



Frequently Asked Questions (FAQ)

Questions regarding Nabisy

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1 How do I get access to Nabisy?

There are several cases to be differentiated:

1.1 How do I get access to Nabisy as a producer (last interface)?

To obtain the relevant application form (application for access to the web application as a producer Nachhaltige Biomasse System (Sustainable Biomass System) – Nabisy – pursuant to § 23 Biokraft-NachV (Biofuel Sustainability Ordinance) and/or BioSt-NachV (BioElectricity sustainability Ordinance), please contact your certification system / voluntary system.

Send your filled-out form to your system. The system shall forward your application to us, along with additional information. As soon as we dispose of all the information required, we shall send you your user name and password, via surface mail and on two different days, for security reasons.

1.2 How do I get access to Nabisy as a trader (supplier)?

Two cases can be distinguished here:

1.2.1 Are you a participant in a certification system or a voluntary system?

To obtain the relevant application form (application for access to the web application as a trader/supplier Nachhaltige Biomasse System (Sustainable Biomass System) – Nabisy – pursuant to § 24 Biokraft-NachV (Biofuel Sustainability Ordinance) and/or BioSt-NachV (Bioelectricity Sustainability Ordinance), please contact your system.

Send your filled-out form to your system. The system shall forward your application to us, along with additional information. As soon as we dispose of all the information required, we shall send you your user name and password, via surface mail and on two different days, for security reasons.

1.2.2 You are subject to German customs supervision within the meaning of § 17(3) No. 2 Biokraft-NachV (Biofuel Sustainability Ordinance).

In that case, you can send your application for access to Nabisy directly to the BLE. The application form is available on the BLE website at www.ble.de/biomasse.

Fill out and sign your application form and send it to the BLE. We shall contact the main customs office you mentioned and shall ask them to confirm your supervision and data.

As soon as we obtain that confirmation from the customs administration, we shall send you your user name and password via surface mail on two different days.



Should the customs authority send us a negative response, we shall refuse your application. You can then still obtain access to Nabisy as the participant in a certification system / voluntary system (case 1).

1.3 How do I get access to Nabisy as an installation operator?

1.3.1 Operators of installations pursuant to the Renewable Energies Law (EEG) including operators of biogas plants (ignition and auxiliary firing)

Pursuant to the law on the introduction of tenders for electricity from renewable energy resources and on further amendments to legislation on renewable energies of 13.10.2016 (Federal Law Gazette, BGBl. I, p. 2258), the biomass electricity sustainability ordinance (Biomassestrom-Nachhaltigkeitsverordnung - BioSt-NachV) applies as of 01.01.2017 to the total volume of bio- liquids promoted by the EEG.

Since 01.01.2017 and pursuant to §§ 44c (1) No. 2, 19 (1) No. 2, 21 EEG 2017 in connection with § 1 BioSt-NachV, installation operators who need starter, ignition or auxiliary firing to operate their installation and who use liquid biomass for that purpose, require a proof of sustainability.

Installation operators obtain this proof of sustainability from the biomass supplier who books the proof, electronically, to the installation operator's account which is or will be opened in the government database Nabisy.

This is how an installation operator creates the necessary account in Nabisy:

1. The first requirement is for the Federal Network Agency (Bundesnetzagentur) to confirm the installation's registration.

In case you are not registered yet, please contact the Federal Network Agency to register your installation. The relevant application form is available on the Agency's website at

https://www.bundesnetzagentur.de/DE/Sachgebiete/ElektrizitaetundGas/Unternehmen_Institutionen/DatenaustauschundMonitoring/MaStR/RegistrEEGANlagen/RegistrEEGANlagen_node.html;jsessionid=ABACF339DC7CAEF798955A258A19E0A3

To contact the Federal Network Agency:

DLZ 60, Karthäuserstraße 7 – 9, 34117 Kassel, Germany
Telephone: +49[0]561/7292-120
Facsimile: +49[0]180 5 734870-1001
E-Mail: anlagenregister@bnetza.de



2. Once you have obtained confirmation of your registration, send that, along with a completed and duly signed application for access to Nabisy, to the Federal Office for Agriculture and Food (BLE). The relevant application form is available on the BLE website at www.ble.de/biomasse.

To contact the Federal Office for Agriculture and Food:

Unit 221, Deichmanns Aue 29, 53179 Bonn, Germany
Telephone: +49[0]228 / 6845-2550
Facsimile: +49[0]30 / 1810 6845-3040
E-Mail: nachhaltigkeit@ble.de

3. The BLE assigns an account number to you as an installation operator and shall tell you that number along with the network operator's identification number (network operator account number). Your user name and password for access to Nabisy shall be sent to you via surface mail on two different days.
4. Please let your fuel supplier know your installation operator account number, so that he can transfer proofs of sustainability to your installation operator account.
5. Now you can transfer, the amount of bioliquids necessary for electricity production to the installation operator's Nabisy account on an accrual basis. Should you change your network operator, please inform the BLE accordingly.

1.3.2 Operators of German Emissions Trading Body (DEHST) installations

You may lodge your application for access to Nabisy directly with the BLE. The relevant application form is available at the BLE website at www.ble.de/biomasse.

Please send the completed and duly signed application to the BLE.

1.4 How do I get access to Nabisy as a network operator?

Please contact the BLE via nabisy@ble.de and name a maximum of three people who should obtain access to Nabisy.

Your e-mail message shall contain the following information:

- network operator's name and complete address, as well as
- the first names, surnames, business address(es) and telephone number(s) of the individuals who are to obtain access to Nabisy.

Should changes occur concerning these individuals, please inform the BLE accordingly and in a timely manner. Access to Nabisy can be suspended or regranted at any time.



2 My application for access to Nabisy was returned to me. Why?

As a participant in a certification system you have sent your application for access to Nabisy directly to the BLE. This is the wrong procedure.

As a participant in a certification system you should send your application for access to Nabisy to your certification system. The system shall forward your application to the BLE, along with further details.

As soon as we dispose of all the information required, we shall send you your user name and password via surface mail and on two different days.

3 Following personnel changes in our company, how can our accesses be adapted?

Using the application for amendments to the Nabisy access for interfaces or suppliers you may, for instance, name additional staff who should obtain access to Nabisy, or you may have accesses cancelled for individuals who no longer need access.

As a system participant, your certification system provides the application for amendments and it shall also lodge the completed and duly signed application with the BLE.

As a supplier subject to customs supervision you may refer to the application available on the BLE website (ble.de/biomasse). Lodge your application, completed and duly signed, directly with the BLE, and please make sure it contains the code which was assigned to the staff members in your company who are entitled to make amendments.

In case of changes occurring with installation and/or network operators, please contact the BLE in advaced.

4 I forgot my password to access Nabisy. What now?

Please contact the Nabisy hotline at +49 (0) 228 6845 2500 and have the following information ready as it might be needed:

- company name and postal code,
- your user name and
- the name of your certification system.

Also, the BLE needs to know whether you are still in possession of the letter by which the BLE assigned you your password.

We shall either reset your password to the one originally assigned to you, or send you a new password by post.



5 We need the accesses urgently. Can access data also be transmitted by e-mail?

No, this is impossible, for security reasons.

Neither user names nor Nabisy passwords are sent via facsimile or e-mail.

You may, however, commission a courier, at your own expense, to pick up the access data (user name and password simultaneously) at the BLE headquarters. Should you wish to use this option, please contact us well in advance, since we need additional information from you to complete the transaction (see also: [I would like to have a courier pick up my access data. What should I do?](#)).

6 I would like to have a courier pick up my access data. What should I do?

Contact the BLE well in time to keep us from sending you the access data by surface mail.

Please provide a duly signed and written declaration of consent stating that

1. you take over the costs incurred for the courier,
2. we may hand the courier user name and password simultaneously and
3. you are liable for the loss or misuse of the information given.

We shall inform you as soon as the letters are ready to be collected. Please let us know which courier service you shall use and when, approximately, we can expect its call.

7 I forgot to make note of my application number. How can I obtain it now?

Please contact the BLE, indicating the:

- number of the proof you have processed,
- quantity of the proof (in cubic metres / kilowatt hour),
- date of your processing the proof, and
- your operation's general data.

You may either e-mail your request to (nabisy@ble.de) or call the Nabisy hotline at +49 (0) 228 6845 2500.

8 I am new to Nabisy. Who can help me with my first-time access?

We have compiled instructions, including screenshots and helpful information for final interfaces, traders and installation operators. They can be downloaded, in German or English, from the BLE website at www.ble.de/biomasse.



Network operators received a user manual along with their password. In case the manual is no longer at hand, write to or call the BLE to request an additional copy.

9 I made a mistake when I issued a proof of sustainability and saved that proof. Can I correct it within Nabisy?

No. Data which were saved in Nabisy cannot be altered. Yet, if the error concerns quantities, it can usually be corrected easily (see also: [I issued a Nabisy proof of sustainability which stated a wrong quantity. How to correct my mistake?](#)).

In case of other mistakes, such as the erroneous use of a biomass code, for instance, please contact your certification system as it disposes of the application to cancel a proof of sustainability in case it is invalid pursuant to § 20 Biokraft-NachV. Please fill out the application form, sign it and forward it to your certification body. It shall check and countersign the application. The application must then be lodged with the BLE, and shall be legible, fully completed and duly signed. It may be forwarded to us either by the certification body (after having been checked by that body) or by the interface.

10 I issued a Nabisy proof of sustainability which stated a wrong quantity. How to correct my mistake?

Proofs cannot be modified within Nabisy. However, a simple error regarding quantities can often be corrected easily.

1. You issued an insufficient quantity to your customer? Just issue a second proof which includes the missing amount.
2. You issued too large a quantity to your customer?

There are three options to change that:

- a) If, aside from your access to Nabisy as a producer you also have a Nabisy supplier's account, you may have the excess quantity transferred to your supplier account in order to use it for another customer later.
- b) If you supply your customer regularly, you may reduce the quantity on the next proof by the excess amount supplied.
- c) It was a one-time delivery to a customer who will not be supplied in the near future and you have no supplier account?

In that case, please contact your certification system; it disposes of the application that renders a proof of sustainability void. Please fill it out, sign it and forward it to your certification



body who must countersign it. The legible, complete and duly signed application must be lodged with the BLE.

11 I would like to have a service provider take care of my Nabisy account. What should I be aware of?

There are several things to be noted:

1. There is no separate access to Nabisy for service providers only. You will have to assign your service provider an access to Nabisy.
2. For the service provider to be able to inquire about your Nabisy account and for the BLE to respond to him, you will have to assign your service provider a power-of-attorney and shall send its original to the BLE. This power-of-attorney shall be valid until it is revoked in writing.

12 Do costs arise for access to or for the use of Nabisy?

No. Access and use of the government database Nabisy are free of charge.

13 Why do data on the proof change in some cases of proof combination?

Various cases apply, when a proof is combined in Nabisy:

13.1 Proofs on DE accounts

Proofs being combined on DE accounts are, i.a., balanced according to GHG emissions (see § 24 BioSt-NachV /Biokraft-NachV). In that case Nabisy recalculates the GHG value, sets it off against the fossil reference values listed in the EU directive and chooses the best possible case for the resulting new proof, given that, in the supply chain, the final use is yet unknown. Hence, the fossil reference value varies in some cases.

13.2 EU proofs on EU accounts

In Voluntary Systems balancing is not allowed. They chose the worst GHG value having resulted from the combined proofs. Concerning that issue, we have published the following information (Information Letter regarding Nabisy of 28.01.2015):

„Note on the combination of proofs of sustainability and partial proofs of sustainability regarding EU suppliers

If an EU supplier combines proofs, the GHG value is not added; instead, the value which indicates the highest amount of GHG emissions is applied. Please note that this action cannot be revoked, not even by retransfer.“



In this case, too, the best possible reference value in the combined proof is calculated.

If the reference value “improves“, i.e. decreases, the product can be used for other methods of operation. Because products which meet the reference value of heat (77), meet that for fuel (83,8) even more so.

Even when you are sure that the biomass will be used as fuel, it is still possible that, at the end of the supply chain, this fuel might be used to produce heat when heating oil is blended. In this case a reference value of 77 is required.

14 Why are values rounded in Nabisy?

It was decided to indicate GHG values rounded to one decimal point for quicker processing in Nabisy and to avoid mistakes.

This is compatible with the Renewable Energies Directive where both the fossil reference values for bioliquids/biofuels for energy production in CHP plants and for heat production are rounded to integrals.

Only the GHG value for fossil fuel was rounded to one decimal point.

The total default values for GHG emissions in Annex V of the Renewable Energies Directive and for the partial default values for cultivation, transport and processing are integrals. The same applies to the predetermined specific energy values for the various fuel types listed in Annex III of the Renewable Energies Directive.

15 I accidentally booked a proof to the discharge account of another member state. How do I retrieve that proof?

If an operator wishes to apply for a retransfer of a proof which was booked to the discharge (retirement) account of another member state, he needs the confirmation of the exporting authority of the member state. The exporting authority must confirm that the delivery related to the proof is not the subject of an application for reductions in that member state.

16 What kind of deadlines apply in Nabisy?

16.1 Entering proofs of sustainability by last interfaces

Where “sustainable biomass“ is concerned, every delivery must be documented in a mass balancing system. All recognised certification systems have laid down relevant provisions and requirements in their basic principles which participants need to comply with.

All the systems we know have specified that the maximum balancing period allowed shall not exceed three months. This does not apply to distributors of biofuels who must calculate their



energy balance monthly and according to prerequisites of the relevant financial administration.

For Nabisy we derived therefore, that justifiable deadlines had to be set at least where establishing basic proofs are concerned. Taking into account the specific needs of the gas industry, the deadline for entering proofs of sustainability was set at 30 days after the mass balancing period relevant for the delivery has expired. Key dates for mass balancing are thus March 31, June 30, September 30 and December 31.

Example: The product is supplied on 01.10.. The proof of sustainability for that delivery may be issued until the day the mass balancing period expires (31.12.) plus 30 days of grace period (30.01.).

We referred to this arrangement in our both information letters in November 2013 and in February 2015.

For technical reasons, proofs cannot be established retrospectively. Generally, a proof's issuing date is the current date.

16.2 Transfer of proofs by a supplier (trader)

Where the transfer of proofs to their customers is concerned, prerequisites for suppliers are less strict. Yet, transfers should happen in a timely manner / immediately along with delivery. Your customers may transfer the proof only once it has arrived at their account. Delays which might occur in the process should be minimised.

You should consider eventual deadlines your customers might have to observe (e.g. presentation to the biofuel quota body).

You may agree, for instance, to combine regular monthly deliveries in order to minimise administrative effort. Note that the period of one month must not be exceeded in case of bundling which is only permissible if both parties mutually agree.

17 What should I consider when I enter proofs?

17.1 Limitations on quantity

Nabisy has an equivalent limitation on quantities of 185.000.000 MJ when proofs of sustainability are established.

Quantities which exceed that limit must be divided between several proofs of sustainability.



17.2 Data regarding quantity in Nabisy

Quantities of bioliquids shall be indicated in cubic metres_{15°} exclusively.

Quantities of gaseous fuels from biomass are indicated in kilowatt hours exclusively.

Note the following for quantity calculations:

- Volumes must refer to 15°C.
- The values for specific energy listed in Annex III of the Renewable Energies Directive (Directive 2009/28/EC) shall apply.
- Energy values refer to the calorific value (which used to be called lower calorific value).

This applies to biomethane as well.

Density values given by the German financial administration are relevant for presentation to the biofuel quota body or to the network operator

(http://www.zoll.de/SharedDocs/Downloads/DE/DontShow/dv_treibhausgasquote_vorlaeufig.pdf?__blob=publicationFile&v=3:).

Type of fuel	Specific Density _{15°C} , prescribed by the Ministry of Finance
FAME	0.883 [g/cm ³]
Bioethanol	0.7935 [g/cm ³]
HVO	0.78 [g/cm ³]
Oil	0.92[g/cm ³]

18 What should I be aware of regarding transfers to/ from the Austrian data base eINa?

18.1 Transfers to Austria

- Quantities can only be transferred to eINa (Austrian data base) as partial proofs of sustainability by a trader.
- Cubic metre is the only (m³) unit allowed.
- As not all biomass codes available in Nabisy are admissible in Austria, not all biomass codes are accepted.



- The Austrian customer's eINa ID shall be indicated as being the recipient. In case of an error message, check upper and lower case spelling. If the ID is not included in Nabisy we shall require a confirmation by the Umweltbundesamt (Federal Environmental Agency) in Vienna.

18.2 Transfers from the Austrian data base

- With Nabisy, transferring partial proofs of sustainability from the Austrian data base eINa is possible. For a transfer, a user of the Austrian data base eINa must enter the customer's Nabisy ID while observing upper and lower case spelling.
- Proofs relating to eINa can be recognized by the system ID "AT-BM-10".

19 Is my certification body allowed to control the proofs / partial proofs I issued?

Yes, it is even obliged to do so.

According to § 53 in connection with § 26 Biokraft-Nachv or BioSt-NachV it is up to the interfaces to forward to the certification body copies of the proofs of sustainability they issued while the certification body shall transmit them to the BLE. The certification bodies are thus responsible for proofs to be issued correctly. A certification body may, however, assign to the interfaces the transmission of proofs to the BLE (usual case), and shall make sure that the interfaces carry this task out correctly.

In order to be able to issue a certificate, a certification body shall also control whether or not the interface meets the requirements laid down in § 26 of the sustainability ordinances which include the question of whether or not an interface may issue proofs (i.e. whether or not it is a "last interface") and whether or not proofs of sustainability are issued correctly.

Your certification body has agreed with you on the above mentioned rights and obligations by contract.

20 Old proofs keep accumulating on my account. What happens to them?

Pursuant to the principles of mass balances, you shall have to book out, every three months, proofs for which you do not have any bioliquids and/or biofuel in store in order to balance/settle your account, which means that, at the end of a mass balancing period, you may only store sustainable bioliquids and/or sustainable biofuels for which you have proofs. You shall have to discharge, at the end of a mass balancing period, proofs which exceed the amounts of



biofuels/ bioliquids in your possession. With most certification systems, a mass balancing period comprises three months.

For that purpose, the BLE has established discharge accounts to which you can book such proofs. For a list of discharge accounts, please refer to www.ble.de/biomasse.

Example:

At the end of the mass balancing period my storage tank holds 1,000 m³ of biodiesel. My account includes proofs on a total volume of 1,125 m³ of biodiesel. Where the difference of 125 m³ cannot be balanced with other quantities of biodiesel, it must be discharged, either to a specific discharge account or to the general account „Shortfall on balance sheet date“.

21 I dispose of a proof which does not indicate greenhouse gas emissions. Is that proof invalid?

Such proofs are not invalid.

For proofs subject to the ruling the grandfathering clause [§ 8(2) sustainability ordinances], the bioliquids used (to be counted towards the quota obligation or to generate electricity to be fed into the grid) and which were produced in an interface which started operating before 23 January 2008, the required reduction potential had to be complied with as of 1 April 2013 only.

This grandfathering clause was meant to prevent conversion plants which had been operating for many years from having to be shut down immediately after the sustainability ordinances came into force in 2009, given that such plants were no longer state of the art in terms of technology and might not have been able to reach the required minimum savings thresholds of 35 %, at the time, compared to fossil fuels. When this ruling was used, instead of indicating a product's emissions it was to be mentioned that the interface had began operating before 23 January 2008 (§ 18(1) No. 5 letter a) Biokraft-Nachv or BioSt-NachV).

In case of supplies of biofuels whose proofs of sustainability relating to the grandfathering clause do not contain any data regarding GHG emissions, one may not simply assume that they could, de facto, have reached the required minimum saving compared to the respective reference value. Hence it is impossible to rewrite such proofs retrospectively by entering emission values corresponding to eventual default values.

Active proofs which make use of the grandfathering clause are thus invalid. Within the scope of the Renewable Energies Directive 2009/28/EC of the European Parliament and the Council, supplies of biomass whose proofs of sustainability do not contain data on their life-cycle emissions, shall be considered as not sustainable during use and shall be excluded from the



allocation of benefits of any kind. You may derecognise these proofs but may not generate new proofs to replace them.

Consequently, the proofs concerned are thus invalid for use in Germany, even though they are not ineffective.

22 Can I transfer a POS, issued within an EU-Voluntary Scheme, to a DE-Account?

Yes, technically you can book on any active account in Nabisy.

However, the following should be noticed:

- If, as an EU-certified interface, you issue a proof to an account whose ID starts with DE, your customer will receive EU proof. If your customer forwards this proof via Nabisy, he will pass on a proof whose proof ID begins with DE.
- If you, as an EU-certified trader, transfer proof to a DE account via Nabisy, the proof ID changes to DE. If the proof is also transferred to an EU account after this transaction, the proof ID will continue to start with DE.
- Cancellation of this transaction is neither technically nor legally possible. The system principles of the EU system allow the transfer of EU sustainable biofuel into the DE system, but not the other way around. Because according to the specifications of the EU system, the product (biofuel) lose their sustainability status with this transfer.
- The biofuels are accepted with DE-proof in Germany and other member states. But not in all member states. So inquire in advance if and where a DE-proof is accepted.
- If the biofuels are not to be used in Germany, you have the option of transferring this proof to a retirement account (e.g. to the country account of the destination country or to a technical clearing account such as "shortfall as of the balance sheet date"). You can issue the corresponding proof to your customer. A return in Nabisy is then excluded.

The interface ID and the system ID always indicate in which voluntary scheme the proof was issued originally.