



REPUBLIC OF SLOVENIA  
MINISTRY OF THE ENVIRONMENT AND SPATIAL PLANNING  
SLOVENIAN ENVIRONMENT AGENCY



# The aim of this study visit

- The aim of this study visit is to support representatives of Montenegro as beneficiary state in their implementation of EU emissions trading by helping to further develop actions needed for its transposition and preparation for implementation.
- **Study visit will help to identify the steps required towards implementation, the capacity needs and the required involvement of various stakeholders.**
- **Main focus will be on priority setting of actions and preparing to organise support for uptake of specific actions.**
- With particular emphasis on actions required by the Competent Authority as well as by potential operators the workshop specifically aims to:
  - **Support the understanding** of and speed up the preparation for implementation of emissions trading in Montenegro, specifically with the future Competent Authority and the main operators that support **implementing the system**.
  - **Formulate priorities and implementation requirements** for the national implementation, including aspects of **timing, resource planning, planning of legislative procedures, and planning of capacity building activities**.
  - Obtain better insight and understanding of required resources for the implementation of specific elements of an ETS system in conformity with EU ETS requirements.
  - Accelerate harmonization with EU acquis in the field of EU ETS to fulfill the requirements of Montenegro's EU Accession process.

# The aim of this study visit

- The study visit is focused on first-hand learning of the needs and requirements to implementation of ETS.
- Experts from the Slovenian Ministry of the Environment and Spatial Planning and Environment Agency will share their **experiences** on implementing legislation, **administrative procedures** and **infrastructure** as well as **lessons learned** during operating as a Competent Authority for the ETS.
- In order to maximise practical understanding of all elements addressed, the study tour participants will have the training on-site of the three operators.
- Experts will participate in the knowledge exchange and show real-life information and infrastructure.

## Agenda training on-site

Three of the most experienced Slovenian operators whose greenhouse gas emissions are regulated under the EU ETS will share the practicalities of implementation of ETS on their side, including aspects such as organisation of data, risk management and the impact on the strategy of their company.

- Thermo power plant, Toplarniška ulica 19, 1000 Ljubljana
- Aluminum plant, Tovarniška cesta 10, 2325 Kidričevo
- Thermal power plant, Cesta Lole Ribarja 18, 3325 Šoštanj

# The EU Emissions Trading System (EU ETS)

## Main EU ETS legislation

- 13/10/2003 - Directive 2003/87/EC of the European Parliament and of the Council establishing a scheme for greenhouse gas emission allowance trading within the Community and amending Council Directive 96/61/EC
- 27/10/2004 - Directive 2004/101/EC of the European Parliament and of the Council amending Directive 2003/87/EC establishing a scheme for greenhouse gas emission allowance trading within the Community, in respect of the Kyoto Protocol's project mechanisms
- 19/11/2008 - Directive 2008/101/EC of the European Parliament and of the Council amending Directive 2003/87/EC so as to include aviation activities in the scheme for greenhouse gas emission allowance trading within the Community
- 23/04/2009 - Directive 2009/29/EC of the European Parliament and of the Council amending Directive 2003/87/EC so as to improve and extend the greenhouse gas emission allowance trading scheme of the Community

# Directive 2003/87/EC

- Stationary Installations - Greenhouse gas emissions permits
  - Applications for greenhouse gas emissions permits, Conditions for and contents of the greenhouse gas emissions permit, Changes relating to installations
- Monitoring and reporting of emissions
- Aviation - Monitoring and reporting plans
- Verification and accreditation
- Auctioning
- Penalties
- **Competent authority** - Member States shall make the appropriate administrative arrangements, including the designation of the appropriate competent authority or authorities, **for the implementation of the rules of this Directive.**
- Registries
- Reporting by Member States

**Implementation - Member States shall bring into force the laws, regulations and administrative provisions necessary to comply with this Directive.**

## **Priorities and implementation requirements for the national implementation, including aspects of timing, resource planning, planning of legislative procedures, and planning of capacity building activities**

- ETS Competent authority - **legislative procedures**
- Implementation body – **permits and monitoring plans**
- Auctioning - **'auctioneer' means any public or private entity appointed by a Member State, to auction allowances on its behalf**
- Climate fund
- National Administrator of the Registry
- Inspection body





REPUBLIC OF SLOVENIA  
MINISTRY OF THE ENVIRONMENT AND SPATIAL PLANNING  
SLOVENIAN ENVIRONMENT AGENCY

# EU ETS in Slovenia

**Ministry of the Environment and Spatial Planning**

Zorana Komar

**Slovenian Environment Agency**

Irena Malešič, Romana Stare, Veronika Tolar Šmid



# **EU ETS implementation framework**

**... institutional...**

## **Ministry of the Environment and Spatial Planning**

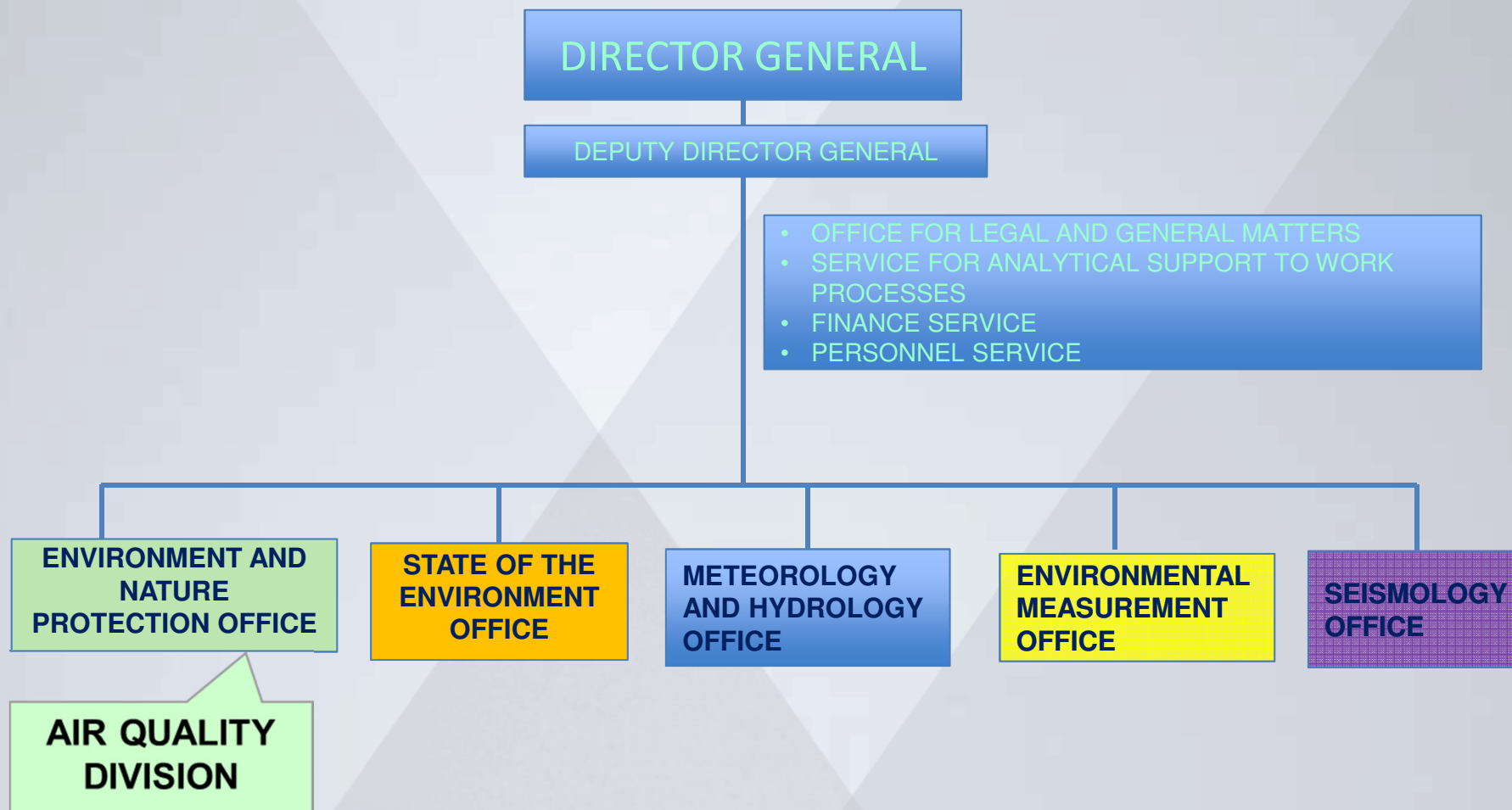
### **Bodies of the Ministry**

- Slovenian Environment Agency
- Inspectorate of the Republic of Slovenia for the Environment and Spatial Planning
- Slovenian Water Agency
- Slovenian Nuclear Safety Administration
- Surveying and Mapping Authority of the Republic of Slovenia

# Ministry of the Environment and Spatial Planning

- ***the overall responsibility for the emission trading scheme in Slovenia and***
- ***the following additional responsibilities:***
  - drafting legislation implementing the ETS Directive and the MRR
  - drafting NIMs and NE&C for Commission approval
  - drafting legislation for allocating emission allowances
  - drafting legislation for penalties
  - approving CERS
  - administrating reserve of allowances
  - coordinating information exchange and cooperation between Slovenian Accreditation, Inspectorate and Slovenian Environment Agency
  - providing information to the public.

# Structure of the Slovenian Environment Agency



# Slovenian Environment Agency

## Air Quality Division

***According to the Environment Protection Act specific responsibilities are delegated to the Agency:***

- issuing permits and approving of monitoring plans (MP)
  - administration/validation of changes to GHG permits and MPs
  - receiving and reviewing verified emissions and verified reports
  - issuing decisions on free allocated allowances
  - administration of NER (new entrant reserve)
- managing the national part of the Union registry
- reporting to European Commission/EEA and to UNFCCC
  - providing data to the other competent authorities and information to the public.

## Agency ...

### ***... other responsibilities, linked to the ETS ...***

- an implementation body responsible for ETS as well as for other environmental legislation such as IED Directive, LCP Directive etc.
- prepares the National GHG emissions inventory report for UNFCCC/EU and ensures that EU ETS data are used for that purpose

# **Inspectorate of the Republic of Slovenia for the Environment and Spatial Planning**

- Inspection is carried out by the Inspectorate which is a separate body within the Ministry.
- The inspection enforces compliance of GHG permits, submission of monitoring plans and reports.
- The inspection imposes fines for the infringements.



## **National Accreditation Body Slovenian Accreditation**

- Slovenian Accreditation (SA) is the national accreditation body responsible for:
  - the establishment,
  - development and maintenance of a professional, independent and impartial accreditation system in Slovenia and
  - for the implementation of the related assignments.
- SA's basic activity is accreditation of conformity assessment bodies.

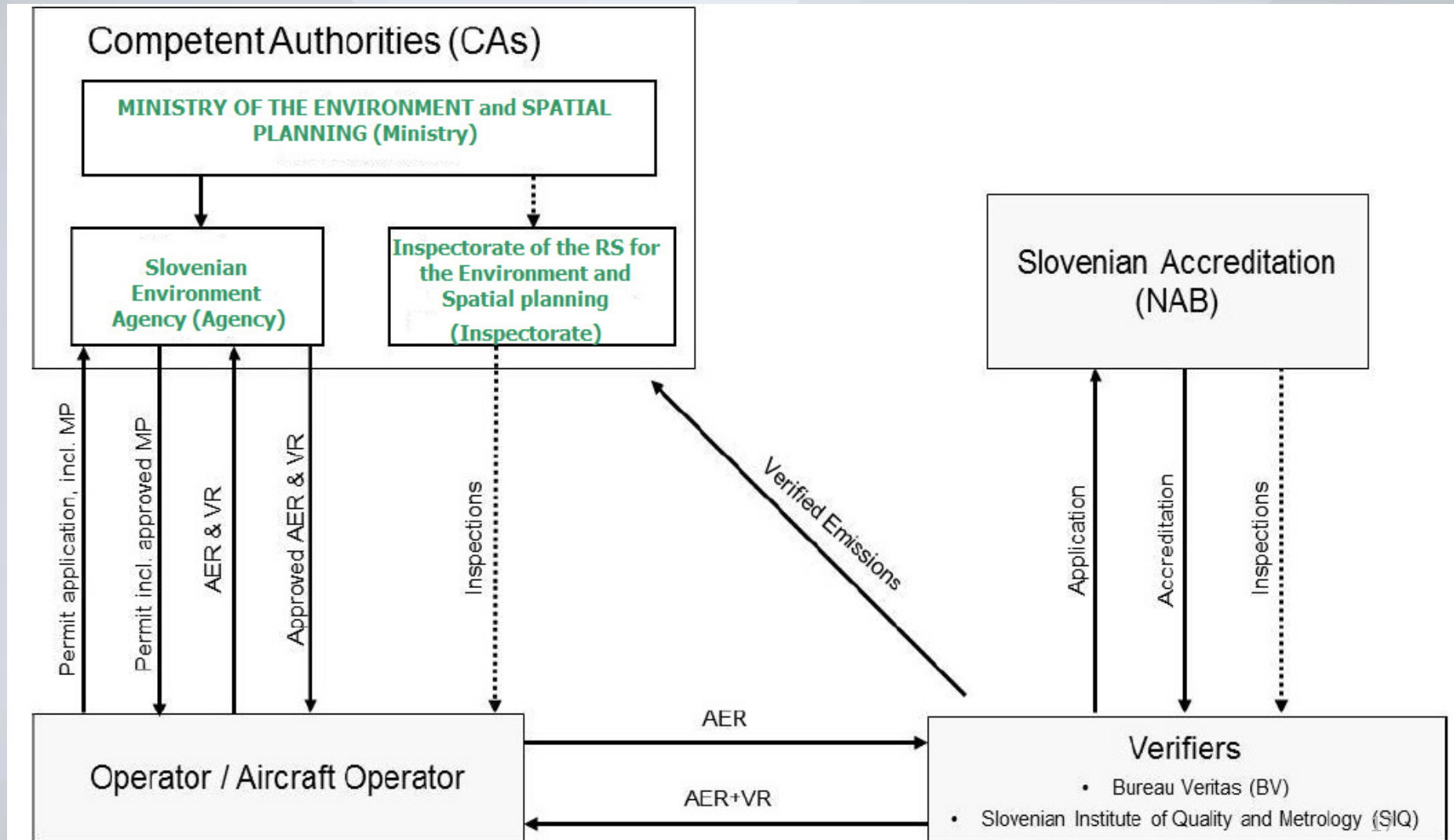
# Slovenian Accreditation

- SA accredits Verification bodies according to ISO 14065:2013 and Regulation (EU) 600/2012 (AVR).
  - <http://www.slo-akreditacija.si/?lang=en>
- SA has granted the accreditation for GHG verification to **two verification bodies:**
  - Bureau Veritas, d.o.o. (BV) and
  - Slovenian Institute of Quality and Metrology (SIQ)

[http://www.slo-akreditacija.si/?post\\_type=lpacreditation&s=&lang=en&podrocja%5B%5D=136&order=Akreditacija\\_DESC](http://www.slo-akreditacija.si/?post_type=lpacreditation&s=&lang=en&podrocja%5B%5D=136&order=Akreditacija_DESC)

# ETS in Slovenia

Organizational chart of the EU ETS in Slovenia - illustrating the hierarchy and/or procedures



# EU ETS implementation framework

## Slovenian legislation

- Environment Protection Act (EPA)  
<http://www.pisrs.si/Pis.web/pregledPredpisa?id=ZAKO1545>
- Decree (SI) on activities, greenhouse gases and installations for which a permit for greenhouse gas emissions is required (Decree on Activities)  
<http://www.pisrs.si/Pis.web/pregledPredpisa?id=URED5824>
- Decree on environmental tax on carbon dioxide emissions (Decree on CO2 tax)  
<http://www.uradni-list.si/1/objava.jsp?sop=2016-01-0889>

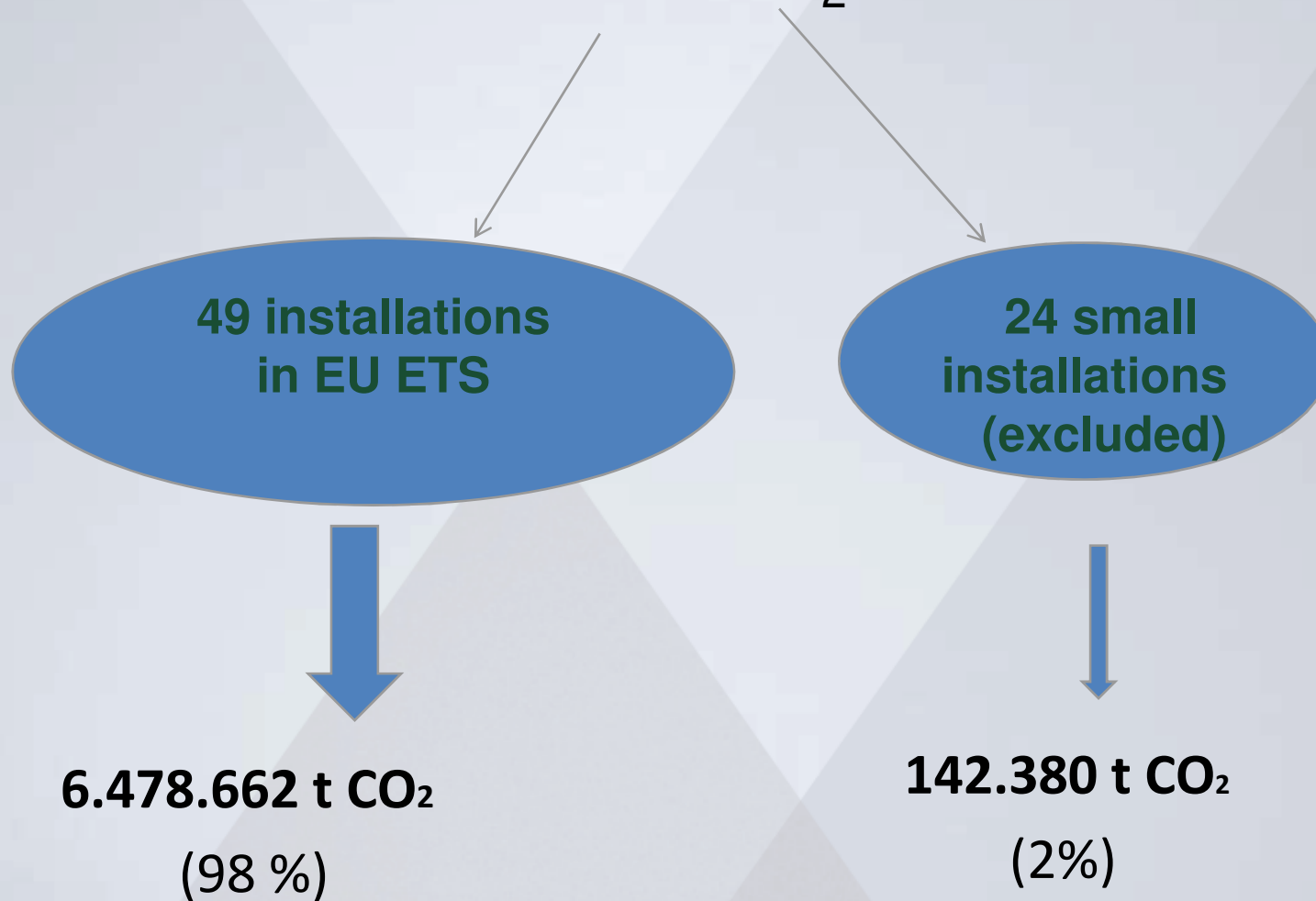
... Implementation of Directive 2003/87/EC  
establishing a scheme for greenhouse gas emission allowance trading within  
the Community

## **Scope of the EU ETS in Slovenia in the period 2013-2020**

- 49 EU ETS installations
- 24 excluded installations under Article 27 of Directive 2003/87/EC
- 1 Aviation Operator
- No CCS, no transferred CO<sub>2</sub>

## 73 Stationary Installations

6.621.042 t CO<sub>2</sub> in 2016





# Stationary Installations in EU ETS

**49 Installations in EU ETS → 6.478.662 t CO<sub>2</sub> in 2016**

- 39 of Cat A (32 less than 25 kt CO<sub>2</sub>) → 9 % of total emissions
- 7 of Cat B → 10 % of total emissions
- 3 of Cat C → 81 % of total emissions (2x Combustion, 1x Cement)

## Activity of installations

26 Combustion	2 Cement clinker
7 Paper	1 Secondary aluminium
3 Iron & Steel	1 Lime
3 Glass	1 Mineral wool
3 Primary aluminium	1 H <sub>2</sub>
1 Ceramic product	

# Small Installations

*(excluded under Article 27 of Directive 2003/87/EC, performing equivalent measures defined in EPA and Decree on CO<sub>2</sub> tax\*)*

**24 small installations**  **142.380 t CO<sub>2</sub> in 2016**

19 Combustion	→	58% emissions
3 Ceramic product	→	17 % emissions
1 Lime	→	15 % emissions
1 Glass	→	10 % emissions

\* An allocation decision defines the amount of emissions that installations can emit yearly, based on the same rules as in the EU-ETS. An Operator needs to prepare the (non verified) emission report and send it to the Agency.

If the yearly emissions are higher than the allocation, operator can either buy allowances on the EU-ETS market and surrender them, or pay a CO<sub>2</sub> tax.

## Information exchange ...

**Agency** prepared guidance for operators such as:

- short guidance for preparing all MP documentation according to MRR
- guidance to fill in AER
- guidance to report annual activity levels of sub-installations
- guidance for entering emissions in Union Registry
- guidance for surrender allowances and exchange of credits in Union registry ...

# Workshops for operators of EU ETS installations

**Agency** organised workshops such as:

**October 2013:** harmonization of permits, adjustment of web application for AER (partial cessations of operations), free allocation of allowances

**November 2014** - together with verifiers: significant capacity change, changes in the allocation of allowances

**All 2015:** individual visits of operators at Agency and online consultations

**April 2016:** new Decree on CO<sub>2</sub> tax

... the whole time: Help desk for administrative procedures, IT system and Union registry...

## Workshops for operators of excluded installations

**in 2013:** change in EPA, new permits

**in 2014:** new reporting requirements for excluded installation (CO<sub>2</sub> tax)

**in 2015:** individual visits of operators at Agency and online consultations

**April 2016:** new Decree on CO<sub>2</sub> tax

... the whole time: Help desk for administrative procedures and IT system ...

## **Information exchange ...**

### **Agency**

- Observers in the assessment programme of verification body carried out by Slovenian Accreditation Body
- Exchange of information with Financial Administration of the Republic of Slovenia
- Cooperation with Chamber of Commerce and Industry of Slovenia
- Meetings with verifiers – debate on technology, fuels, content of reports



# IT System for ETS

Different application forms

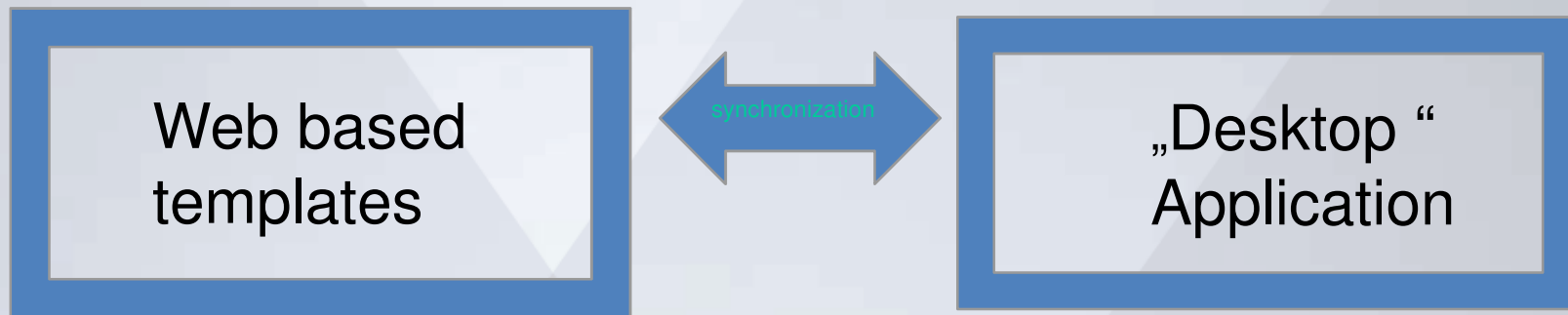
User friendly IT web based system used for:

- Reporting (73 operators)
- Applying for a permit with monitoring plan / changes



Web based system is used only for installations, not for Aviation.

# IT System



## Used

By operator for  
-AER, MP/permit and changes


By Agency for  
– on line checking of operator`s  
entered data

## Used only by Agency:

- MP / permit template decision is printed out from application
- decision for allocation of free allowances is printed out
- different queries are carried out

## Environment Agency's website of Emission Trading

<http://www.arso.gov.si/podnebne%20spremembe/Register%20emisij%20kuponov/Obrazci/>



REPUBLIKA SLOVENIJA  
MINISTRSTVO ZA OKOLJE IN PROSTOR  
AGENCIJA REPUBLIKE SLOVENIJE ZA OKOLJE

English  
Državne ustanove  
O agenciji  
po tem naslovu najdi  
po vseh ARSO strane najdi

VREMEVODEVARSTVO OKOLJANARAVA**PODNEBNE SPREMEMBE**POTRESIZRAK

ARSO > podnebne spremembe > Register emisijskih kuponov > Obrazci

Podatki o spreminjanju podnebja

Podnebje v prihodnosti

Strategija in politika

Emisije toplogrednih plinov

Poročila in publikacije

**Register emisijskih kuponov**

Obrazci

Cenik storitev

Javno dostopna poročila

Obvestila

Letalske dejavnosti

Projekti

Zakonodaja

Ozonu škodljive snovi in F-plini

Na vrh

### PODNEBNE SPREMEMBE

#### Obrazci (Forms)

- [Vloga za pridobitev dovoljenja za izpuščanje toplogrednih plinov](#) [doc, 130.5 KB]
- [Obvestilo o nameravani spremembi dovoljenja za izpuščanje toplogrednih plinov](#) [doc, 107.5 KB]
- [Vloga za spremembo dovoljenja za izpuščanje toplogrednih plinov](#) [doc, 114.5 KB]
- [Vloga za izdajo odločbe o emisijskih kuponih za obdobje 2013 - 2020](#) [doc, 111.0 KB]
- [Imenovanje pooblaščenih zastopnikov računa v registru emisijskih kuponov z izjavo](#) [doc, 113.5 KB]
- [Vloga za odprtje osebnega ali trgovalnega računa - pravne osebe](#) [doc, 114.5 KB]
- [Vloga za odprtje osebnega ali trgovalnega računa - fizične osebe](#) [doc, 112.5 KB]

### POVEZAVE

- [Monitoring emisij toplogrednih plinov - Vloga za načrt in poročilo](#)

- Application Form for GHG Permit
- Application Form for changes of GHG Permit
- Application Form for opening trading / person holding account,...

Link to IT web based system

#### Kontakt

Agencija RS za okolje  
Vojkova 1b  
1000 Ljubljana, Slovenija  
Tel: +386 (0)1 4784 000  
Fax: +386 (0)1 4784 052  
arso@arso.si

#### Izpostavljene vsebine

Generalni direktor  
Novice  
Strateški dokumenti  
Katalog informacij javnega značaja  
Obvestila  
Razpisi

#### Povezave

Vlada Republike Slovenije  
Ministrstva  
Vladne službe  
Državni zbor  
E-uprava

**Agency website for web applications  
(different electronically based templates)**


[http://okolje.arso.gov.si/REMIS\\_TGP/](http://okolje.arso.gov.si/REMIS_TGP/)

Datoteka Urgiranje Pogled Zgodovina Zaznamki Orodja Pomoč

Okoljska poročila in vloge

okolje.arso.gov.si/REMIS\_TGP/

Najbolj obiskano Prvi koraki Zadnje novice Vizualizacije meteorol... ehr: Aktuelle Meldung...

 REPUBLIKA SLOVENIJA  
MINISTRSTVO ZA OKOLJE IN PROSTOR  
AGENCIJA REPUBLIKE SLOVENIJE ZA OKOLJE

## APLIKACIJA REMIS

(Uporabniško ime in geslo zavezanca pridobijo na Agenciji RS za okolje)

### EMISIJE IZ NAPRAV

[Ocena letnih emisij snovi v zrak](#)  
[Poročanje HOS](#)

### EMISIJE TOPLOGREDNIH PLINOV (TGP)

[Vloga za načrt in Poročilo o monitoringu TGP](#)

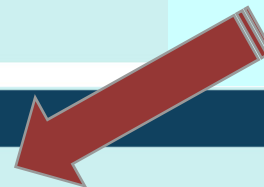
### OZONU ŠKODLJIVE SNOVI IN FLUORIRANI TOPLOGREDNI PLINI

[Letna poročila o količinah plinov in prijava opreme](#)

### VODE

[Napoved za odmero vodnega povračila in koncesij](#)

**link to web application EU ETS -  
database for electronically based  
template for a permit with MP /  
annual emissions report**



## ENTRY into database

([http://okolje.arso.gov.si/REMIS\\_TGP/OLESVZ/ETR\\_Default.aspx](http://okolje.arso.gov.si/REMIS_TGP/OLESVZ/ETR_Default.aspx))

..... **Registration**

The screenshot shows a web browser window with the URL [http://okolje.arso.gov.si/REMIS\\_TGP/OLESVZ/ETR\\_Default.aspx](http://okolje.arso.gov.si/REMIS_TGP/OLESVZ/ETR_Default.aspx). The browser's address bar and tabs are visible. Below the browser window, the registration form is displayed. It includes a menu bar at the top with links: Datoteka, Urejanje, Pogled, Zgodovina, Zaznamki, Orodja, and Pomoč. The main content area has a header with navigation links: Najbolj obiskano, Prvi koraki, Zadnje novice, Vizualizacije meteorol..., and ehr: Aktuelle Meldung... The registration form itself consists of two input fields: 'Uporabniško ime:' (User name) and 'Geslo:' (Password). To the right of these fields are the labels 'User name' and 'Password'. Below the input fields is a blue button labeled 'Prijava' (Login).

Datoteka Urejanje Pogled Zgodovina Zaznamki Orodja Pomoč

http://okolje.ar...TR\_Default.aspx x +

okolje.arso.gov.si/REMIS\_TGP/OLESVZ/ETR\_Default.aspx

Najbolj obiskano Prvi koraki Zadnje novice Vizualizacije meteorol... ehr: Aktuelle Meldung...

Poročevalec:

Uporabniško ime:  User name

Geslo:  Password

Prijava

# GHG permit and Monitoring plan approval stationary installations

- An operator, of an installation falling under the scope of ETS, has to obtain a GHG permit to emit greenhouse gas emissions.
- The GHG permit is not connected to other permits like the IED permit and permits related to air legislation.
- In 2014 all GHG permits were harmonized with the Change of Environment Protection Act, monitoring plan became a part of GHG permit (before: MP was a separate document from the GHG permit).
- An IT web based system has been set up allowing operators to apply for a permit and a monitoring plan electronically. IT web system is used also in case of changes.



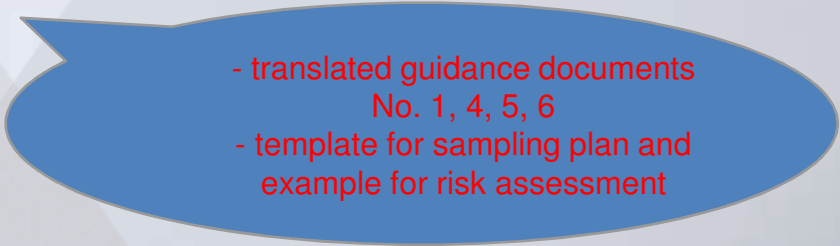
## Monitoring Plan Approval procedures

- Operators apply for a permit with MP by entering data in web based electronic template, enclose documentation prescribed in Art. 12 MRR and in Annex I MRR and submit it in paper to the Agency for approval.
- According to the General Administrative Procedure Act the application form must be signed by legal representative, an evidence of paying administrative fee need to be enclosed too.

# Monitoring Plan Approval procedures

## Enclosed documentation:

- simple scheme of the emission sources, source streams, sampling points and metering equipment
- technical documentation of rated thermal input
- report by inspection body regarding the check of the metering device
- the environmental management system in place
- description of procedures applied for the provision and control of data management regarding the implementation of monitoring and reporting
- in case that the calculation factors are based on analyses:
  - a copy of accreditation certificate to prove that laboratory is accredited in accordance with EN ISO/IEC 17025 for the relevant analytical methods or
  - an argumentation for technically not feasible / unreasonable costs + statement of equivalence for laboratory acc. to Art. 34(3) MRR
- risk assessment
- uncertainty assessment
- brief summary of the monitoring plan



- translated guidance documents  
No. 1, 4, 5, 6  
- template for sampling plan and  
example for risk assessment

# Monitoring Plan Approval procedures

- During the approval process of the MP the following checks are made:
  - A completeness check
  - Consistency checks with MRR (i.e. whether the correct tier is applied, whether the uncertainty matches the tier applicable, etc.)
  - Checks of additional documentation
  - Checks with other external sources like IED data.
- During the approval of the MP there is close contact between the Agency and the operators. The Agency asks operators by post to adapt the MP if necessary. Open issues may also be clarified via e-mail or phone. On-site inspections are performed too.

# Wording of permits...



REPUBLIKA SLOVENIJA  
MINISTRSTVO ZA OKOLJE IN PROSTOR

AGENCIJA REPUBLIKE SLOVENIJE ZA OKOLJE

Vojkova 1b, 1000 Ljubljana

T: 01 478 40 00

F: 01 478 40 52

E: [gp.arso@gov.si](mailto:gp.arso@gov.si)

[www.arso.gov.si](http://www.arso.gov.si)

Ref. No.: 35485-16/2014-4

Date: 24 December 2014

**Art. 90 of the Act on amending  
and supplementing the  
Environmental Protection Act,  
Art. 119 of Environmental  
Protection Act**

Slovenian Environment Agency issues on the basis of the fourth paragraph of Article 8 of the Decree on Administrative Authorities within Ministries (Official Gazette of the Republic of Slovenia, Nos. 58/03, 45/04, 86/04 - ZVOP-1, 138/04, 52/05, 82/05, 17/06, 76/06, 132/06, 41/07, 64/08 - ZViS-F, 63/09, 69/10, 40/11, 98/11, 17/12, 23/12, 82/12, 109/12, 24/13, 36/13, 51/13 in 43/14 ), first paragraph of Article 90 of the Act on amending and supplementing the Environmental Protection Act (Official Gazette of the Republic of Slovenia, No. 92/13) and Article 119 of the Environmental Protection Act (Official Gazette of the Republic of Slovenia, Nos. 9/06-ZVO-1-UPB1, 49/06-ZMetD, 66/06-Odl.US, 112/06-Odl.US, 33/07-ZPNačrt, 57/08-ZFO-1A, 70/08, 108/09, 48/12, 57/12 in 92/13), in the procedure of adjustment of greenhouse gas emissions permit of the **OPERATOR**, **STREET**, **CITY**, represented by an authorised person **PERSON (name, surname)**, the following

GREENHOUSE GAS EMISSIONS PERMIT

# Wording of permits...

1. The **OPERATOR, STREET, CITY** (hereinafter referred to as: the 'Operator') is permitted to emit the greenhouse gases from an installation with ID **SI-XX**, located at the **STREET, CITY** (hereinafter referred to as: 'the Installation') and carried out **ACTIVITY Y**.
2. The installation, referred to in point 1 of the operative part of this permit with rated thermal input of **XXX MW** and is divided into the following sub-installations with the initial levels of activity and the initial capacity, configured as follows:

<b>Sub-installation</b>	<u>Historical activity level</u>	<u>Initial capacity</u>	<u>Unit</u>

\*CL – Carbon Leakage (premetitev emisij CO2); \*\*nonCL –non Carbon Leakage (premetitev emisij CO2);

3. Agency approve monitoring plan to operator of installation and the sampling plan, to the extent and in the manner, set out in Annex 1, which is an integral part of this permit.
4. The operator must regularly check whether it is possible to improve the methodology used for monitoring of greenhouse gas emissions **every year / every two years / every four years** and report on the improvements to the monitoring plan of greenhouse gas emissions to the Agency before 30 June. **(This section does not apply for installations with low emissions!)**

Art. 69 of  
Regulation  
601/2012

## Wording of permits...

5. Upravljavec naprave mora pripraviti poročilo o emisijah toplogrednih plinov za preteklo leto in ga skupaj s poročilom preveritelja o preverjanju poslati na Agencijo Republike Slovenije za okolje najkasneje do 31. marca tekočega leta.
6. Upravljavec mora do 30. junija tekočega leta Agenciji Republike Slovenije za okolje poslati pisno opredelitev do navedb preveritelja v poročilu iz 5. točke izreka tega dovoljenja, če je preveritelj ugotovil neodpravljene neskladnosti ali podal priporočila za izboljšave.
7. Upravljavec mora najkasneje do 30. aprila tekočega leta predati emisijske kupone v količini, ki ustreza celotni količini emisije toplogrednih plinov, ki jih je v preteklem letu naprava izpustila v ozračje in je enaka višini preverjenih emisij iz 5. točke izreka tega dovoljenja.
8. Upravljavec mora Agenciji Republike Slovenije za okolje **brez nepotrebnega odlašanja** pisno prijaviti:
  - vsako nameravano spremembo vrste ali delovanja naprave, ki se nanaša na njene tehnične značilnosti, in vsako razširitev ali zmanjšanje njene zmogljivosti,
  - vsako spremembo firme ali sedeža upravljavca in
  - vsako bistveno spremembo načrta monitoringa emisij toplogrednih plinov.

Art. 69 of  
Regulation  
601/2012

MP – significant  
changes- Art. 15 of  
Regulation  
601/2012

# Monitoring plan as ANNEX 1 of the permit

## PRILOGA 1: NAČRT MONITORINGA EMISIJ TOPLOGREDNIH PLINOV

### 1. OSNOVNI PODATKI O UPRAVLJAVCU NAPRAVE:

Naziv: UPRAVLJAVEC d.o.o.  
Naslov: Ljubljanska cesta 1  
Pošta: 1000 Ljubljana

Basic operator information

### 2. PODATKI O NAPRAVI:

Lokacija:  
Naslov: Ljubljanska cesta 1  
Pošta: 1000 Ljubljana

Location of the installation

Oznaka naprave: SI-150  
NACE koda rev.2: 3530

Id of the installation  
 Nace code

Kategorija naprave: A  
Naprava z nizkimi emisijami: NE

Category of inst.  
 Inst with low emissions (yes/no)

Tabela 1: Dejavnosti na napravi

Dejavnost	Vhodna toplotna moč	Enota	CRF1	CRF2
1.1. - Izgorevanje goriv v napravah s skupno nazivno vhodno toplotno močjo nad 20 MW (razen v napravah za sežiganje nevarnih ali komunalnih odpadkov)	152	MW	1A1a	-

Tabela 2: Struktura naprave

Zap. št.	Naziv enote naprave	Vhodna toplotna moč (MW)	Dejavnost	Gorivo	Podnaprava
1	Vročevodni kotel EMO 1	115,50	1.1.	Zemeljski plin	Podnaprava za referenčno vrednost toplote, non-CL (brez premestitve emisij CO2)
2	Vročevodni kotel EMO 2	11,60	1.1.	Zemeljski plin	Podnaprava za referenčno vrednost toplote, non-CL (brez premestitve emisij CO2)



# Acceptance process for AERs and VRs

...stationary installations...

## AER and VR submission

According to the EPA the operator is required to submit a verified AER and VR by 31th March each year to the Agency

- AER is submitted through the IT Web based system (entry fields in electronic report template which meets the requirements laid down in MRR)
- To support web version and to follow the SI administrative procedure, also a signed paper copy of AER is required
- AER reports can only be verified by a legal person with accreditation according to AVR
- Verifiers have to provide a paper version of the VR and to send to the Agency all their internal documentation for each operator and aircraft operator.



## AER and VR submission

Agency every year reminds operators by e-mails:

- to submit AER on time
- about publishing of new EF, NCV on Agency website
- about changes/updates in template

Through IT system Agency can:

- check at which stage are operators AERs
- ensure that AERs are submitted on time.

## AER and VR - checks

- The Agency checks verified emissions and verified reports each year after submission.
- The same staff as for permitting is involved in reviewing these reports.
- Reports are reviewed before 30 April when allowances have to be surrendered.
- Operators are not informed of acceptance of the AER. They are only informed if the corrections are required.
- VRs contain detailed information about the verification activities performed and the documents and systems that have been verified. This enables the Agency to assess the work of verifier by means of document study.

# **AER & VR**

## **Checks for EU ETS installations**

- Reports for all 49 installations (in 2016) have been checked
- The following checks are being performed:
  - Completeness check of both reports;
  - Consistency with permit and monitoring plan;
  - Check on the comments mentioned in the verification report which also involves an assessment of whether there is a need to change the permit or monitoring plan;
  - Check whether there was any change in the operation of installation;
  - Check on the correctness of the data in the reports;
- Findings are documented in for that purpose prepared xls file

## Additional checks

- Ministry can supervise AERs and VRs at any time according to Slovenian legislation,
  - if errors are found in the report, the operators are required to make corrections and the AER has to be re-verified and resubmitted to the Agency (also in the Registry annual emissions has to be corrected and additional allowances has to be surrendered)
  - Ministry informs Slovenian Accreditation in the case of serious violations of the AVR provisions (Art. 134(4) of EPA)
- Financial Administration of the Republic of Slovenia performs checks on fuel consumption because of CO<sub>2</sub> tax
- GHG inventory team also do some cross-checks on EU-ETS data

# AER submission and checks for excluded installations

- Submitting process is the same as for ETS installation (same IT system, slightly different template)
- They do not need to verify emissions
- Agency checks reports (in 2016 all 24 installations have been checked and findings have been documented in for that purpose prepared xls file)
- The following checks are being performed:
  - Completeness check of reports;
  - Check on the correctness of the data in the reports (EF, NCV);
  - Consistency with permit and monitoring plan;
  - Check whether there was any change in the operation of installation;
  - In case that emissions are higher than the allocation Agency checks if operator has chosen the way to fulfil the requirement (buy allowances on the EU-ETS market or pay a CO<sub>2</sub> tax)
  - Cross checks with data gathered from other reporting mechanisms (UR and Financial Administration of the Republic of Slovenia).

# REGISTRY set up

## Union Registry for MS

### Legislation:

- **Commission Regulation (EU) No 389/2013** of 2 May 2013 establishing a Union Registry pursuant to Directive 2003/87/EC of the European Parliament and of the Council, Decisions No 280/2004/EC and No 406/2009/EC of the European Parliament and of the Council and repealing Commission Regulations (EU) No 920/2010 and No 1193/2011
- National legislation

# Union Registry

## **Agency**

- is a national administrator in the Union registry
- manage national accounts
- tick free allocations
- is a help desk for operators and traders

## **Each operator with GHG permit:**

- needs to have an operator account in the SI part of the Union registry
- has to nominate account representatives
- has to enter verified emissions in the registry
- has to surrender sufficient amount of allowances

# Free allocation 2013 -2020

The 'road' to allocation

1. Operators apply for free allocation by providing
  - Verified data (data collection template)
  - The way the data has been obtained (methodology report)
2. CA prepares NIMs
3. Commission evaluates NIMs and determines the need for a cross-sectoral correction factor
4. CA determines final allocation

The Commission provides

- Guidance Documents
- A helpdesk for CA
- A data collection template
- A template for the methodology report
- A template for the NIMs



# Free allocation

The following documents describe the allocation methodology

- Commission Decision provides the Community Implementation Measures (CIMs) = legal context for application of allocation rules

Guidance documents provide further guidance for correct and harmonized application:

1. General guidance
2. Guidance on allocation methodologies
3. Guidance on data collection
4. Guidance on verification
5. Guidance on carbon leakage
6. Guidance on cross-boundary heat flows
7. Guidance on new entrants/closures
8. Guidance on waste gases and process emissions
9. Sector specific guidance

# Free allocation

## Allocation to an installation

- Allocation = Benchmark x Historical activity level x Carbon leakage exposure factor x Cross-sectoral correction factor OR linear factor

Allocation is based on four methodologies which should be applied in hierarchical order

1. Product benchmarking (allowances/unit of production)
  2. Heat benchmarking (62.3 allowances/TJ heat consumption or export)
  3. Fuel benchmarking (56.1 allowances/TJ fuel consumption)
  4. Process emissions approach(0.97 allowances/tCO<sub>2</sub> process emissions)
- No free allocation for electricity production and consumption and flaring (except for safety flaring)
  - Emissions can only be covered by one methodology

# Free allocation

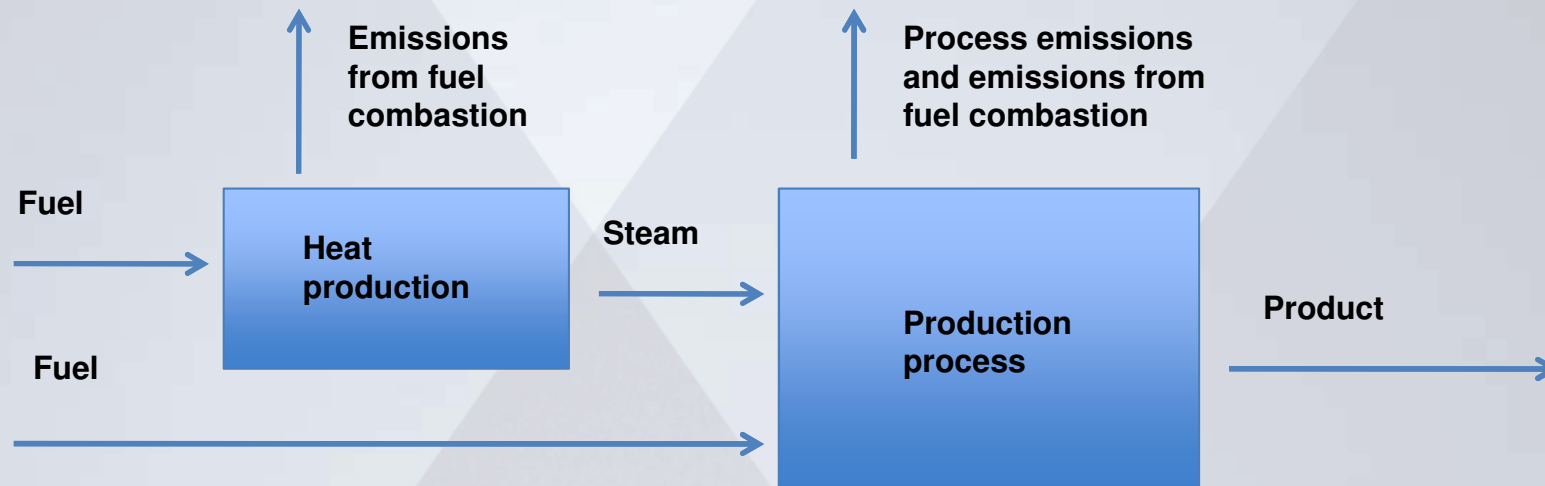
The installation is therefore divided in sub-installations...

- Product benchmark sub-installations
- Heat benchmark sub-installations
- Fuel benchmark sub-installations
- Process emissions sub-installations
  
- A sub-installation means all inputs, outputs and corresponding emissions related to a specific allocation regime

Stepwise approach to determine allocation

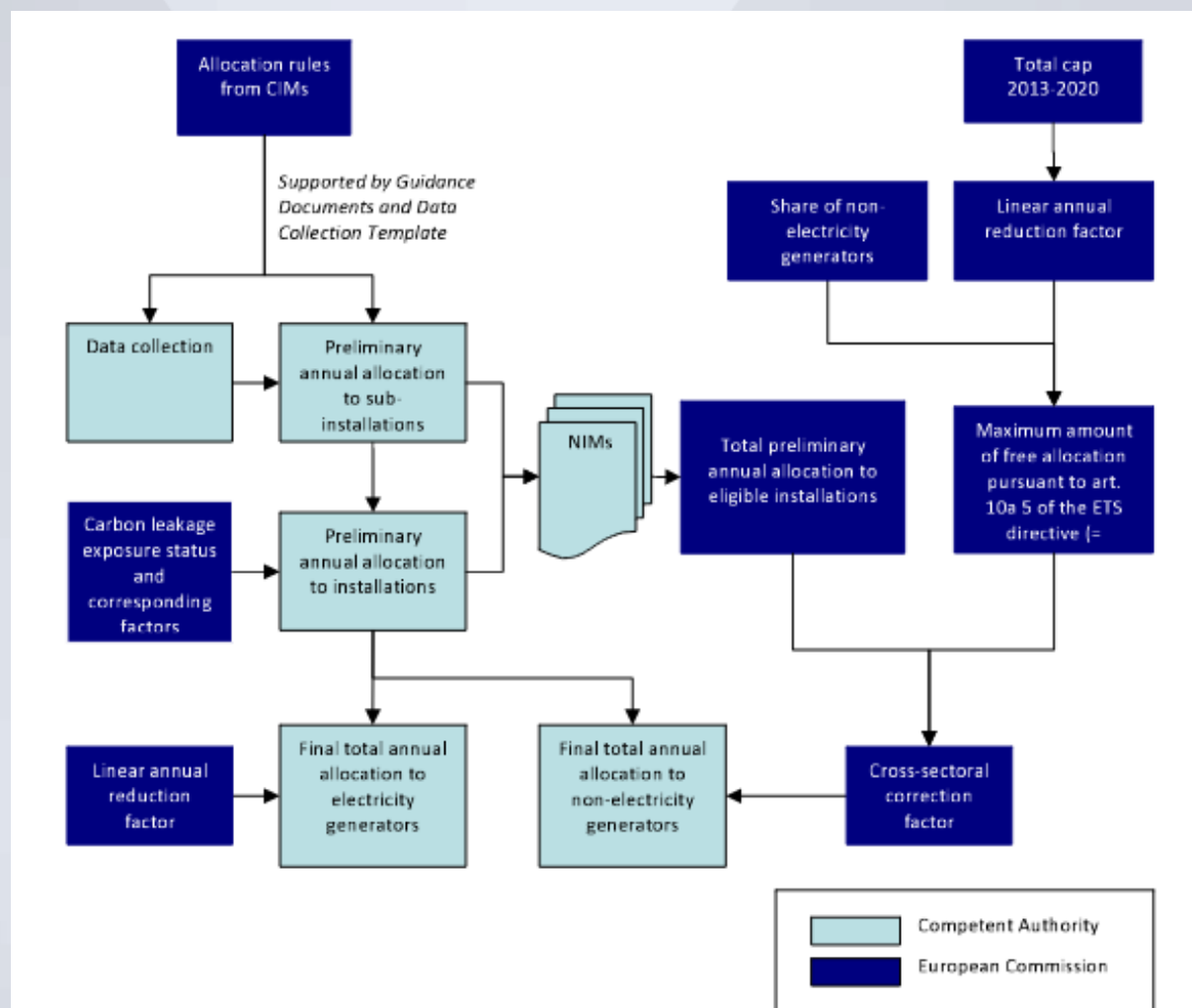
1. a) Define relevant sub-installations  
b) Attribute relevant inputs /outputs (to prevent omissions or overlaps)
2. Determine historical activity level per sub-installation
3. Determine preliminary allocation
4. Determine total final allocation (not part of NIMs)

# Free allocation



# Process diagram of determination of final free allocation to installation

[https://ec.europa.eu/clima/sites/clima/files/ets/allowances/docs/gd1\\_general\\_guidance\\_en.pdf](https://ec.europa.eu/clima/sites/clima/files/ets/allowances/docs/gd1_general_guidance_en.pdf)



**ETS  
and  
Slovenia's National Inventory  
Report  
Submission under the Regulation  
(EU) No. 525/2013**

[http://cdr.eionet.europa.eu/si/eu/mmr/art07\\_inventory/ghg\\_inventory/envwj26bw/](http://cdr.eionet.europa.eu/si/eu/mmr/art07_inventory/ghg_inventory/envwj26bw/)

