

**“Annex**

**PART 1**

**Questionnaire on the implementation of Directive 2003/87/EC**

**1. DETAILS OF INSTITUTION SUBMITTING THE REPORT**

1. Name of contact person: AFRODITI KOTIDOU
2. Official title of contact person: DEPUTY HEAD OF EMISSIONS TRADING BUREAU
3. Name and department of organisation: MINISTRY FOR THE ENVIRONMENT, ENERGY AND CLIMATE CHANGE-DIRECTION FOR THE CONTROL OF ATMOSPHERIC POLLUTION & NOISE-EMISSIONS TRADING BUREAU
4. Address: EPAVLIS KAZOULI, KIFISSIAS 241 st , 14561, KIFISSIA, ATHENS, GREECE
5. International telephone number: +302108089275  
International telefax number: +302108089239/+302108084707
7. E-mail: a.kotidou@ekpaa.minenv.gr

**2. COMPETENT AUTHORITIES**

*Questions 2.1 and 2.2 are to be answered in the report due by 30 June 2007 and in subsequent reports if changes were made during the reporting period.*

- 2.1. Please state the name and the abbreviation of the competent authorities which are involved in the implementation of the emissions trading scheme in your country.

*In answering this question, use the table below. Add further rows if necessary.*

**TABLE 2.1:**

Name	Abbreviation	Contact details
MINISTRY FOR THE ENVIRONMENT, ENERGY AND CLIMATE CHANGE*	YPEKA	
*please note that the only change occurred in the name of the Ministry. All other information pertaining to this table remain the same as last year.		

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- 2.2. Please indicate which competent authority is responsible for each of the tasks listed in the table below using their abbreviations.

**TABLE 2.2:**

Please indicate the abbreviation of the competent authority which is in charge of the following tasks:	
Issuance of permits	YPEKA / GEDE
Allocation of allowances	YPEKA / GEDE /INTER MINISTERIAL COMMITTEE
Issuance of allowances	YPEKA / GEDE
Validation of monitoring methodology	YPEKA / GEDE
Receiving and supervising verified emission reports	YPEKA / GEDE
Accreditation of verifiers	ESYD
Registry	EKPAA
Compliance and enforcement	YPEKA / GEDE
Issuance of ERU as a host country	YPEKA / GEDE
Approval of the use of CERs & ERUs for compliance	YPEKA / GEDE
Administration of new entrants reserve	YPEKA / GEDE
Information to the public	YPEKA / GEDE
Auctioning	NOT DECIDED YET
Administration of opt-ins	YPEKA / GEDE/INTER MINISTERIAL COMMITTEE
Administration of pooling	YPEKA / GEDE/INTER MINISTERIAL COMMITTEE
Other (please specify): _____	

### 3. COVERAGE OF ACTIVITIES AND INSTALLATIONS

- 3.1. How many of the combustion installations have a rated thermal input that exceeds 20 MW but is below 50 MW on 31 December of the reporting year? In total, how many CO<sub>2</sub> equivalents were emitted by these installations in the reporting period?

*In answering this question, use the table below.*

	Number	Share in total number of installations or emissions
Number of installations with a rated thermal input that exceeds 20 MW but is below 50 MW	6	

CO <sub>2</sub> equivalents emitted by those installations	133524	
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- 3.2. What changes occurred during the reporting period in comparison with the national allocation plan table (NAP table) as entered into the Community Independent Transaction Log on 1 January of the reporting year (new entrants, closures, installations falling below the capacity thresholds)?

*In answering this question, use Table 1 of Part 2 of this Annex.*

Information pertaining to this section can be found in table 1 of part 2 of this Annex.

- 3.3. Did the competent authority receive any application(s) during the reporting period from operators who wish to form a pool pursuant to Article 28 of Directive 2003/87/EC (ET Directive)? If yes, to which activity listed in Annex I to Directive 2003/87/EC (hereinafter - “Annex I activity”) did the application refer to and was the pool formed?

*In answering this question, use the table below.*

<b>Main Annex I activity <sup>(a)</sup></b>		<b>Number of applications received</b>	<b>Number of pools formed</b>
<b>Energy activities</b>			
E1	Combustion installations with a rated thermal input exceeding 20 MW (excepting hazardous or municipal waste installations)		
E2	Mineral oil refineries		
E3	Coke ovens		
<b>Production and processing of ferrous metals</b>			
F1	Metal ore (including sulphide ore) roasting or sintering installations		
F2	Installations for the production of pig iron or steel (primary or secondary fusion) including continuous casting, with a capacity exceeding 2.5 tonnes per hour		
<b>Mineral industry</b>			
M1	Installations for the production of cement clinker in rotary kilns with a production capacity exceeding 500 tonnes per day or lime in rotary kilns with a production capacity exceeding 50 tonnes per day or in other furnaces with a production capacity exceeding 50 tonnes per day		
M2	Installations for the manufacture of glass including glass fibre with a melting capacity exceeding 20 tonnes per day		
M3	Installations for the manufacture of ceramic products by firing, in particular roofing tiles, bricks, refractory bricks, tiles, stoneware or porcelain, with a production capacity exceeding 75 tonnes per day, and/or with a kiln capacity exceeding 4 m <sup>3</sup> and with a setting density per kiln exceeding 300 kg/m <sup>3</sup>		
<b>Other activities</b>			
Industrial plants for the production of			
O1	(a) pulp from timber or other fibrous materials		
O2	(b) paper and board with a production capacity exceeding 20 tonnes per day		
<sup>(a)</sup> If an installation carries out more than one activity, please only count the installation once under its main Annex I activity.			

No applications received during the reporting period from operators who wish to form a pool pursuant to Article 28.

- 3.4. Is there any other relevant information concerning the coverage of installations and activities in your country? If so, please specify.

#### 4. THE ISSUE OF PERMITS FOR INSTALLATIONS

*Questions 4.1 to 0 are to be answered in the report due by 30 June 2007 and in subsequent reports if changes were made during the reporting period.*

- 4.1. What measures have been taken to ensure that operators comply with the requirements of their greenhouse gas emissions permits?

*Note: Fines or penalties which might be imposed in case of infringements must not be reported here but under section 11.*

*In answering this question, use the table below. Add further rows if necessary.*

**TABLE 4.1: SAME, AS ANSWERED LAST YEAR**

Which of the following measures are applied in your country (add explanatory text if necessary)?	
The account will be blocked in case of irregularities	
Selling will be prohibited in case of irregularities	
Withdrawal of permit; suspension of the installation	
Spot or routine checks or inspections by the administration	
Conservative emission estimates in case of missing emission reports	
Verification bodies check compliance with the conditions of the permit	
Regular meetings with industry & associations to discuss relevant issues	
Provision of specific reporting formats and guidance	
Naming and shaming of non compliant operators	
Other (please specify): _____	

- 4.2. Where more than one competent authority is involved, how does national legislation ensure that the conditions of and the procedures for the issuance of permits are fully coordinated? How does this co-ordination work in practice?

*In answering this question, use the table below. Add further rows if necessary.*

**TABLE 4.2:**

Which of the following statements applies to your country (add explanatory text if necessary)?	
More than one competent authority	ONLY ONE C.A ; THE EMISSION PERMITS ARE ISSUED BY YPEKA / GEDE
If yes, please answer the following questions:	
Co-operation explicitly regulated by a law or a regulation	
Commission or working group or co-ordination with regular meetings established	
Guidance note for implementation of the national emissions trading law	
Interpretation group to clarify ambiguous issues	
Co-ordination of administrative acts by one central authority	
Training courses to ensure consistent implementation	
Other (please specify): _____	

- 4.3. In cases where installations carry out activities listed in Annex I to Directive 96/61/EC (IPPC Directive)<sup>1</sup> what measures have been taken to ensure that conditions and procedure for the issue of a greenhouse gas emissions permit are coordinated with those for the permit provided for in that Directive? Have the requirements laid down in Articles 5, 6 and 7 of Directive 2003/87/EC been integrated into the procedures provided for in Directive 96/61/EC? If so, how was this integration performed?

*In answering this question, use the table below. Add further rows if necessary.*

**TABLE 4.3: SAME, AS ANSWERED LAST YEAR**

Which of the following statements applies to your country (add explanatory text if necessary)?
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<sup>1</sup> OJ L 257, 10.10.1996, p. 26

Requirements laid down in Articles 5-7 of Directive 2003/87/EC have been transposed by national legislation	
Law which transposes the IPPC Directive does not include emission or concentration limits for CO <sub>2</sub>	
Integrated permitting procedure under the IPPC Directive and the ET Directive	
Separate permits for IPPC and ET Directive	
Granting of an IPPC permit requires a valid emissions trading scheme (ETS) permit	
Granting of an ETS permit requires a valid IPPC permit	
IPPC regulators will check whether ETS permit is necessary and inform ETS regulators	
Other (please specify): _____	

- 4.4. What are the legislative provisions, procedures and practice concerning updating of permit conditions by the competent authority pursuant to Article 7 of Directive 2003/87/EC?

*For answering this question, use the table below. Add further rows if necessary.*

**TABLE 4.4:**

Please refer to the legal provision which transposes Article 7 of Directive 2003/87/EC	
Which of the following provisions, procedures and practices apply to your country (add explanatory text if necessary)?	
Authorisation for changes in the installation type or operating mode required	YES – APPROVAL IS REQUIRED FROM THE AUTHORITIES THAT ISSUE THE OPERATION AND ENVIRONMENTAL PERMITS(YPEKA- PERIPHERAL OFFICES) – GEDE IS NOTIFIED
Authorisation for changes in the monitoring methodology required	
Changes have to be notified in advance	
Closures have to be notified immediately	
Penalty in case of non compliance with request to update monitoring methodology	
Change of the operator requires an update of permit	
Less significant changes are just recorded	
Other (please specify): _____	

- 4.5. How many permits were updated during the reporting period because of a change in the nature or functioning, or extension, of installations made by operators as specified in Article 7 of Directive 2003/87/EC? Please provide for each category (capacity increase, capacity decrease, change in process type, etc.) how many permits were updated.

*In answering this question, use the table below. Add further rows if necessary.*



Please state the number of changes in each category:	
<b>Total changes</b>	10
Revoked	
Surrendered	
Transferred	
Increase of capacity	8
Decrease of capacity	
Changes to monitoring and reporting details	
Change in name of installation or operator	1 ( IN ADDITION TO CAPACITY INCREASE)
Non-significant amendment	
Notification of changes without update of permit	1
Other (please specify): _____	

- 4.6. Is there any other relevant information concerning the issue of permits for installations in your country? If so, please specify.

## 5. APPLICATION OF THE MONITORING AND REPORTING GUIDELINES

*Question 5.1 is to be answered in the report due by 30 June 2007, the first report of each trading period and in subsequent reports if changes were made during the reporting period.*

- 5.1. What legal acts have been adopted in your country in order to implement monitoring and reporting guidelines? Are general derogations from the monitoring and reporting guidelines allowed by the legislation of your country, e.g. for specific fuels or activities? If so, please specify.

Community Decision 2007/589/EC is applied. In addition to the information reported last year, supplementary guidelines for the application of Decision 2007/589/EC were sent to the operators and verification bodies in the form of Ministerial circulars:

Circular no.100915 of February 9, 2009, “Basic guidelines for reporting and verification of CO<sub>2</sub> emissions that will be submitted in 2009”

Circular no.101761 of March 13, 2009 “Clarifications in the use of the oxidation factor for the 2009 emission verification process”

The operators were informed about the IMPEL ETSG Technical Guidance Note to be used as a tool in their uncertainty calculation methodology.

When an operator in determining a measurement instrument uncertainty uses a value that is given in the national legislation for this type of instrument, the operator has to submit to the C.A. proof that the instrument operates according to the provisions of the legislation.

When the volume of a solid fuel stored in an open storage pile is determined through topographical methods the uncertainty of this measurement is stated by the surveying engineer that performed the measurement.

The use of higher than tier 1 for the oxidation factor is allowed for the installations that use tier 3 for the estimation of the emission factor of their fuels, after the approval of the competent authority.

The installations are asked to include in their annual emission report a verified emission sources catalogue including back-up emission sources.

Any interruption in the operation of an installation has to be reported to the C.A. within fifteen days along with a re-operation plan.

The internal verification report has to be submitted also for clarification purposes.

All forms and support documents submitted to the C.A. as part of the of the verification documentation have to be signed and sealed for their authenticity.

- 5.2. Which tiers were used in the monitoring methodologies for the major emitting installations (cf. Commission Decision 2007/589/EC)?

*In answering this question, use Table 2 of Part 2 of this Annex. The information required in Table 2 need only be given for the largest installations covered by the ET Directive which contribute cumulatively to 50% of the total emissions included in the trading scheme. No information needs to be reported for sources within these installations with annual emissions below 25 kt CO<sub>2</sub> eq.*

Please see attached Table 2

- 5.3. If tiers below the minimum tiers specified in Table 1 in section 4.2.2.1.4 of Annex I to Decision 2007/589/EC have been accepted in the monitoring methodology, please indicate for each installation for which this situation occurred the coverage of emissions, the activity, the tier category (activity data, net calorific value, emission factor, oxidation factor or conversion factor) and the monitoring approach/tier agreed in the permit.

*In answering this question, use Table 3 of Part 2 of this Annex. The information required in Table 3 needs only be given for installations not reported under question 5.2. General derogations provided for in the national legislation must be reported under question 5.1.*

Please see attached Table 3

- 5.4. Which installations temporarily applied different tier methods than those agreed with the competent authority?

*In answering this question, use Table 4 of Part 2 of this Annex.*

- 5.5. In how many installations was continuous emissions measurement applied? Please indicate the number of installations per Annex I activity and within each activity per

subcategory based on reported annual emissions (less than 50 kt, 50-500 kt and over 500 kt).

*In answering this question, use Table 5 of Part 2 of this Annex.*

There are no installations that apply continuous emissions measurement

- 5.6. How much CO<sub>2</sub> was transferred from installations? Please indicate the number of tonnes of CO<sub>2</sub> transferred pursuant to section 4.2.2.1.2 of Annex I to Decision 2004/156/EC and the number of installations that transferred CO<sub>2</sub> for each activity listed in Annex I to Directive 2003/87/EC.

*In answering this question, use the table below.*

Main Annex I activity	Number of installations	CO <sub>2</sub> transferred [kt CO <sub>2</sub> ]	Use of transferred CO <sub>2</sub>
E1			
E2			
E3			
F1			
F2			
M1			
M2			
M3			
O1			
O2			

- 5.7. How much biomass was combusted or employed in processes? Please indicate the quantity of biomass as defined in paragraph 2(d) of Annex I to Decision 2004/156/EC combusted (TJ) or employed (t or m<sup>3</sup>) for each activity listed in Annex I to Directive 2003/87/EC.

*In answering this question, use the table below.*

Main Annex I activity	Biomass combusted [TJ]	Biomass employed [t]	Biomass employed [m <sup>3</sup> ]
E1			
E2			
E3			
F1			
F2			
M1		43437	
M2			

M3		6068	
O1			
O2			79015

- 5.8. What was the total quantity of waste used as fuel or input material per waste type?  
What was the total quantity of resulting CO<sub>2</sub> emissions per waste type?

*In answering this question, use the table below. Add further rows if necessary.*

Waste type (2)	Quantity used/deployed (m3)	Quantity used/deployed (t)	CO2 Emissions (t CO2)
160103		5420,3	12843
0501		1006,3	1541
1301		549,0	491
191208		282,4	731
Total		7258,0	15606

- 5.9. Please submit sample monitoring and reporting documents from some temporarily excluded installations, if applicable.

*Question 5.10 is to be answered in the report due by 30 June 2007 and in subsequent reports if changes were made during the reporting period:*

There are no installations temporarily excluded

- 5.10. What measures have been taken to coordinate reporting requirements with any existing reporting requirements in order to minimise the reporting burden on businesses?

*In answering this question, use the table below. Add further rows if necessary.*

**TABLE 5.10: SAME AS ANSWERED LAST YEAR**

Which of the following statements applies to your country (add explanatory text if necessary)?	
ETS reporting requirements are coordinated with other reporting requirements	
Coordination with greenhouse gas inventory compilation under UNFCCC <sup>2</sup> and Decision 280/2004/EC	
Coordination with EPER <sup>3</sup>	
Coordination with IPPC	
Coordination with NEC <sup>4</sup>	
Coordination with LCP <sup>5</sup>	
Coordination with EMEP <sup>6</sup>	
Coordination with voluntary covenants	
Coordination with other trading schemes (please specify)	
ET data can be used by statistical office	
Other (please specify): _____	

5.11. What procedures or measures have been implemented to improve monitoring and reporting by operators?

In order to improve monitoring and reporting by operators, after the verified reports were examined by the Competent Authority (CA), a letter was sent to specific installations including one or more of the following:

- information on corrections made on the verified report such as change of emissions due to mathematical errors, use of wrong emission factor, etc
- request for data by a specific deadline that had been asked for by the CA and have not been included such as the table with the installation emission sources
- request to inform the CA by a specific deadline on the improvement actions that are/will be implemented for certain essential issues indicated by the verifier in the verification report
- request to inform the CA by a specific deadline on the reasoning if the installation declared zero emissions for one or more years, or if it seized its operation for a specific period during the reporting year

<sup>2</sup> United Nations Framework Convention on Climate Change

<sup>3</sup> European Pollutant Emission Register (Commission Decision 2000/479/EC of 17 July 2000), OJ L 192, 28.7.2000, p. 36

<sup>4</sup> National Emissions Ceilings (Directive 2001/81/EC), OJ L 309, 27.11.2001, p. 22

<sup>5</sup> Large Combustion Plants (Directive 2001/80/EC), OJ L 309, 27.11.2001, p. 1

<sup>6</sup> Co-operative Programme for Monitoring and Evaluation of the Long-range Transmission of Air pollutants in Europe

- 5.12. Is there any other relevant information concerning the application of the monitoring and reporting guidelines in your country? If so, please specify.

**6. ARRANGEMENTS FOR VERIFICATION**

*Question 6.1 is to be answered in the report due by 30 June 2007 and in subsequent reports if changes were made during the reporting period.*

- 6.1. Please describe the framework for verification of emissions, in particular the role of the competent authorities and other verifiers and any special requirements for verifiers already accredited in another country. Please submit documents setting out the accreditation criteria for verifiers as well as any verification guidance provided for accredited verifiers and documents setting out the mechanisms for supervision and quality assurance for verifiers, if available.

*In answering this question, use the table below. Add further rows if necessary.*

**TABLE 6.1: No change has occurred in 2009**

Which of the following statements apply to your country (add explanatory text if necessary)?	
Independent verifiers can be accredited according to national criteria  (if so, please provide relevant documents or internet link)	
National guidance for verification developed  (if so, please provide relevant documents or internet link)	
Are national rules and procedures for verification based upon EN45011 and EA-6/01 <sup>7</sup>	
Verifiers are required to recommend improvements to installation's monitoring	
Competent authority or other agency has a right to check verified emission reports	
Competent authority or other agency has a right to adjust the verified emission report if deemed unsatisfactory	
Competent authority or other agency supervises verifiers (including spot checks, training, quality assurance and quality control procedures)	
Competent authority has a right to appoint a verifier to an installation	
Verifiers accredited in another Member State are subject to another accreditation process	
Knowledge of language and/or national laws/regulations required for verifiers accredited in another Member State	
Special QA/QC procedures in place at CA for verifiers accredited in another Member State	
Other (please specify): _____	

- 6.2. Did any operator provide an emission report for the reporting period not considered satisfactory by 31 March? If so, please provide a list of the installations concerned and the reasons why no positive verification statement was given.

*In answering this question, use Table 6 of Part 2 of this Annex. Cases where operators did not provide any emission report must be reported under question 6.3.*

No such case occurred.

- 6.3. For how many installations were no emission reports for the reporting period provided by 31 March? Please indicate the number of installations, allocated allowances

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<sup>7</sup> European Co-operation for Accreditation's (EA) Guidance on the application of EN 45011.

and allowances blocked in the operators' holding accounts per Annex I activity and within each activity per subcategory based on reported annual emissions (less than 50 kt, 50-500 kt and over 500 kt).

*In answering this question, use Table 7 of Part 2 of this Annex.*

No such case occurred.

- 6.4. Which measures were undertaken in cases where operators did not provide an emission report by 31 March of the reporting period?

No such case occurred.

- 6.5. Did the competent authority carry out any independent checks on verified reports? If yes, please describe how additional checks were undertaken and/or how many reports were checked.

No such procedure took place.

- 6.6. Did the competent authority instruct the registry administrator to correct the annual verified emissions for the previous year for any installation(s) to ensure compliance with the detailed requirements established by the Member State pursuant to Annex V to Directive 2003/87/EC?

*Indicate any corrections in Table 6 of Part 2.*

The competent authority requested the registry administrator to correct the annual verified emissions for 35 installations. The wrong estimations were caused mainly due to the use of incorrect EF for the CO<sub>2</sub> emissions estimation from the combustion of different fuels. The main difference was observed in case of Pet Coke where some installations used the default value from the last national inventory instead of the country specific one which was estimated through laboratory analysis from the main combustion installations in Hellas (Greece). Some minimal changes were caused due to mathematical errors as well.

- 6.7. Is there any other relevant information concerning the arrangements for verification in your country? If so, please specify.

## **7. OPERATION OF REGISTRIES**

*Question 7.1 is to be answered in the report due by 30 June 2007 and in subsequent reports if changes were made during the reporting period:*

- 7.1. Please provide any terms and conditions required to be signed by account holders and provide a description of the identity check of persons undertaken before creating holding accounts (cf. Commission Regulation (EC) No 2216/2004).

*In answering this question, use the table below.*

**TABLE 7.1:**



Please provide the link to your registry	<a href="https://registry.ekpaa.gr/crwebekpaaproductio/startApp.do">https://registry.ekpaa.gr/crwebekpaaproductio/startApp.do</a>
Which of the following statements apply to your country (add explanatory text if necessary)?	
Specific terms and conditions elaborated which account holders have to sign  (if yes, please provide relevant documents or links)	No
Different identity checks applied for operators and individuals	Yes . There are differences in requirements for proving identity for operator and person holding accounts. Requirements for opening person holding accounts are stricter than for operator holding accounts and include an official certified copy of a valid passport or valid identity card.
Personal presence required for ID checks for residents in Member State <sup>8</sup>	Operator holding accounts: No. Authorized representatives have to submit copies of a valid ID card through written procedure. Person Holding Accounts: Yes. All applicants for person holding accounts have to provide an official certified copy of a valid passport or valid identity card, official appointment of representatives and official certified document for the legal operation .
ID check through written procedure only for residents <sup>9</sup>	Operator holding accounts: Yes. Authorized representatives have to submit copies of a valid ID card. Person Holding Accounts: Yes. All applicants for person holding accounts have to provide an official certified copy of a valid passport or valid identity card, certified documents for the appointment of representatives and official certified document for the legal operation of the company .
Personal presence required for ID checks for residents of other countries <sup>10</sup>	Person Holding Accounts: All applicants for person holding accounts have to provide an official certified copy of a valid passport or valid identity card, certified documents for the appointment of representatives and official certified document for the legal operation of the company .
ID check through written procedure only for residents in other countries <sup>11</sup>	Person holding accounts: No, applicants for person holding accounts have to provide the Registry Service Office with a notarially or judicially certified copy of a valid passport or valid identity card.
Copy of company register or similar	Operator holding accounts: Yes. In order to open an opera-

<sup>8</sup> This includes ID checks by third parties like post offices or notary where the applicant has to present himself in person.

<sup>9</sup> This includes electronic procedures.

<sup>10</sup> This includes ID checks by third parties like embassies where the applicant has to present himself in person.

<sup>11</sup> This includes electronic procedures.

documentation required for opening of operator holding account?	tor holding account operators have to fill out a form, which requires them to state their number in the company register. Person holding accounts: An excerpt of the company register or tax office has to be submitted.
Documentation showing right to represent company required for opening of operator holding account?	Yes.
Other (please specify): _____	

- 7.2. Please provide a summary of all security alerts relevant to the national registry which have occurred during the reporting period, how they were addressed and the time taken for resolution.

*In answering this question, use the table below. Add further rows if necessary.*

**TABLE 7.2:**

Which of the following statements apply to your country (add explanatory text if necessary)?			
General procedures in place to prevent occurrence of security alerts		<p>Yes</p> <p>The following security measures have been taken in order to prevent the occurrence of security alerts in the registry system:</p> <ul style="list-style-type: none"> <li>• Encoding of data transmission in the WEB and user authentication with SSL</li> <li>• Continuous security updates of the software</li> <li>• Employment of continuously updated virus-scanner software on the servers and the clients of the registry administration</li> <li>• Hardware firewalls of renowned producers</li> <li>• Continuous checks of the firewall logs for attack attempts. If such attempts are logged the issue is investigated and additional preventive measures are taken (e.g. blocking of certain IP addresses)</li> <li>• All attempts to access the system are logged. The logs can be analysed according to users, time and access type.</li> <li>• Daily incremental and weekly total backup</li> <li>• The backup hardware is located separately from the computer hardware</li> <li>• Access to the data bank is logged and the logs are stored in separate hardware</li> <li>• If the database has been corrupted due to a hardware or software failure, the system and the data are recovered from the latest backup tape and a reconstruction of the transactions carried out after the backup is carried out with the help of the access log.</li> </ul>	
Security alerts relevant to national registries occurred during the reporting period		No	
If yes, please fill out the following table			
Type of security alert	Number of occurrences	Action taken	Time needed for resolution

7.3. Please state how many minutes for each month of the reporting period the national registry was unavailable to its users (a) due to scheduled downtime, and (b) due to unforeseen problems.

*In answering this question, use the table below.*

Month	Scheduled downtime [minutes]	Unscheduled downtime [minutes]
January	–	–
February	–	–
March	–	–
April	–	–
May	–	–
June	–	–
July	–	–
August	–	–
September	–	–
October	–	–
November	–	–
December	–	–

- 7.4. Please list and provide details on each upgrade to the national registry scheduled for the next reporting period.

*In answering this question, use the table below. Add further rows if necessary.*

Which of the following statements apply to your country (add explanatory text if necessary)?	
Regular time slots allocated for maintenance and upgrading of registry (if so, please provide dates)	No
Registry will be upgraded together with upgrade of software system used	Yes
Please provide details for all upgrades scheduled for the next reporting period	
<b>Date</b>	<b>Purpose</b>

- 7.5. Is there any other relevant information concerning the operation of registries in your country? If so, please specify.

No

**8. ARRANGEMENTS FOR THE ALLOCATION OF ALLOWANCES – NEW ENTRANTS – CLOSURES**

*Questions 8.1 and 8.2 are to be answered in the first report after each notification and allocation procedure laid down in Articles 9 and 11 of Directive 2003/87/EC.*

8.1. Looking back at the completed allocation process, please describe the main lessons learnt by your authorities, and how you think they will influence your approach to the next allocation process.

8.2. Do you have any suggestions for the improvement of future notification and allocation processes for the Community as a whole?

A unified approach on how additional allowances will be granted to existing installations due to expansions should be adopted and agreed.

8.3. How many allowances were allocated to the new entrants listed in Table 1, if any? Please give the installation identification code for the new entrant and the transaction identification code associated with the allocation of allowances.

Information pertaining to this section can be found in table 1 Part 2

8.4. How many allowances were left in any new entrants reserve at the end of the reporting period, and what share do they represent of the original reserve?

*In answering this question, use the table below.*

Number of allowances left in the new entrants reserve at the end of the reporting period (31 December each year)	<b>31/12/2009</b> <b>26.060.084</b>
Share of allowances remaining in the new entrants reserve, in percent	<b>99,8% *</b>

\* this figure does not include allowances that are in the process of being allocated to new entrants 2009 as explained in Table 1 Part 2

8.5. If your Member State allocates allowances other than for free, please explain how such allocation is made (e.g. way in which auctioning is undertaken)?

All allowances were granted for free.

8.6. If auctioning was used as an allocation method, who was allowed to participate in the auction?

*In answering this question, use the table below.*

National operators only	Yes/No
National registry account holders only	Yes/No
All Community operators	Yes/No

All bidders with an account in a Community registry	Yes/No
Other (please specify): _____	

- 8.7. If auctioning was used as an allocation method, how many auctions were held during the reporting period, how many allowances were auctioned during each auction, what share do they represent of the total quantity of allowances for the trading period and what was the price per allowance at each auction?

*In answering this question, use the table below.*

Was auctioning used as an allocation method?	yes/no
If yes, please answer the following questions.	
Number of auctions held during the reporting period (1 January to 31 December)	
Number of allowances auctioned (each auction separately)	
Clearing price of auction (each auction separately)	

- 8.8. If auctioning was used as an allocation method, what use was made of allowances not purchased at the auction(s)?
- 8.9. If auctioning was used as an allocation method, what were the revenues used for?
- 8.10. How were allowances treated that had been allocated but were not issued to installations that closed during the reporting period?

No installation ceased operation in 2009.

*Question 8.11 is to be answered in the first report following the end of the trading periods set out in Article 11(1) and (2) of Directive 2003/87/EC.*

- 8.11. Were allowances remaining in the new entrants' reserve at the end of the trading period cancelled or auctioned?
- 8.12. Is there any other relevant information concerning the arrangements for allocation, new entrants and closures in your country? If so, please specify.

## **9. SURRENDER OF ALLOWANCES BY OPERATORS**

- 9.1. In all cases where an account in the registry was closed because there was no reasonable prospect of further allowances being surrendered by the installation's operator, please describe why there was no reasonable further prospect and state the amount of outstanding allowances.<sup>12</sup>

*In answering this question, use the table below. Add further rows if necessary.*

<sup>12</sup> If the amount of outstanding allowances is not known please provide an estimate of outstanding allowances based on the last verified emission report, remaining allowances in the account and other information available to the Competent Authority.

Reason for closure of account	Quantity of outstanding allowances [kt CO <sub>2</sub> eq]

No installation account in the registry was closed, because of not surrenderring allowances.

- 9.2. Is there any other relevant information concerning the surrender of allowances by operators in your country? If so, please specify.

No

## 10. USE OF EMISSION REDUCTION UNITS (ERUs) AND CERTIFIED EMISSION REDUCTIONS (CERs) IN THE COMMUNITY SCHEME

*Question 10.1 is to be answered annually starting with the report submitted in 2006 as regards CERs and starting with the report submitted in 2009 as regards ERUs:*

- 10.1. Have ERUs and CERs been issued for which an equal number of allowances had to be cancelled pursuant to Article 11(b)(3) or (4) of Directive 2003/87/EC because the Joint Implementation (JI) or Clean Development Mechanism (CDM) project activities reduce or limit directly or indirectly the emission level of installations falling under the scope of that Directive? If so, please provide the sum of allowances cancelled and the total number of operators concerned separately for cancellation pursuant to Article 11(b)(3) and (4) of that Directive.

No

*In answering this question, use the table below.*

	Quantity of allowances cancelled	Number of operators affected
cancellation pursuant to Article 11(b)(3)		
cancellation pursuant to Article 11(b)(4)		

*Questions 10.2 and 10.3 are to be answered in the report due by 30 June 2007 and in subsequent reports if changes were made during the reporting period:*

- 10.2. Which CERs and ERUs may be used for compliance in your Member State? Please state any project category excluded except those which are already excluded pursuant to Article 11(a)(3) of Directive 2003/87/EC (CERs and ERUs from nuclear or from land use, land use change and forestry project activities).

*In answering this question, use the table below.*

**TABLE 10.2: SAME, AS ANSWERED LAST YEAR**

CERs and ERUs from all project categories can be used	
CERs and ERUs from certain project categories are excluded (if yes, please specify)	

- 10.3. What measures have been taken to ensure that relevant international criteria and guidelines, including those contained in the year 2000 Final Report of the World Commission on Dams (WCD), will be respected during the development of hydro-electric power production projects with a generating capacity exceeding 20MW?

*In answering this question, use the table below. Add further rows if necessary.*

Which of the following statements apply to your country (add explanatory text as necessary):	
Project participants are legally obliged to adhere to the WCD guidelines	Yes
Adherence to WCD guidelines is verified (if so, please provide relevant authority, e.g. competent authority or Designated National Authority)	Yes YPEKA/GEDE
Other international criteria and guidelines have to be respected during the development of large hydro-electric power projects (if so, please provide relevant documents or links)	At the CCC meeting of 29-1-09, Greece agreed to a harmonisation process in applying Article 11b(6) and will use the Guidelines and Compliance Report in the future
Other (please specify): _____	

- 10.4. Is there any other relevant information concerning the use of ERUs and CERs in the Community scheme in your country? If so, please specify.

**SAME AS ANSWERED LAST YEAR.**

## **11. FEES AND CHARGES**

*Questions 11.1 to 11.4 are only to be answered in the report due by 30 June 2007 and in subsequent reports if changes were made during the reporting period:*

**QUESTIONS 11.1 TO 11.4: SAME, AS ANSWERED LAST YEAR**

- 11.1. Are fees charged to operators for the issuance and update of permits? If so, please provide details on the fees charged, total proceeds and the use of the proceeds.
- 11.2. What fees are charged to operators for the issuance of allowances? If so, please provide details on the fees charged, total proceeds and the use of the proceeds.



- 11.3. What fees are charged for the use of the registry if any? Please give details.

*In answering this question, use the table below?*

Which of the following statements apply to your country (add explanatory text as necessary)?	
Fees are charged for the use of the registry	
Different fees in place for operators and individuals	
Fee for opening an account <sup>13</sup>	
Annual fee for maintaining account <sup>14</sup>	
Other (please specify): _____	

- 11.4. Is there any other relevant information concerning fees and charges in the Community scheme in your country? If so, please specify.

## 12. ISSUES RELATED TO COMPLIANCE WITH THE ET DIRECTIVE

*Question 12.1 is to be answered in the report due by 30 June 2007 and in subsequent reports if changes were made during the reporting period:*

- 12.1. Please state the relevant national provisions and the penalties for infringements of national provisions pursuant to Article 16(1) of the ET Directive.

*In answering this question, use the table below. Add further rows if necessary.*

**TABLE 12.1: SAME, AS ANSWERED LAST YEAR**

Kind of infringement	Relevant national provision	Fines [€]		Imprisonment [months]	
		min	max	min	max
Operation without permit					
Infringements of monitoring and reporting obligations					
Omission to notify changes to the installation					
Other (please specify)					

<sup>13</sup> Indicate the relevant period as well (once/per trading period).

<sup>14</sup> If fees depend on allocation please provide minimum and maximum fees if applicable and the relevant formula.

- 12.2. Where penalties were imposed pursuant to Article 16(1) of the ET Directive for infringements of national provisions, please state the relevant national provisions, briefly describe the infringement and give the penalties imposed.

*In answering this question, use the table below. Add further rows if necessary.*

Infringement	National provision	Penalty imposed	
		Fines [€]	Imprisonment [months]

- 12.3. Please provide the names of operators for which excess emission penalties were imposed pursuant to Article 16(3) of the ET Directive.

*In answering this question, it is sufficient to provide a reference to the publication of the names under Article 16(2) of the ET Directive.*

Such case did not exist.

- 12.4. Is there any other relevant information related to compliance with the ET Directive in your country? If so, please specify.

### **13. THE LEGAL NATURE OF ALLOWANCES AND FISCAL TREATMENT**

*Questions 13.1 to 13.8 are only to be answered in the report due by 30 June 2007 and in subsequent reports if changes were made during the reporting period:*

**QUESTIONS 13.1 TO 13.8: SAME AS ANSWERED LAST YEAR**

- 13.1. What is the legal nature of an allowance (commodity/financial instrument) for the purpose of financial regulation?

- 13.2. What is the legal status given to allowances and emissions for the purposes of accounting?
- 13.3. Were any specific accounting rules established or adopted for allowances? If yes, please describe them briefly.
- 13.4. Are transactions of allowances subject to VAT?
- 13.5. Is the issuance of allowances subject to VAT?
- 13.6. If your Member State allocates allowances for payment, is VAT due on the transaction?
- 13.7. Are profits or losses from transactions of allowances subject to a specific income tax (e.g. specific tariffs)?
- 13.8. Is there any other relevant information concerning the legal nature of allowances and their fiscal treatment in your country? If so, please specify.

**14. ACCESS TO INFORMATION PURSUANT TO ARTICLE 17 OF THE ET DIRECTIVE**

- 14.1. Where are decisions relating to the allocation of allowances, information on project activities in which a Member State participates or authorises private or public entities to participate, and reports of emissions required under the greenhouse gas emissions permit and held by the competent authority made available to the public?

*In answering this question, use the table below:*

Type of information	Information available to public	If information is available, at which location?		
		Internet <sup>15</sup>	Official Publication <sup>16</sup>	Other (please specify)
Allocation rules	Yes	<a href="http://www.ypeka.gr">www.ypeka.gr</a>	KYA 52115/2970/E103/2008/(FEK 2575 B). Approval of National Allocation Plan for Green House Gases Emission Allowances (ESKDE) for the period 2008-20012.	
NAP table	Yes	<a href="http://www.ypeka.gr">www.ypeka.gr</a>	KYA 52115/2970/E103/2008/(FEK 2575 B). Approval of National Allocation Plan for Green House Gases Emission Allowances (ESKDE) for the period 2008-20012.	
Changes to list of installations	Yes/ upon request only			
Verified emission reports	upon request only			
Project activities	Yes			
Greenhouse gas emissions permit	Yes/ upon request only			
Information required by Annex XVI to Regulation (EC) No 2216/2004	Yes/ upon request only			
Other (please specify): _____				

14.2. Is there any other relevant information concerning the access to information pursuant to Article 17 of the ET Directive in your country? If so, please specify.

## 15. OTHER OBSERVATIONS

15.1. Were public studies on the implementation and the further development of the European emissions trading scheme undertaken in your country? If so, please provide the document, reference or internet link together with a very brief outline of the study.

15.2. Are there any particular implementation issues that give rise to concerns in your country? If so, please specify.

<sup>15</sup> Please provide web address.

<sup>16</sup> Please provide the title.

**PART 2**

**Table 1: Changes to list of installations**

Member State: EL

Reporting period: 2009

A		B	C	D	E	F	G	H	I	J
Installation		Operator		Main Annex I activity <sup>(a)</sup>	Other Annex I activities <sup>(a)</sup>	Main non-Annex I activity <sup>(b)</sup>	Change compared with installations included in NAP <sup>(c)</sup>	Allowances allocated or issued <sup>(d)</sup>		Transaction identification code <sup>(e)</sup>
Permit ID Code	Installation ID Code	Name						Quantity	Year(s)	
	GR-176	THERMIE SERRES S.A.		E2			NEW ENTRANT	33005	2009	
	GR-97	SOVEL S.A.		F2			NEW ENTRANT	13166*	2009	
	GR-102	PRINTZIS, D., BROS S.A.		M3			NEW ENTRANT	4360*	2009	
	GR-179	NORTHERN GREECE BRICK AND TILE INDUSTRY S.A. –K.E.B.E. S.A.		M3			NEW ENTRANT	59680	2009	
	GR-31	DEH S.A. APP CHIOS		E1			NEW ENTRANT	**		
	GR-35	DEH S.A. APP MIKONOS		E1			NEW ENTRANT	**		
	GR-39	DEH S.A. APP MILOS		E1			NEW ENTRANT	**		
	GR-28	DEH S.A. APP SYROS		E1			NEW ENTRANT	**		
	GR-27	DEH S.A. APP LESVOS		E1			NEW ENTRANT	**		
	GR-46	DEH S.A. TPS ATH-ERINOLAKOS		E1			NEW ENTRANT	**		

(\*) IN ADDITION TO NAP (\*\*) PERMIT UPDATED IN 2009 –ALLOWANCES IN THE PROCESS TO BE ALLOCATED IN 2010

EN

EN

**Table 2: Monitoring methods applied (only for installations contributing cumulatively to 50% of the total emissions included in the trading scheme. No information needs to be reported for sources within these installations with annual emissions below 25 kt CO<sub>2</sub> eq.)**

Member State: GREECE

Reporting Period: 2009

Installation				Emission source			Tier chosen <sup>(e)</sup>				Values				
Per. ID code	Installation ID code	Main Annex I activity <sup>(a)</sup>	Total annual emissions <sup>(b)</sup>	Annex I activity <sup>(c)</sup>	Fuel or activity type <sup>(d)</sup>	Related emissions <sup>(b)</sup>	Activity data	Emission factor	Net calorific value	Oxid. factor	Emission factor		Net calorific value		Oxidation factor
t CO <sub>2</sub>				t CO <sub>2</sub>			Tier	Tier	Tier	Tier	Value	Unit <sup>(f)</sup>	Value	Unit <sup>(g)</sup>	%
GR 15	E 1	12.919.320		E 1	Lignite	12.905.029	3	2a**	2a**	*	122,00	t/Tj	5,297	Tj/Kt	*
					Diesel	14.291	***	2a**	2a**	*	73,33	t/Tj	43,00	Tj/Kt	*
					Lignite/coal	9.628.340	3	2a**	2a**	*	121,25	t/Tj	5,408	Tj/Kt	*
					Diesel	17.715	***	2a**	2a**	*	73,33	t/Tj	43,00	Tj/Kt	*
					Lignite	4.992.670	3	2a**	2a**	*	122,00	t/Tj	5,297	Tj/Kt	*
					Diesel	35.145	4	2a**	2a**	*	73,33	t/Tj	43,00	Tj/Kt	*
					Lignite	4.411.515	3	3	3	2	130,66	t/Tj	4,333	Tj/Kt	98
					Diesel	34.724	1****	2a**	2a**	*	73,33	t/Tj	43,00	Tj/Kt	*
					De-SO <sub>2</sub>	15.512	***	1	n.a	n.a.	0,44	t/t	n.a.	n.a.	n.a.

\*Included in the emission factor \*\* lower tier approved by the competent authority .Use of accredited ( EN ISO 17025) laboratories after 18.12..2009

\*\*\*lower tier-de minimis source stream

\*\*\*\* lower tier- minor source stream

<sup>(a)</sup> The same installation can carry out activities falling under different subheadings. The main Annex I activity should be indicated. Please use the codes for Annex I activities listed in the Table to question. <sup>(b)</sup> Verified emissions if available, otherwise emissions as reported by the operator. <sup>(c)</sup> The same installation can carry out activities falling under different subheadings. For each fuel or activity type the Annex I activity should be indicated. Please use the codes for Annex I activities listed in Table 1. <sup>(d)</sup> Hard coal, natural gas, steel, lime, etc. Please use a separate line for each fuel or activity if more than one fuel or activity is carried out in the same installation. <sup>(e)</sup> Only to be filled out if emissions are calculated. <sup>(f)</sup> kg CO<sub>2</sub>/kWh, t CO<sub>2</sub>/kg, etc. <sup>(g)</sup> kJ/kg, kJ/m<sup>3</sup>, etc.

**Table 3: Monitoring methods applied for installations for which it has not been feasible to use the minimum tiers specified in Table 1 of Section 4.2.2.1.4 of Decision 2004/156/EC**

Member State: GREECE

Reporting Period: 2009

A	B	C	D	E	F	G	H	I
Per. ID code	Installation ID code	Annex I activity (a)	Total annual emissions t CO <sub>2</sub>	Affected monitoring parameter (b)	Minimum tier according to MRG Tier	Tier applied Tier	Reason for lower tier (c)	Lower tier permitted until (d) Month/year
	GR 86	E 1	1.402.132	AD (fuel gas) AD (LPG, diesel) AD (flare)	4 4 3	3 2* No tier estimation method	Technical /Economical	31-12-09
	GR 88	E 1	1.976.541	EF (flare) EF ( H <sub>2</sub> production/naptha)	3 2	2b 1	»	»
				EF (H <sub>2</sub> production/naptha) AD (H <sub>2</sub> production/naptha)	2 2	1 1	»	»
	GR 89	E 1	218.878	AD (fuel oil,LPG) AD (fuel gas)	3 3	2 2		
	Six electricity production installations that consume lignite	E 1		NCV EF	3 3	2a** 2a**	»	18-12-09

\* Minor source

\*\* Use of accredited laboratory ( EN ISO 17025) after 18-12-2009

(a) The same installation can carry out activities falling under different subheadings. The main activity should be indicated. Please use the codes for Annex I activities listed in the Table to question. (b) Please use the following notation keys: activity data (AD), net calorific value (NCV), emission factor (EF), composition data (CD), oxidation factor (OF), conversion factor (CF). If several values in an installation are affected, fill out one row per value. (c) Please use the following notation keys: technically not feasible, unreasonable high costs, other (please specify). (d) If the lower tier is permitted for a limited time only, please provide the date. Otherwise leave empty.



Table 4: Temporary change of monitoring method

Member State:

Reporting year:

A	B	C	D	E	F	G	H	I	J
Installation		Annex I Activity <sup>(a)</sup>	Total annual emissions	Affected monitoring parameter <sup>(b)</sup>	Original method approved	Temporary method applied	Reason for temporary change <sup>(c)</sup>	Period of temporary suspension until restoration of appropriate tier method	
Permit ID Code	Installation ID Code		t CO <sub>2</sub>		Tier	Tier		Beginning	End
								Month/year	month/year
<sup>(a)</sup> The same installation can carry out activities falling under different subheadings. The main activity should be indicated. Please use the codes for Annex I activities listed in the Table to question 3.3. <sup>(b)</sup> Please use the following notation keys: Activity Data (AD), Net Calorific Value (NCV), Emission Factor (EF), Composition Data (CD), Oxidation Factor (OF), Conversion Factor (CF); if several values in an installation are affected, fill out one row per value. <sup>(c)</sup> Please use the following notation keys: Failure in measurement devices (FMD), temporary lack of data (TLD), changes in installation, fuel type etc. (CIF), other (please specify).									

**Table 5: Number of installations applying continuous emission measurement**

Member State: **EL**

Reporting year: **2009**

<b>A</b>  <b>Main Annex I activity <sup>(a)</sup></b>	<b>B</b>  <b>&lt; 50,000 t CO<sub>2</sub>e</b>	<b>C</b>  <b>50,000 to 500,000 t CO<sub>2</sub>e</b>	<b>D</b>  <b>&gt; 500,000 t CO<sub>2</sub>e</b>
<b>E1</b>  <b>E2</b>  <b>E3</b>  <b>F1</b>  <b>F2</b>  <b>M1</b>  <b>M2</b>  <b>M3</b>  <b>O1</b>  <b>O2</b>			
<p><sup>(a)</sup> Please refer to the Table under question 3.3 for a description of the Annex I activity codes. If an installation carries out more than one activity, it should only be counted once under its main Annex I activity.</p>			

**Table 6: Emissions reports under Article 14(3) of the ET Directive not validated as satisfactory**

Member State:

Reporting year:

<b>A</b> <b>B</b>  <b>Installation</b>		<b>C</b>  <b>Emissions re- ported from installations</b>	<b>D</b>  <b>Allowances surrendered</b>	<b>E</b>  <b>Allowances blocked in operator holding account</b>	<b>F</b>  <b>Reason for no posi- tive verification statement <sup>(a)</sup></b>	<b>G</b>  <b>Correction of veri- fied emissions by competent authority</b>
<b>Permit ID Code</b>	<b>Installation ID Code</b>	<b>t CO<sub>2</sub></b>	<b>t CO<sub>2</sub></b>	<b>t CO<sub>2</sub></b>		<b>t CO<sub>2</sub></b>
<sup>(a)</sup> Please use the following notation keys: reported data is not free of inconsistencies and material misstatements (NFI), collection of data has not been carried out in accordance with the applicable scientific standards (NASS), relevant records of installation are not complete and/or consistent (RNC), verifier was not provided with access to all sites and information related to the subject of verification (VNA), no report was produced (NR), other (please specify).						

Table 7: Installations for which no emission reports were provided by 31 March of the reporting period

Member State:

Reporting Period:

A	B	C	D	E	F	G	H	I	J
	< 50 000 t CO <sub>2</sub> e			50 000 to 500 000 t CO <sub>2</sub> e			> 500 000 t CO <sub>2</sub> e		
Main Annex I activity <sup>(a)</sup>	Number of emission reports not provided	Allocation	Allowances blocked in operator holding accounts	Number of emission reports not provided	Allocation	Allowances blocked in operator holding accounts	Number of emission reports not provided	Allocation	Allowances blocked in operator holding accounts
		t CO <sub>2</sub>	t CO <sub>2</sub>		t CO <sub>2</sub>	t CO <sub>2</sub>		t CO <sub>2</sub>	t CO <sub>2</sub>
E1									
E2									
E3									
F1									
F2									
M1									
M2									
M3									
O1									
O2									
<sup>(a)</sup> Please refer to the Table to question 3.3 for a description of the Annex I activity codes. If an installation carries out more than one activity, it should only be counted once under its main Annex I activity.									