



Bundesanstalt für Landwirtschaft und Ernährung, 53168 Bonn

To all users of Nabisy
via certification systems, voluntary schemes and certification bodies

By e-mail

Copies to biofuels quota body, *Generalzolldirektion*, and for publication
on the internet at www.ble.de/biomasse

8. Information letter Nabisy – changes to the program

Annex: csv- format for the upload of proofs of sustainability
Reference: 221-04.10-5021-Nabisy Newsletter 8 - gut
Bonn, January 9, 2019
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Dear Sir or Madam,

Presumably on 21 January 2019 the following changes to Nabisy will be
activated:

1. Description of all elements of the sum formula used to calculate
greenhouse gas emissions in the proof of sustainability and of all
partial proofs of sustainability arising throughout the entire
supply chain
2. Switching off of the option to combine proofs
3. Deactivation of worthless proofs
4. Miscellaneous (among others, account statements, delivery date,
mass balancing)

On 1. Description of all elements of the sum formula to calculate greenhouse gas emissions in the proof of sustainability and of all partial proofs of sustainability arising throughout the entire supply chain

In its note (BK/abd/ener.c (2017) 2122195) the European Commission
has explained that all proofs along the supply chain must set out the
composition of the greenhouse gas emissions. Where the total default
value is used, this must be indicated; this also applies to the calculation
of the actual values.

For this purpose Nabisy shall be adjusted as follows:

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SERVICEZEITEN
Montag bis Donnerstag
9 bis 12 Uhr und 13 bis 16 Uhr
Freitag
9 bis 14 Uhr

Die Übermittlung eines elektronischen
Dokuments, das mit einer qualifizierten
elektronischen Signatur versehen ist, ist
ausschließlich an info@ble.de möglich.
Andere E-Mail-Adressen stehen hierfür
nicht zur Verfügung.



Last interfaces / producers:

When creating a proof of sustainability (PoS) after the Nabisy update last interfaces (producer of biofuels or bioliqids) have the option of quantifying the emissions by using the overall standard value or using precisely calculated values. In the latter case the emission values for the process stages and, where applicable, other relevant data for the calculation shall be entered.

The following applies:

	Explanation	Comment
E	total emissions when using g CO _{2eq} / MJ	calculated by Nabisy – not editable
e _{ec}	emissions from the production of raw materials, notably during cultivation and harvesting of raw materials in g CO _{2eq} / MJ	mandatory field, only for cultivated biomass, not editable in case of waste and residues
e _l	annualized emissions from carbon stock changes caused by land-use changes in g CO _{2eq} / MJ	not editable in case of waste and residues
e _p	emissions during processing in g CO _{2eq} / MJ	mandatory field
e _{td}	emissions during supply in g CO _{2eq} / MJ	mandatory field
e _u	emissions during use of the fuels in g CO _{2eq} / MJ	will automatically be set to 0 in g CO _{2eq} / MJ
e _{sca}	emission savings from soil carbon accumulation via improved agricultural management in g CO _{2eq} / MJ	not editable in case of waste und residues
e _{ccs}	emission savings from capture and geological storage of carbon dioxide in g CO _{2eq} / MJ	
e _{ccr}	emission savings via capture and substitution of carbon dioxide in g CO _{2eq} / MJ	
e _{ee}	emission savings from excess electricity from co-generation in g CO _{2eq} / MJ	

The csv format for the uploading of PoS will be adapted; the new template will be annexed. Any modifications made will be highlighted in the relevant columns.

The "record proofs" menu interface will also be adapted accordingly.

Where details on GHG emissions are concerned it will first have to be declared whether the total default value is to be used. Where this declaration is not made, the individual elements of the formula must be completed.



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PDF files for PoS which were registered after the update were modified accordingly.

Note on the use of the total default value:

For types of biomass for which in Annex V letter D of Directive 2009/28/EG no default values have been stated the declaration on the use of the total default value logically leads to an error message. In these cases the declaration on the use of the total default value must not be clicked.

The total default value is entered automatically into the proof by Nabisy in accordance with the background data, as are the percentages of GHG savings for the respective uses.

Note on the use of the formula:

NUTS2 values (g CO_{2eq} / MJ) published on the Commission's Transparency Site, and disaggregated default values in the Annex of the Directive are considered to be accurately calculated data. In this respect, the option persists to enter total emissions with a mix of e.g. the NUTS2 value from cultivation, the disaggregated default value from transport, and data measured from conversion into the formula.

Calculation of total emissions is program controlled; the same is true for GHG-savings, as a percentage for the respective uses.

Information for suppliers after the last interface / traders:

Basic proofs, which will be registered after the Nabisy update and all partial proofs of sustainability resulting therefrom will either display the entire sum formula of the GHG calculation or bear the information that GHG emissions were calculated by applying the total default value. The forms of these kind of proofs (pdf files) are amended accordingly.

Treatment of inventory proofs:

For inventory proofs (PoS, registered already before the update), the calculation method were stored in Nabisy only in qualitative terms. Therefore, these proofs continue not to state any further information on greenhouse gas emissions referring to specific stages of conversion. The GHG emission values can not be added to inventory PoS retrospectively. Neither is it possible to file an application for blocking such PoS due to missing data of the formula are to be entered. The fact that there are no individual values for GHG emissions at the value chain levels does not constitute a legal invalidity pursuant to Art. 20 of the applicable Sustainability Ordinances.



Transfer to and from the Austrian database elNa:

When transferring partial proofs of sustainability, which represent the formula for the complete calculation of greenhouse gas emissions to the Austrian database, it must be noted that elNa currently does not (yet) take these data into account. These data will be lost.

When transferring proofs from elNa to Nabisy it should be noted that elNa does not provide data for illustrating the entire calculation method for GHG emissions. These proofs will be treated like inventory proofs, even if they initially originate from Nabisy where the information about GHG emissions in the stages of conversion were included. This will change only after a corresponding amendment of elNa and of the interface between the two databases.

On 2. Switching off of the option to combine proofs for suppliers

Where DE systems are concerned, a **combination** of proofs allows for the balancing of the GHG emissions. Pursuant to specifications of EU voluntary systems recognized by the Commission this is expressly prohibited. Here, for the combination of proofs with different emission values, the worst value of all the proofs involved in the combination is representative for the entire mixture.

In the context of the introduction of the elements of the GHG-methodology it is necessary to deactivate the option to combine proofs at the suppliers' (traders') level. This is the only way to ensure clear and meaningful data, in particular in the case of the calculated emissions, up to the end of the supply chain.

Consequently, the corresponding update will deprive suppliers and installation operators of the option to combine proofs.

Leading associations of the fuel industry in Germany favour this approach.

On 3. Deactivation of worthless proofs

Proofs which have not been put to a final use and which stem from basic proofs issued by applying the rule in place for older installations (grandfathering clause - applicable up to April 2013), and which therefore do not contain any information on GHG emissions are no longer adequate for applying for funding of any nature whatsoever for quantities stated there.

For this reason, the BLE will remove these worthless proofs from the accounts of corresponding suppliers. On the one hand, this aims to improve the transparency of accounts and to avoid recurring sources of error in Nabisy on the other. This will happen in mid-March 2019.



On 4. Miscellaneous

1. In mid-October 2018, we had revised the account statements in Nabisy. Now these are to be downloaded on a quarterly basis. Last **interfaces** (producers of biofuels/bioliquids), for the first time now, have the option to download an overview of the proofs issued. **Suppliers** are provided with further information. Thus, their opening balance and all transactions within the respective quarter of a year will be displayed. Furthermore, the information on the PoS are more detailed.
2. In the course of the changes of the account statements, the **delivery date** also is indicated. It should be noted that a cell left blank means that the proof has been developed as a surplus from a division.
3. Due to the changes in the account statements, we would once again like to point out to all recipients of proofs that they need to comply with the mass balance requirements according to the standards of their certification systems. The **mass balance** has to be settled at the balance sheet date, i.e. the proofs available on the Nabisy account must not exceed the actual physical stock. Any quantities exceeding the stock must be retired by the latest on balance sheet date to the account "Shortfall at the balance sheet date". For further retirement accounts, please refer to www.ble.de/biomasse.
4. Please note that the indication of the actual delivery date in Nabisy is significant for the transfer of a proof from Nabisy to **eINa**, where this date determines the quarterly allocation.
The date of delivery appears on all account statements by now so that it has become easier to assign a delivery.
5. New **manuals**, which reflect the changes brought about by the last few updates will be published on 21 January 2019 on our website www.ble.de/biomasse.

Yours faithfully,

Küppers