



Bundesanstalt für Landwirtschaft und Ernährung, 53168 Bonn

To all Nabisy Users  
via certification systems, voluntary schemes and  
certification bodies

via e-mail only

Copies go to the Biofuel Quota Body, the  
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**11. information letter:  
Upcoming changes due to new sustainability ordinances.**

Reference 523-04.10-5021-Nabisy Newsletter 11 - gut.  
Bonn, 17.12.2021  
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Dear Sir or Madam,

the new version of the sustainability ordinances came into force on  
08.12.2021. We would like to inform you with this letter about the  
upcoming changes in Nabisy.

Nabisy will be adapted to the new ordinances in several milestones. These  
are based on legal deadlines.

The first changes include adjustments due to the Biofuel Sustainability  
Regulation – Biokraft-NachV.

1. Extension of the information on the proof and account statement
2. Identification of the disaggregated default values when used
3. Special types of biomass
4. Calculation of emissions E, esp. shortening of emission saving from  
excess electricity from cogeneration. ( $e_{ee}$ ) and changes in emissions  
from the fuel in use ( $e_u$ )
5. Information on the receipt and transfer of the goods
6. Introduction of a capacity limit for interfaces
7. Revision of the list of biomass types - impact on Nabisy
8. Minimum savings - introduction of a new date of initial operating

Unsere Servicezeiten:  
Montags bis donnerstags von 9:00 bis 12:00 Uhr und von 13:00 bis 16:00 Uhr  
Freitags von 9:00 bis 14:00 Uhr

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Gesetz angeordnete Schriftform), weisen wir auf Folgendes hin: Die Übermittlung mittels einer mit qualifizierter  
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### **Re 1. Extension of the information on the proof and account statement**

The information on the proof will be extended according to the specifications. Thus, in the future, the information on the back exemption, waste-based fuel or even High-ILLUC will be visible on the second page of the proof. We will also expand the information on the date of initial operating (see point 8).

We have already implemented the calculation of greenhouse gas savings for the new fossil comparators for biofuels and for heat generation.

We will also add various details to the account statement, for example, the total emissions will be included.

### **Re 2: Identification of the disaggregated default values when used**

If a total standard value was used for the GHG-Emissions, this is already indicated on the statement. Now the usage of disaggregated default values are indicated automatically in Nabisy and marked on the proof.

This change concerns only the types of biomass, for which the renewable energy directive (REDII) mentioned appropriate values.

In the csv format for uploading proofs, a \* must be set at the appropriate place if a default value is to be used.

### **Re 3. Special types of biomass**

Types of Biomass, which have a total default values regarding the REDII, but correspond to the categories "agricultural residue" and "cultivated biomass" (e.g. manure-maize mixtures), are recorded in Nabisy in such a way that they can only be used with the total default value.

If the emissions for these mixtures are to be calculated exactly, several proofs must be created.

### **Re 4. Calculation of emissions E, esp. shortening of emission saving from excess electricity from cogeneration. (eee) and changes in emissions from the fuel in use (eu)**

The formula for calculating emissions E has changed. The emission savings from excess electricity from cogeneration ( $e_{ee}$ ) are eliminated. This will be accounted in Nabisy.

Existing proofs that have an entry for  $e_{ee}$  in Nabisy will be adjusted accordingly. In such cases, this part of the formula will be enclosed in square brackets and the value will not be considered further in the calculation of E. However, should the verification be used under the REDI, the emissions can be taken into account .

The law regulates now also:

Emissions of the fuel in use,  $e_u$ , shall be taken to be zero for biofuels, bioliquids and/or biomass fuel. Emissions of non-CO<sub>2</sub> greenhouse gases (N<sub>2</sub>O and CH<sub>4</sub>) of the fuel in use shall be included in the  $e_u$  factor for bioliquids. (cf. Directive (EU) 2018/2001 - REDII)

This means that for certain types of biomass, information on  $e_u$  will be required in the future. If this applies, the information for  $e_u$  will become mandatory in the future.

### **Re 5: Information on the receipt and transfer of the goods**

The legal requirement to document the receipt and transfer of the goods, we comply with the receipt of the goods on the proof.

Since the date and place of delivery of the pre-supplier corresponds to the date of receipt and place of receipt (place of delivery) of the recipient, the date and place of receipt will be indicated on the proof.

The information on the transfer of the goods will be documented in the statement of account.

### **Re 6. Introduction of a capacity limit for interfaces**

Certification bodies have to inform the BLE with the new certificates also about the maximum capacity of a scope. This indication is deposited in Nabisy in such a way that manufacturers can set proofs at a maximum of 105% of this capacity limit.

This change only affects certificates that are transmitted to the BLE from 2022.

### **Re 7. Revision of the list of biomass types - impact on Nabisy**

The list of types of biomass is coordinated with the various federal ministries. In addition to new types of biomass, the list will also be expanded to include additional information (see also point 1).

As soon as the list has been implemented in Nabisy, the old biomass codes will be locked for entering sustainability proofs and will not be opened again. On already existing proofs that contain new types of biomass that are supplemented with additional information, the additional information will appear as soon as the verification is downloaded again.

As several federal ministries are involved, it cannot be granted that the list of types of biomass will be updated at the beginning of January.

**Re 8. Minimum savings - introduction of a new date of initial operating**

Furthermore, the legal requirement of a further date of initial operating (01.01.2021) for last interfaces of liquid biomass and biofuels will be implemented. This information will continue to be communicated to the BLE with the certificate of the last interfaces by the certification bodies.

For last interfaces put into operation after 01.01.2021, the greenhouse gas savings must be at least 65%.

It is planned to make the above changes productive at the **beginning of January**.

We will send the new csv format of the certificates to the certification bodies and voluntary schemes separately.

Yours sincerely

On behalf of

sgnd. Kinkel