

## **Appendix 13: Energy efficiency, climate change**

**UMBRELLA CLIMATE CHANGE AGREEMENT FOR THE PAPER SECTOR**  
**Agreement dated 6<sup>th</sup> March 2013**

THIS AGREEMENT is made the 6<sup>th</sup> day of March 2013

BETWEEN:

- (1) the Environment Agency (“the Administrator”); and
- (2) the Sector Association set out in Schedule 2 (“the Sector Association”).

**RECITALS**

- (A) Section 30 of and Schedule 6 to the Finance Act 2000 (“the Act”) make provision for a tax known as the climate change levy (“the Levy”). The Levy is charged on the supply of taxable commodities as defined in paragraph 3 of Schedule 6 to the Act.
- (B) Paragraphs 42(1)(ba) and 42(1)(c) of Schedule 6 to the Act provide that the amount payable by way of the Levy shall be discounted from the full rate where the supply is a reduced-rate supply. A reduced-rate supply is a taxable supply supplied to a facility specified in a certificate given by the Administrator to the Commissioners for Her Majesty’s Revenue and Customs as a facility which is covered by a climate change agreement for a period specified in the certificate in accordance with paragraphs 42 to 52F of Schedule 6 to the Act.
- (C) A climate change agreement is defined in paragraph 46 of Schedule 6 to the Act. It may consist of a combination of agreements that falls within paragraph 48. A combination of agreements falls within paragraph 48 if a number of conditions are satisfied. The first condition is that the combination of agreements is a combination of an umbrella agreement and an agreement that, in relation to the umbrella agreement, is an underlying agreement.
- (D) This agreement is an umbrella agreement entered into for the purposes of the reduced rate of Levy. It is not intended to give rise to contractual obligations between the parties.
- (E) The Sector Association is a representative as defined in paragraph 47(2) of Schedule 6 to the Act of each facility to which this agreement applies.
- (F) The facility or facilities set out in Schedule 4 to this agreement are a facility or facilities to which an agreement applies.

**AGREED TERMS**

IT IS AGREED as follows:

# UMBRELLA CLIMATE CHANGE AGREEMENT FOR THE PAPER SECTOR

## Agreement dated 6<sup>th</sup> March 2013

### 1. INTERPRETATION

1.1 In this Agreement, unless the context otherwise requires:

“account” means the account in the Register of a sector association or an operator;

“agreement” means, as the context requires, either:

- a) this agreement; or
- b) an umbrella agreement or an underlying agreement;

“base year” in respect of a target unit which does not include a greenfield facility means a 12 month period agreed between an operator and the administrator, ending prior to the date of an underlying agreement, for which data is supplied by an operator to the administrator prior to the operator entering into the underlying agreement;

“base year” in respect of a target unit which does include a greenfield facility means the 12 month period starting on the date of an underlying agreement”;

“buy-out fee” means the fee calculated in accordance with Rule 7;

“certification period” means, any of the following periods:

- (a) 1<sup>st</sup> April 2013 to 30<sup>th</sup> June 2015;
- (b) 1<sup>st</sup> July 2015 to 30<sup>th</sup> June 2017;
- (c) 1<sup>st</sup> July 2017 to 30<sup>th</sup> June 2019;
- (d) 1<sup>st</sup> July 2019 to 30<sup>th</sup> June 2021; or
- (e) 1<sup>st</sup> July 2021 to 31<sup>st</sup> March 2023;

“charges” means charges due to the Administrator under the charging scheme;

“charging scheme” means the Climate Change Agreements Charges Scheme 2012 made by the Administrator or any replacement or revision of that charging scheme;

“emissions” means the total emissions in tCO<sub>2</sub> equivalent for a target period;

“EU ETS Directive” means Directive 2003/87/EC of the European Parliament and of the Council establishing a scheme for greenhouse gas emissions allowance trading within the Community and amending Council Directive 96/61/EC, as amended from time to time;<sup>1</sup>

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<sup>1</sup> \*OJ No L 275, 25.10.03, p 32. The Directive was amended by European Parliament and Council Directives 2004/101/EC (OJ No. L 338, 13.11.2004, p 18), 2008/101/EC (OJ No L 8, 13.1.2009, p 3) and 2009/29/EC (OJ No L 140, 5.6.2009, p 63), and by Regulation (EC) No 219/2009 of the European Parliament and of the Council (OJ No L 87, 31.3.2009, p 109).

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“facility” means a facility within the meaning of paragraph 50(2) to (6) of Schedule 6 to the Act;

“facility number” means the unique identification number of a facility set out in schedule 4 of this Agreement;

“greenfield facility” means a facility which started to carry out the process by virtue of which it is a facility within the meaning of paragraph 50 of Schedule 6 during the 12 month period ending on the date the operator applies for the facility to be covered by an agreement”

“Novem ratio target” has the meaning set out in the technical annex;

“operator” means a party to an underlying agreement other than the Administrator;

“personal information” means:

- a) the address of the registered office of the sector association or operator;
- b) the name, address and email address of:
  - i) in the case of a sector association, a person who can be contacted in respect of the sector association;
  - ii) in the case of an Operator, the responsible person; and
- c) the name, address and email address of a person who can be contacted in respect of the facility or each facility covered by an agreement;

“the Register” means the electronic system established and operated by the Administrator for the administration of agreements;

“the Regulations” means the Climate Change Agreements (Administration) Regulations 2012 S.I. 2012/1976;

“Rule or Rules” means the Rules for the Operation of Climate Change Agreements or any of them set out in Schedule 1 to this Agreement as varied from time to time;

“Schedule 6” means Schedule 6 to the Finance Act 2000;

“sector” means the sector consisting of facilities which are covered by the same umbrella agreement;

“sector association” means the party to this agreement other than the Administrator;

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“sector commitment” means the commitment set out in Schedule 5 of the umbrella agreement, as varied from time to time;

“surplus” means the amount by which the emissions have fallen below the target for any target period;

“target” means the percentage improvement in energy efficiency or carbon efficiency from the base year applicable to the target unit, set out in Schedule 6 to the underlying agreement, as varied from time to time;

“target period” means any of the following periods:

- a) 1st January 2013 to 31st December 2014;
- b) 1st January 2015 to 31st December 2016;
- c) 1st January 2017 to 31st December 2018; or
- d) 1st January 2019 to 31st December 2020;

“target unit” means a facility or group of facilities to which an underlying agreement applies;

“tCO<sub>2</sub> equivalent” means tonnes of carbon dioxide equivalent;

“technical annex” means the technical annex to this Agreement dated 6 March 2013 and published by the Administrator or the Secretary of State, available via the Administrator’s website;

“throughput” means the measure of production, or factor related to production, used to determine the relationship between the amount of energy used by the target unit and the levels of activity of the target unit, as set out in Schedule 6 to an underlying agreement;

“the Tribunal” means the First-tier Tribunal established under the Tribunal Courts and Enforcement Act 2007<sup>2</sup>;

“umbrella agreement” means, as the context requires, either:

- a) this agreement; or
- b) an agreement that is an umbrella agreement for the purposes of paragraph 48 of Schedule 6 to the Act;

“underlying agreement” means an agreement that is an underlying agreement for the purposes of paragraph 48 or Schedule 6 to the Act.

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<sup>2</sup> Appeals are assigned to the General Regulatory Chamber of the First-tier Tribunal by virtue of article 3(a) of the First-tier Tribunal and Upper Tribunal (Chambers) Order 2010 (S.I. 2010/2655). The Tribunal Procedure (First-tier Tribunal) (General Regulatory Chamber) Rules 2009 (S.I. 2009/1976) sets out procedural rules relating to such appeals.

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- 1.2 Other words and expressions used in this Agreement have the same meaning as they bear in Schedule 6 to the Finance Act 2000 or the Regulations.

## **2. FACILITIES TO WHICH THIS AGREEMENT APPLIES**

- 2.1 This Agreement applies to the facilities set out in Schedule 4.
- 2.2 A facility belongs to the sector if it is a facility which undertakes one or more of the activities set out in Schedule 3.

## **3. SECTOR COMMITMENT**

- 3.1 The sector commitment for the sector to which this Agreement applies is set out in Schedule 5 to this Agreement, as varied from time to time.
- 3.2 The Secretary of State shall carry out a review of the sector commitment during 2016 for the target periods 1st January 2017 to 31st December 2018 and 1st January 2019 to 31st December 2020. The sector commitment and associated targets may be varied following the review to take account of the review in accordance with the procedure set out in Rule 12.

## **4. THE RULES**

- 4.1 Schedule 1 to this Agreement which sets out the Rules for the operation of Climate Change Agreements has effect.
- 4.2 The Sector Association agrees to comply with the Rules.

## **5. DURATION AND TERMINATION OF THIS AGREEMENT**

- 5.1 Subject to clause 5.2 below, this Agreement comes into force on 1 April 2013 or the date on which it is made, if later, and ends on 31 March 2023.
- 5.2 This Agreement may be terminated before 31 March 2023:
- 5.2.1 at any time by a notice by the Sector Association giving at least 10 working days notice served on the Administrator; or
  - 5.2.2 in accordance with the Regulations.

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**6. VARIATION OF AGREEMENT**

- 6.1 Subject to clauses 3.2, 6.2 and 6.3, this Agreement may be varied at any time if agreed between the Administrator and the Sector Association.
- 6.2 The facilities to which this Agreement applies may be varied in accordance with Rules 9 and 10.
- 6.3 This Agreement may be varied at any time by the Administrator to take account of changes to the terms specified in the Regulations.

**7. COLLECTION OF CHARGES**

- 7.1 The parties agree that the Administrator shall not be liable to pay any expenses of the Sector Association in connection with or arising out of the collection of charges under Rule 16, nor to indemnify or remunerate the Sector Association in connection with the collection of charges.

Signed by authority of  
the Environment Agency



Matthew Williamson  
CCA Manager

Signed on behalf of the  
Sector Association



(Name and position)

DES FOGERTY  
FINANCIAL DIRECTOR  
& COMPANY SECRETARY

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**SCHEDULE 1**

**RULES FOR THE OPERATION OF CLIMATE CHANGE AGREEMENTS**

**1. OBLIGATIONS OF A SECTOR ASSOCIATION AND OF AN OPERATOR**

1.1 An Operator and a Sector Association must:

- 1.1.1 supply such information to the Administrator as the Administrator may request in connection with an agreement, by the date specified in the request;
- 1.1.2 notify the Administrator of any changes to its personal information within 20 working days of the change;
- 1.1.3 co-operate with any person appointed by the Administrator to undertake an independent audit of information provided to the Administrator; and
- 1.1.4 comply with the provisions of the charging scheme. If a charge remains unpaid after the date on which it is due, it may be recovered by the Administrator as a civil debt.

**2. OBLIGATIONS OF A SECTOR ASSOCIATION**

- 2.1 Following the setting of the sector commitment by the Secretary of State, or following a variation of the sector commitment under Rule 12.1, a Sector Association must distribute the sector commitment between each target unit under the umbrella agreement.

**3. OBLIGATIONS OF AN OPERATOR**

3.1 An Operator must:

- 3.1.1 notify the Administrator and the Sector Association within 20 working days of the date when the Operator has reason to believe that a facility covered by an underlying agreement may not be eligible for inclusion in the underlying agreement;
- 3.1.2 notify the Administrator within 20 working days of becoming aware of any structural change or other change set out in the technical annex which may give rise to a variation to the target in accordance with Rule 11;
- 3.1.3 notify the Administrator within 20 working days of discovering any error in the data provided to the Administrator for the base year;
- 3.1.4 provide to the Administrator on or before 1st May following the end of a target period such information as has been requested by the

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Administrator in order to determine whether progress towards meeting the target is, or is likely to be, taken to be satisfactory;

- 3.1.5 provide any other information requested at any time by the Administrator by the date specified in the request to enable the Administrator to determine that:
    - (a) the target has been met; or
    - (b) the Operator is complying with the terms of the underlying agreement;
  - 3.1.6 notify the Administrator within 5 working days of the Operator or a facility in a target unit becoming a firm in difficulty, within the meaning of the European Commission Guidelines on State Aid for Rescuing and Restructuring Firms in Difficulty (2004/C 244/02);
  - 3.1.7 provide the responsible person with full authority to carry out his or her functions, including authorisation to accept on behalf of the Operator the service of any notice; and
  - 3.1.8 provide a current UK postal address and an operational email address of the responsible person for service of any notice.
- 3.2 If the Administrator enters into an underlying agreement before a target has been agreed, conditional upon the Operator providing sufficient information within a specified period in order to set the target for the target unit, the Operator must supply any data requested by the Administrator within the period specified by the Administrator on energy use and throughput of the target unit.

#### **4. OPERATION OF THE REGISTER**

- 4.1 Subject to Rules 4.2 and 4.3, to the extent possible, a Sector Association and an Operator must communicate with the Administrator using the Register.
- 4.2 Until a Sector Association and an Operator have been notified by the Administrator that the Operator is able to operate an account on its own behalf, an Operator must provide all information to the Sector Association to comply with the obligations of an Operator under an underlying agreement. The Sector Association must then operate the register on behalf of the Operator to provide the information to the Administrator.
- 4.3 After receiving notification from the Administrator that an Operator is able to operate an account on its own behalf, an Operator must notify the Administrator if it wishes to access its account directly to comply with its obligations under an underlying agreement. If an Operator makes such notification, the Operator must then operate the Register on its own behalf in order to comply with its obligations under an underlying agreement. If an Operator does not make such notification, the Operator must continue to provide all information to the Sector

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Association to comply with the obligations of an Operator under an underlying agreement and the Sector Association must continue to operate the register on behalf of the Operator to provide information to the Administrator.

#### **5. CERTIFICATION OF A FACILITY**

- 5.1 The Administrator must certify that a facility is covered by an agreement from the signing of an underlying agreement to the end of the certification period in which the underlying agreement is signed.
- 5.2 The Administrator must certify that a facility is covered by an agreement for any certification period other than the certification period in which the underlying agreement is signed, where it appears to the Administrator that progress made in the immediately preceding certification period, whether under the underlying agreement or under any previous underlying agreement, towards meeting targets set for the target unit is, or is likely to be, satisfactory.
- 5.3 For the purposes of this Rule, progress made in the immediately preceding certification period towards meeting targets set for the target unit is, or is likely to be satisfactory only where condition 1 and condition 2 are satisfied.
- 5.4 Condition 1 is that:
- 5.4.1 the target set for the target unit for the relevant target period is met, in accordance with Rule 6; or
  - 5.4.2 if the target set for the target unit has not been met, the target unit has paid the buy-out fee in accordance with Rule 7.
- 5.5 Condition 2 is that obligations imposed under or by virtue of regulations made for the purpose of implementing the EU ETS Directive have been complied with in respect of each facility comprising the target unit.
- 5.6 If:
- 5.6.1 a target unit has failed to meet its target in accordance with Rule 6 and the Operator has failed to pay the buy-out fee in accordance with Rule 7;
  - 5.6.2 obligations imposed under or by virtue of regulations made for the purpose of implementing the EU ETS Directive have not been complied with in respect of any facility in a target unit; or
  - 5.6.3 the underlying agreement or umbrella agreement is terminated in accordance with Regulation 17(1)(2), or (3) or Regulation 18,
- the Administrator must not certify that the facility or facilities comprising the target unit are covered by an agreement or, where a certificate has been issued, the Administrator must vary the certificate in accordance with paragraph 45 of Schedule 6.

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5.7 If:

5.7.1 a facility is not or ceases to be eligible for inclusion in an agreement; or

5.7.2 a facility is excluded from an underlying agreement under Rule 10;

the Administrator must not certify that the facility is covered by an agreement or, where a certificate has been issued, the Administrator must vary the certificate in accordance with paragraph 45 of Schedule 6.

5.8 If the information supplied to the Administrator is insufficient to determine whether:

5.8.1 the target for the target period has been met; or

5.8.2 obligations imposed under or by virtue of regulations made for the purpose of implementing the EU ETS Directive have been complied with in respect of each facility comprising the target unit;

the Administrator may refuse to certify that the facility or facilities are covered by an agreement or, where a certificate has been issued, the Administrator may vary that certificate in accordance with paragraph 45 of Schedule 6.

5.9 Subject to Rule 5.10, if the Administrator does not certify a facility or varies a certificate that has been issued, the Administrator must serve a decision notice on the Sector Association and the Operator of the facility setting out the reasons for the decision, unless a notice of termination has already been served.

5.10 The Administrator is not required to serve a decision notice where a facility has been certified under this Rule and it is subsequently discovered that the target unit for the relevant target period had not been met because of an error in the information originally supplied to the Administrator provided that:

5.10.1 the Sector Association and the Operator have satisfied the Administrator that the error was unintentional; and

5.10.2 the Operator has paid any buy-out fee in accordance with Rule 7.

## **6. MEETING THE TARGET**

6.1 A target unit meets its target for the purpose of Rule 5 if it meets or exceeds the percentage improvement in energy efficiency or carbon efficiency from the base year set out in Schedule 6 to the underlying agreement.

6.2 The Administrator must determine whether the target has been met in accordance with the principles, methodologies and procedures set out in the technical annex.

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- 6.3 An Operator must notify the Administrator on or before 31<sup>st</sup> January in the year following the end of a target period of any circumstances which may give rise to an adjustment to the target for the previous target period, as set out in the technical annex.
- 6.4 If an Operator makes a notification under Rule 6.3, the Administrator may adjust the previous target in accordance with the principles, methodologies and calculations set out in the technical annex and must serve a notice on the Operator, setting out:
- 6.4.1 whether or not it had decided to vary the target; and
  - 6.4.2 any revised target (as varied) for the target unit.

## **7. BUY-OUT MECHANISM**

- 7.1 If the administrator finds that the target unit has failed to meet its targets:
- 7.1.1 at any time in the period beginning with 1st May in the year following the end of a target period and ending immediately before the first day of the next certification period; or
  - 7.1.2 at any other time,
- the obligation to make progress towards meeting targets may instead be satisfied by the payment to the administrator of a fee in accordance with Rule 7.2.
- 7.2 If Rule 7.1 applies, the administrator must serve a notice on the Operator containing the following information:
- 7.2.1 that the target unit has failed to meet its target;
  - 7.2.2 the fee to be paid, calculated in accordance with Rule 7.3 or Rule 7.4;
  - 7.2.3 the date by which the fee must be paid, determined in accordance with Rule 7.5 or Rule 7.6;
  - 7.2.4 to whom the fee must be paid;
  - 7.2.5 how the fee is to be paid; and
  - 7.2.6 that failure to pay the fee in accordance with the notice will result in the issue of a variation certificate in accordance with paragraph 45 of Schedule 6.
- 7.3 If Rule 7.1.1 applies, the amount of the fee is:
- $$£12 \times (W - S)$$

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where  $W$  in units of tCO<sub>2</sub> equivalent represents the amount by which the emissions for the target period exceed the target and  $S$  in units of tCO<sub>2</sub> equivalent represents any surplus.

7.4 If Rule 7.1.2 applies, the amount of the fee is:

$$£12 \times W$$

where  $W$  in units of tCO<sub>2</sub> equivalent represents the amount by which the emissions for the target period exceed the target.

7.5 If Rule 7.1.1 applies, the fee must be paid on or before 1st July in the year in which the target unit is found to have failed to meet its targets.

7.6 If Rule 7.1.2 applies, the fee must be paid within 30 working days beginning with the date of the notice.

7.7 Payment of the fee is deemed to have been made when the person to whom the fee must be paid as specified in the notice receives full cleared funds.

7.8 For the purposes of calculating the buy-out fee under this Rule and for calculating the amount of any surplus, the Administrator must calculate the difference between the target for the target period and the actual performance achieved during the target period, where the target and the actual performance achieved are expressed in the same units, and convert any difference between the two into a quantity of carbon dioxide equivalent, expressed in units of tCO<sub>2</sub> equivalent, using the principles, methodologies and calculations set out in the technical annex.

## **8. SURPLUS**

8.1 If a facility is excluded from a target unit, the Operator must determine how any surplus should be distributed between the facilities that have been excluded from the target unit and the facilities remaining in the target unit and must notify the Administrator of the redistribution within 20 working days of the facility being excluded from the target unit.

8.2 If an Operator fails to notify the Administrator of the redistribution in accordance with Rule 8.1 any surplus remains with the facilities remaining in the target unit.

8.3 If facilities join a target unit, any surplus attributable to those joining facilities may be used by the target unit as a whole.

## **9. VARIATION BY INCLUSION OF ADDITIONAL FACILITIES**

9.1 A facility which is not already included in another umbrella agreement is eligible at any time to be considered for inclusion in an umbrella agreement where:

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- 9.1.1 it is a facility within the meaning of paragraph 50 of Schedule 6; and
- 9.1.2 it is a facility undertaking the activities set out in Schedule 3 to an umbrella agreement.
- 9.2 A facility which is not already included in another underlying agreement is eligible at any time to be considered for inclusion in an underlying agreement where:
  - 9.2.1 it is a facility within the meaning of paragraph 50 of Schedule 6;
  - 9.2.2 it is a facility undertaking the activities set out in Schedule 3 to an umbrella agreement; and
  - 9.2.3 it has the same operator as the operator of the underlying agreement under which it will be included, as set out in the technical annex.
- 9.3 A facility which is already included in another underlying agreement is eligible to be considered for inclusion in a different underlying agreement on or before 30 September 2013 where:
  - 9.3.1 it is a facility within the meaning of paragraph 50 of Schedule 6;
  - 9.3.2 it is a facility undertaking the activities set out in Schedule 3 to an umbrella agreement; and
  - 9.3.3 it has the same operator as the operator of the underlying agreement under which it will be included, as set out in the technical annex.
- 9.4 A facility which is already included in another underlying agreement is eligible to be considered for inclusion in a different underlying agreement on or after 1 October 2013 where:
  - 9.4.1 it is a facility within the meaning of paragraph 50 of Schedule 6;
  - 9.4.2 it is a facility undertaking the activities set out in Schedule 3 to an umbrella agreement;
  - 9.4.3 it has the same operator as the operator of the underlying agreement under which it will be included, as set out in the technical annex; and
  - 9.4.4 there has been a change of operator of the facility.
- 9.5 An additional facility cannot be added to an umbrella agreement or an underlying agreement:
  - 9.5.1 during the final target period under the umbrella agreement or the underlying agreement; or
  - 9.5.2 during the last two months of a target period.

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- 9.6 The administrator may vary the target of a target unit to take account of the inclusion of additional facilities following the principles, methodologies and calculations set out in the technical annex.
- 9.7 If a Sector Association wishes to add an additional facility to an umbrella agreement or an Operator wishes to add an additional facility to an underlying agreement the Sector Association or the Operator must notify the Administrator not less than two months before the commencement of the next target period setting out:
- 9.7.1 the name of the Operator of the facility;
  - 9.7.2 the address of the facility;
  - 9.7.3 a description of the facility;
  - 9.7.4 such information as will enable the Administrator to reach a decision on establishing eligibility of the facility, as requested by the Administrator; and
  - 9.7.5 such information as will enable the Administrator to determine the revised target for the target unit, as requested by the Administrator.
- 9.8 If the Administrator receives a notification under Rule 9.4, the Administrator must serve a notice on the Operator, copied to the Sector Association:
- 9.8.1 consenting to include the additional facility in an umbrella agreement or an underlying agreement and setting out whether or not it has decided to vary the target, and if so, the revised target (as varied) for the target unit;
  - 9.8.2 refusing consent to include the facility in an umbrella agreement or an underlying agreement, giving reasons for the decision; or
  - 9.8.3 requesting such further information as is required in order to establish eligibility of the facility or reach a decision on the target for the facility.

**10. VARIATION BY EXCLUSION OF FACILITIES**

- 10.1 If a Sector Association or an Operator wishes to exclude a facility, or part of it, from an umbrella agreement or an underlying agreement, it must notify the Administrator of the proposed exclusion, setting out:
- 10.1.1 the name of the Operator of the facility;
  - 10.1.2 the facility number, or a description of the part that is to be excluded; and
  - 10.1.3 the reason for the exclusion.

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10.2 If:

10.2.1 a Sector Association or an Operator has notified the Administrator that it wishes to exclude a facility under Rule 10.1; or

10.2.2 the Administrator has terminated an agreement so far as it relates to an individual facility under Regulation 17(4),

the Administrator may vary the target to take account of the exclusion or termination following the principles, methodologies and calculations set out in the technical annex, and may request such information from the Sector Association or the Operator as it requires in order to determine the revised target.

10.3 If the Administrator decides to vary or not to vary the target under Rule 10.2, it must serve a notice on the Operator, copied to the Sector Association, setting out whether or not it has decided to vary the target, and if so the revised target (as varied) for the target unit.

**11. VARIATION OF TARGETS IN OTHER CIRCUMSTANCES**

11.1 The Administrator may vary the target to take account of:

11.1.1 any structural changes or other changes to the target unit which the Operator must notify to the Administrator under Rule 3.1.2;

11.1.2 any errors in the data provided to the Administrator for the base year; or

11.1.3 in respect of a target unit which has a Novem ratio target, the removal of a product produced in the target period which was produced in the base year,

following the principles, methodologies and calculations set out in the technical annex.

11.2 The Administrator may request any information of a Sector Association or an Operator as it requires in order to determine the revised target under Rule 11.1.

11.3 If the Administrator decides to vary or not to vary a target under Rule 11.1, it must serve a notice on the Operator, copied to the Sector Association, setting out:

11.3.1 whether or not it has decided to vary the target; and

11.3.2 any revised target (as varied) for the target unit.

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**12. VARIATION OF SECTOR COMMITMENT FOLLOWING A REVIEW**

- 12.1 The sector commitment may be reviewed by the Secretary of State during 2016 for the target periods from 1 January 2017 to 31 December 2018 and from 1 January 2019 to 31 December 2020.
- 12.2 If the Sector Association and the Secretary of State agree on a variation to the sector commitment following a review, the Secretary of State may issue a direction to the Administrator that the sector commitment must be varied and then the Administrator must serve a variation notice on the Sector Association.
- 12.3 The variation notice must state:
- 12.3.1 the agreed variation; and
  - 12.3.2 the date from which the agreed variation will take effect.
- 12.4 The Sector Association must, within 20 working days of receipt of a variation notice, serve notice on the Administrator setting out the proposed distribution of the revised sector commitment between each target unit under the umbrella agreement.
- 12.5 The Administrator must:
- 12.5.1 agree to the proposed distribution and vary the targets of each target unit accordingly;
  - 12.5.2 request further information in relation to the proposed distribution; or
  - 12.5.3 refuse the proposed distribution and propose an alternative distribution, giving reasons for the decision.
- 12.6 If the Sector Association and the Secretary of State fail to agree on a variation of the sector commitment, either party may refer any dispute as to matters of fact to an adjudicator for adjudication, in accordance with the procedure set out in guidance published by the Secretary of State.
- 12.7 The adjudicator must, on the basis of representations provided to the adjudicator and any additional information considered necessary by the adjudicator, make a finding on the disputed questions of fact and notify the parties of that finding.
- 12.8 The adjudicator's finding on a disputed question of fact shall be binding on the parties but it shall be for the Secretary of State and the Sector Association to agree, in the light of that finding, what variations to the sector commitment are required.
- 12.9 If the Secretary of State and the Sector Association fail to agree on the variation to the sector commitment, the Administrator may terminate the agreement in accordance with Regulation 18.

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**13. RIGHT OF APPEAL**

13.1 If the Administrator:

13.1.1 decides not to certify a facility or to vary a certificate which has been issued;

13.1.2 serves a notice imposing a buy-out fee under Rule 7 upon determining that a target unit has failed to meet its target; or

13.1.3 decides to vary or not to vary the target for a target unit,

the Operator may appeal to the Tribunal against the decision.

13.2 In respect of an Operator which enters into an agreement after 1 April 2013, the Operator may appeal to the Tribunal against the target that has been set for the target unit by the Administrator.

13.3 For the purposes of Rule 13.2, the date on which notice of the decision is deemed to have been sent to the Operator is the later of the date the agreement is entered into or the date the Administrator sends notice to the Operator of the target for the target unit.

13.4 The grounds on which an Operator may appeal under Rule 13.1 and 13.2 are:

13.4.1 that the decision was based on an error of fact;

13.4.2 that the decision was wrong in law;

13.4.3 that the decision was unreasonable;

13.4.4 any other reason.

13.5 The bringing of an appeal suspends the effect of the decision pending final determination by the Tribunal of the appeal or its withdrawal.

13.6 On determining an appeal under these Rules the Tribunal must either:

13.6.1 affirm the decision;

13.6.2 quash the decision; or

13.6.3 vary the decision.

**14. RECORDS AND INFORMATION**

14.1 A Sector Association and an Operator must retain records of all information required to be supplied to the Administrator under these Rules.

14.2 In particular, an Operator must retain:

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- 14.2.1 sufficient records to allow the Administrator to verify whether a target unit has met its target, including sufficient records to allow the accurate verification of throughput and annual consumption of energy of a target unit; and
- 14.2.2 records of energy saving actions and measures implemented during each target period.
- 14.3 A Sector Association and an Operator must make all records which it is required to retain under these Rules available for inspection by the Administrator or a person appointed by the Administrator and must provide copies of such records in response to a request by the date specified in the request.
- 14.4 All records required to be retained under these Rules must be retained throughout the duration of an agreement and for a period of four years following the termination of an agreement.

## **15. PUBLICATION AND DISCLOSURE OF INFORMATION**

- 15.1 The Administrator must publish such information as required under the Regulations.
- 15.2 In respect of the disclosure of information other than disclosure of information required to be published under the Regulations, information supplied by a Sector Association or an Operator to the Administrator or the Secretary of State, to any agent of the Administrator or the Secretary of State, or to any person appointed by the Administrator or Secretary of State to carry out an independent audit, may be disclosed without the consent of the Sector Association or Operator, where such disclosure is:
  - 15.2.1 by the Administrator to the Secretary of State, for any purpose connected with the functions of the Secretary of State;
  - 15.2.2 by the Secretary of State to the Administrator, for any purpose connected with the functions of the Administrator;
  - 15.2.3 to a relevant authority, for any purpose connected with the functions of the relevant authority;
  - 15.2.4 to any person appointed by the Administrator or the Secretary of State to carry out an independent audit;
  - 15.2.5 to an adjudicator appointed under these Rules;
  - 15.2.6 to any person appointed by the Administrator or the Secretary of State to act as agent, consultant, adviser or contractor to the Administrator or the Secretary of State, in connection with the functions of the Administrator or the Secretary of State;

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- 15.2.7 necessary for the purpose of or in connection with any legal proceedings, including the obtaining of legal advice;
  - 15.2.8 required to comply with any Act of Parliament or subordinate legislation made under an Act of Parliament, including requests made under the Freedom of Information Act 2000 or the Environmental Information Regulations 2004; or
  - 15.2.9 required to meet any obligation to the European Union.
- 15.3 A relevant authority referred to in this Rule means:
- 15.3.1 either House of Parliament including any committee of either or both Houses;
  - 15.3.2 any Government department;
  - 15.3.3 the European Commission;
  - 15.3.4 the Committee on Climate Change;
  - 15.3.5 the Commissioners of Her Majesty's Revenue and Customs;
  - 15.3.6 a person or body prescribed by or appointed under Part I of the Environmental Protection Act 1990 or regulations made under section 2 of the Pollution Prevention and Control Act 1999 or any corresponding legislation for Northern Ireland;
  - 15.3.7 any regulator appointed under section 54 of the Competition Act 1998; or
  - 15.3.8 any other public body, regulatory agency or government advisory body, where in the absolute discretion of the Administrator or the Secretary of State, as appropriate, the Administrator or Secretary of State considers that it would be obliged to disclose such information in response to a request for information under the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, if such a request were made.

## **16. COLLECTION OF CHARGES**

- 16.1 A Sector Association may request the consent of the Administrator to collect charges due from Operators to the Administrator in respect of facilities under the charging scheme.
- 16.2 If a Sector Association wishes to collect charges due from an Operator to the Administrator under the charging scheme, the Sector Association may serve a notice in writing on the Administrator by the last working day in February in the calendar year in which the charges fall due.

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- 16.3 A notice served under Rule 16.2 must specify the facilities in respect of which the Sector Association intends to collect charges, being not fewer than 50% of the facilities covered by an umbrella agreement.
- 16.4 Following receipt of the notice, the Administrator must:
- 16.4.1 consent to the Sector Association collecting charges; or
  - 16.4.2 refuse consent to the Sector Association collecting charges, giving reasons for the decision.
- 16.5 If the Administrator consents to the Sector Association collecting charges the Sector Association must:
- 16.5.1 itemise charges separately in any invoices that it issues in respect of charges;
  - 16.5.2 collect and remit all charges collected to the Administrator without deduction or set off by the last working day in September in each year;
  - 16.5.3 prepare an annual report to the Administrator by the last working day in October in the year in which it has collected charges setting out which Operators it has collected charges from and which Operators have failed to pay charges due to the Sector Association.
- 16.6 A Sector Association must not actively pursue any outstanding charges after the last working day in September in any year in which they fall due. If a Sector Association receives charges after this date the Sector Association must accept the payment and remit this to the Environment Agency along with information identifying the Operator making the payment.
- 16.7 If a Sector Association fails to comply with any of its obligations under this Rule the Administrator may serve a notice on the Sector Association that consent to the Sector Association continuing to collect charges is withdrawn at the expiry of 20 working days from the date of the notice.

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**17. SERVICE OF NOTICES**

17.1 Any notice served under these Rules must be in writing and may be served by sending it by post or electronically.

17.2 The address for the service of all notices on the Administrator is:

Postal: Environment Agency  
Richard Fairclough House  
Knutsford Road, Latchford,  
Warrington,  
Cheshire, WA4 1HT

Electronic: CCA-operations@environment-agency.gov.uk

17.3 The address for the service of all notices on the Sector Association is the address of the person set out in Schedule 2 to the umbrella agreement.

17.4 The address for the service of all notices on the Operator is the address of the responsible person.

**UMBRELLA CLIMATE CHANGE AGREEMENT FOR THE PAPER SECTOR**  
**Agreement dated 6<sup>th</sup> March 2013**

**SCHEDULE 2**  
**THE SECTOR ASSOCIATION**

The Confederation of Paper Industries  
Which represents facilities that belong to the paper sector.

Whose address for service of all notices under this Agreement is

By post:  
1 Rivenhall Road, Swindon, Wiltshire, SN5 7BD, England

Electronically:  
[dmorgan@paper.org.uk](mailto:dmorgan@paper.org.uk)

**SCHEDULE 3**  
**THE SECTOR**

A facility belongs to the paper sector if it is a facility at which the primary activity is the manufacture of paper, pulp or cardboard.

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**SCHEDULE 4**  
**LIST OF FACILITIES**

**SCHEDULE 5**  
**THE SECTOR COMMITMENT**

Sector Commitment:

<u>Target Period</u>	<u>Sector Commitment (percentage reduction from base year)</u>
1 January 2013 to 31 December 2014	3.500%
1 January 2015 to 31 December 2016	4.667%
1 January 2017 to 31 December 2018	5.833%
1 January 2019 to 31 December 2020	7.000%



**Cyfoeth  
Naturiol**  
Cymru  
**Natural  
Resources**  
Wales

## **Greenhouse Gas Emissions Permit (with introductory note)**

### **Greenhouse Gas Emissions Trading Scheme Regulations 2012**

**Operator name(s)**

NORTHWOOD & WEPA Limited

**Installation name**

Bridgend Operation

**Site name (if applicable)**

Bridgend Paper Mill

**Installation address**

Bridgend Paper Mill  
Llangynwyd  
Bridgend  
Bridgend  
CF34 9RS  
Wales

**Permit number**

UK-W-IN-12920

**Effective Date of Consolidation**

01 February 2016

**Issued by Natural Resources Wales**

## **INTRODUCTORY NOTE**

This introductory note does not form part of the permit.

This Greenhouse Gas Emissions Permit ("permit") is issued by Natural Resources Wales ("the regulator"). It authorises the holder to emit the greenhouse gases specified in the permit from the regulated activities listed and is subject to a number of conditions, including the monitoring and reporting of such emissions, the surrender of allowances and notification requirements.

As required by the Regulations, the permit sets out a description of the installation to which it applies. An "installation" includes one or more regulated activities, and any directly associated activities, as defined in the EU ETS Directive. However, the monitoring and reporting requirements of the permit apply only to emissions from the regulated activities. The installation covered by a permit may in fact be part of a larger installation (where different regulated activities in the overall installation, or parts thereof, are operated by different operators).

Allocations of free allowances to installations are set out in the UK's National Implementation Measures document and are issued to operator's registry accounts each year as appropriate. In certain circumstances, operators may also be eligible to apply for an allocation of allowances from the New Entrant Reserve. The permit includes a requirement on the operator to surrender allowances equal to the annual reportable emissions from the installation in a particular year (increased to account for non-surrenders or reporting errors in respect of earlier years), by 30 April in the following year. Allowances may be bought or sold to enable operators to meet their surrender requirements.

### **Talking to us**

If you contact the regulator about this permit, please quote the permit reference number.

You can contact us by e-mail on [GHGHelp@naturalresourceswales.gov.uk](mailto:GHGHelp@naturalresourceswales.gov.uk).

### **Variations to the permit**

This permit may be varied in the future, on application by the operator (in accordance with the permit conditions) or at the initiative of the regulator. The variation application requirements are set out in the permit conditions and the powers of the regulator to vary permits are set out in the Regulations.

### **Surrender of the permit**

The operator must apply to surrender the permit where it has "ceased operation". The definition of "ceases operation", together with the procedure and requirements are set out in the Regulations.

### **Transfer of the permit or part of the permit**

Before the permit can be wholly or partially transferred to another operator, a joint application to transfer the permit must be made by both the current and new operators. The procedure and requirements are set out in the Regulations.

### **Appeals**

Operators may appeal against the provisions of this permit. The Regulations contain information about the appeals procedure.

### **Subsistence Charge**

Following the issue of the permit, annual subsistence fees will be payable. Fees will also be payable in respect of permit variations (except where the variation relates to minor changes or changes of a purely administrative nature), transfers, surrenders or revocations.

### **Regulator's Address**

Our contact address is as follows:

Email to: [GHGHelp@naturalresourceswales.gov.uk](mailto:GHGHelp@naturalresourceswales.gov.uk)

## Status Log

### Permit

Permit number	Date application received	Date further information received*	Date Permit issued
UK-W-IN-12920	22 December 2015		27 January 2016

### Changes to Permit

Notice number	Change Type	Date application received	Date further information received*	Date Notice issued	Comment
AEMV12 920-P3- 3	AEM Variation	22 December 2015			<ol style="list-style-type: none"><li>1. Petrol fuel stream calc factors upgraded from tier 1 to 2a and to use the UNFCCC factors</li><li>2. Stoichiometric EF of 3.38 tCO<sub>2</sub>/t applied to the acetylene stream and upgraded from no tier to tier 1</li><li>3. Duly Authorised Person and job titles within management procedures updated.</li><li>4. Measurement units on F1 stream updated from CFT/h to m<sup>3</sup>/h</li></ol>
AEMV12 920-P3- 1	AEM Variation	08 October 2013		18 November 2013	<ol style="list-style-type: none"><li>1. removed S6 and A5 from the fuel stream F3</li><li>2. added a new fuel stream (F71) to account for the standby generator being fuelled from an on-site tank rather than by the F3 fuel stream</li><li>3. new site diagram submitted to show the standby generator moved from F3 to F71</li></ol>
AEMV12 920-P3- 2	AEM Variation	11 November 2014		13 November 2014	<ol style="list-style-type: none"><li>1) calculation approach description updated</li><li>2) Control of Outsourced Activities procedure updated</li><li>3) Risk Assessment Issue 9 updated</li></ol>

\* Further information received in response to notices under Schedule 3, paragraph 1(12) of the Regulations.

**End of introductory note**

## **PERMIT**

Under the Greenhouse Gas Emissions Trading Scheme Regulations 2012

**Permit number**

UK-W-IN-12920

**Consolidation number**

4

Natural Resources Wales (“**the regulator**”) in exercise of its powers under the Greenhouse Gas Emissions Trading Scheme Regulations 2012, hereby authorises:

NORTHWOOD & WEPA Limited (“**the operator**”)

**Company Registration Number**

08347876

**Registered Office Address**

Bridgend Paper Mill  
Llangynwyd  
Bridgend  
Mid Glamorgan  
CF34 9RS

to carry out regulated activities resulting in greenhouse gas emissions, as described and defined in and subject to the conditions set out in this permit, at:

**Installation Name**

Bridgend Operation

**Site Name (if applicable)**

Bridgend Paper Mill

**Installation Address**

Bridgend Paper Mill  
Llangynwyd  
Bridgend  
Bridgend  
CF34 9RS  
Wales

**National Grid Reference**

SS87448724

## PART 1

### Scope of permit and of the installation

1. This permit authorises the operator to carry out in the installation the regulated activities listed in Table 1 below.

Regulated activities	Specified emissions
Production of paper or cardboard	Carbon Dioxide

Table 1 Regulated activities carried out in the installation.

2. For the purposes of this permit, the installation is as described in Table 2, as supplemented by any change notified to the regulator in accordance with the permit conditions.

The Bridgend Paper Mill, owned and operated by Northwood & WEPA Ltd, manufactures hygienic paper in jumbo roll form, followed by conversion to final product. There is currently 1 paper machine. The paper is mainly of toilet tissue, kitchen towel napkin and facial grades, although others can be produced. The raw material for this production is virgin pulp. The majority of the paper production is converted to final product on site, in extremely modern plant.

As such the mill has an environmental permit (EP3738NG). Papermaking capacity is 200 tpd (a schedule 1 activity). The sites primary power and heat requirement is supplied via a gas turbine based combined heat and power plant, which comprises two Solar Taurus 60 gas turbines (19MWth each) associated heat recovery steam generators (HRSG) (9MWth each) and one shell boiler (16MWth) plus a standby generator. The CHP plant supplies steam and electricity to the tissue-paper manufacturing facility, with excess electricity being exported to the National Grid. Fuel for the plant is obtained from the local Transco natural gas network or on-site fuel oil storage (delivered by road). There are also drying hoods on the paper machines, heated by duct burners, the maximum total heat input capacity here being 11.6 MW th. Carbon dioxide emissions arise as a result of the combustion of these fuels.

The plant is located on the Bridgend Paper Mill site towards the South-East corner. Both the CHP and the duct burners are primarily fired by natural gas, although gas oil may be burnt if necessary. Apart from the CHP turbine and boiler exhaust stacks and the hood burners, there are no CO2 emitting points within the mill apart from those arising from de-minimis sources. The site itself is located in the Llynfi valley adjacent to the A4063, between Maesteg and Bridgend.

Table 2 Description of the installation

## PART 2

### Conditions

1. The operator must monitor the annual reportable emissions of the installation in accordance with the Monitoring and Reporting Regulation and the monitoring plan (including the written procedures supplementing that plan).
2. The operator must, by 31 March in every year, submit a verified report of its annual reportable emissions made in the previous year to the regulator, in accordance with the Monitoring and Reporting Regulation and the Verification Regulation.
3. The operator must satisfy the regulator, if an emission factor of zero has been reported in respect of the use of bioliquids, that the sustainability criteria set out in Article 17(2) to (5) of the Renewable Energy Directive have been fulfilled in accordance with Article 18(1) of that Directive.
4. The operator must, by 30 April in each year, surrender a number of allowances in the registry equal to the annual reportable emissions of the installation made in the previous year.
5. Where an operator proposes to make a significant modification to its monitoring plan under Article 15, the operator must apply to the regulator for a variation of its permit at least 14 days prior to making the change or, where this is not practicable, as soon as possible thereafter and such application must:
  - (a) include a description of the change; and
  - (b) set out how it affects the information contained in the monitoring plan.
6. Where an operator makes a change to its monitoring plan under Article 14 or 58(4) that is not a significant modification, the operator must notify the regulator by 31 December in the year in which the change occurred and such notification must:
  - (a) include a description of the change;
  - (b) set out how it affects the information contained in the monitoring plan; and
  - (c) explain how the change is in accordance with the Monitoring and Reporting Regulation.
7. Where the name of the operator changes, the operator must apply to the regulator for a variation of its permit in order to reflect the change as soon as practicable following the change.
8. Where the operator does not apply at least the tiers required or applies a fall-back methodology pursuant to the Monitoring and Reporting Regulation, the operator must submit a report to the regulator in accordance with the requirements specified in Article 69(1) by the following deadlines, starting in the case of a new operator with 30 June in the year following that in which the permit is granted and for any other operator, with 30 June 2013:
  - (a) for a category A installation, by 30 June every four years
  - (b) for a category B installation, by 30 June every two years
  - (c) for a category C installation, by 30 June every year
9. Where a verification report states outstanding non-conformities or recommendations for improvements as specified in Article 69(4), the operator must submit a report to the regulator in accordance with the requirements of that Article by 30 June of the year in which the verification report is issued.
10. The operator must notify the regulator in accordance with the Monitoring and Reporting Regulation at least 14 days prior to commencement of any of the circumstances in paragraphs (a) to (d) below or, where this is not practicable, as soon as possible thereafter:
  - (a) where there is a temporary change to its monitoring methodology as specified in Article 23;
  - (b) where tier thresholds are exceeded or equipment is found not to conform to requirements which require corrective action as specified in Article 28(1);
  - (c) where a piece of measurement equipment is out of operation as specified in Article 45; and
  - (d) where an installation with low emissions exceeds the relevant threshold as specified in Article 47(8).

11. Except in the case of installations not eligible for an allocation, where a sub-installation has had a qualifying significant capacity reduction, the operator must, by the later of (a) the end of the period of 7 months following the change of capacity, (b) 31 December in the year in which that change occurred or (c) 1 February 2013 ("the relevant date"), submit a notice to the regulator containing:
  - (a) a statement of the reduced capacity and the installed capacity of the sub-installation after taking into account the capacity reduction; and
  - (b) a statement that the data under paragraph (a) have been verifiedexcept that, where the relevant date is before 30 May 2013, the statement required in (b) above need only be submitted by 30 May 2013.
12. Except in the case of installations not eligible for an allocation, where a sub-installation has had a qualifying partial cessation, the operator must, by the later of (a) 31 December in the year in which the reduction occurred or (b) within one month after the date on which it occurred, notify the regulator that a reduction in activity level has occurred, stating the amount of that reduction and the sub-installation to which it applies.
13. Except in the case of installations not eligible for an allocation, where a sub-installation has had a qualifying partial cessation which occurred during 2012, the operator must, by 1 February 2013, notify the regulator that a reduction in activity level has occurred, stating the amount of that reduction and the sub-installation to which it applies.
14. Unless already notified in accordance with other requirements of this permit, the operator must notify the regulator of any planned or effective changes to the capacity, activity level or operation of the installation by 31 December in the year in which the change was planned or has occurred.
15. The operator must keep records of all relevant data and information in accordance with Article 66.

## Part 3

### Definitions

- (1) In this permit:
- (a) “allowance” has the meaning given in Article 3a of the Directive but excludes aviation allowances;
  - (b) “annual reportable emissions” means the reportable emissions arising during any year;
  - (c) “aviation allowance” has the meaning given in Article 3a of the Directive but is limited to those allowances allocated in accordance with Article 3e or 3f of the Directive or auctioned in accordance with Article 3d of the Directive;
  - (d) “bioliquids” has the meaning given in Article 2(h) of the Renewable Energy Directive;
  - (e) “category A installation” has the meaning given in Article 19(2) of the Monitoring and Reporting Regulation;
  - (f) “category B installation” has the meaning given in Article 19(2) of the Monitoring and Reporting Regulation;
  - (g) “category C installation” has the meaning given in Article 19(2) of the Monitoring and Reporting Regulation;
  - (h) “the Directive” means Directive 2003/87/EC of the European Parliament and of the Council establishing a scheme for greenhouse gas emissions allowance trading within the Community and amending Council Directive 96/61/EC, as amended from time to time and as adapted by Annex 20 to the EEA agreement;
  - (i) “the Free Allocation Decision” means Commission Decision 2011/278/EU of 27 April 2011 determining transitional Union-wide rules for harmonised free allocation of emission allowances pursuant to Article 10a of Directive 2003/87/EC;
  - (j) “installation” means the installation operated by the operator and as described in Part 1 of this permit, as supplemented by any change notified to the regulator in accordance with the conditions of this permit;
  - (k) “installations not eligible for an allocation” means installations that, by virtue of Article 10a(3) of the Directive, are not eligible for an allocation;
  - (l) “the Monitoring and Reporting Regulation” means Commission Regulation (EU) No 601/2012 of 21 June 2012 on the monitoring and reporting of greenhouse gas emissions pursuant to Directive 2003/87/EC of the European Parliament and of the Council, as amended from time to time;
  - (m) “monitoring plan” means the plan attached at Annex A, together with any modifications notified to the regulator under condition 6 and includes the written procedures supplementing that plan;
  - (n) “new operator” means the operator of an installation whose permit was granted after 1 January 2013;
  - (o) “operator” means the holder of this permit;
  - (p) “qualifying partial cessation” applies where one sub-installation of an installation which contributes to (a) at least 30% of the final annual amount of allowances allocated to the installation, or (b) the allocation of more than 50,000 allowances, reduces its activity level in a given year by at least 50% compared to the activity level originally used for calculating the sub-installation’s allocation;
  - (q) “qualifying significant capacity reduction” means a significant capacity reduction occurring:
    - i. after 30 June 2011; or
    - ii. on or before 30 June 2011, but the extent of the reduction could not be determined before 30 September 2011;
  - (r) “reduced capacity” has the meaning in Article 3(m) of the Free Allocation Decision;
  - (s) “the Registries Regulation 2011” means Commission Regulation (EU) No 1193/2011 of 18 November 2011 establishing a Union Registry for the trading period commencing on 1 January

2013, and subsequent trading periods, of the Union emissions trading scheme pursuant to Directive 2003/87/EC of the European Parliament and of the Council and Decision 280/2004/EC of the European Parliament and of the Council and amending Commission Regulations (EC) No 2216/2004 and (EU) No 920/2010, as amended from time to time;

- (t) “registry” means the Union Registry established by Article 4 of the Registries Regulation 2011 and which can be accessed at <https://ets-registry.webgate.ec.europa.eu/euregistry/GB/index.xhtml>;
  - (u) “regulated activity” means an activity that is listed in Annex 1 to the Directive;
  - (v) “the Regulations” means the Greenhouse Gas Emissions Trading Scheme Regulations 2012;
  - (w) “the regulator” means the Environment Agency;
  - (x) “the Renewable Energy Directive” means Directive 2009/28/EC of the European Parliament and of the Council on the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC, as amended from time to time;
  - (y) “reportable emissions” means the total emissions of gases specified in Table 1 in Part 1 of this permit (expressed in tonnes of carbon dioxide equivalent) which arise from the regulated activities carried out in the installation;
  - (z) “significant capacity reduction” has the same meaning as in Article 3(j) of the Free Allocation Decision;
  - (aa) “significant modification” has the same meaning as in Article 15 of the Monitoring and Reporting Regulation;
  - (bb) “start of normal operation” has the same meaning as in Article 3(n) of the Free Allocation Decision;
  - (cc) “sub-installation” has the same meaning as in the Free Allocation Decision;
  - (dd) “verified”, for the purposes of condition 11 only, means verified as satisfactory in accordance with Article 8 of the Free Allocation Decision (except that reference to Decision 2007/589/EC in Article 8(3) is to be read as a reference to the Verification Regulation);
  - (ee) “verification report”, for the purposes of condition 9 means a report submitted in accordance with condition 2 of this permit;
  - (ff) “the Verification Regulation” means Commission Regulation (EU) No 600/2012 of 21 June 2012 on the verification of greenhouse gas emission reports and tonne-kilometre reports and the accreditation of verifiers pursuant to Directive 2003/87/EC of the European Parliament and of the Council, as amended from time to time;
  - (gg) “year” means a calendar year commencing on 1 January;
- (2) In this permit, a reference to a numbered Article is to that Article of the Monitoring and Reporting Regulation.
- (3) When interpreting the provisions of the Monitoring and Reporting Regulation, references to competent authority are to be read as references to the Environment Agency (with the exception of Article 68(3)).
- (4) Where this permit has been issued following a partial transfer of the permit under the Regulations, “final annual amount of allowances” in relation to the definition of qualifying partial cessation means the amount of allowances transferred to the transferred units authorised by this permit.
- (5) Where this permit has been issued following a partial transfer of the permit under the Regulations, “initial activity level”, in relation to the definition of qualifying partial cessation, means the activity level used for calculating the sub-installation’s allocation following the partial transfer.
- (6) For the purposes of condition 4 (surrender of allowances), the amount of annual reportable emissions in relation to a recovery year is deemed to be increased by an amount equal to the amount of annual reportable emissions, arising in a non-compliance year, in respect of which the operator failed to comply with the surrender requirements. For these purposes:
- (a) a “non-compliance year” is a year in respect of which an operator fails to comply with the surrender requirements; and

- (b) the “recovery year” is (i) the year following that non-compliance year; or (ii) where the non-compliance results from an error in the verified emissions report submitted by the operator under condition 2, the scheme year in which the error is discovered.

## Appendix 1 to Greenhouse Gas Emissions Permit Number UK-W-IN-12920

### Monitoring Plan

List of environmental licenses related to this installation

Permit number	Type of permit	Permit holder	Competent body
EP3738NG	EPR	Northwood & WEPA ltd	Natural Resources Wales

Estimated annual emissions (tonnes CO<sub>2(e)</sub>)                      40000

#### Emission Sources

Summary of emission sources which relate to the regulated activities at the installation.

Emission Source Reference	Emission Source Description
S1	Gas Turbine 1
S2	Gas Turbine 2
S3	Heat Recovery Boiler 1
S4	Heat Recovery Boiler 2
S5	Shell Boiler
S6	Standby Generator
HV2	Jupiter Paper Machine
S7	Sprinkler fire pumps
S8	Mobile fire pump
S9	Oxy/Acetelyne torch
S10	Propane torch

#### Emission Points

Summary of the emission points which relate to the regulated activities at the installation.

Emission Point Reference	Emission Point Description
A1	Main stack
A2	Shell boiler stack
A4	Jupiter machine hood exhaust vent
A5	Standby Generator Exhaust
A6	Sprinkler fire pumps exhaust
A7	Mobile fire pump exhaust
A8	Oxy/Acetelyne / Propane torch extract

#### Source Streams (fuels and/or materials)

Summary of the source streams used in the regulated activities at the installation.

Source Stream Reference	Source Stream Type	Source Stream Description
F1	Combustion: Other gaseous & liquid fuels	High Pressure Natural Gas

Source Stream Reference	Source Stream Type	Source Stream Description
F2	Combustion: Other gaseous & liquid fuels	Natural Gas
F3	Combustion: Commercial standard fuels	Gas/Diesel Oil
F31	Combustion: Commercial standard fuels	Gas/Diesel Oil
F41	Combustion: Commercial standard fuels	Petrol
F51	Combustion: Other gaseous & liquid fuels	Acetylene
F61	Combustion: Commercial standard fuels	Propane
F71	Combustion: Commercial standard fuels	Gas/Diesel Oil

### Technical details of the regulated activities

Source streams ( Fuel / Material )	Emission Source Refs.	Emission Point Refs.	Regulated Activity
F1	S1,S2	A1	Production of paper or cardboard
F2	HV2,S3,S4,S5	A1,A2,A4	Production of paper or cardboard
F3	HV2,S1,S2,S5	A1,A2,A4	Production of paper or cardboard
F31	S7	A6	Production of paper or cardboard
F41	S8	A7	Production of paper or cardboard
F51	S9	A8	Production of paper or cardboard
F61	S10	A8	Production of paper or cardboard
F71	S6	A5	Production of paper or cardboard

# Calculation

## Approach Description

**NATURAL GAS (F1 & F2):**  
Activity Data will be calculated using meter readings taken from the main high pressure fiscal gas supply meter into the site (owned by NGT) and the low pressure fiscal gas meter into the site (also owned by NGT). The Net Calorific Value and Emissions Factor are taken from the National Inventory (Tier 2a). A Tier 1 default value Oxidation factor is used. The CO2 emissions are calculated as a product of  $AD \cdot NCV \cdot EF \cdot OxF$ . The uncertainty using this method resolves down to the meter accuracy and this is +/- 1% (see NGT advice).

**GAS Oil (F3, F31 & F71):**  
Gas Oil is available on site as a back up supply in the event of a gas Interrupt, largely declared by NGT, or by the standby generator in the event of power interruption. Gas oil supply to the CHP plant is via a single coriolis flowmeter and gas oil supply to the burners is via two rotary meters each supplying a distinct burner bank. Gas oil to standby generator is via the site diesel storage tank and off take is measured via a odometer. The Net Calorific Value and Emissions Factor for Gas Oil are taken from the National Inventory (Tier 2a). A Tier 1 default value Oxidation factor is used. The CO2 emissions are calculated as a product of  $AD \cdot NCV \cdot EF \cdot OxF$ .

$$\text{Site Gas Oil Consumed} = \text{GOJup1} + \text{GOJup2} + \text{GOMeter2} + \text{GO odometer(diesel tank)}$$

**PETROL (F41):**  
Petrol consumption will be recorded on the servicing bill of the fire protection contractor, the usage will be recorded in exception i.e. when top up of fuel tanks is required. The Net Calorific Value and Emissions Factor for petrol are taken from the National Inventory (Tier 2a). A Tier 1 default value Oxidation factor is used. The CO2 emissions are calculated as a product of  $AD \cdot NCV \cdot EF \cdot OxF$ . This is a de-minimis source.

**ACETYLENE (F51):**  
Engineering and maintenance gases may be employed on an ad hoc basis to attend to ignition, welding or other transient requirements. The quantity consumed is taken from the invoiced mass (rounded up to a whole number of bottles). The Emissions Factor used for acetylene is the Competent Authority approved Tier 1 value of 3.38 tCO2/t. A Tier 1 default value Oxidation factor is used. The CO2 emissions are calculated as a product of  $AD \cdot EF \cdot OxF$ . This is a de-minimis source.

**PROPANE (F61):**  
Propane usage will be monitored by the amount of bottles withdrawn from the stores. This is a third party vendor and is billed directly on usage. The Net Calorific Value and Emissions Factor for LPG are taken from the National Inventory (Tier 2a). A Tier 1 default value Oxidation factor is used. The CO2 emissions are calculated as a product of  $AD \cdot NCV \cdot EF \cdot OxF$ . This is a de-minimis source.

## Measurement Devices

Source Stream Refs.	Emission Source Refs.	Measurement Device Ref.	Type of Measurement Device	Measurement Range	Metering Range Units	Specified Uncertainty (+/- %)	Location
F1	S1,S2	G2	Turbine meter	20-400	m3/h	1.00	Transco high pressure gas compound
F1	S1,S2	G2 (ECVI)	Electronic volume conversion instrument (EVCI)	700-14000	CFH	1.00	Transco high pressure gas compound
F2	S3,S4,S5 ,HV2	G1.1	Rotary meter	38000-1400	cfh	1.00	Transco low pressure gas compound
F2	S3,S4,S5 ,HV2	G1.1 (ECVI)	Electronic volume conversion instrument (EVCI)	38000-1400	cfh	1.00	Transco low pressure gas compound
F3	S1,S2,S5	GOMeter2	Coriolis meter	0-45000	kg/hr	1.00	CHP Compound
F3	HV2	GOJup1	Rotary meter	30-1500	lhr	1	Jupiter Burner Annexe
F3	HV2	GOJup2	Rotary meter	30-1500	l/h	1	Jupiter Burner Annexe

Source Stream Refs.	Emission Source Refs.	Measurement Device Ref.	Type of Measurement Device	Measurement Range	Metering Range Units	Specified Uncertainty (+/- %)	Location
F31	S7	D2	Supplier invoices & run hour meter	n/a	n/a	n/a	Supplier invoices retained by Purchasing Dept
F41	S8	D3	Supplier invoices	n/a	n/a	n/a	Supplier invoices retained by Purchasing Dept
F51	S9	D4	Supplier invoices	n/a	n/a	n/a	Supplier invoices retained by Purchasing Dept
F61	S10	D5	Supplier invoices	n/a	n/a	n/a	Supplier invoices retained by Purchasing Dept
F71	S6	D6	Odometer readings	N/A	N/A	N/A	Site Diesel tank South road

### Applied tiers

Source Stream Ref.	Emission Source Refs.	Measurement Device Refs.	Overall uncertainty (+/- %)	Activity Data Tier	NCV Tier	Emission Factor Tier	Oxidation Factor Tier	Carbon Content Tier	Conversion Factor Tier	Biomass Fraction Tier	Category
F1	S1,S2	G2,G2 (ECVI)	<1.5%	4	2a	2a	1	N/A	N/A	N/A	Major
F2	S3,S4,S5 ,HV2	G1.1,G1.1 (ECVI)	<1.5%	4	2a	2a	1	N/A	N/A	N/A	Major
F3	S1,S2,S5	GOMeter2	N/A	No tier	2a	2a	1	N/A	N/A	N/A	De-minimis
F3	HV2	GOMeter2,GO Jup1,GOJup2	N/A	No tier	2a	2a	1	N/A	N/A	N/A	De-minimis
F31	S7	D2	N/A	No tier	2a	2a	1	N/A	N/A	N/A	De-minimis
F41	S8	D3	N/A	No tier	2a	2a	1	N/A	N/A	N/A	De-minimis
F51	S9	D4	N/A	No tier	N/A	1	1	N/A	N/A	N/A	De-minimis
F61	S10	D5	N/A	No tier	2a	2a	1	N/A	N/A	N/A	De-minimis
F71	S6	D6	N/A	No tier	2a	2a	1	N/A	N/A	N/A	De-minimis

### Uncertainty Assessment

The table below lists evidence attached that demonstrates compliance with the applied tiers in accordance with Article 12 of the MRR.

Attachment	Description
Uncertainty_Analysis_for_Main_Gas_Meters new.docx	Uncertainty calculations Natural Gas meters

### Reference sources applied

The table below lists, for each parameter, the reference sources to be used for calculation factors.

Source Stream Refs.	Emission Source Refs.	Parameter	Reference Source	Default Value applied (where appropriate)
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Source Stream Refs.	Emission Source Refs.	Parameter	Reference Source	Default Value applied (where appropriate)
F1	S1,S2	NCV & EF	Data to be taken from the latest UK national inventory as submitted to the United Nations Framework Convention on Climate Change	n/a
F1	S1,S2	OxF	MRR Annex II Section 2.3	1
F2	S3,S4,S5, HV2	NCV & EF	Data to be taken from the latest UK national inventory as submitted to the United Nations Framework Convention on Climate Change	n/a
F2	S3,S4,S5, HV2	OxF	MRR Annex II Section 2.3	1
F3	HV2,S1,S2,S5	NCV & EF	Data to be taken from the latest UK national inventory as submitted to the United Nations Framework Convention on Climate Change	n/a
F3	HV2,S1,S2,S5	OxF	MRR Annex II Section 2.3	1
F31	S7	NCV & EF	Data to be taken from the latest UK national inventory as submitted to the United Nations Framework Convention on Climate Change	n/a
F31	S7	OxF	MRR Annex II Section 2.3	1
F41	S8	NCV & EF	Data to be taken from the latest UK national inventory as submitted to the United Nations Framework Convention on Climate Change	n/a
F41	S8	OxF	MRR Annex II Section 2.3	1
F51	S9	EF	Competent Authority approved Tier 1 value	3.38 tCO2/t
F51	S9	OxF	MRR Annex II Section 2.3	1
F61	S10	NCV & EF	Data to be taken from the latest UK national inventory as submitted to the United Nations Framework Convention on Climate Change	n/a
F61	S10	OxF	MRR Annex II Section 2.3	1
F71	S6	NCV & EF	Data to be taken from the latest UK national inventory as submitted to the United Nations Framework Convention on Climate Change	n/a
F71	S6	OxF	MRR Annex II Section 2.3	1

## Management Procedures

### Monitoring and Reporting Responsibilities

Responsibilities for monitoring and reporting emissions from the installation are listed below:

Job Title / Post	Responsibilities
Senior Mechanical Engineer	Collation and submission of year data to verifier, Submit verified emission report to EA, improvement reports, risk assessment's, Cpi /BSI verification process
Electrical Engineer	Submit data to CPI database
Environmental Health & Safety Manager	Site contact for Competent Authority
Engineering Manager	Meter readings

### Assignment of Responsibilities

Details of the procedure used for managing the assignment of responsibilities for monitoring and reporting within the installation and for managing the competencies of responsible personnel in accordance with Article 58(3)(c) of the MRR:

This procedure identifies how the monitoring and reporting responsibilities for the roles identified above are assigned and how training and reviews are undertaken.

Title of procedure	CCLA/EUETS Data Collection and Reporting
Reference for procedure	"EPR 31
Diagram reference	N/A
Brief description of procedure.	This Procedure ensures that all staff receive internal or external training appropriate to their roles and that training records are kept. Training needs for all personnel are assessed annually by a responsible person.
Post or department responsible for the procedure and for any data generated	Engineering Manager
Location where records are kept	S:\Environmental\CCLA-EU ETS\EU ETS Phase III
Name of IT system used	N/A (normal network drives)
List of EN or other standards applied	ISO14001:2004

### Monitoring Plan Appropriateness

Details of the procedure used for regular evaluation of the monitoring plan's appropriateness covering in particular any potential measures for the improvement of the monitoring methodology:

Title of procedure	CCLA/EUETS Data Collection and Reporting
Reference for procedure	"EPR 31
Diagram reference	N/A
Brief description of procedure.	This procedure ensures that internal audits and other forms of monitoring are carried out as a means of maintaining both the effectiveness of the health, safety and environment management system and compliance with our EPR and Greenhouse gas permits. Planned audit schedule, trained competent auditors complete the checklists for specific areas

	including Energy Management and EUETS procedures. One auditor nominated to take responsibility for progressing corrective or preventative actions. Details recorded on a non-compliance notice and entered into the non-compliance register. Audit Frequency reflects the importance of the topic and the outcome of previous audits.
Post or department responsible for the procedure and for any data generated	Environmental Health & Safety Manager
Location where records are kept	S:\Environmental\CCLA-EU ETS\EU ETS Phase III
Name of IT system used	N/A (normal network drives)
List of EN or other standards applied	ISO14001:2004

## Data Flow Activities

Details of the procedures used to manage data flow activities in accordance with Article 57 of the MRR:

Title of procedure	CCLA/EUETS Data Collection and Reporting
Reference for procedure	"EPR 31
Diagram reference	N/A
Brief description of procedure.	This procedure describes the actions to be taken to control and monitor energy consumption in the mill and to satisfy the requirements of our Climate Change Agreement, Greenhouse Gas Permit and EPR Permit. It includes actions to be taken in the event of gas meter or corrector failure.
Post or department responsible for the procedure and for any data generated	Senior Electrical & Senior Mechanical Engineers
Location where records are kept	S:\Environmental\CCLA-EU ETS\EU ETS Phase III
Name of IT system used	N/A (normal network drives)
List of EN or other standards applied	ISO14001:2004
List of primary data sources	Gas Meter its corrector, other meter data and invoices where appropriate
Description of the relevant processing steps for each specific data flow activity.  Identify each step in the data flow and include the formulas and data used to determine emissions from the primary data. Include details of any relevant electronic data processing and storage systems and other inputs (including manual inputs) and confirm how outputs of data flow activities are recorded	<p>"In order to comply with the monitoring and reporting requirements associated with CCLA/EUETS, Bridgend Mill utilise a data collection system developed for the Paper Federation. The system utilises Microsoft Access and requires the user to input data on a monthly basis to the database. The data is obtained from several different sources including the downloading of the Kenda database and is collated in a single excel spread-sheet, prior to input into the CPI Access database.</p> <p>Emissions will be calculated using the main High pressure fiscal gas supply meter into the site (owned by NGT) Plus the Low pressure fiscal gas meter into the site (owned by NGT). We will use national standard data for natural gas in this local delivery zone (LDZ). The uncertainty using this method resolves down to the meter accuracy and this is +/- 1% (see NGT advice).</p> <p>Following data input and error checking, a data file is created which must be downloaded and sent via email to the Paper Federation before the 10th day of the new month.</p> <p>Following receipt of the new data file the CPI will analyse the data and produce a file which includes CO2 emissions data which is emailed back to Stubbins Mill and must be uploaded into the database prior to the next download being created.</p>

	<p>The Monitoring and Measurement Matrix (EU ETS) details what data is reported and collected on a weekly/monthly basis and the related responsibilities.</p> <p>"</p>
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Documents relevant to the recording of data flow activities

Attachment	Description
N/A	N/A

### Assessing and Controlling Risks

Details of the procedures used to assess inherent risks and control risks in accordance with Article 58 of the MRR:

Title of procedure	CCLA/EUETS Data Collection and Reporting
Reference for procedure	"EPR 31
Diagram reference	N/A
Brief description of procedure.	Mill Procedure EPR 31 describes the actions to be taken to control and monitor energy consumption in the mill and to satisfy the requirements of our Climate Change Agreement , Greenhouse Gas Permit and EPR Permit. The risk of misstatement is minimised by a) Monthly meter readings allow errors to be picked up on subsequent readings.This also acts as a check on the correct functioning of the fiscal meter. b) Data being separately validated by the Management Consultant at CPI/TMC. c). The CPI/TMC active reporting programme prevents the inclusion of wrongly transcribed data. d) keeping the gas meter compound locked prevents unauthorised access to the gas meter and corrector and avoids disturbance and loss of data. e). Comparison of data against suppliers invoices is made but this economic validation and not primary data management.
Post or department responsible for the procedure and for any data generated	Senior Electrical & Senior Mechanical Engineers
Location where records are kept	S:\Environmental\CCLA-EU ETS\EU ETS Phase III
Name of IT system used	N/A (normal network drives)
List of EN or other standards applied	ISO14001:2004

### Quality Assurance of Metering / Measuring Equipment

Details of the procedures used to ensure quality assurance of measuring equipment in accordance with Article 58 and 59 of the MRR.

Title of procedure	CCLA/EUETS Data Collection and Reporting
Reference for procedure	"EPR 31
Diagram reference	N/A
Brief description of procedure.	The Procedure ensures compliance with our monitoring quality policy . It also ensures monitoring and measuring equipment is maintained and calibrated to preserve efficiency and accuracy. Each piece of equipment which requires calibration or regular maintenance is

	uniquely identified by serial number. Meters, where appropriate, are permanently connected to a telemetry link to the supplier and checked half hourly by the supplier. Gas meter(s) are serviced periodically by the supplier or NG/Transco. Actions in relation to gas meter or corrector failure are covered under EPR 31 EUETS Compliance and Reporting. This requires that the responsible person shall notify the EA of any failure without delay and the Energy Co-ordinator in conjunction with TMC/ CPI shall estimate the amount of gas used during the breakdown period by a method approved by the EA, Prompt action shall be taken to correct the failure.
Post or department responsible for the procedure and for any data generated	Electrical Engineer
Location where records are kept	S:\Environmental\CCLA-EU ETS\EU ETS Phase III
Name of IT system used	N/A (normal network drives)
List of EN or other standards applied	ISO14001:2004

### Quality Assurance of Information Technology used for Data Flow Activities

Details of the procedures used to ensure quality assurance of information technology used for data flow activities in accordance with Article 58 and 60 of the MRR:

Title of procedure	CCLA/EUETS Data Collection and Reporting
Reference for procedure	"EPR 31
Diagram reference	N/A
Brief description of procedure.	This Procedure ensures compliance with the company's Monitoring Quality Policy. It ensures computer equipment and IT systems are suitable and sufficient to meet the needs of the company and that maintenance and upgrading of both hardware and software takes place when necessary.
Post or department responsible for the procedure and for any data generated	Electrical Engineer
Location where records are kept	Records of equipment or software purchase are held at the mill and the company's head office. Information relating to CPI/TMC data handling and computer systems are held by CPI/TMC and its contractors.
Name of IT system used	N/A (normal network drives)
List of EN or other standards applied	ISO14001:2004

### Review and Validation of Data

Details of the procedures used to ensure regular internal reviews and validation of data in accordance with Articles 58 and 62 of the MRR.

Title of procedure	CCLA/EUETS Data Collection and Reporting
Reference for procedure	"EPR 31
Diagram reference	N/A
Brief description of procedure.	This Procedure describes the actions to be taken to control and monitor energy consumption and emissions in the mill and to satisfy the requirements of our Climate Change Agreement, Greenhouse Gas permit and EPR permit. Daily usage of both gas and electricity is included on the daily Production Costing and Efficiency Report which is evaluated by the management team at routine production meetings. Anomalies can be discussed earlier if necessary. Additionally comparison checks are made against supplier invoices and historic data is also available. Daily / Monthly meter readings use absolute readings rather than incremental consumption - a self checking procedure that avoids perpetuating problems associated with wrong readings. The CCA/EUETS data base is updated monthly and forwarded to TMC/CPI for separate validation. CPI /TMC responses advise on data management issues and automatically provide EU ETS data validation.
Post or department responsible for the procedure and for any data generated	Electrical Engineer
Location where records are kept	S:\Environmental\CCLA-EU ETS\EU ETS Phase III

Name of IT system used	N/A (normal network drives)
List of EN or other standards applied	ISO14001:2004

### Corrections and Corrective Actions

Details of the procedures used to handle corrections and corrective actions in accordance with Articles 58 and 63 of the MRR:

Title of procedure	CCLA/EUETS Data Collection and Reporting
Reference for procedure	"EPR 31
Diagram reference	N/A
Brief description of procedure.	Internal audit and other forms of monitoring are carried out as a means of maintaining both the effectiveness of the health,safety and environment management system and compliance with our EPR and Greenhouse Gas permits . Auditors seek evidence to demonstrate that the requirements of the HSE management system, EPR and Greenhouse Gas Permits are being fulfilled . Findings are recorded on Internal Audit Checklists. Non Compliances are entered on a non compliance notice and recorded in the non compliance catalogue. The non compliance notice contains information on the area under review , specific details on the non compliance and planned corrective action, including target date for completion, actual completion date and person responsible for action.Non- compliances are brought to the attention of the management team at the next daily production meeting and a full audit review report is provided for the Operations Manager on completion of the audit programme. Specifically in regard to gas meter or corrector failure enhanced meter readings help to capture break down periods and historical data acts as a reference.
Post or department responsible for the procedure and for any data generated	Enviromental Health & Safety Manager
Location where records are kept	S:\Environmental\CCLA-EU ETS\EU ETS Phase III
Name of IT system used	N/A (normal network drives)
List of EN or other standards applied	ISO14001:2004

### Control of Outsourced Activities

Details of the procedures used to control outsourced processes in accordance with Articles 59 and 64 of the MRR.

Title of procedure	CCLA/EUETS Data Collection and Reporting
Reference for procedure	"EPR 31
Diagram reference	N/A
Brief description of procedure.	<p>The Confederation of Paper Industries (CPI), through its wholly-owned subsidiary, The Paper Sector Climate Change Management Co Ltd (TMC), collects monthly energy data from all paper mills in the paper sector CCA and holds it on a web-based database (www.cpi-paper.co.uk). The database is used to produce reporting data for the purposes of CCA and EU ETS reporting.</p> <p>The data relationship between the two schemes is possible since the energy data required to be recorded for EU ETS purposes is generally a sub-set of that required for CCA purposes. Since 1 January 2013 CCA has required all non-trivial energy use at participating facilities to be recorded including that from renewables (although it should be noted that at the same time energy use covered by EU ETS was deemed to be non-reportable in CCA). Also, since 1 January 2013, the EU ETS scheme coverage has been enlarged in that trivial emissions sources are now included.</p> <p>The Database forms the basis for data collection, monthly checking and calculation/monitoring of EU ETS emissions for each and every mill obligated under EU ETS or the EU ETS Opt-Out for small emitters.</p>
Post or department responsible for the procedure and for any data generated	Electrical Engineer
Location where records are kept	web-based database (www.cpi-paper.co.uk)

Name of IT system used	web-based database (www.cpi-paper.co.uk)
List of EN or other standards applied	ISO 14001:2004

## Record Keeping and Documentation

Details of the procedures used to manage record keeping and documentation:

Title of procedure	CCLA/EUETS Data Collection and Reporting
Reference for procedure	"EPR 31
Diagram reference	N/A
Brief description of procedure.	Computerised records are held on the mill computer system which is backed up daily. Paper records are held in the Energy Management File . Master copies of HSE Procedures are held in the HSE Management System File which has a document location index at the front. Records are kept for 10 years.
Post or department responsible for the procedure and for any data generated	Electrical Engineer
Location where records are kept	S:\Environmental\CCLA-EU ETS\EU ETS Phase III
Name of IT system used	N/A (normal network drives)
List of EN or other standards applied	ISO14001:2004

## Risk Assessment

The results of a risk assessment that demonstrates that the control activities and procedures are commensurate with the risks identified:

Attachment	Description
risk assesment Monitoring Reporting procedure - Issue 6.pdf	risk assessment
risk assesment Monitoring Reporting procedure - Issue 9.docx	risk assessment recognising inclusion of outsourced activity

## Changes in Operation

Your permit conditions require you to notify the regulator of any planned or effective changes to the capacity, activity level or operation of the installation by 31 December in the year in which the change was planned or has occurred (or by different dates where significant capacity reductions or partial cessations have occurred).

The Regulations require you to provide a summary of the procedure ensuring that the operator regularly checks whether information regarding any planned or effective changes to the capacity, activity level and operation at the installation impacts on the free allocation of allowances and that the information is submitted to the regulator at the appropriate time.

Details of the procedure ensuring the above:

Title of procedure	CCLA/EUETS Data Collection and Reporting
Reference for procedure	"EPR 31
Diagram reference	N/A
Brief description of procedure.	This procedure sets out the requirements of management review. Meetings are held periodically and include consideration of the environmental effect (including legislative) of any major process change , expansion or development plans via completion of an environmental risk assessment form by the management team .
Post or department responsible for the procedure and for any data generated	Enviromental Health & safety Manager
Location where records are kept	S:\Environmental\CCLA-EU ETS\EU ETS Phase III
Name of IT system used	N/A (normal network drives)
List of EN or other standards applied	N/A

**Environmental Management System**

Standard to which the Environmental Management System is certified: ISO14001:2004

**END**

## Abbreviations

Abbreviations, acronyms or definitions referred to in the monitoring plan

Abbreviation	Definition
N/A	N/A