

# AEM Plan Form

This document is an example of the level of information that is expected when applying for a Phase 3 Annual Emissions Monitoring Plan (AEM plan) . This plan is an example of an application made by a 'Small Emitter' applying using the Simplified Approach. Please note, if you chose to use this example as a basis to your plan, the text highlighted in yellow indicates where you will need to edit the text or chose an option to ensure the plan is relevant to your company/operation.

All **\*\*New\*\*** information to meet MRR Requirements is boxed in Blue. This is additional information that is required over and above that copied from the Phase 2 monitoring plan.

2. The Monitoring and Reporting Regulation (Commission Regulation (2012) 601/EU) (hereinafter the "MRR"), defines further requirements for monitoring and reporting. The MRR can be downloaded from: [http://ec.europa.eu/clima/news/articles/news\\_2011121401\\_en.htm](http://ec.europa.eu/clima/news/articles/news_2011121401_en.htm)

Article 12 of the MRR sets out specific requirements for the content and submission of the monitoring plan and its updates. Article 12 outlines the importance of the Monitoring plan as follows:

*The monitoring plan shall consist of a detailed, complete and transparent documentation of the monitoring methodology of a specific installation [or aircraft operator] and shall contain at least the elements laid down in Annex I.*

Furthermore, Article 74(1) states:

*Member States may require the operator and aircraft operator to use electronic templates or specific file formats for submission of monitoring plans and changes to the monitoring plan, as well as for submission of annual emissions reports, tonne-kilometre data reports, verification reports and improvement reports. Those templates or file format specifications established by the Member States shall, at least, contain the information contained in electronic templates or file format specifications published by the Commission.*

This form has been designed to incorporate the requirements for the minimum content of monitoring plans defined in Annex I of the MRR plus requirements to assist the operator in demonstrating compliance with the MRR.

3. All Commission guidance documents on the Monitoring and Reporting Regulation will be published at the link below as they become available:  
[http://ec.europa.eu/clima/policies/ets/monitoring/index\\_en.htm](http://ec.europa.eu/clima/policies/ets/monitoring/index_en.htm)

## Information sources:

### EU Websites:

EU-Legislation: <http://eur-lex.europa.eu/en/index.htm>

EU ETS general: [http://ec.europa.eu/clima/policies/ets/index\\_en.htm](http://ec.europa.eu/clima/policies/ets/index_en.htm)

Monitoring and Reporting in the EU ETS: [http://ec.europa.eu/clima/policies/ets/monitoring/index\\_en.htm](http://ec.europa.eu/clima/policies/ets/monitoring/index_en.htm)

### Competent Authority Websites:

[www.environment-agency.gov.uk/emissionstrading](http://www.environment-agency.gov.uk/emissionstrading)

[http://www.sepa.org.uk/climate\\_change/solutions/eu\\_emissions\\_trading\\_system.aspx](http://www.sepa.org.uk/climate_change/solutions/eu_emissions_trading_system.aspx)

<http://www.doeni.gov.uk/niea/pollution-home/emissionstrading.htm>

### Competent Authority Contacts:

[euetsphase3help@environment-agency.gov.uk](mailto:euetsphase3help@environment-agency.gov.uk) (prior to 01/01/2013)

[ethelp@environment-agency.gov.uk](mailto:ethelp@environment-agency.gov.uk)

[emission.trading@sepa.org.uk](mailto:emission.trading@sepa.org.uk)

[emissions.trading@doeni.gov.uk](mailto:emissions.trading@doeni.gov.uk)

## Identification Of The Aircraft Operator And Description Of Activities

### Identification

Aircraft Operator Name

Simple Airways

Unique Identifier as it appears on the Commission list

66666

Your aircraft operator name and CRCO number is automatically populated by ETSWAP

Operator Name as it appears on the Commission list

Simple Airways plc

Do you specify an ICAO designator in the call sign used for Air Traffic Control purposes?

No

Please provide the aircraft registration markings used in the call sign for ATC purposes for the aircraft you operate.

### Aircraft Registration Markings

N123AV

Insert your aircraft registration details. Please update this list to reflect your current fleet.

### Air Operating Certificate Details

Do you hold an Air Operating Certificate?

No

### Operating License Details

Do you hold an Operating License?

No

### Organisation Structure

Please select the the legal status of the organisation

Company / Limited Liability Partnership Details

Select the relevant option from the drop down menu.

## Company / Limited Liability Partnership Details

Please enter the Company name and address details. Click the Refresh button to update the company name to the name provided above

Company Name

Address Line 1

Address Line 2

City

State/Province/Region

Postcode/Zip

Country

Email ID

Telephone Number

Company Registration Number

Are the registered company details different from the details provided above?

No

Does the aircraft operator belong to a parent / holding company?

No

Does the aircraft operator have any subsidiary companies

No

This should be a unique number for your company that identifies the legal entity (e.g. in the USA this could be an IRS Tax number).

## Description of Annex I Activities undertaken by the aircraft operator

Are you a commercial or non-commercial operator?

Do you carry out scheduled flights, non-scheduled flights or both scheduled flights and non-scheduled flights?

Does the scope of the aviation activities undertaken, include only EU countries, or EU and non-EU countries?

Please provide further description of your activities as necessary

## Service Contact

### Service Contact

Title

First Name

Surname

E-mail Address

Address Line 1

Address Line 2

City

State/Province/Region

Postcode/Zip

Country

Ideally the service contact should be the company/ corporate secretary or clerk.

This section will be pre-populated in ETSWAP with the service contact details that you have stated on the 'Organisation Details' page in your account

Please select your aircraft types and sub-types using the drop-down selections in ETSWAP. Please update these lists to reflect your current fleet.

## Emission Sources And Fleet Characteristics

### Aircraft Types

Please provide a list of the aircraft types performing your aviation activities at the time of submission of this monitoring plan.

The list should include all aircraft types (by ICAO aircraft type designator - DOC8643), which you operate at the time of submission of this monitoring plan and the number of aircraft per type, including owned aircraft, as well as leased-in aircraft. You are required to list only aircraft types used for carrying out activities falling under Annex I of the EU ETS Directive.

You may use the second column to further specify sub-types of that aircraft type, if relevant for defining the monitoring methodology. This can be useful e.g. if there are different types of on-board measurement systems, different data transmission systems (e.g. ACARS) etc.

Generic Aircraft Type	Comments	Number of Aircraft	Jet Kerosene	Jet Gasoline	Aviation Gasoline	Alternative	Biofuel
GLF5 - GULFSTREAM AEROSPACE C-37 Gulfstream 5		1	✓				

Please provide an indicative list of additional aircraft types expected to be used.

This list should not include any of the aircraft listed in the table above. Where available, please also provide an estimated number of aircraft per type, either as a number or an indicative range.

Generic Aircraft Type	Comments	Number of Aircraft	Jet Kerosene	Jet Gasoline	Aviation Gasoline	Alternative	Biofuel
FA20 - DASSAULT Falcon 20		1	✓				

### Procedures

The three procedures below are examples of the text a small emitter could use to detail how they will monitor their emissions. The procedures cover the following areas.

- Procedures used to determine the completeness of the list of aircraft including additional aircraft types.
- Procedures used to determine the completeness of the list of flights.
- Procedures for determining whether flights are covered by Annex I of the EU ETS Directive.

## List of emission sources (aircraft used)

Please provide details about the systems, procedures and responsibilities used to track the completeness of the list of emission sources for each reporting year. The items specified below are for monitoring and reporting of the emissions of all aircraft used during the reporting year, as well as leased-in aircraft.

Title of procedure

AE - Asset List

This title is an example, you can use this if you wish or create your own titles. Please note each procedure title should be different and relevant to that procedure.

Please ensure that relevant Key Risks and Control Activities are included in each section.

Reference for procedure

EU-ETS Operations - 001

Brief description of procedure

An asset list is kept within our financial records. This list identifies the aircraft owned over the monitoring period, identifying the type of aircraft and its registration marking. Any leased-in aircraft are recorded within our invoicing system, identifying the type and registration marking of the aircraft and lease periods (including start and end dates). The asset list is reviewed by the Aviation Department periodically throughout the monitoring period to ensure that it is accurate and up to date. Any additional aircraft purchased or leased during the reporting year will be identified and updated in our asset list by the Aviation Department.

Key risks: Aircraft not completely recorded. Human error when transcribing data to the technical log.  
Control Activity: Aircraft identified within the finance and invoicing systems are referenced against aircraft details contained in each flight's technical log and against records produced by Eurocontrol on flights undertaken over the monitoring period.

Post or department responsible for data maintenance

Aviation Department

Location where records are kept

Simple Airways Head Office, 100 Aviation, Jet City, Jetville, UK

Name of system used

Flight Server Database & Aviation Asset List.

Insert name of office location and address

This could be a database or a simple spreadsheet

## Completeness of the List of Flights

Please provide details about the procedures to monitor the completeness of the list of flights operated under the unique designator by aerodrome pair.

Please detail the procedures and systems in place to keep an updated detailed list of aerodrome pairs and flights operated during the monitoring period as well as the procedures in place to ensure completeness and non duplication of data.

Title of procedure

AE Flight Recording

Reference for procedure

EU-ETS Operations - 002

Brief description of procedure

Flight schedules are provided by Nav Pak, which are updated onto our flight recording system. The system records actual flight data consisting of; date, aircraft registration markings, type of flight, aerodrome of departure and arrival and number of passengers onboard (by passenger type). Inputs into the system are updated upon completion of all flights, this is undertaken by the Chief Pilot.

Key risks: Flights operated under Simple Airways aircraft registration markings that are not captured by the system.

Human error when transferring flight data to or from the technical log.

Control Activities: The data held on the flight recording system is cross referenced against Nav Pak, and/or technical log records and against records produced by Eurocontrol on flights undertaken over the monitoring period.

Post or department responsible for data maintenance

Chief Pilot and Aviation Department

Location where records are kept

Simple Airways Head Office, 100 Aviation, Jet City, Jetville, UK

Name of system used

ETS Flight Recording System

## Flights are Covered by Annex I

Please provide details about the procedures for determining whether flights are covered by Annex I of the Directive, ensuring completeness and avoiding double counting.

Please detail the systems in place to keep an updated detailed list of flights during the monitoring period which are included/excluded from EU ETS, as well as the procedures in place to ensure completeness and non-duplication of data.

Title of procedure

AE - Annex 1 Flight Recording.

Reference for procedure

EU-ETS Operations - 003

This could be a manual or an automatic process

Brief description of procedure

The same flight recording system is used for recording flights covered by Annex 1. Annex 1 exemptions (if any), are identified in the flight plan, and are then transferred into the flight recording system. This is a manual sort process.

Key risks: Type of flight is incorrectly marked in the technical log, leading to the exclusion of a flight that does not fall under the Annex 1 exemptions.

Control Activities: The procedure provides guidance to our pilots on when to apply an "exempt" flight flag. Technical log entries into the system are cross referenced against data from Eurocontrol's CRCO to ensure completeness of data. Internal checks are undertaken on technical logs against Eurocontrol CRCO data.

Post or department responsible for data maintenance

Chief Pilot and Aviation Department

Location where records are kept

Simple Airways Head Office, 100 Aviation, Jet City, Jetville, UK

Name of system used

ETS Flight Recording System

## Eligibility for simplified procedures for small emitters

Please confirm whether you operate fewer than 243 flights per period for three consecutive four-month periods; or operate flights with total annual fossil CO<sub>2</sub> emissions lower than 25 000 tonnes per year?

Yes

Do you intend to use simplified procedures to estimate fuel consumption

Yes

Please provide information to support your eligibility for the simplified calculation procedures

Our flight records from the **Flight Server Database** identifies that we undertook **10, 50 and 30**, flights respectively over the last 3 consecutive 4-month periods (data can be provided upon request). Data provided from Eurocontrol's CRCO data system calculated emissions of **456** tonnes CO<sub>2</sub> for 2011, for our qualifying flights. Our own fuel purchase system also confirms fuel used was equivalent to < 10,000 tCO<sub>2</sub> pa.

Estimated Annual Emissions (tonnes CO<sub>2</sub>)

**456**

Please estimate the number of flights covered by the EU ETS in each four-month period during the reporting year for which you are the aircraft operator:

Number of Flights - January to April

**10**

Number of Flights - May to August

**50**

Number of Flights - September to December

**30**

If necessary, please attach further documents to support your eligibility

Eligibility documents

## Simplified Calculation Of CO<sub>2</sub> Emissions

### Simplified Calculation

You may apply the simplified procedure for the calculation of activity data described in Article 54 of the MRR if you are operating either:

- fewer than 243 flights per period of three consecutive four-month periods; or
- flights with total annual emissions lower than 25,000 tonnes per year

Please specify the name or reference of the Commission approved tool used to estimate fuel consumption.

**Small Emitters Tool - Eurocontrol's fuel consumption estimation tool**

Please confirm that the following standard emission factors for commercial standard aviation used to calculate emissions

Please confirm that you will use the following standard emission factors for commercial standard fuels

Jet Kerosene (Jet A1 or Jet A) at 3.15 tCO<sub>2</sub>/t fuel

**Confirm**

Jet Gasoline (Jet B) at 3.10 tCO<sub>2</sub>/t fuel

Confirm

Aviation Gasoline (AvGas) at 3.10 tCO<sub>2</sub>/t fuel

Confirm

Do you use alternative fuels (including biofuels)?

No

The tool used in the simplified method is selected from a drop-down list. There is only one approved tool available at this time.



## Description Of Procedures For Data Management And Control Activities

### Please identify the responsibilities for monitoring and reporting (Article 61 of the MRR)

Please identify the relevant job titles/posts and provide a succinct summary of the responsibilities for monitoring and reporting. Only those with overall responsibility and other (i.e. do not include delegated responsibilities)

As a minimum please identify the main personnel responsible for collating and reporting EU-ETS data for the Annual Emissions Report. This must include a brief description of responsibilities. This is to be expanded upon in "Assessment of Responsibilities of Procedure".

Job Title / Post	Responsibilities
Chief Pilot	Quarterly review on the emissions data. Audit and report on data covered in
Finance Manager	Quarterly collation of data used to calculate emissions that
Aviation Department Manager	Production of annual emissions report. Responsible for reviewing and authorizing of the

If you wish, you may attach a tree diagram or organisational chart of the procedure.



These sections must include a relevant title and procedure. The references should be sequential and different to those used in the "Emissions Sources & Fleet Characteristics"

### Assessment of Responsibilities of Procedure

Please provide details about the procedure for managing the assignment of responsibilities and competences of personnel responsible for monitoring and reporting, in accordance with Article 58(3)(c) of the MRR. This procedure should identify how the monitoring and reporting responsibilities for the roles identified above are assigned, how training and reviews are undertaken and how duties are segregated such that all relevant data is confirmed by a person not involved with the recording and collection of the data.

Title of procedure

CONTROL SYSTEMS FOR EU-ETS

Reference for procedure

EU-ETS Management - 001

Brief description of procedure

Simple Airways procedure identifies the assignment of monitoring and reporting responsibilities for EU-ETS based on the existing roles within our organisation. The assignment of roles is allocated such that the Aviation Department Manager confirms all monitoring information recorded by the Chief Pilot and the Finance Manager in order that at least one person does not have conflicting responsibility. Training of all personnel involved with the obtaining and collating of data relating to monitoring and reporting of emissions is recorded. The ability of personnel to perform the required tasks together with internal performance reviews are recorded in personnel files. Simple Airways keeps written procedures documenting the responsibilities for each person involved with monitoring and reporting.

Post or department responsible for data maintenance

Aviation Department Manager

Location where records are kept

Simple Airways Head Office, 100 Aviation, Jet City, Jetville, UK

Name of system used

N/A

## Monitoring Plan Appropriateness Procedure

Please provide details about the procedure for regular evaluation of the monitoring plan's appropriateness, covering in particular any potential measures for the improvement of the monitoring methodology. This procedure must identify the process of regularly checking to ensure that the monitoring plan reflects the nature of the operation and that it conforms with the Monitoring and Reporting Regulation. The brief description should identify how regular the plan is evaluated, dependent on the nature of the operation and how changes identified from internal reviews and verification visits are communicated to the Competent Authority.

Title of procedure

AEM IMPROVEMENT PROCESS FOR EU-ETS

Reference for procedure

EU-ETS Management - 002

Brief description of procedure

As Simple Airways is a 'small emitter' utilising the simplified approach we will evaluate our approved monitoring plan's appropriateness on an annual basis. In addition we perform quarterly checks on the data used for reporting emissions in line with our approved plan and assess whether our approved methodology covers the needs of our operation. Where an internal review of the data highlights a need for change in our procedures we will submit a change request to the Competant Authority. If it becomes clear that our procedures need to change after the verification of our annual emissions report we will submit an improvement report in line with the verifiers recommended improvements before the 30th June following the reporting year.

Post or department responsible for data maintenance

Aviation Department Manager

Location where records are kept

Simple Airways Head Office, 100 Aviation, Jet City, Jetville, UK

Name of system used

N/A

## Data flow activities

Where a number of procedures are used, please provide details of an overarching procedure which covers the main steps of data flow activities along with a diagram showing how the data management procedures link together (please reference this diagram below and include when submitting your monitoring plan). Alternatively please provide details of additional relevant procedures on a separate sheet.

Under "Description of the relevant processing steps", please identify each step in the data flow from primary data to annual emissions which reflect the sequence and interaction between data flow activities 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.

Title of procedure

DATA FLOW PROCESS FOR EU-ETS

Reference for procedure

EU-ETS Management - 003

Diagram reference

Simple Airways Data Flow Diagram.

Brief description of procedure. The description should cover the essential parameters and operations performed

Simple Airways utilise primary data sources and the Commissions Approved Small Emitter Tool to produce the Annual Emission Report. Please see description of relevant processing steps below.

Post or department responsible for the procedure and for any data generated

Aviation Department Manager

Location where records are kept

Simple Airways Head Office, 100 Aviation, Jet City, Jetville, UK

Name of IT system used

ETS Flight Recording System/Nav Pak

List of EN or other standards applied

N/A

List of primary data sources

Flight Logs, Asset Lists, Eurocontrol Small Emitter Tool Data.

Description of the relevant processing steps for each specific data flow activity

Simple Airways utilises the simplified approach thus our primary sources of data are as follows:

Asset lists (Fleet List) of owned and leased aircraft.

Flight data: Flight schedules are provided via Nav Pak and uploaded to our flight recording logs. These logs contain the flight date, the aircraft type and registration, type of flight, aerodrome pairs and flight distance in Nm for actual flights undertaken.

Eurocontrol Billing records: These records contain the CRCO number, flight date, aerodrome pair and tail registration of the aircraft.

We will use the data contained in our updated asset list to input the correct data into the Aircraft Data Section of the AER.

Simple Airways will input the required primary data into the Commission Approved Small Emitter Tool. Where actual distance is unknown we will use GCD +95km. The output from the Small Emitter Tool will provide us with the necessary data to populate the annual emissions report's Additional Emissions Section, Detailed Emissions Section and Total Emissions Section.

Simple Airways will save a copy of the Small Emitter Tool Output (Excel Spreadsheet) along with copies

of the Technical Flight Log and Asset and Financial Records. Where applicable we will cross reference annex 1 activity against Eurocontrol Billing Data to ensure completeness and avoid misstatements.

Please attach a representation of the data flow for the calculation of emissions, including responsibility for retrieving and storing each type of data. If necessary, please refer to additional information, submitted with your completed plan. Please reference the file/document attached to your monitoring plan.



## Control Activities

Please provide details about the procedures used to assess inherent risks and control risks. The brief description should identify how the assessments of inherent risks ("errors") and control risks ("slips") are undertaken when establishing an effective control system.

Title of procedure

RISK & CONTROL ACTIVITIES FOR EU-ETS

Reference for procedure

EU-ETS Management - 004

Brief description of procedure

Simple Airways has identified the inherent risk of human error when maintaining asset lists in our financial records, human error in the manual transfer of flight information to or from the technical flight log and human error in incorrectly identifying an annex 1 flight as exempt from EU-ETS.

We have identified the following control risks that could lead to a material misstatement(s) in our annual emissions report that may not be picked up our existing control systems in the "Emissions Sources & Fleet Characteristics" section: Failure of the Aviation Department's IT systems including servers leading to loss of Simple Airways flight data and loss of hard copies of Eurocontrol's Billing Information.

Post or department responsible for data maintenance

Aviation Department Manager

Location where records are kept

Simple Airways Head Office, 100 Aviation, Jet City, Jetville, UK

Name of system used

N/A

Please provide details about the procedures used to ensure quality assurance of measuring equipment and information technology used for data flow activities.

The brief description should identify how all relevant measurement equipment is calibrated or checked at regular intervals, if applicable, and how information technology is tested and controlled, including access control, back-up, recovery and security.

Title of procedure

QUALITY ASSURANCE FOR EU-ETS

Reference for procedure

EU-ETS Management - 005

Brief description of procedure

Simple Airways will conduct regular reviews of our IT equipment and Software (including updates) used for the generation of Annual Emission Reports including the Nav Pak system. This will be done through regular testing through our IT Support Department. In addition our IT department is responsible for the continuous update of IT security system. Simple Airways store Asset lists, Technical Flight Logs, Nav Pak and Small Emitter Tool output spreadsheets on local hard drives. These records are automatically backed up and stored on our Server which is maintained by our IT department. Data Recovery is available through out IT Support Department. Simple Airways keep hard copies of this data with the Eurocontrol Billing Data in a secure office location.

As Simple Airways is a small emitter utilising the Commission Approved Small Emitter Tool we will ensure that we are using the most up to date version of the tool in order to avoid potential data output discrepancies with older versions of the tool. We will not save the tool to local drive, we intend to open the latest version of the tool from the Commission's website and save the output file to local hard drives and back up to our remote server.

Post or department responsible for data maintenance

Aviation Department Manager. IT Manager. IT Support Department.

Location where records are kept

Simple Airways Head Office, 100 Aviation, Jet City, Jetville, UK. Off site server storage systems

Name of system used

Simple Airways Information Management System/Information Security Systems.

Please provide details about the procedures used to ensure regular internal reviews and validation of data.

The brief description should identify that the review and validation process includes a check on whether data is complete, comparisons with data over previous years, comparison of fuel consumption reported with purchase records and factors obtained for fuel suppliers with international reference factors , if applicable, and criteria for rejecting data.

Title of procedure

INTERNAL REVIEW AND VALIDATION OF EU-ETS DATA

Reference for procedure

EU-ETS Management - 006

Brief description of procedure

As Simple Airways is a small emitter we will instigate internal data reviews on a quarterly basis in line with the data collection for our annual emissions report. We will check data is complete and comparable to previous years data (where applicable). As we are using the Commission Approved Small Emitter tool we will cross reference output to check data is reasonable and comparable to fuel purchased and therefore expected emissions associated with our fleet.

Post or department responsible for data maintenance

Aviation Department Manager.

Location where records are kept

Simple Airways Head Office, 100 Aviation, Jet City, Jetville, UK. Off Site Server Storage.

Name of system used

N/A

Please provide details about the procedures used to handle corrections and corrective actions.

The brief description should outline what appropriate actions are undertaken if data flow activities and control activities are found not to function effectively. The procedure should outline how the validity of the outputs are assessed, the process of determining the addressing the cause of the error.

Title of procedure

CORRECTIVE ACTIONS FOR EU-ETS

Reference for procedure

EU-ETS Management - 007

Brief description of procedure

Where Simple Airways identifies errors in data arising from control activity failure with regards to Asset Lists, Flight Recording Data and loss of hard copies of Eurocontrol Billing Information, we will re-assess our control measures for data collection and adjust them as necessary as part of the quarterly data collection. The updated control measures effectiveness will be assessed during the successive quarterly review. In the event of complete data loss we will contact Eurocontrol to request a copy of the flight data for our CRCO account number providing an updated fleet list for the relevant reporting year to conservatively estimate emissions for all aircraft operating an Annex 1 flight.

Post or department responsible for data maintenance

Aviation Department Manager.

Location where records are kept

Simple Airways Head Office, 100 Aviation, Jet City, Jetville, UK. Off Site Server Storage.

Name of system used

N/A

If applicable, please provide details about the procedures used to control outsourced activities.

The brief description should identify how data flow activities and control activities of outsourced processes are checked and what checks are undertaken on the quality of the resulting data.

Title of procedure

CONTROL OF OUTSOURCED PROCESSES FOR EU- ETS

Reference for procedure

EU-ETS Management - 008

Brief description of procedure

As Simple Airways are a small emitter we occasionally use a flight planning agent via a management company. Simple Airways cross reference this data with our own records to ensure that the management company follows the same data flow processes from primary data sources (Recording aircraft type, registration and aerodromes of departure and arrival, including distance in Nm) to ensure that this data can reliably be used as part of our annual emissions report.

Post or department responsible for data maintenance

Aviation Department Manager.

Location where records are kept

Simple Airways Head Office, 100 Aviation, Jet City, Jetville, UK. Off Site Server Storage. Management Company IT Systems.

Name of system used

N/A

Please provide details about the procedures used to manage record keeping and documentation. The brief description should identify the process of document retention, specifically in relation to the data and information stipulated in Annex IX of the MRR and to how the data is stored such that information is made readily available upon request of the competent authority or verifier.

Title of procedure

RECORDS AND DOCUMENTS FOR EU-ETS

Reference for procedure

EU-ETS Management - 009

Brief description of procedure

Simple Airways retains records of all relevant data for a minimum of 10 years in accordance with MRR including; The current approved annual emissions monitoring plan, older versions of the approved plan, any submitted variations to the Competant Authority, all written procedures pertaining to the approved monitoring plan including any data flow diagrams and procedures for control activities, any improvement report submitted to the Competent Authority, all verified annual emissions reports (these are available via ETSWAP, but we retain a pdf of the report for our electronic records,

In addition Simple Airways will retain the following records for a minimum of 10 years; Annual company asset lists including any changes made over the reporting years. Output data from the Small Emitter Tool. Copies of email correspondence vital to the verification of the annual emissions report.

All our EU-ETS applicable documents and records are stored on our local hard drive and backed up to our server and maintained by our IT Department. Where applicable hard copies will be kept in a secure office environment.

Post or department responsible for data maintenance

Aviation Department Manager. IT Department.

Location where records are kept

Simple Airways Head Office, 100 Aviation, Jet City, Jetville, UK. Off Site Server Storage.

Name of system used

Simple Airways Record Management Procedure.

Does your organisation have a documented environmental management system? Please choose the most relevant response.

Certified environmental management system in place

Is the Environmental Management System certified by an accredited organisation?

Yes

If the Environmental Management System is certified by an accredited organisation and the system incorporates procedures relevant to EU ETS monitoring and reporting, please specify to which standard e.g. ISO14001, EMAS, etc.

ISO 14001

### List of Definitions And Abbreviations Used

Please list any abbreviations, acronyms or definitions that you have used in completing this monitoring plan.

Abbreviation	Definition
CRCO	Central Route Charging Office
GCD	Greater Circle Distance
AER	Annual Emissions Report

### Additional Information

If you are providing any other information that you wish us to take into account in considering your plan, tell us here. Please provide this information in an electronic format wherever possible. You can provide information as Microsoft Word and Excel (Office version 2003 or earlier), or Adobe Acrobat portable document format. Please attach the document by clicking the button below and add a description along with the filename to the table.

You are advised to avoid supplying non-relevant information as it can slow down the verification process.

File Name	Document Description
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### Confidentiality



## Confidentiality Statement

### **If you are an Operator regulated by the Environment Agency or the Northern Ireland Environment Agency:**

The information submitted in respect of this application will be subject to public access to information requirements, including the Freedom of Information Act 2000 and the Environmental Information Regulations 2004.

If you consider that any information you provide in connection with your application should be treated as commercially confidential, please let us know. Under the Environmental Information Regulations the test is whether there would be an adverse effect on the confidentiality of commercial or industrial information where that confidentiality is protected by law to protect a legitimate economic interest. We are also required to consider whether, taking into consideration the presumption in favour of release of information, the public interest in maintaining the exception outweighs the public interest in disclosing the information. To the extent that the information to be disclosed relates to information on emissions, it cannot be withheld on the grounds of commercial confidentiality.

You should be aware that under the provisions of the Freedom of Information Act 2000 and regulations made under it, the Environment Agency may be obliged to disclose information even where the applicant requests that it is kept confidential.

### **If you are an Operator regulated by the Scottish Environment Protection Agency:**

The information submitted in this form will be subject to public access to information requirements including the Freedom of Information (Scotland) Act 2002 ("the Act") and the Environmental Information (Scotland) Regulations 2004 ("the Regulations"). If you consider that any information you provide in connection with your application should be kept confidential because it is a trade secret or is confidential commercial or industrial information or because its public disclosure would substantially prejudice your commercial interests please let us know. You should be aware however that SEPA may be legally obliged to disclose such information under the Act or the Regulations even when you have requested that it is kept confidential.

Please tick this box if you consider that any part of your form should be treated as commercially confidential/sensitive

Please complete the table below to identify which sections of the form you consider should be treated as commercially confidential and explain why disclosure of this information would cause an adverse effect to your commercial interests.

Section	Justification
Emissions Sources.	We wish for our monitoring methodology to remain confidential.