

National Emissions Reduction Plan

Additional Guidance for Operators

In regulating the NERP a number of issues or questions have arisen where additional guidance is required to assist operators. This has been issued on website as a Frequently Asked Questions. Any feedback on the content or style of this guidance is welcome and this FAQ will be updated to reflect this or other developments.

Which PPC reference number should I use?

In completing forms or communicating with the NERP Registry, the original PPC Permit reference rather than a subsequent variation reference should be used. This provides a consistent reference number as opposed to the latest variation number which can change frequently. The original permit numbers appear on the Register.

The plant operator or contact has changed, what should I do?

Please email the NERP Registry at nerphelp@environment-agency.gov.uk with details of any changes. This will ensure that we process any enquires or transfers as quickly as possible. We will not be able to process a quarterly return or transfer if the request arises from a different company or contact to that previously notified to us.

Why have the forms have been removed from NERP guidance?

Forms will be kept on website to allow for updates without having to re-issue guidance.

Will less than figures be accepted?

No, the NERP has not been designed to accept or handle less than values. Therefore emissions should not be submitted as less than values, and should not be prefaced with "less than" or "<". The NERP Register can only accept absolute numbers and so the RTA1 Form will be amended not to accept these.

The RTA1 form did not accept 0?

The form is being amended to accept "0" as well as "nil".

Allowances are stated in whole tonnes only, should emissions be reported in whole tonnes or in decimal places?

Emissions can be reported to 3 decimal places, i.e. to nearest kg, if monitoring measures to this level.

This is to avoid repeated rounding causing exceedances for operators with small allowances.

For example:

An operator with a 3 tonne allowance reports 4 quarterly emissions of 0.6 tonnes. The annual emission would be 2.4 tonnes and compliant. If only whole tonnes were accepted, then each quarterly return would be rounded to 1 tonne and the annual emission would be 4 tonnes and require a transfer of 1 tonne.

How will compliance be determined if allowances are expressed in whole tonnes and emissions to decimal places?

The 4 quarterly emissions will be rounded up or down to the nearest whole number to calculate the annual emission and to determine compliance.

Thus an annual emission that is ≤ 0.5 above the allowance will be considered compliant. An annual emission that is > 0.5 over the allowance would not be compliant.

The regulators wish to avoid operators having to seek transfers for very low amounts.

Do transfers have to be for whole tonnes or can they be for part of a tonne?

Transfers are in whole tonnes only.

An annual emission that is 5.5 tonnes over the allowance would require a transfer of 5 tonnes to become compliant while an annual emission of 5.55 tonnes would require a transfer of 6 tonnes to become compliant.

As transfers have the affect of changing allowances, the regulators wish to avoid any transfers of allowances of < 1 tonne would conflict with the NERP allowances being set in tonnes.

Also, the regulators wish to keep the trading system simple by avoiding operators having to trade part tonnes.