



To all Nabisy users

via the newsletter, certification systems, certification bodies and the
customs administration

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6. Information letter concerning Nabisy - Changes to the program

Appendix: csv format for uploading proofs of sustainability
New list of biomass types

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Bonn, 19.12.2017

Dear Sir/Madam,

Some changes will be active in Nabisy early in 2018.

This concerns the following topics:

1. Change to the minimum saving (from 35% to 50%)
2. Abandonment of the tonne as a unit of measurement.
3. Designation of detailed information for a proof of sustainability
4. Designation of the sum of the mean of the provisionally estimated emissions as a result of indirect land use change with greenhouse gas emissions
5. Other information

Concerning 1. Change to the minimum saving (from 35% to 50%)

From January 2018, the minimum saving on emissions will be raised from 35% to 50% in accordance with sect. 8 of the Sustainability Regulations. Due to the grace periods in Nabisy for the registration of sustainability proofs from 30 days after the end of a mass balance sheet period (4th calendar quarter of 2017) and the possible submission deadlines for proofs for 2017 (with 35% rule) in 2018, this change will be gradually introduced in Nabisy.

From the start of January 2018, the possible usage types and comparative values for all inventory proofs and newly created sustainability proofs in Nabisy will be calculated on the basis of the 50% minimum saving and this will be shown on the proof.

To this end, an addition sentence is provided on the proof that the "fulfilment of the reduction potential is given for use from 2018".

Proofs that do not meet the 50% minimum saving will not be provided with a cross in the usage information and can only be credited for biomass used in 2017.



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The changes in detail:

The following applies to inventory proofs of sustainability

At the start of January, all proofs will be checked to see if they meet the newly applicable minimum greenhouse gas saving of 50%.

If this is the case, the maximum possible usage types are stated. If necessary, the comparative value also changes.

If the inventory proofs do not reach the 50% minimum saving, then the comparative value 91 (power generation) is listed, but no cross is provided for the usage types. This means that these proofs cannot be credited for the year 2018.

The following applies for interfaces as a Nabisy user:

When creating proofs by means of an input template with a greenhouse gas saving of less than 50% but more than 35%, the comparative value of 91 must be set in Nabisy in addition to the greenhouse gas emissions. In selecting the usage options (for 2018) all 4 options are displayed as crossed out in the program. No usage type is crossed on the proofs.

In the CSV upload, the comparative value of 91 must always be specified for proofs below 50% saving and the usage type fields must be left blank (see appendix).

The option of submitting proofs in Nabisy for a minimum saving below 50% for biofuels used in Q4 of 2017 will end on 30 January 2017.

The following applies to traders as Nabisy users:

Proofs showing a minimum greenhouse gas saving of less than 50% can no longer be summarised with proofs showing greenhouse gas savings of at least 50%.

This results in a new restriction in the summary. In the light of the restrictions which are already known, proofs below 50% can only be summarised with proofs that also show a greenhouse gas saving of less than 50%. In addition, proofs with a greenhouse gas saving of at least 50% may only be summarised with proofs that also show greenhouse gas savings of at least 50%, taking into account the restrictions already in force.

Partial sustainability proofs with greenhouse gas savings of less than 50% can no longer be issued on plant operator accounts after 30.01.2018.

The deadline granted by grid operators to provide proofs for biofuels used for the generation and supply of electricity in the calendar year 2017 will end in February 2018.

Proofs and partial proofs of sustainability with a greenhouse gas saving of less than 50%, which are not used after the end of the quota year 2017 and contain the concluding processing of the applications by the biofuel quota office, shall be withdrawn from the access of economic operators.



The following applies to plant operators

Biofuels that are used in the electricity sector after 31 December 2017 and whose sustainability proofs or partial sustainability proofs show a minimum saving of less than 50%, do not meet the requirements for the granting of a feed-in tariff/a biomass bonus.

These regulations do not apply to so-called 'new plants', which went into operation after 05.10.2015. Here, a minimum saving of 60% must still be achieved when producing proofs .

Concerning 2. Abandonment of the tonne as a unit of measurement.

After 31.12.2017, when calibrate Nabisy proofs for liquid biofuels or biofuels, only cubic meters at 15 °C can be used as a unit of delivery, .

The option to specify the quantities in metric tonnes will be stopped, because in a conversion, the parameters to be used for a specific density and specific energy content regularly led to unsatisfactory results.

The following applies for interfaces as a Nabisy user:

If you set up proofs for liquid biomass in Nabisy via the input template, Nabisy will give you cubic metres as the unit of measurement. It is no longer possible to select a tonne as a unit of measurement.

If you use the csv upload, you must specify the quantity in the unit of measure m³ (15 °C) (see attachment). The inputting of another unit of measurement is no longer accepted by Nabisy.

In connection with this, please pay attention to the correct entry of the quantity, especially when distinguishing the decimal separators and thousands separators.

The following applies to traders as Nabisy users:

Inventory proofs with quantities in metric tonnes will automatically be converted to m³ (15 °C) when an application is renewed in Nabisy. The greenhouse gas value of the preceding proof is adopted.

After this, a selection of the unit of measurement is no longer possible.

It should be noted that the quantity in cubic metres must always be stated at 15 °C (reference temperature for fuel) in Nabisy.

Proofs concerning gaseous biofuels (e.g. biomethane) are not affected by this rule. Here, the rule is that only kilowatt hours are allowed as a unit of measurement.

Concerning 3. Designation of detailed information for a proof

In addition to the green proofs of sustainability or partial proofs of sustainability, the download in the appendix contains further details concerning biomass shares and biomass cultivation/producing countries, as well as the provisionally estimated average value for the emissions caused by indirect land use change and the sum of ILUC and declared greenhouse gas emissions, in each case in g CO_{2eq}/MJ.

Concerning 4. Designation of the total of the average value for provisionally estimated emissions caused by indirect land use changes as well as a total including greenhouse gas emissions

From January 2018, Nabisy will show the total of the average value for provisionally estimated emissions caused by indirect land use changes along with the greenhouse gas emissions on the detail page.

The biomass types stored in Nabisy were assigned the corresponding averages. The values are legally defined and cannot be edited by the user.

Group of raw materials	Average value [g CO _{2eq} /MJ]	Bandwidth between percentiles derived from the sensitivity analysis [g CO _{2eq} /MJ]
Cereals and other high-starch crops	12	8 to 16
'Sugar' plants	13	4 to 17
Oil plants	55	33 to 66

Table 1: Provisionally estimated emissions caused by indirect land use changes from biofuels and bioliquid fuels (g CO_{2eq} / MJ) in accordance with Directive (EU) 2015/1513 of the European Parliament and the Council

The designation of the average value is controlled by the program and requires no additional effort when creating the proofs by the user.

Biomass types without the above mentioned average value are assigned the average value 0 for the calculation.

The following applies to traders as Nabisy users:

Inventory proofs are subsequently assigned this information concerning the average value as a result of indirect land use change. If inventories contain mixtures of biomass types with different average values, the highest value is used to calculate the sum of the average value and the greenhouse gas emissions.

It should be noted that this results in two further new restrictions for the summary of proofs :

1. Only proofs with the same average value can be summarised.



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2. If inventory proofs have mixtures of several biomass types with different average values, they may only be summarised with proofs which also contain mixtures of different biomass types with different average values.
If only one type of biomass or mixtures are used with the same average, they may only be summarised with proofs showing only one type of biomass or mixtures with the same average value.

Concerning 5. Other information

- When entering sustainability proofs or using the csv upload, the inputting of greenhouse gas emissions is limited to one decimal place (see appendix).
- In Nabisy, each biomass type contained in a summarised proof is currently displayed. The share of the biomass type is displayed, rounded to two decimal places. Biomass types with a share of less than 0.005% are therefore rounded off with a 0% share.
In the future, the biomass types with such a small share will be hidden (however, they will continue to be included in the database). When determining the average value of the provisionally estimated emissions resulting from indirect land use change for biofuels and bioliquid fuels (g CO₂eq / MJ), the hidden biomass types are not considered.
This has been done in order to improve clarity in Nabisy.
- Please pay attention to the revised list of biomass types that will take effect at the start of the new year.
- Also revised, we are making a new form available for applying to block proofs on account of ineffectiveness in accordance with sect. 20 Biokraft-NachV and/or BioSt-NachV. Four weeks after the publication of the new application form, applications submitted using the old form will no longer be processed.

For queries concerning Nabisy, please contact us by writing to nabisy@ble.de or calling +49 (0)228 99 6845 – 2500.

We kindly ask that you forward this newsletter to those customers who use Nabisy. – Thank you for your support! –

Kind regards
On behalf of the office

Küppers