



EU ETS for aircraft operators

Procedures in the Flemish Region for registration and notification of changes to the monitoring methodology and abnormal circumstances during the reporting year

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1. What are changes and abnormal circumstances (AC)? (1/2)

A Change

(defined in Article 1, point 47 of the EAT decision)

= a change in the content or underlying procedures of the approved monitoring plan CO₂ emissions/tonne-kilometres which is not temporary

and concerns the monitoring methodology or the rules and procedures for obtaining, processing, registering, reporting or securing the quality of the data, with a view to the reporting of CO₂ emissions/tonne-kilometres

example:

- a new aircraft type in operation
- exceeding threshold for small emitters

1. What are changes and abnormal circumstances? (2/2)

An abnormal circumstance

(defined in Article 1, point 51 of the EAT decision)

= a circumstance which cannot be foreseen by the aircraft operator, which is a one-off circumstance or is restricted in time, and has the result that the monitoring methodology in the approved monitoring plan for CO₂-emissions / tonne-kilometres temporarily cannot be followed.

examples:

- Data are lost because of breakdowns in the IT system,
- Flights have to be changed as a result of circumstances of a political/technical/natural character, e.g. other types of aircraft have to be used or flights have to be routed to other airports.

The aircraft operator must do everything possible to remedy the abnormal circumstance as quickly as possible.

2. Changes: substantial and non-substantial changes (1/3)

A substantial change tonne-kilometres

(defined in Article 1, point 48 of the EAT decision)

= a change tonne-kilometres which relates, either to:

- a) the start of the use of a new generic aircraft type, including a new, long term leasing operation;
- b) a change in the call sign or other unique designator which is used for air traffic control purposes for all or part of the fleet of the aircraft operator;
- c) a change in the status of the aircraft operator (commercial vs non-commercial);
- d) a change in the applied method or procedures for determining the passenger mass, including the baggage;
- e) a change in the method or procedures applied to determine the mass of transported freight or mail;
- f) a change in the procedures which influence the methodology for registering, processing and securing the data with a view to reporting tonne-kilometres;

2. Changes: substantial and non-substantial changes (2/4)

A *substantial* change CO₂ emissions

(defined in Article 1, point 48 of the EAT decision)

= a change CO₂ emissions which relates, either to (part 1):

- a) the use of new generic aircraft type, including new, long-term leasing operation;
- b) a change in the call sign or other unique designator which is used for ATC purposes for all or part of the fleet of the aircraft operator;
- c) a change in the status of the aircraft operator; (commercial vs. non-commercial)
- d) a change in the formula used to determine the fuel consumption per flight;
- e) a change in the data sources used to determine the fuel taken on board or the amount of fuel in the fuel tank of the aircraft, or a change in the methods for sending, storing and retrieving those data;
- f) a change in the method used to determine the density of the fuel for a particular type of aircraft;

2. Changes: substantial and non-substantial changes (3/4)

A substantial change CO₂ emissions

(defined in Article 1, point 48 of the EAT decision)

= a change CO₂ emissions which relates, either to (part 2):

- g) a change in the procedures which influence the methodology for the registration, processing and securing of the data with a view to the reporting of CO₂ emissions;
- h) a change in the average annual CO₂ emissions which means that the aircraft operator is obliged to use a different tier for determining fuel consumption;
- i) a change in the number of flights or in the total annual emissions which means that the aircraft operator exceeds the limit determined for small emitters;
- j) a change in the fuels used to carry out aviation activities.

2. Changes: substantial and non-substantial changes (4/4)

A non-substantial change

= a change which does not comply with the definition of a substantial change

In case of doubt whether it is a change or an abnormal circumstance that is concerned or exactly what sort of change it is
→ *contact Flemish Verification Office*



3.1. Changes: registration in logbook (1/3)

Each aircraft operators has to register all changes in a logbook

Mandatory templates: <http://www.lne.be/themas/klimaatverandering/co2-emissiehandel/luchtvaart>

- Ton km → logbook changes tonkm
- CO₂ → logbook changes CO₂ emissions

When must the logbook be filled in?

- non-substantial changes → from the moment at which the aircraft operator has knowledge of this or could reasonably be expected to know about this
- substantial changes → immediately after they have been approved by the competent authority

3.1. Changes: registration in logbook (2/3)

What information must be entered in the logbook?

- ***substantial changes***

- 1) The date on which you notified the Competent Authority (CA) of the change.
- 2) The date on which you enter the change in the logbook.
- 3) The indication that it is a (non-)substantial change (SC/NSC).
- 4) The date from which the change is applied.
- 5) A short description of the change.
- 6) The part or parts of the monitoring plan which are influenced by the change
- 7) The reference number of the approved notification form for the substantial change.
The approved notification forms (including appendices) must be available in the business location.

- ***non-substantial changes***

points 1) to 6)

It is possible to document the change with appendices. For example, this could be an extract from the monitoring plan that was adapted to the change. In this case, the appendices are mentioned in the logbook and are kept together with the logbook.



3.1. Changes: registration in logbook (3/3)

What else do you have to do with this logbook?

1. This logbook must always be available at the locations used by the aircraft operator to perform aviation activities.
2. You must add a copy of this logbook to your annual report on CO₂ emissions or your report tonkm as an appendix when you submit it for verification and approval. The logbook must then contain all the changes CO₂ emissions / tonkm which have taken place during the calendar year to which the report relates.

3.2. Changes: notification to CA (1/3)

Each aircraft operator has to notify all changes to the CA

Mandatory notification forms: <http://www.lne.be/themas/klimaatverandering/co2-emissiehandel/luchtvaart>

1. Substantial changes

a) Notification: when and how?

- have to be notified and submitted for approval to CA
 - from the moment that the aircraft operator knows about this or could reasonably be expected to know about this
 - by registered mail
 - if applicable: together with proposal for adapted MP as result of change
-
- Ton km → notification form substantial change tonkm
 - CO₂ → notification form substantial change CO₂ emissions

3.2. Changes: notification to CA (2/3)

b) How will CA deal with your proposal for substantial change?

- Verification by Flemish Verification Office: questions and visit possible (→ advice for approval)
- Approval decision by CA:
 - Approval
 - Rejection
 - Preliminary approval under conditions
- In case of (preliminary) approval → change becomes addendum to approved MP
 - Versionnumber e.g. xxxx2010/2
- CA notifies operator by registered mail (form with approval CA + approved changed MP)

c) When can you implement the proposed substantial change?

- After approval by CA

2. Non-substantial changes

in general

- must be sent to the verification bureau in bundles for information
- For ton.km: every 4 months
- For emisissions: once a year (1 Novembre)
- by registered post or by electronic mail
- print of the logbook of the changes (including attachments) together with an explanatory text

specific

(in case of changes regarding contact data or other data needed for the communication between CA and aircraft operator or regarding the performance of aviation activities between a new aerodrome combination)

- from the moment operator knows about this or could reasonably be expected to know about this.
- by registered letter or by electronic mail

4. AC: High impact and non high impact AC (1/1)

A high impact abnormal circumstance

(defined in Article 1, point 52 of the EAT decision)

= an abnormal circumstance which has the result that the monitoring methodology in the approved monitoring plan cannot be applied for at least one per cent of the data (emissions or ton.km) to be monitored on an annual basis

A non-high impact abnormal circumstance

(defined in Article 1, point 53 of the EAT decision)

= an abnormal circumstance which does not comply with the definition of a high impact abnormal circumstance

In case of doubt about whether it is a change or an abnormal circumstance, or exactly what sort of abnormal circumstance it is → contact Flemish Verification Office



5.1. AC: registration in logbook (1/4)

Each aircraft operators has to register all abnormal circumstances in a logbook

Mandatory templates: <http://www.lne.be/themas/klimaatverandering/co2-emissiehandel/luchtvaart>

- Ton km → logbook AC tonkm
- CO2 → logbook AC CO2 emissions

When must the logbook be filled in?

all high impact and all non-high impact AC: from the moment at which the aircraft operator has knowledge of this or could reasonably be expected to know about this

5.1. AC: registration in logbook (2/4)

What information must be entered in the logbook?

For every non-high impact AC, at least the following boxes must be completed in the logbook:

- 1) The date on which the abnormal circumstance was detected. This is the date on which you enter the abnormal circumstance in the logbook;
- 2) The indication that it is a (non-)high impact abnormal circumstance (HIAC/NHIAC);
- 3) (Presumed) starting date of the abnormal circumstance.
- 4) The date on which you notified the Verification Bureau Benchmarking Flanders (VBBV) of the abnormal circumstance.
- 5) The ending date of the abnormal circumstance;
- 6) A short description of the abnormal circumstance. It is possible to document the AC with appendices. In that case, the appendices are mentioned in the logbook and are kept up together with the logbook.
- 7) A description of the alternative monitoring methodology which is necessarily used during the AC. It is possible to document the monitoring methodology with appendices. In that case the appendices are mentioned in the logbook and are kept up together with the logbook.

5.1. AC: registration in logbook (3/4)

For every high impact AC, at least the following boxes must be filled in in the logbook:

- 1) Boxes 1, 2, 3, 4, and 5, as described above for non-high impact abnormal circumstances.
- 2) The reference number of the approved notification form for high impact abnormal circumstances. The approved notification forms (including appendices) must be available in the business location.

5.1. AC: registration in logbook (4/4)

What else do you have to do with this logbook?

1. This logbook must always be available at the locations used by the aircraft operator to perform aviation activities.
2. You must add a copy of this logbook to your annual report on tonne-kilometres/CO₂ emissions as an appendix when you submit it for verification and approval. The logbook must then contain all the abnormal circumstances which have taken place during the calendar year to which the report relates.



5.2. AC: notification to VBBV (1/2)

Each aircraft operator has to notify all high impact AC to the Flemish Verification Office(VBBV)

- **High impact AC**

- have to be notified and submitted for approval to VBBV
 - no later than five working days after the day you learn about it or could have reasonably known about it
 - by registered mail
 - together with the proposal for an alternative monitoring methodology for CO₂-emissions or tonkm
- Ton km → notification form HI AC tonkm
 - CO₂ → notification form HI AC CO₂ emissions

Mandatory notification forms: [.http://www.lne.be/themas/klimaatverandering/co2-emissiehandel/luchtvaart](http://www.lne.be/themas/klimaatverandering/co2-emissiehandel/luchtvaart)

- **Non high impact AC**

- Do not have to be notified

How will VBBV deal with your proposal for alternative monitoring methodology?

1. During the check of the abnormal circumstance the Verification Office may get in touch with the aircraft operator to seek further information. Where appropriate, the Verification Bureau may make a check at sites the aircraft operator uses to carry out the air transport activities.
2. Within two months after receiving the form concerning an abnormal circumstance for CO₂-emissions, the Verification Bureau shall take a decision about approving or rejecting the proposed monitoring methodology.
3. The relevant authority notifies the aircraft operator about the approval or rejection, subsequent to validation.



More information?

- ENE website:

<http://www.lne.be/en/ets-aviation/monitoring-reporting-and-verification-mrv>

- Contact Flemish Verification Office:

vbbv@vbbv.be

tel: 0032 (0)3 / 286.74.35

- Contact Competent Authority:

liesbeth.clerick@lne.vlaanderen.be

tel: 0032 (0)2 / 553.79.47