

How to prepare for emissions trading for aviation

Aviation activities will be included in the CO₂ emissions trading scheme in 2010. This means that from 2010 aircraft operators will be required to participate in emissions trading and to monitor their emissions. If this applies to you, you need to make preparations in 2009. This information bulletin explains what preparations for emissions trading you will have to make in 2009 and the procedures you must follow (A); what your obligations for participation in emissions trading are after 2009 (B); and where you can get more information to help you fulfil your obligations (C).

A. Preparations in 2009 for emissions trading

Before you start your preparations, the Dutch Emissions Authority (NEa) recommends that you carefully read chapters 1 and 2 and Annex A of the Guidance for the Aviation Industry ('the Guidance'). The Guidance contains important information about emissions trading for aviation. On the NEa website (<http://www.emissieautoriteit.nl/english/aviation>) there is a decision tree to help you check whether you must participate in emissions trading for the aviation industry.

If you conclude that you are under obligation to participate in emissions trading, you must take the following steps in 2009 so as to fulfil your obligations from 2010:

1. Set up a monitoring system

You must develop a monitoring system and the internal procedures necessary to monitor, record and process your data in 2010 so as to fulfil your obligations. For more information you should refer to chapter 3 of the Guidance.

2. Submit monitoring plans

If you are required to participate in CO₂ emissions trading from 2010, you must submit an annual emissions monitoring plan to NEa by 31 August 2009 at the latest. In this plan you must describe how you will determine your emissions from 2010. If you want to apply for free allowances, you must also submit a tonne-kilometre monitoring plan not later than 31 August 2009. Submission of the annual emissions monitoring plan is mandatory. The tonne-kilometre monitoring plan is required only if you want to apply for free allowances in 2011.

Strict requirements apply to the contents of both monitoring plans. Therefore, NEa has provided for both plans a format (template) that you must use. If you fill in the format correctly, you can be assured that NEa will approve your monitoring plans.

NEa will accept monitoring plans written in English and Dutch, monitoring plans in other languages will not be validated.

How do I submit a monitoring plan?

On the NEa website you will find a link to the Commissions website with templates for both monitoring plans and reports. Use of these Excel templates is obligatory. To submit your monitoring plan you must:

1. Send a signed letter to NEa stating that you will participate in emissions trading as of 1 January 2010. State in the letter which monitoring plan(s) you will submit to NEa by e-mail. On the NEa website you will find in good time a model of such an accompanying letter. The elements mentioned in the model must be included in your accompanying letter. Address the letter to: Netherlands Emissions Authority, Attn. Director, PO Box 91503 (IPC 652), 2509 EC, The Hague). Such a letter is necessary only for the first version of the monitoring plan.
2. E-mail the digital monitoring plan to NEa. Address it to nea.aviation@minvrom.nl, stating in the subject line "Annual Emissions Monitoring Plan <name of aircraft operator>, version 0.1" or, as the case may be, "Tonne-Kilometre Monitoring Plan <name of aircraft operator>, version 0.1". You can send later versions of the monitoring plan in the same way to NEa.

What is the rest of the procedure?

After receiving your monitoring plan NEa will send you a confirmation of receipt to the correspondence address that you stated in your monitoring plan. Within a few weeks NEa will give you feedback about the findings of its initial examination. You will be requested by e-mail (addressed to the contact address stated under item 3a of your monitoring plan) to revise the monitoring plan and return it to NEa before a certain date. NEa will re-examine the revised version, which might result in your receiving a new request to make changes. Ultimately, this process will result in validation of your monitoring plan by NEa. NEa will send you a formal decision before 1 January 2010 that it has approved the plan. A timely decision is guaranteed if you submit your monitoring plans not later than 31 August 2009 and make revisions within the time NEa gives you.

B. Participation in emissions trading after 2009

After validation of your monitoring plans in 2009, you must start using the plans to monitor your emissions from 2010. Some information is provided below regarding what will be expected of you from 2010. Later in 2009 and 2010 you will receive more detailed information of the procedures and obligations that will apply in the period after 2009.

Emissions

- In 2010 you will be under obligation to monitor your emissions data in the way laid down in your validated monitoring plan. You must ensure that your monitoring plan is up to date at all times. You must notify NEa of certain changes to the monitoring plan. You will be informed in due course of the changes that are subject to mandatory notification.
- Over each calendar year, you must draw up an annual emissions report, which you must send to NEa not later than 31 March of the following year. The first deadline for submission is thus 31 March 2011, concerning the 2010 calendar year. The report has to be verified by a independent and accredited verifier.
- From 2012 you must surrender your allowances for each calendar year in the following year. The surrendered allowances must correspond with the emissions that you reported in your annual emissions report sent to NEa. This must be done not later than 30 April of each year. Although you must draw up annual emissions reports for 2010-2011, you do not yet need to surrender any allowances in this pre-trading period. You must surrender allowances for the first time over the year of 2012, i.e. not later than 30 April 2013.

Tonne-kilometres

- If you wish to apply for free allowances, you will have to monitor your tonne-kilometre data in 2010 in the way laid down in your validated monitoring plan. You will be informed in due course of the changes in the monitoring plan that are subject to mandatory notification.
- If you wish to apply for free allowances, you must send NEa before 31 March 2011 a verified tonne-kilometre report. In this report you must state your tonne-kilometres in 2010, as determined using your tonne-kilometre monitoring plan. By submitting this report you will request free allowances. A model letter for applying for free allowances and more information about the procedure will be placed on the NEa website in good time.

C. Overview of information sources

An overview of all the information sources that you can use to help you fulfil your obligations is provided below. All of these documents can be found on the NEa website (<http://www.emissieautoriteit.nl/english/aviation>).

Guidance for the aviation industry

To familiarise aircraft operators with emissions trading and their obligations and to offer practical support in preparing monitoring plans, NEa has drawn up a Guidance document (together with other EU Member States). This document is based on the Monitoring and Reporting Guidelines issued by the European Commission.

Monitoring plan templates

These are formats for monitoring plans, both for tonne-kilometres and for emissions. You are required to use these templates when you submit your monitoring plans to NEa. All EU member states will use these templates.

Exemplar monitoring plans

NEa will make available exemplar monitoring plans to give you an impression of what a monitoring plan might look like. It will be in the form of a filled-in template for a fictitious aircraft operator.

Model of accompanying letter

NEa will draft a model letter that you can use for submission of the first version of your monitoring plan to NEa.

Legislation

On the NEa website you will find the legislation covering emissions trading for the aviation industry. The information includes the Directive published by the European Commission on 13 January 2009, the Monitoring and Reporting Guidelines (MRG) issued by the EC which contain the monitoring requirements, and the national legislation into which the Directive and MRG have been incorporated. You will also find on the website the Guidance issued by the EC regarding the scope of emissions trading for aircraft operators.

List of operators

The European Commission has drawn up a list of aircraft operators that will probably be required to participate in emissions trading. This list is purely informative and provides no certainty as to which aircraft operators will and will not be required to participate in emissions trading.

Questions and more information

If you have any questions about emissions trading for the aviation industry, please contact the NEa by e-mail (nea.aviation@minvrom.nl) or by telephone (+31 70 339 1580).

