements should be corrected by the Operator prior to finalisation of the verification process.
- Nonconformities should be addressed by the Operator with the Environmental Protection Agency through the “Notification” or “Permit Variation” workflow.
- For data-gaps and temporary non compliance such as meter breakdowns the process outlined earlier should be followed by the Operator to comply with Permit and the MRR requirements.

Findings: bio-liquids

- The agreed frequency of analysis of bio-liquids was not met by the Operator. This could be an issue for non-sustainable bio-liquids.
- Bio-liquids must be sustainable for an Operator to report an emission factor of zero and zero emissions, the Verifier must be satisfied that such emissions are correctly reported and not under reported.
- There must be a current sustainability certificate available to cover all batches of each type of sustainable bio-liquid claimed by the Operator. Total quantities of sustainable bio-liquids combusted related to each sustainability certificate should be verified.
- The Operator is required to attach the certificates to the AEM report.

Findings: sampling and analysis

- Where the Operator is required to meet tier 3 for the calculation factor determination, the agreed sampling plan should be verified to ensure it is being applied by the Operator and continues to comply with the requirements of Article 33 of the MRR. The analytical results should be examined to ensure that the appropriate standard methods are applied by an accredited laboratory. In addition results should be compared with previous results to assess if there are changes in the heterogeneity of the fuel or material. The Operator should be directed to submit an updated sample plan to Environmental Protection Agency where there are changes.
- Samples must be representative for the relevant batch/delivery period. Analysis results should only be used for the relevant batch or delivery period for which they are representative.

Findings: NACE codes

- NACE codes listed incorrectly or not all NACE codes listed. This is an issue for installations that receive free allocation. It could also indicate for any installation that there are changes in the nature of the installation, capacity or range of activities that require updating of the GHG permit.
- Where a different NACE code is listed or a NACE code has been omitted compared to what was reported for baseline data for the Phase III allocation, it could mean that there is a potential partial cessation or significant capacity reduction at a site or it could just be a reporting error by the Operator.

Findings: Non-conformities

- The Verifier should have reported under "Uncorrected Non-compliances with the MRR which were identified during verification" that the Operator had not reported to CA details of temporary changes to monitoring methodology as per Article 23 the MRR due to missing fuel data.
- "No" should have been reported for Permit conditions met.
- Where an existing emission source or source stream e.g. workshop cutting and de-minimis acetylene are not included in the current agreed monitoring plan. This should be reported as "Uncorrected Non-conformities with approved plan in Annex 1A. "No" should be reported for both Permit and MP met.

Findings data errors

- Non conformities with the MP and/or permit or the MRR should result in a "Verified with comments" opinion statement (section 3.1.3 of the Guidance Document on reviewing the Annual Emissions and Verification Reports and Section 3 FAQs)
- In numerous Operator reports, incorrect calculation factors or activity data or TJ was reported. The Verifier should print out a copy of the AEM report for review. This includes the detailed calculation information reported by the Operator for each Source stream. If the report is reviewed through "Open Form" only the emission summary is available and such errors will not be picked up. The Verified AEM report is the official submission of the Operators emissions and it needs to be factually correct.

Improvement reports

- Improvement reports are started in the Operators work queue where the Verifier has raised an issue in Annex 1A of the VOS, Uncorrected Misstatements, Uncorrected Non-conformities with the approved monitoring plan or MRR or where the Verifier has raised recommended improvements all Operators except Low Emitters (<25,000 t CO₂/yr) will be required to submit an Improvement Report.
- You will be required to report on prior years non conformities that have not been resolved and consider whether the omission increases the risk of misstatements. These should be raised as non conformities and or misstatements in the current report.

Improvement reports

- In accordance with Article 30 of the AVR, a check on implementation of previous years recommended improvements should be undertaken by the Verifier.
- Where improvements have not been implemented or implemented incorrectly the impact on the risk of misstatements and non-conformities shall be assessed.

Further guidance

- Please refer to the EU Commission website for Guidance and FAQs on the MRR and AVR.
http://ec.europa.eu/clima/policies/ets/monitoring/documentation_en.htm
- Please refer to the Environmental Protection Agency website and EU Commission website for guidance on phase III free allocation process and reporting of changes to capacity and activity level. In addition the application for amending amounts allocated free of charge and the VOS template is available for download from the Environmental Protection Agency website.
<http://www.epa.ie/climate/emissionstrading/etscheme/phase/>
- http://ec.europa.eu/clima/policies/ets/cap/allocation/documentation_en.htm