



Greenhouse Gas Emission Permit

Application Guidance Notes for New Entrants

This document does not purport to be and should not be considered a legal interpretation of the provisions and requirements of the Directive 2003/87/EC of the European Parliament and of the Council.

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Glossary of Terms

For the purposes of this guidance document the terms listed in the left hand column shall have the meaning given in the right hand column below:

Activity Code	Code number assigned to the categories of activity in Schedule I of S.I. No. 437 of 2004) and amendments and as given in the EPA's GHG permit application form (Document IRL ETS 001) Appendix 1.
The EPA	Environmental Protection Agency.
Agreement	Agreement in writing.
Annex IV	Annex IV to Directive 2003/87/EC of the European Parliament and of the Council.
The Directive	Directive 2003/87/EC of the European Parliament and of the Council establishing a scheme for greenhouse gas emission allowance trading within the Community and amending Council Directive 96/61/EC.
Emissions	The release of greenhouse gases into the atmosphere from sources in an installation.
GHG	Greenhouse gas.
GHG M&R Proposal	Greenhouse gas emissions permit monitoring and reporting proposal as required by the GHG Permit. (Proposal template IRL ETS 003 and updates).
GHG Permit	Greenhouse gas emissions permit.
Installation	Any stationary technical unit where one or more activities listed in Annex I to the Directive are carried out. Also any other directly associated activities that have a technical connection with the activities carried out on that site and which could have an effect on emissions and pollution.
New Entrant	Any installation carrying out one or more of the activities listed in Annex I of the Directive which has obtained a greenhouse gas emissions permit or an update of its greenhouse gas emissions permit because of a change in the nature or functioning or an extension of the installation, subsequent to the notification to the Commission of the National Allocation Plan.
M&R Guidelines	Commission Decision of 18/VII/2007 establishing guidelines for the monitoring and reporting of greenhouse gas emissions pursuant to Directive 2003/87/EC of the European Parliament and of the Council.
The Operator	The natural or legal person specified in the GHG Permit application.
Source	The plant from where permitted emissions of GHG arise for subsequent discharge to the atmosphere.
The Verifier	A competent, independent, accredited verification body with responsibility for performing and reporting on the verification process, in accordance with detailed requirements as established pursuant to Annex V to the Directive.

GUIDANCE NOTES ON APPLICATION FOR GREENHOUSE GAS EMISSIONS PERMIT

These guidance notes have been prepared to assist applicants in the preparation of an application for a Greenhouse Gas Emissions Permit. They outline the information required to allow the EPA to process a Greenhouse Gas Emissions Permit Application. This document does not purport to be and should not be considered a legal interpretation of the provisions and requirements of the Directive 2003/87/EC of the European Parliament and of the Council.

INTRODUCTION

Directive 2003/87/EC establishes a scheme for greenhouse gas emission allowance trading within the Community in order to promote reductions of greenhouse gas emissions in a cost-effective and economically efficient manner.

OVERVIEW

The application form has been designed in MS Excel to allow it to be filled out electronically. Once completed, it should be submitted by email and as two signed and stamped paper copies to the address listed in Part B, Section 7 of the Application Form.

Note that the spreadsheet should be saved as an MS Excel file and together with all electronic attachments should be **no larger than 2MB**. If the completed application and related documents are larger than 2MB please include attachments on a separate email referenced accordingly.

Hard copies of the application should not be bound and maps should be no larger than A3 in size.

Permit applications will not be processed and issued until all sections of this form are completed in sufficient detail and to a satisfactory standard with all relevant attachments submitted.

All attachments should be clearly numbered, titled and paginated and referenced in the application form in Part A.

We can accept **additional information** in the following formats **only**:

- Microsoft Word
- Microsoft Excel
- Adobe Acrobat PDF

Charges

No application fee has yet been set, so there is no initial charge. Once a permit has been issued, an annual subsistence fee may be payable. Furthermore, a fee may also be payable in the future in respect of any permit variations, transfers and/or surrenders. Details of any such fees will be notified to permit holders.

Further Guidance

If, having read the application form and this accompanying guidance note, you feel you have special circumstances which are not catered for in the application or you are unclear as to how to complete this form please contact us by email at GHGpermit@epa.ie

PROCEDURES

An application for a GHG Permit must be submitted on the appropriate electronic form (IRL ETS 001) together with all relevant supporting documentation as attachments e.g. IRL ETS 003 (The monitoring and reporting plan template) and IRL ETR 013 (Registry Information). IRL ETS 006 (set-aside request form) may also be completed if the applicant is an eligible new entrant and wishes to claim allowances from the New Entrant or CHP Reserves.

Wherever possible all answers, information, etc., must be given in the spaces provided in the form (unless directed otherwise), with supporting information only forming the attachments.

Attachments should be clearly numbered, titled and paginated and must contain the required information as set out in the application form.

Confidential Information:

The application form and all supporting documentation will be made available to the public on request. Should the applicant consider certain information to be confidential, that information should be submitted in a separate sealed enclosure bearing the legend “ In the event that this information is deemed not to be held as confidential, it must be returned to....”. In the event that the EPA decides to withhold information from the public the nature of the information withheld and the reason why it is considered confidential will be available for public inspection.

Should there be any apparent contradiction between the information requirements set out in the application form and any clarifying explanation contained in this guidance note, then the requirements in the GHG Permit Application Form should take precedence.

GUIDANCE ON APPLICATION FORM

PART A – NON-TECHNICAL SUMMARY AND ATTACHEMENTS

Article 5 of the Directive requires that a non-technical summary is included in the application. The non-technical summary should include as a minimum a brief description of the following based on the information contained in Part B of the Application Form:

- The installation and the activity(ies) including the technology used.
- The raw materials and auxiliary materials, the use of which is likely to lead to emissions of carbon dioxide.
- The sources of emissions of carbon dioxide from the installation.
- The measures planned to monitor and report emissions in accordance with guidelines adopted pursuant to Article 14 and as detailed in the *Commission Decision of 18/VII/2007 establishing guidelines for the monitoring and reporting of greenhouse gas emissions pursuant to Directive 2003/87/EC of the European Parliament and of the Council*. This Decision is available from the EPA website at www.epa.ie.

One application should be made per installation.

If there is more than one installation on a single site, then separate applications must be made for each installation and noted in the non-technical summary. An installation may carry out multiple activities in a single installation.

The non-technical summary should ideally contain no more than 500 words and should be included as a clearly numbered, titled and paginated attachment to the application.

Attachment details:

The applicant should reference the attachments here and check that they have been submitted with the application. There are **Mandatory Attachments** which the EPA requires before it can determine the application. These are listed on the table; additional attachments should also be listed here.

Monitoring and Reporting Plan:

All new entrants shall submit a Monitoring and Reporting Plan. The template is available at: <http://www.epa.ie/downloads/forms/etu/>.

The monitoring and reporting Guidelines (2007/589/EC) are available at: http://ec.europa.eu/environment/climat/emission/mrg_en.htm.

All installations can modify the M&R proposals, as new information becomes available. **The EPA will not issued GHG permits to any New Entrant Installation without an approved M&R plan.**

Registry Information:

Applications for new installations or where there are to be changes to existing Registry accounts must also supply a completed IRL ETR 013 (Registry Information) form.

Applications for allowances from the New Entrant or CHP set-aside:

IRL ETS 006 (set-aside request form) may also be completed if the applicant is an eligible new entrant and wishes to claim allowances from the New Entrant or CHP Reserves.

Other Attachments:

Evidence of capacity and commencement dates:

The applicant must also provide as a mandatory attachment, confirmation of the capacities of the plant and commencement date(s) where applicable. If you have any doubt on the capacities at your installation you should contact the manufacturers or service agents for guidance. This report will be verified by the EPA.

Applicants may provide any other information they wish to have taken into account during consideration their application for a GHG Permit. Such information should be relevant to the GHG Permit application only. This information may be provided in Microsoft Word, MS Excel or Adobe Acrobat formats.

Applicants are advised to avoid supplying non-relevant information as it can slow down the determination. Additional documentation provided should be clearly referenced in the Application Form.

PART B – APPLICATION DETAILS

Section 1 Company Details

B 1.1 Company Details

This should be the legal entity (person or body corporate) and not just the trading name or trading company.

B 1.2 Legal Status

For applications from installations that do not have an IPPC licence or other environmental licence from the EPA, certified copies of certificates of incorporation for national companies must be supplied. In the case of a foreign-based legal entity a certified copy of the company's registration with the Companies Registration Office (Dublin) must be supplied.

Applicants who have current valid IPPC licences and who have previously provided 'certified copies' of the above documents need not submit them again. However, such Applicants should enter 'IPPC Reg. No: XXX' in the appropriate boxes and proceed to Part B Section 2. If there have been changes to the status of any of these documents and the changes have not been notified to the EPA then the revised documents should be provided here.

Section 2 Operator Details

B2.1 Operator Details

The Operator is defined the entity who operates or controls an installation or, where this is provided for in national legislation, to whom decisive economic power over the technical functioning of the installation has been delegated.

The Operator should be identified in this section. The Operator can be 'any natural person or legal person' and therefore can be a corporate body. The applicant should supply details of the controlling company where appropriate.

Section 3 Site - Installation Details and Description

B 3.1 Site and Installation Details

The site name and installation name should be provided along with the address and location of the installation. The site and installation names are not necessarily the



same, but in many situations they will be. The site is the physical location of the installation while the installation is where the activity takes place.

If the site has a current IPPC licence or other environmental licence, the Reg. Number should also be provided here.

A brief description of the site and the installation is required. A scaled location map should clearly indicate the boundary of the site and the location of the installation and emission points for the greenhouse gases (carbon dioxide in this instance). Eight digit grid references for the main entrance of the site must be supplied.

The installation is defined in the Directive as “a stationary technical unit where one or more activities listed in Annex I are carried out and any other directly associated activities that have a technical connection with the activities carried out on that site and which could have an effect on emissions and pollution.”

While most sites will have one activity on a particular site as defined by the Directive, some may have more than one. A single GHG Permit application can be made for any site/installation having one or more activities on the same site being operated by the same Operator. Multiple installations on the same site even when having the same Operator must make separate applications.

Specific Rules for Combustion Installations:

De-minimis Aggregation Threshold Rule:

Applying installations should note the “*De-minimis Aggregation Threshold Rule*” as referred to in ‘Ireland’s National Allocation Plan for Emissions Trading 2008-2012’ which states:

When determining whether-or-not a combustion installation which had annual emissions below 20,000 tCO₂ in 2005 meets the 20 MW_{th} threshold and therefore falls within the scheme, all individual combustion units with a rated thermal input capacity of less than 3 MW_{th} will be excluded from the determination of total thermal input capacity (20 MW_{th}). However, should the aggregation of the remaining units still exceed 20 MW_{th}, all units regardless of thermal input capacity shall be included for permitting.

Proximity of multi-site installations:

Furthermore, in multi-site installations with the same operator the following rule also applies:

Combustion plant for inclusion in the emissions trading scheme must be on sites which are within 100 m (by closest proximity), of the boundary of the main combustion site that is above the 20 MW_{th} threshold as prescribed in Annex I of Directive 2003/87EC (subject to the *De-minimis Aggregation Threshold Rule*). Other combustion sites with an aggregated rated thermal input of 2 MW_{th} or greater that are



within 0.5 km (by closest proximity), of the main combustion site shall also be included.

B3.2 NACE Codes

NACE codes are available from the Central Statistics Office web site at:

<http://www.cso.ie/px/u/NACECoder/NACEItems/searchnace.asp>

B 3.3 Application Type

Please indicate if the installation is also making an application for allowances from either the New Entrant Set-aside or CHP Set-aside. If no applications are being made select 'neither of the above'.

B 3.4 On-Site Contact Details

The applicant should identify a person in charge (preferably on-site). This person will be the principal point of contact with the EPA during the application process.

The contact person should be available to meet with authorised persons of the EPA on-site at all reasonable times. Contact name, telephone number and fax number should be provided.

Section 4 About the Installation

B 4.1 Activities at the Relevant Site

The applicant should identify and list the activity(ies) that are carried out on site at the installation using the codes provided in Appendix I of the GHG Permit application form and provide a brief description of the activity(ies).

B 4.2 Technical Detail for Activities Listed in Appendix I

The applicant should provide information here on the technical aspects of the installations. It is important to note that the term capacity in combustion plant relates to the total rated thermal input for the unit and not the output capacity e.g. a generator of 1MW_e may have a rated thermal input of 3MW_{th} .

Other Schedule I activities, which are not rated in MW_{th} must detail in the application the relevant capacity/production units e.g. tonnes per day.

The applicant must also provide as an attachment, confirmation of the capacities of the plant and commencement date(s) where applicable. If you have any doubt on the capacities at your installation you should contact the manufacturers or service agents for guidance.

All the sections of the table should be completed.

Where there are emission point references and emission point descriptions under an IPPC licence they should be used. Installations that do not have IPPC licences should use a similar unique identifier as given in the example below.

Example One:

Emission Point Reference	Emission Point Description	Plant Type/ Technology	Capacity	Capacity Units	Commencement Date
A1-1	Boiler 1 Stack	Nat. Gas Boiler	16	MW	01/1997
A1-2	Boiler 2 Stack	Natural Gas Boiler	14	MW	04/1997
A1-3	Boiler 3 Stack	Natural Gas Boiler	25	MW	04/2009
A3-1	EG 1 Stack	Diesel fired Emergency Generator	8	MW	04/1997
A3-2	EG 1 Stack	Lime Kiln	2000	Tonnes per day	10/2004

Section 5 Directly Associated Activities

B 5.1 Technical Details for Directly Associated Activities

The Directly Associated Activities (DAA) are those activities which while not included in Annex I of the Directive are carried out on the same site as, and have a technical connection with the Annex I activity(ies) carried out at the installation and which have an effect on the carbon dioxide emissions from the Annex I activity(ies).

Note: DAA emissions will be not considered for allowance allocation.

Example Two: An example of such a DAA is a wastewater treatment process attached to a chemical plant:

Directly Associated Activity (DAA) Description	Technology	Capacity of DAA	Capacity Units
Wastewater treatment	Aerobic digestion	100	m ³

Section 6 Material Use

B 6.1 Material Leading to Carbon Dioxide Emissions

Please indicate materials and processes, which may lead to carbon dioxide emissions for all activities listed in Section B 4.1. Note that material for a combustion installation will normally mean fuel.

Example Three: A limeworks might use the following materials.

Material	Action Leading to Emissions of Carbon Dioxide
HFO	Combustion
Limestone	Raw material in lime production
Natural Gas	Combustion

Section 7 Application Instructions

Applicants must submit two hard copies of the completed application, one of which must **be a signed and stamped original**, plus an electronic copy. The electronic copy should **not exceed 2MB** in size when forwarded to the EPA by e-mail.

Email: GHGPermit@epa.ie

By Post: **Permit Applications, Climate Change Unit,
Environmental Protection Agency, Regional Inspectorate,
McCumisey House, Richview,
Clonskeagh Road, Dublin 14.**

Section 8 Declaration

The application must complete this section and seal with the company stamp. The EPA will not process any application in the absence of a completed declaration.