



Bundesanstalt für Landwirtschaft und Ernährung, 53168 Bonn

To all Nabisy users
via certification bodies and
certification systems

via e-mail only

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Upcoming changes due to the new version of the Ordinance on Emissions Reporting under the Fuel Emissions Trading Act for the years 2023 to 2030 (EBeV 2030) and the Ordinance on the Implementation of the Greenhouse Gas Emissions Trading Act in the Trading Period 2021 to 2030 (EHV 2030)

523-04.10-5021-Nabisy Newsletter 17-gut
Bonn, 05.03.2024

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Attachment: csv-Format für Nachhaltigkeitsnachweise

Dear Sir or Madam

As part of the legal changes in national (nEHS) and European emissions trading (EU ETS), adjustments are also being made to Nabisy. These mainly affect the interfaces, but also plant operators and BEHG responsible parties. There have also been minor adjustments in all roles. You will receive further information on this today:

1. Introduction of new types of interfaces for issuing of proofs of sustainability for heating / cooling and biomass fuels
 - a. Issuing of proofs of sustainability for heating / cooling by final interfaces
 - b. Issuing of proofs of sustainability for biomass fuels used in the nEHS and/or EU ETS
 - c. Interfaces that cover several scopes
2. Changes in the role of the installation operator
 - a. Changes
 - b. Note for aircraft operators
3. Miscellaneous
 - a. New csv format for uploading proofs of sustainability

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

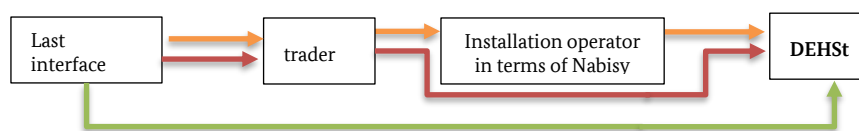
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- b. Note for interfaces in the electricity and heating sector that issue proofs of sustainability to the DEHSt
- c. Training for Nabisy
- d. Current information on deadlines for issuing proofs of sustainability in Nabisy
- e. Notes due to current circumstances: Explanations on the procedure for cancelling (and correcting) proofs and for the subsequent entry of proofs

zu 1. Introduction of new types of interfaces for issuing of proofs of sustainability for heating / cooling and biomass fuels

According to the legal requirements under Section 3 EHV 2030 and Section 8 EBeV 2030, proof of sustainability in accordance with the BioSt-NachV or Biokraft-NachV is required in order to apply the emission factor zero in the annual emissions reporting for biomass fuels or biofuels.

The following options are available for issuing and forwarding sustainability certificates in accordance with the legal changes under EHV 2030 and EBeV 2030:



These options for issuing proof of sustainability and passing on partial proofs of sustainability basically correspond to the equivalent methods in the electricity sector. However, the legal requirements result in minor changes to the electricity sector, which we outline below.

Some of the legal changes also affect the fuel sector, but there are no changes for interfaces here, only for installation operators (see point 2).

Note:

The participant ID for the DEHSt is DE-B-BLE-BM-NtzB-90000000

zu a. Issuing of proofs of sustainability for heating / cooling by final interfaces

As already mentioned, the implementation of the new heating/cooling scopes is based on the electricity sector. For the changes, see 3.b Note for interfaces in the electricity and heating sector that issue sustainability certificates to the DEHSt. These paths are shown in green and red in the diagram. These paths are shown in green and red in the diagram.

As in the electricity sector, the corresponding system must be selected, with whose efficiency ECh is calculated. Further data that you must be aware of when issuing sustainability certificates are:

- Place of issue
- Date of transfer (delivery date)
- Nabisy ID of the recipient
- Terms of delivery (usually: ex works = EXW)
- Place of transfer (place of delivery)
- Biomass code incl. the associated information on
 - Cultivation,
 - agricultural / forestry residue or
 - waste and residue
- Country of cultivation / origin
- Quantity of the end product (heating / cooling) in kWh
- If necessary, information on the greenhouse gas calculation
- The country / region of possible use of the end product (usually Germany)

There are no other changes in the handling of Nabisy compared to the electricity sector.

The efficiency level is transmitted to the BLE with the certificate data from the certification bodies.

zu b. Issuing of proofs of sustainability for biomass fuels used in the nEHS and/or EU ETS

If a proof of sustainability is issued for biomass fuel with use in the nEHS and/or EU ETS, the handling is similar to liquid biomass that is converted into electricity. According to the sustainability regulations, the proof of sustainability is issued for the end product (e.g. biomass fuel), which is "further processed" into electricity or heat in a plant. The orange route in the diagram.

However, there are also cases in which the biomass is further processed directly at the interface to the end product, so that the green route is used in the diagram.

Please note that, in addition to the data mentioned under (a), the fuel quantity must be available in the delivery state if you issue the proof directly to the DEHSt (green route).

If you issue a proof of sustainability to a supplier or plant operator, you must specify the quantity of fuel as delivered. In this case, you do not enter the quantity of the endproduct, as you do not know this quantity (orange route).

zu c. Interfaces that cover several scopes

As an interface that covers several or even all scopes, you must decide at the beginning of the proof issuance which type of sustainability proof you want to issue.

The prerequisite for this is that you use one participant ID for the various areas within a voluntary scheme.

In these cases, select the corresponding type of proof and, if applicable, specify whether you want to include the Carnot efficiency in the calculation of EC in the electricity and heat sector.

In this case, both the thermal and electrical efficiency are taken into account for the calculation of EC.

If you select this option, a different formula is used to calculate EC.

Example electricity sector (without Carnot efficiency):

$$EC_{el} = \frac{E}{\eta_{el}}$$

Compared to (with Carnot efficiency)

$$EC_{el} = \frac{E}{\eta_{el}} \left(\frac{C_{el} \eta_{el}}{C_{el} \eta_{el} + C_h \eta_h} \right)$$

where

$EC_{el,h}$	=	Total greenhouse gas emissions from the final energy commodity
E	=	Total greenhouse gas emissions of the fuel before end-conversion.
η_{el}	=	The electrical efficiency, defined as the annual electricity produced divided by the annual energy input, based on its energy content.
η_h	=	The heat efficiency, defined as the annual useful heat output divided by the annual energy input, based on its energy content.
C_{el}	=	Fraction of exergy in the electricity, and/or mechanical energy, set to 100 % ($C_{el} = 1$)
C_h	=	Carnot efficiency (fraction of exergy in the useful heat)

Note:

The question as to whether you want to calculate with or without Carnot's efficiency only appears if the corresponding scopes (electricity and heat) have been transmitted to the BLE for your company.

Note:

If you use different Voluntary Schemes for different scopes, you must ensure that you log in to Nabisy as a participant in the respective system for the proof you wish to issue.

zu 2. Changes in the role of the installation operator

There are two changes for installation operators.

zu a. Changes

When managing the installations, the Carnot efficiency for heat can now also be specified. The exergy fraction of electricity and/or mechanical energy is legally set to 1 and is therefore not queried. Furthermore, the date of biomass first use is required, which is mandatory in the area of emissions trading.

In the area of emissions trading, there is the option of issuing a proof for either electricity or heat, only if both efficiencies have been entered. If the Carnot efficiency has also been entered, this can also be taken into account when calculating emissions.

For proofs of sustainability for biomass fuels in emissions trading that have a biomass fuel quantity in the delivery state, the quantity of the end product can also be specified. In the case of biomass fuels in emissions trading, however, the quantity of fuel as delivered (in tons) is the mandatory quantity.

zu b. Note for aircraft operators

Aircraft operators who use biofuels (e.g. SAF or HVO) and receive proof of this for DEHSt are installation operators for Nabisy. In this case, they are subject to an exemption.

As installation operators normally convert biofuels into electricity and therefore the calculation of E to EC is necessary taking into account the thermal efficiency, aircraft operators must enter 1 as the electrical efficiency. It is sufficient to create a plant in Nabisy and use it to pass on the proofs.

Zu 3. Miscellaneous

zu a. New csv format for uploading proofs of sustainability

The new dataset description can be requested from the BLE and has also been sent to the recipients of the information letter.

This change affects all interfaces that import proofs of sustainability into Nabisy as a csv file.

The changes mainly affect interfaces that issue proofs of sustainability in the new areas.

Interfaces that "only" create fuel or electricity proofs of sustainability in Nabisy using a csv file only need to add the corresponding number of semicolons at the end of the file.

This would be three additional semicolons per line after the previous last column AL.

zu b. Note for interfaces in the electricity and heating sector that issue proofs of sustainability to the DEHSt

For interfaces in the electricity and heat sector that issue proofs of sustainability to the DEHSt, please enter the quantity of fuel as delivered in

tons in the document link. This information is important for the processing of your emissions reports at DEHSt, but is not explicitly requested during the entry of proofs.

zu c. *Training for Nabisy*

The BLE will offer various free online training courses/presentations on Nabisy. These are expected to last around 1.5 to 2.5 hours and will be offered for different user groups on different days.

The Nabisy application will be presented to the respective user group and you will have the opportunity to ask questions.

A certificate of attendance will not be issued afterwards.

To take part in the training courses, click on Participate on the relevant date. You will then be redirected to Zoom.

User group	Language	Date	Time (MEZ)	Link to meeting
Last Interfaces producing fuels or liquid biofuels	German Session	11.03.2024	13:30	Link
Traders after the last interface	German Session	12.03.2024	09:30	Link
last interface biomass fuels	German Session	13.03.2024	09:30	Link
last interface heat / cold	German Session	13.03.2024	13:30	Link
csv format for issuing of proofs	German Session	14.03.2024	09:30	Link
Last interface for electricity and mechanical energy	German Session	14.03.2024	13:30	Link
Installation operators who receive certificates and pass them on to grid operators or DEHSt	German Session	15.03.2024	09:30	Link
Grid operators	German Session	18.03.2024	09:30	Link
Last interfaces producing fuels or liquid biofuels	English Session	18.03.2024	13:30	Link
Traders after the last interface	English Session	19.03.2024	09:30	Link
Installation operators who receive certificates and pass them on to grid operators or DEHSt	German Session	19.03.2024	13:30	Link
Last Interfaces producing fuels or liquid biofuels	German Session	20.03.2024	09:30	Link
Traders after the last interface	German Session	20.03.2024	13:30	Link
last interface heat / cold	German Session	21.03.2024	09:30	Link
last interface biomass fuels	German Session	21.03.2024	13:30	Link
Last interface for electricity and mechanical energy	German Session	22.03.2024	09:30	Link
csv format for issuing of proofs	German Session	22.03.2024	13:30	Link

Notes:

- Certification bodies and voluntary schemes are welcome to attend the events.
- It is anticipated that 2-3 further training periods will be offered throughout the year in 2024. The dates have not yet been set.

zu d. Current information on deadlines for issuing proofs of sustainability in Nabisy

In the "sustainable biomass" sector, all deliveries must be documented in a mass balance system. According to the specifications of the European Commission (IMPLEMENTING REGULATION (EU) 2022/996), the mass balance period is 12 months for producers of agricultural and forest biomass and first gathering points that only purchase agricultural biomass and forest biomass, and **three months for all other economic operators**. Accordingly, a balancing period of three months applies to Nabisy users. Taking into account the special needs of some economic operators, the deadline for submitting proofs of sustainability was set at **30 days** after the end of the mass balancing period applicable to the supply/feed-in. **The accounting deadlines are March 31, June 30, September 30 and December 31.**

The entry deadline in Nabisy is therefore April 30, July 30, October 30 and January 30.

Example: The goods are delivered on May 5th. The corresponding proof of sustainability can be issued until the end of the mass balance period (30.06.) plus 30 days' grace (30.07.).

zu e. Notes due to current circumstances: Explanations on the procedure for cancelling (and correcting) proofs and for the subsequent issuance of proofs

The application procedures "Application for cancellation of a proof of sustainability" and "Application for subsequent issue of a proof of sustainability" are **two different procedures that are not related**.

Application to cancel a proof

Proofs of sustainability that were issued incorrectly can be canceled upon request.

No separate application for "Subsequent issuance of a NNw" is required for the issue of replacement proofs after the incorrect proofs have been canceled. This is done in the course of processing your application of cancellation. The replacement proofs may only be issued by the BLE. They will be reissued after a decision has been made on your application of cancellation.

No request for cancelling needs to be made for proofs of sustainability that have been rejected by recipients. Nabisy treats these rejected proofs of sustainability as cancelled proofs of sustainability.

If the recipient rejects the proofs of sustainability within the deadline of the relevant mass balance period, the interface can issue the corrected proofs of sustainability itself.

If the deadline for issuance has already passed, the interface can contact nabisy@ble.de by e-mail and the BLE will then issue the corrected sustainability certificates. This also does not require an application for "Subsequent issuance of proofs".

Application for subsequent issuance of a proof

You can submit this application if the deadline for a mass balance period has expired and you have not issued any proofs or have issued proofs for insufficient quantities. The application is therefore for proofs that you need to have issued for the first time or retrospectively.

The next update is scheduled for 15.03.2024.

Nabisy will not be available for you on this date. Should Nabisy be unavailable for longer, we will announce this accordingly.

With best regards
In order

sgn. Paffenholz