

Frequently Asked Questions (FAQ)

Questions regarding Nabisy

Date	09.03.2021
Version	3/2021
Type of text	for publication
Editor	Bundesanstalt für Landwirtschaft und Ernährung Referat 523 <u>nabisy@ble.de</u> (+49) (0) 228 6845 2500
Exposé	Questions asked frequently regarding Nabisy



1	HOW DO I GET ACCESS TO NABISY?
1.1	How do I get access to Nabisy as a producer (last interface)?5
1.2	How do I get access to Nabisy as a trader (supplier)?
1.3	How do I get access to Nabisy as an installation operator?
1.4	How do I get access to Nabisy as a network operator?
2	MY APPLICATION FOR ACCESS TO NABISY WAS RETURNED TO ME. WHY?8
3	FOLLOWING PERSONNEL CHANGES IN OUR COMPANY, HOW CAN OUR
ACO	CESS DATA BE ADAPTED ACCORDINGLY?9
3.1	Interfaces and suppliers9
3.2	Installation operators and network operators9
4	I FORGOT MY PASSWORD FOR ACCESS TO NABISY. WHAT CAN I DO NOW? . 10
5	WE NEED ACCESSES QUITE URGENTLY. CAN ACCESS DATA BE E-MAILED? 10
6	I WOULD LIKE TO HAVE A COURIER PICK UP MY ACCESS DATA. WHAT DO I
NEE	ED TO CONSIDER?
7	I FORGOT TO TAKE NOTE OF MY APPLICATION NUMBER. HOW DO I FIND IT
OU	Γ NOW?
8	I AM A NEW NABISY USER. WHERE DO I GET HELP? 11
9	I MADE A MISTAKE WHEN I CREATED A PROOF OF SUSTAINABILITY AND
SAV	ED IT ACCIDENTALLY. CAN I CORRECT IT IN NABISY?
10	I ISSUED A PROOF OF SUSTAINABILITY TO SOMEONE IN NABISY WITH THE
	ONG QUANTITY. HOW CAN I CORRECT MY MISTAKE?
WK	•
11	I WOULD LIKE TO HAVE A SERVICE PROVIDER TAKE CARE OF MY NABISY
ACC	COUNT. WHAT SHOULD I BEAR IN MIND?12
12	DO ANY COSTS ARISE FOR ACCESS TO NABISY OR ITS USE? 13
13	I CAN INDICATE EMISSIONS IN NABISY WITH ONE DECIMAL PLACE ONLY. IS
THA	AT INTENDED?
14	I ACCIDENTALLY BOOKED A PROOF TO ANOTHER MEMBER STATE'S
DIS	CHARGE ACCOUNT. HOW CAN I GET THIS PROOF BACK?
010	
15	WHAT DEADLINES APPLY IN NABISY?
	Entering proofs of sustainability by last interfaces
15.2	Passing on of proofs by a supplier (trader)14
16	WHAT SHOULD I BEAR IN MIND WHEN ENTERING PROOFS? 14
16.1	Restrictions regarding quantity14

16.2	Indications regarding quantity on a proof of sustainability in Nabisy	;
17	WHAT SHOULD I BEAR IN MIND REGARDING DATA TRANSFERS TO / FROM	
THE	E AUSTRIAN DATA BASE ELNA? 15	;
	Transfers to Austria15	
17.2	Transfers from the Austrian data base16	;
18	MAY MY CERTIFICATION BODY CONTROL THE PROOFS / PARTIAL PROOFS I	
ISSU	JED?)
20	I HAVE A PROOF THAT CONTAINS NO INFORMATION RE. GREENHOUSE GAS	
EMI	SSIONS. IS THIS PROOF INVALID?	,
21	CAN I BOOK A PROOF FROM AN EU-SYSTEM TO A (GERMAN) DE-ACCOUNT? 18	
22	I HAVE A PROOF, DATING FROM BEFORE THE SYSTEM UPDATE, WHICH DOES	,
NO	F CONTAIN SAVINGS FOR EACH FOSSIL REFERENCE VALUE. THE PROOF ONLY	
IND	ICATES EMISSIONS AND A REFERENCE VALUE. YET I NEED A REFERENCE	
VAL	UE OTHER THAN THE ONE ON THE PROOF. WHAT CAN I DO?)
23	HOW CAN I TELL WHICH PROOFS I PASSED ON TO MY CUSTOMERS(S)/	
NET	WORK OPERATOR(S) IN A GIVEN PERIOD? 20)
24	WHAT IS THE DIFFERENCE BETWEEN PROOF, BASIC PROOF, PROOF OF	
	TAINABILITY, PARTIAL PROOF OF SUSTAINABILITY, POS AND PPOS?)
25	IS THERE A LEGAL DIFFERENCE BETWEEN THE VALIDITY OF A PROOF AND A	
	TIAL PROOF OF SUSTAINABILITY?	
	BASED ON A PROOF, CAN YOU TELL THE SUPPLY CHAIN?	-
27	WHAT IS A DOCUMENT LINK?	-
28	WHY, ACCORDING TO NABISY, DO I NOT HAVE A VALID CERTIFICATE EVEN	
THO	DUGH I HAVE A VALID CERTIFICATION?21	-
29	HOW LONG DOES IT TAKE TO GET MY LOGIN DATA?	;
30	I WOULD LIKE TO USE A NEW TYPE OF BIOMASS FOR A PROOF. HOW DO I	
PRC	OCEED?	ŀ
31	I CANNOT FIND A CERTAIN BIOMASS TYPE ON THE CURRENT LIST OF	
BIO	MASS TYPES. HOWEVER, I KNOW THAT THIS BIOMASS CODE WAS PUBLISHED	,
	ORE. HOW DO I GET THE BIOMASS CODE I AM LOOKING FOR ACTIVATED FOR	
USE	IN NABISY?	ŀ

*

32	WHY CAN I NOT FIND A BIOMASS TYPE IN NABISY ALTHOUGH IT HAS BEEN	[
PUE	BLISHED?	25
32.1	The voluntary schme is not recognised for this biomass type	. 25
	The BLE was notified of the wrong scope	
32.3	The extension of your plant has not been considered	. 25
	You made a wrong declaration	
33	I USE A CERTAIN PRODUCT IN PRODUCTION BUT CANNOT FIND THE	
APP	PROPRIATE BIOMASS CODE OR I AM UNSURE WHICH BIOMASS CODE TO USE	3.
WH	O CAN HELP ME?	26
34	MY CERTIFICATION BODY REQUESTS INFORMATION FROM MY NABISY	
ACC	COUNT. CAN THEY DO THIS? IF SO, WHY ARE THEY ALLOWED TO CHECK MY	
NAI	BISY ACCOUNT?	26
35	I HAVE ENTERED MY PASSWORD INCORRECTLY TOO OFTEN AND BLOCKED)
MY	ACCESS. WHO CAN HELP ME AND HOW?	28

1 How do I get access to Nabisy?

There are several cases to be considered:

1.1 How do I get access to Nabisy as a producer (last interface)?

To obtain the relevant application form (Access to the web application as a producer Sustainable Biomass System – Nabisy – pursuant to § 23 Biokraft-NachV [Biofuel Sustainability Ordinance] or BioSt-NachV [Bioenergy Sustainability Ordinance]), please contact your your certification system / Voluntary System.

You submit the completed form to your system, which will add various details and will then forward your application to us. As soon as we have all the information we need, we will send you your login and password by post, on different days for security reasons.

⇒ If you already know your login and password, our <u>manuals</u> can help you further.

⇒ Question 8: I am a new Nabisy user. Where do I get help?

1.2 How do I get access to Nabisy as a trader (supplier)?

There are two cases to be considered:

1.2.1 You participate in a certification system or a voluntary system.

To obtain an application form (Application for access to the web application as a trader / supplier Nachhaltige Biomasse System – Nabisy – pursuant to § 24 Biokraft-NachV or BioSt-NachV), please contact your system.

You submit the completed form to your system. This will add various details and will then forward your application to us. As soon as we have all the information we need, we will send you your login and password by post, on different days for security reasons.

⇒ If you already know your login and password, our <u>manuals</u> can help you further.

⇒ Question 8: I am a new Nabisy user. Where do I get help?

1.2.2 You are subject to German customs control within the framework of § 17 par. 3 No. 2 Biokraft-NachV.

In that case, you apply for access to Nabisy directly with the BLE. The relevant application form is available on the BLE homepage at <u>www.ble.de/biomasse</u>.

Please submit the application, completed and signed, to the BLE. We will write to the biofuel quota body at the main customs office in Frankfurt (Oder) - being the customs office's central body - and will ask them to confirm your monitoring and data.

As soon as we receive a confirmation by the customs authority, we will send you your login and password by mail on different days.

If we receive a negative response from the customs authorities, we will reject your application. You still have the option to get Nabisy access as a participant in a certification system / voluntary system (⇔1.2.1 You participate in a certification system or a voluntary system.).

⇒ If you already know your login and password, our <u>manuals</u> can help you further.

⇒ Question 8: I am a new Nabisy user. Where do I get help?

1.3 How do I get access to Nabisy as an installation operator?

1.3.1 REL-installation operator including biogas plant operator (ignition and auxiliary firing)

Resulting from the Act on the Introduction of Tenders for Electricity from Renewable Energies and on Further Amendments to the Renewable Energies Law of 13 October 2016 (Federal Law Gazette I, p. 2258), the Biomass Electricity Sustainability Ordinance will apply from 1 January 2017 to all liquid biomass promoted by the EEG (Renewable Energies Law, REL).

Plant operators who need ignition, pilot or auxiliary firing systems for the operation of their plant and use liquid biomass for this purpose have been required to submit sustainability certificates since 01.01.2017. This results from §§ 44c par. 1 No. 2, 19 par. 1 No. 2, 21 EEG 2017 in V. m. § 1 BioSt-NachV.

Installation operators will obtain a proof of sustainability from the supplier of the liquid biomass. He or she will book the proof electronically to the installation operator's account, which has been or will be established in the government database Nabisy.



For installation operators to obtain the required Nabisy account:

1. The first requirement is for the Federal Network Agency (Bundesnetzagentur) to confirm the installation's registration.

In case you are not registered yet, please contact the Federal Network Agency to register your installation. The relevant application form is available on the Agency's website at

https://www.marktstammdatenregister.de/MaStR/Assistent/AuswahlAssistent

To contact the Federal Network Agency:

Bundesnetzagentur, Tulpenfeld 4, 53113 Bonn, Germany Telefon: +49[0]228 14-3333 Fax: +49[0]228 14-3334 www.marktstammdatenregister.de/kontakt

2. Once you have obtained confirmation of your registration, send that, along with a completed and duly signed application for access to Nabisy, to the Federal Office for Agriculture and Food (BLE). The relevant application form is available on the BLE website at www.ble.de/biomasse.

To contact the Federal Office for Agriculture and Food:

Unit 523, Deichmanns Aue 29, 53179 Bonn, Germany Telephone: +49[0]228 / 6845-2550 Facsimile: +49[0]30 / 1810 6845-3040 E-Mail: nachhaltigkeit@ble.de

- 3. The BLE assigns a system operator account number and informs you of this together with the identification number of the network operator (network operator account number). Your Nabisy user name and password will be sent to you by surface mail on different days.
- 4. Please inform your fuel supplier of your installation operator number so that he can transfer sustainability certificates to your installation operator account.
- 5. You can now transfer the amount of liquid biomass required for electricity generation to the network operator's Nabisy account on an accrual basis. If you change your network operator, you must inform the BLE, because the new network operator must be assigned to you in Nabisy.

1.3.2 Installation operators with the German Emissions Trading Authority at UBA (Deutsche Emissionshandelsstelle, DEHST)

Companies that are registered with the German Emissions Trading Authority and use sustainable liquid biomass or biofuel can receive reductions in emissions trading in return. For this purpose, you must submit the proofs to DEHSt, electronically, via Nabisy.

You can apply for access to Nabisy directly with the BLE. But please be sure to note the DEHST - file number of your installation on your application. The relevant application form is available on the BLE homepage at <u>www.ble.de/biomasse</u>.

Submit the application, completed and signed, to the BLE who will send you your login, password and installation operator number (which corresponds to the account number in Nabisy) on different days and via surface mail.

Installation operators will obtain a proof of sustainability from the supplier of the liquid biomass. He or she will book the proof electronically to the installation operator's account, which has been or will be established in the government database Nabisy.

1.4 How do I get access to Nabisy as a network operator?

Please contact the BLE by sending an e-mail to <u>nabisy@ble.de</u> and name a maximum of three people who should obtain access to Nabisy.

The e-mail will contain the following details:

- the network operator's name, complete address and MaStR number and
- first name(s), office address(es) and telephone number(s) of the person(s) who will obtain access to Nabisy.

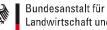
Please inform the BLE of personnel changes regarding people who have access to Nabisy. Accesses can be blocked or renewed at any time.

The BLE will send you your login, password and network operator number (which corresponds to the account number in Nabisy) on different days via surface mail.

2 My application for access to Nabisy was returned to me. Why?

You participate in a certification system and submitted your application for access to Nabisy directly to the BLE. Which was the wrong way to apply.

As a participant in a certification system, you should send your application for access to Nabisy to your system. It will add a number of details and the forward your application to us.



As soon as we have all the information we require to grant access, we will send you your login and password by surface mail on different days.

⇒ How to register for Nabisy properly is described above: Question 1: How do I get access to Nabisy?

Following personnel changes in our company, how can our access 3 data be adapted accordingly?

3.1 **Interfaces and suppliers**

With the amendment application for access to Nabisy for interfaces or suppliers, you can designate additional people to have access to Nabisy or delete access for people who no longer need access, for instance.

As a system participant, you can obtain the amendment application from your certification system. Once completed, the application must be submitted to the BLE via the system.

As a supplier under customs supervision, you can access the application form via the BLE homepage at <u>www.ble.de/biomasse</u>. You will submit the completed form directly to the BLE. Please make sure that the code given to persons of your company, who are authorized to make changes, has been entered.

3.2 Installation operators and network operators

Installation operators send the BLE an application for access to Nabisy in order to appoint new persons entitled to access. The corresponding application form is available on the BLE website at www.ble.de/biomasse.

You can notify the BLE of the blocking of access by e-mail (nabisy@ble.de). Please state your installation operator number and the persons to be blocked

Network operators please send an informal e-mail to nabisy@ble.de and inform us of the persons for whom access is to be blocked. We also need the following data:

- first name(s),
- last name(s),
- office address and
- telephone numbers

of persons who are to receive (additional) access.

4 I forgot my password for access to Nabisy. What can I do now?

In such a case, please contact us at nabisy@ble.de with the following information

- your name
- the participant ID of the company under which you wanted to log in (e.g. EU-BM-99-SSt-1234678 or EU-BM-88-Lfr-87654321) and
- the information whether you still know the password assigned by the BLE.

We can then reset your password to the one assigned by the BLE.

If you do not have the letter with the initial password any longer, the BLE will assign you a new password and send it to you by post.

With the first login to Nabisy after the password reset you are automatically requested to change the password. You cannot continue in Nabisy without assigning a new password (one-time password).

5 We need accesses quite urgently. Can access data be e-mailed?

No, this is impossible for security reasons.

Neither will login data or password(s) to Nabisy be sent by fax or e-mail.

However, you can instruct a courier at your expense to collect the access data (identification and password at the same time) from us. In that case, please contact us well in advance, as we will need various details from you beforehand.

 \Rightarrow <u>I would like to have a courier pick up my access data. What do I need to consider?</u>

6 I would like to have a courier pick up my access data. What do I need to consider?

Please contact the BLE in good time, so that we have not already sent your access data by post.

Please send us a signed declaration of consent stating that

- 1. you will pay for the courier,
- 2. we may hand the courier your login data and password at the same time und
- 3. that you are liable for loss or misuse of the data.



We will also need the waybill for the documents, as we will not be able to send the documents by courier without it.

7 I forgot to take note of my application number. How do I find it out now?

The application number appears in the account statement. Download the statement for the relevant period. You will find the application number in the column Antragsnummer - application number (AN).

8 I am a new Nabisy user. Where do I get help?

For last interfaces, traders and installation operators we have compiled a manual with screenshots and help texts. It is available, in German or English, for download from the BLE website at <u>www.ble.de/biomasse</u>.

Network operators received a user manual by e-mail together with their password. Should you no longer have the manual, you can download it at <u>www.ble.de/biomasse</u>.

9 I made a mistake when I created a proof of sustainability and saved it accidentally. Can I correct it in Nabisy?

No. Data stored in Nabisy cannot be altered. However, in the case of incorrect quantities, you can usually simply correct the error ($\Rightarrow 0$

<u>I issued a proof of sustainability to someone in Nabisy with the wrong quantity. How can</u> <u>I</u> correct my mistake?).

In case of other mistakes, such as the incorrect use of a biomass code, please contact your certification system. It will provide you the required application for blocking a proof of sustainability. You can also download the application at <u>www.ble.de/biomasse</u>.

Please fill out this application, sign it and forward it to your certification body. The certification body will check the application and countersign it. It must be submitted to the BLE legibly, completely filled in and signed. It does not make a difference whether the certification body forwards the application to us or whether the interface (after checking and countersigning by the certification body) submits the application

It suffices to e-mail the application to <u>nabisy@ble.de</u>. There is no need to submit an original in paper form via surface mail.

10 I issued a proof of sustainability to someone in Nabisy with the wrong quantity. How can I correct my mistake?

Proofs cannot be modified in Nabisy. However, a mistake concerning quantities can easily be corrected in most cases.

- 1. You issued too small a quantity to your customer? Simply issue a second proof with the remaining quantity.
- 2. The quantity you issued to your customer is too big?

There are three options for action:

- a) In addition to your access to Nabisy as a producer, you also have a supplier account in Nabisy. You can thus have the difference quantity transferred to your supplier account and use it later for another customer.
- b) You deliver regularly to your customer? In that case, you can deduct the excess quantity delivered from the next proof.
- c) It was a one-time delivery to a customer, no further deliveries to this customer are planned in the near future, and you do not have a supplier account? In that case, please submit a request to block the proof. In your justification, please also state why you could not rectify the quantity error yourself. (⇒ Question 9 <u>I made a mistake</u> <u>when I created a proof of sustainability and saved it accidentally. Can I correct it in</u> <u>Nabisy?</u>)

11 I would like to have a service provider take care of my Nabisy account. What should I bear in mind?

There are several things to consider:

- 1. There is no separate access to Nabisy for service providers. You must give your service provider access to your Nabisy account.
- 2. In order for the service provider to be able to request information regarding your Nabisy account and for the BLE to be able to reply to him, the service provider must be given power of attorney, the original of which you should send to the BLE. This power of attorney is valid until revoked.

12 Do any costs arise for access to Nabisy or its use?

No. Access and use of the government database Nabisy are free of charge.

13 I can indicate emissions in Nabisy with one decimal place only. Is that intended?

The decision to round the GHG values to one decimal place was taken because of faster processing in Nabisy and to avoid errors.

This is in line with the Renewable Energy Directive. There, both the fossil reference values for liquid fuels for electricity generation in CHP plants and for heat generation are rounded off to the nearest integer.

Only the GHG value for fossil fuel was rounded to one decimal place.

The total default values for GHG emissions in Annex V of the Renewable Energy Directive and the partial default values for cultivation, transport and processing are expressed in integers. The same applies to the specified specific energy values for the various types of fuel from Annex III of the Renewable Energy Directive.

14 I accidentally booked a proof to another member state's discharge account. How can I get this proof back?

If an economic operator wishes to request the retransfer of a proof held in a discharge account in another Member State, he must obtain confirmation from the exporting authority of the Member State. The competent authority must confirm that the delivery/goods to which the proofs relates is not the subject of an application for reductions in that Member State.

15 What deadlines apply in Nabisy?

15.1 Entering proofs of sustainability by last interfaces

In the area of "sustainable biomass", all deliveries must be documented in a mass balance system. For this purpose, all recognised certification systems have laid down relevant specifications in the system principles, which participants will adhere to, of course.

All systems known to us have specified that the maximum permissible accounting period may not exceed three months. This does not apply to marketers of biofuels. These must complete their energy balance according to the requirements of the tax authorities. For Nabisy, we deduced that plausible deadlines had to be set, at least for the preparation of basic proof. Taking into account the special needs of the gas industry, the deadline for the submission of sustainability certificates was set at 30 days after the end of the mass balance period relevant for the delivery. Balancing dates are thus 31 March, 30 June, 30 September and 31 December and are therefore quarterly.

Example: The goods are delivered on 01.10. The corresponding proof of sustainability can be issued until the end of the mass balance period (31.12.) plus 30 days of goodwill (30.01.).

We pointed out this regulation in our information letters of November 2013 and February 2015.

For technical reasons, proofs cannot be issued retrospectively. The date of issue of a proof is generally the current date.

15.2 Passing on of proofs by a supplier (trader).

Suppliers do not have such strict requirements regarding the passing on of proofs to their customers. However, the passing on should always take place promptly / immediately with the delivery. Your customers, for their part, can only pass a proof on when it is available on the account. Please make sure to minimize gaps that arise here.

However, the voluntary schemes and certification systems provide for a mass balance period of 3 months.

You should also take into account possible deadlines set by your customers (e.g. submission to the biofuel quota office or the network operator).

However, you can contractually agree, for example, that regular deliveries of a month can be combined in order to minimize the administrative effort. However, the period of one month may not be exceeded for such bundling and is only permitted by mutual agreement.

16 What should I bear in mind when entering proofs?

16.1 Restrictions regarding quantity

To create proofs of sustainability, Nabisy sets an equivalent quantity limit of 185,000,000 MJ.

Quantities delivered in excess of this limit must be split between several proofs.

FAQ Nabisy

16.2 Indications regarding quantity on a proof of sustainability in Nabisy

For liquid biofuels, the quantity has to be expressed in cubic metres only.

For gaseous biofuels, the quantity has to be expressed exclusively in kilowatt-hours.

When calculating the quantity, please be aware of the following:

- Volumes must refer to 15°C.
- The specific energy values from Annex III of the Renewable Energy Directive (Directive 2009/28/EC) shall apply.
- Energy values refer to the calorific value (formerly called lower calorific value). **This also applies to biomethane**.

The density values specified by the German tax authorities are authoritative for submission to the biofuel quota office or network operator.

(http://www.zoll.de/SharedDocs/Downloads/DE/DontShow/dv_treibhausgasquote_vorl aeufig.pdf?_blob=publicationFile&v=3:).

Fuel type	Specific density _{15°C} ,specified by the German Ministry of Finance			
FAME	0,883 [g/cm ³]			
Bio Ethanol	0,7935 [g/cm³]			
HVO	0,78 [g/cm ³]			
Oil	0,92[g/cm ³]			

17 What should I bear in mind regarding data transfers to / from the Austrian Data base elNa?

17.1 Transfers to Austria

- The quantities can only be transferred to elNa (Austrian database) as partial proof of sustainability and by a trader.
- Cubic meters (m³) is the only measuring unit permitted.
- Given that not all biomass codes deposited in Nabisy are permitted in Austria, not all biomass codes are accepted.
- The elNa-ID of the Austrian customer must be specified as the recipient.
- If this leads to an error message, check upper and lower case. If the ID is not deposited in Nabisy, we need a confirmation from the Umweltbundesamt in Vienna that the company is registered in elNa. We will then deposit the company in Nabisy so that it can receive proofs from Nabisy.

17.2 Transfers from the Austrian data base

- Transferring partial proofs from the Austrian database elNa to Nabisy is possible. The user of the Austrian database elNa has to specify the Nabisy-ID of the customer during the transfer; please observe upper and lower case.
- Proofs relating to elNa can be recognized by the beginning of the proof ID "AT-BM-10-".

18 May my certification body control the proofs / partial proofs I issued?

Yes, it may and is even obliged to do so.

According to § 53 in conjunction with § 26 of the Biokraft-NachV and BioSt-NachV, it is the task of the interface to forward copies of the proofs of sustainability issued by the interface to the certification body, which then forwards them to the BLE. The certification bodies are therefore responsible for the correct issue of the proofs. However, a certification body may delegate the transmission to the BLE to the interfaces (normal case) but must ensure that the interfaces perform this task correctly.

Furthermore, in order to issue a certificate, a certification body must check whether the interface meets the requirements of § 26 of the Sustainability Ordinances. These requirements also include the question of whether the interface may issue proof (whether it is the "last interface") and whether the correct issue of sustainability proofs is guaranteed.

Your certification body has contractually agreed the above rights and obligations with you.

19 (Old) proofs keep accumulating in my account. What happens with them?

You must retire proofs for which you do not have liquid biomass or biofuel in stock every three months in accordance with the principles of mass balance to balance your account. This means that at the end of the mass balance period you may only have sustainable liquid biomass or sustainable biofuels in your tank for which you have proof. In the majority of certification systems and voluntary schemes, a mass balance period comprises three months.

For this purpose, the BLE has set up retirement accounts to which you can book these proofs. A list of the retirement accounts is available at www.ble.de/biomasse.



Example:

I have 1,000 m³ of biodiesel in my tank at the end of the mass balance period. I have proofs for a total of 1,125 m³ of biodiesel in my account. If the difference of 125 m³ cannot be balanced with other biodiesel, the difference must be retired, either to a specific retirement account or to the general account "Shortfall on balance sheet date".

Installation operators may send already remunerated sustainability certificates to the BLE (nabisy@ble.de). We will mark the certificates with a note of use so that they will no longer appear in your account.

20 I have a proof that contains no information re. greenhouse gas emissions. Is this proof invalid?

Such proofs are not invalid.

For proofs which were subject to the so-called "grandfathering clause" (§ 8 para. 2 Sustainability Ordinances), the liquid biomass which was used (for offsetting against the quota obligation or for electricity generation and feed into the network) and produced in an interface that was commissioned before 23 January 2008, has to comply with the required reduction potential from 1 April 2013 onwards.

The purpose of this regulation on old installations was to prevent converters, which had been in operation for many years from being decommissioned immediately after the sustainability ordinances came into force in 2009 because they were no longer state of the art and possibly unsuitable to achieve the prescribed minimum savings of 35% compared to comparable fossil fuels. If this regulation was used, instead of indicating the emissions of the product it had to be stated that the interface was put into operation before 23 January 2008 (§ par. 18(1) no. 5(a) Biokraft-NachV or BioSt-NachV). Delivered quantities of biofuels or biofuel whose proofs of sustainability do not contain any information on GHG emissions in relation to the grandfathering clause may therefore not be assumed to have de facto achieved the prescribed minimum savings compared to the corresponding comparative value. In this respect, it is also not possible to rededicate such certificates retrospectively and to quantify the emissions with eventually existing default values.

Active proofs that make use of the grandfathering clause are therefore worthless. Within the scope of the Renewable Energy Directive 2009/28/EC of the European Parliament and of the Council, biomass delivered in quantities for which proofs of sustainability do not contain any information on their lifecycle emissions are considered to be non-

sustainable when used and are excluded from any kind of benefit. You may retire these proofs, but may not create new certificates in their stead.

The proofs concerned are thus worthless for use in Germany while they are not invalid.

21 Can I book a proof from an EU-System to a (German) DE-account?

Yes, technically speaking, you can book to any active account in Nabisy, but this is not fully recommended.

Please be aware of the following:

- If, as an EU-certified interface, you issue a proof of sustainability for an account whose ID begins with DE, your customer will receive an EU proof. If your customer passes this proof on via Nabisy, they will pass on a proof whose proof ID starts with DE.
- If you, as an EU-certified trader, transfer a proof via Nabisy to a DE account, the proof ID will change to DE. If the proof is also booked to an EU account after this transaction, the proof ID will continue to start with DE.
- Reversing this transaction is neither technically nor legally possible, given that the principles of the EU system allow the transfer of sustainable EU goods into the DE system, while the reverse is impossible. According to the requirements of the EU system, the goods lose their sustainability status with this transfer.
- The goods are accepted with the DE certificate in Germany and some other countries, but not in all member states. So please enquire in advance, whether and where a DE proof is accepted.
- If the goods are not to be used in Germany, you have the option of transferring this proof to a retirement account (e.g. to the country account of the target country or to a technical retirement account such as "shortfall in cover on the balance sheet date") and presenting the corresponding proof to your customer. A return to Nabisy is then excluded. Austria is an exception here, as Nabisy has an interface with the Austrian database elNa.
- The system ID always shows by which system the certificate was originally issued.

22 I have a proof, dating from before the system update, which does not contain savings for each fossil reference value. The proof only indicates emissions and a reference value. Yet I need a reference value other than the one on the proof. What can I do?

Proofs of sustainability issued after the Nabisy update of 15.01.2019 differ from the previous proofs. They, and all partial proofs resulting from them, contain the statement that either the total default value was used or the individual elements of the calculation formula for greenhouse gas emissions. Together, both new proofs show the greenhouse gas emission savings for all fossil comparison values. These proofs can be used for any purpose, provided, that the minimum savings are achieved.

Inventory proofs, i.e. proofs that were already stored in Nabisy before the update, only show emissions and a fossil comparator. In the past, the comparator could change when poofs were combined if the minimum saving for another (better) comparator was reached. This was necessary, for example, when fuel (comparator 83.8) was sold to the heating sector (comparator 77).

Since with the 15 January update, combining proofs is no longer possible, the comparatators in the proofs in store will not change.

However, if you pass on a proof for a different purpose with a different comparator to your customer, you must calculate the savings for the required comparator according to the following formula and list it on the supporting documents with the corresponding proof ID.

Formula for the calculation of savings:

$$Savings [\%] = \frac{(fossil \ comparator) - (total \ emissions)}{fossil \ comparator} \times 100$$

Example:

The proof in store includes the following values:

- fossil comparator 83.8
- total emissions: 28.4

Savings for the comparator 77 are required:

Savings
$$[\%] = \frac{77 - 28.4}{77} \times 100 = 63.12 \%$$

Emission savings for a comparator 77 therefore amount to 63.12 %.



23 How can I tell which proofs I passed on to my customers(s)/ network operator(s) in a given period?

If you are not sure which proofs or quantities you have already passed on to your customer or network operator, you can download an account statement.

The account statement must be downloaded for each quarter of the period.

The account statement contains the following columns:

- Antragsnummer application number
- Antragsdatum application date
- follow-up proof ID
- follow-up document link (optional entry in Nabisy)
- follow-up POS reciever
- follow-up reciever name

If these columns are filled, you have passed the proof on and will be able to see to whom and when.

24 What is the difference between proof, basic proof, proof of sustainability, partial proof of sustainability, POS and PPOS?

The proof of sustainability (POS) is a document accompanying the goods, which the manufacturer of the biofuel or bio liquids issues to document that the requirements of the voluntary schemes / certification systems within the framework of the Renewable Energy Directive (2009/28/EC) are met. This document is also called basic proof, as it is the first proof in the supply chain.

If the proof of sustainability is passed on in the retail chain, this results in a partial proof of sustainability (PPOS) or a partial proof, in short. The name does not imply that the previous proof was split. It may also have been transferred, for instance. This type of proof is the most common in Nabisy.

The proof of sustainability could also be called original proof while the partial proof of sustainability could be named follow-up proof.

The terms POS and PPOS are the corresponding terms in international trade. POS is the Proof of Sustainability, while PPOS is the Partial Proof of Sustainability.

Proof is the generic term and includes all kinds of proofs. We usually speak of proofs or POS in English.

25 Is there a legal difference between the validity of a proof and a partial proof of sustainability?

No, legally there is no difference. Both are equally valid and effective.

26 Based on a proof, can you tell the supply chain?

No, this is not possible. Although the proof contains some information that can be used to identify the manufacturer, this information is coded. The code is not accessible to everyone.

Only the company that held the previous proof can be identified from the partial proof. As this is your pre-supplier, it is not a disclosure of the supply chain.

27 What is a document link?

The field Document Link is an optional text field in which you can enter the invoice number, delivery note number, contract number or similar information intended to make it easier for you and your customer to assign a particular proof to specific deliveries.

The entry may have a maximum length of 15 characters. The following characters are allowed:

- A-Z
- a-z
- 0-9 • ,.-;:/

Umlauts or special characters, except for those indicated above, are not allowed.

The connecting document is always assigned to a specific transaction in Nabisy and can only be seen by the sender and the receiver of this transaction.

28 Why, according to Nabisy, do I not have a valid certificate even though I have a valid certification?

Nabisy has an automatic check routine that ensures that interfaces and suppliers/retailers can neither create nor receive or pass on in trade proofs of sustainability or partial proofs of sustainability without valid certification.

In your case, Nabisy background data indicates no currently valid certificate for you. This can have several causes. If you are subject to a German certification body, this entity is obliged to report to us your certificate's data record within 24 hours of its issue. If you are

not subject to a certification body recognised by the BLE, the obligation to report lies with your voluntary scheme.

Therefore, please contact your certification body or voluntary scheme and ask them to report your certificate to the BLE. Please also inform your certification body or voluntary scheme which role (interface [SSt] = manufacturer; supplier [Lfr] = retailer) you are active in in Nabisy, as it is possible that your certificate was incorrectly reported at that point. As a result, the reported certificate does not match your role in Nabisy and the error message occurs.

If you have only had a new certificate for a few days, please contact the BLE, as in individual cases your reported certificate may not have been deposited yet. To speed up the process, please e-mail a screenshot of the error message to nabisy@ble.de. We will examine the case and then contact you, your certification body or voluntary scheme.

Since the certificate is to be imported into Nabisy, the BLE needs the certificate prepared for that purpose, i.e. by means of an appropriate csv file, which will transmit data to the BLE in coded form.

One of these codes indicates the scope of the certification. This tells Nabisy whether you are a manufacturer or a trader.

For producers, Nabisy will only show you the biomass types that correspond to your area of scope, i.e. companies whose certificate shows the coding for an esterification plant will only be shown biomass codes for biodiesel.

In the case of suppliers, a distinction is made as to whether you are a supplier before or after the last interface. As only suppliers after the last interface are relevant for Nabisy, incorrect coding might prevent you from receiving or forwarding any certificates in Nabisy.

Certification carried out on Please enter the date on which the certification was carried out.	Participant ID Please enter participant ID	Certificate ID Please enter certificate ID	Valid from Please enter the date the certificate is valid from.	Valid until Please enter the date on which validity ends.	Scope of certifi- cation / type of participant Please enter the type of holding certified here. Multiple entries are possible and must be separat- ed by " " (Pipe).	Date of commis- sioning Please enter the commissioning date of the last interfaces here. Leave this field empty for all other partici- pants.
Format: dd.mm.yyyy	possible versions: see table sheet "ID" of the data record description	possible versions: see table sheet "ID" of the data record description	Format: dd.mm.yyyy	Format: dd.mm.yyyy	possible ver- sions: see table sheet "Scope of validi- ty" of the data record descrip- tion	Format: dd.mm.yyyy for last interfaces

Your certificates will be transmitted to the BLE in the following format and exclusively by your certification body or voluntary scheme:

Please note that the csv format may only be submitted by authorized certification bodies or voluntary schemes. Economic operators (interfaces and traders) themselves are not authorised to submit this data to the BLE. Therefore, in your own interest, please refrain from sending us a certificate as a csv file if you are not an authorized party yourself.

29 How long does it take to get my login data?

The BLE needs an average of two weeks to process an application for access to Nabisy, if the application is provided fully and correctly through the voluntary scheme.

The access data will then be sent by post on different days. The mail delivery times are not taken into account in the processing time. If the mail delivery time is too long, you can also have the documents collected by a courier from us. (⇔ Question 6: <u>I would like</u> to have a service provider take care of my Nabisy account. What should I bear in mind?)

When applying for access to Nabisy as <u>a trader under the supervision of the German</u> <u>Main customs</u>, it must be taken into account in addition that the biofuel quota office is asked for a statement between submitting the application and sending the access data. This interruption in processing at BLE is not taken into account in the average processing time of two weeks.



Note: We ask that you do not make any inquiries about the processing status. Your application forms will be processed according to the date of receipt - only the complete and correct application forms at the BLE counts.

30 I would like to use a new type of biomass for a proof. How do I proceed?

The interface contacts its certification system / voluntary scheme to indicate the need for a new biomass code. In case of waste, it must be documented accordingly, e.g. by let-ter/permits from a competent authority, that the biomass in question is waste, that the waste hierarchy of the Waste Cycle Management Act (KrWG) is observed and which waste code is applied.

The certification system submits an informal, but thoroughly justified application to the BLE. The interface provides the certification system with all required information (type of biomass, description of the processing/ transformation process, resulting emissions, possible alternative uses, etc.). If necessary, the certification body must also be involved. The BLE checks the information and requests further data if necessary.

In the case of waste and residual materials, the BLE brings about a coordinated decision to be made by the responsible ministries. Where cultivated biomass is concerned, the BLE decides on its own responsibility.

Following a positive decision, the certification system / voluntary scheme (multiplier) informs interfaces of their new biomass code.

31 I cannot find a certain biomass type on the current list of biomass types. However, I know that this biomass code was published before. How do I get the biomass code I am looking for activated for use in Nabisy?

In summer 2018, the BLE removed those biomass types from the possible selection for interfaces that had never been used before or had not been used for years. This is mainly for the sake of clarity. The list, which once contained over 400 existing biomass codes, was streamlined to about 160 codes.

If you wish to use a biomass code originally available in the list, please contact the BLE at nabisy@ble.de and provide the following information:

- your interface ID,
- the system you use,
- the biomass code you are looking for.

The BLE will check whether the biomass code can be activated for your system or whether the requested code has been updated.

Please note: Not all systems are approved for all types of biomass, so that a biomass code may not be activated for you.

32 Why can I not find a biomass type in Nabisy although it has been published?

This may be for various reasons:

32.1 The voluntary schme is not recognised for this biomass type

Your voluntary scheme is not recognised for this type of biomass. A number of schemes have been approved for certain types of raw materials only (e.g. soy products). As a participant in such a system, you cannot select biomass types for which your system is not recognised.

32.2 The BLE was notified of the wrong scope

With each certificate, the BLE receives information about the so-called scope of the interface. This means that the BLE will know whether you have a certification for a biodiesel plant, for instance. As this data is stored in Nabisy, only biodiesel codes are then displayed in Nabisy for selection to reduce the risk of incorrect entries.

If you find differences in the scope of the certification, please contact your certification body for clarification. The BLE may require a correction of the certificate from your certification body.

32.3 The extension of your plant has not been considered

You have recently expanded your plant and can now produce an additional type of fuel. Therefore, you do not find the biomass codes for it in the selection given in Nabisy

Contact your certification body for clarification. If necessary, the certification body may have to submit a corrected certificate to the BLE.

32.4 You made a wrong declaration

Nabisy does not show any biomass types in the selection? Check that you have selected the correct declaration for the biomass code you are looking for in Nabisy. Only if the declaration matches the type of biomass code will you get the code you are looking for.

Example: A biodiesel plant wants to use waste and residue code 38260010-200125-01 Biodiesel from separately collected used cooking oils and fats of vegetable origin). It must also select the respective declaration in Nabisy ("The bioliquid or liquid/gaseous biofuel has been produced by wastes, residues, cellulosic non-food-material or lignocellulosic material; the residues do not stem from agriculture, forestry or fishery nor from aquaculture") to provide the code.

33 I use a certain product in production but cannot find the appropriate biomass code or I am unsure which biomass code to use. Who can help me?

Please contact your certification system / voluntary scheme to find out whether your raw material is known by more than one name and whether there are differences, e.g. between the name given by the system and the one given in Nabisy.

An example for this is biodiesel from "EFB" (Empty Palm Fruit Bunches) which is listed in Nabisy under "Biodiesel from the preparation and processing of fruit, vegetables, cereals unsuitable for consumption or processing - vegetable edible oils and fats".

If you are not sure which biomass code to use for a product, please contact your certification system / voluntary scheme. The system will advise you and contact the BLE if necessary. The BLE will then respond to the system, which in this case acts as a multiplier

34 My certification body requests information from my Nabisy account. Can they do this? If so, why are they allowed to check my Nabisy account?

Yes, the certification body is entitled to request that information.

Under Section 16 (1) of the Biofuel Sustainability Ordinance, mass balance systems must be used to provide complete proof of the origin of the biomass for production. To this end, the requirements set out in Paragraph 2 must be met.

Furthermore, Section 17 (1) Biokraft-NachV stipulates that all suppliers must provide proof of the biofuels' origins, from the interface (producer) who issued the proof of sustainability up to the party required to provide proof, by documenting the biofuels' delivery in a mass balance system that also meets the requirements of Section 16 (2) Biokraft-NachV.

Both producers of the biofuel and traders must therefore maintain mass balance systems. Only the producer can issue the proof of sustainability, but, as part of the mass balance, suppliers must also document the information it contains.

In this context, Section 17 (2) No. 2 Biofuel Sustainability Ordinance states that the requirements under Section 17 (1) in conjunction with § Section 16 (2) is deemed to be fulfilled if the suppliers have undertaken to meet the requirements of a certification system / voluntary scheme and to provide appropriate documentation in the competent authority's database, which serves as proof of fulfilment of the requirements under (1).

The existence of the electronic Nabisy proof of sustainability for the fuel is also essential for its later usability and for crediting it against the GHG reduction quota in Germany. For example, Section 37 a) para. 4 sentence 7 nos. 1 to 3 BImSchG (Federal Emission Control Act) state that biofuels are treated like fossil petrol or fossil diesel if sustainability certificates pursuant to Section 14 Biofuel Sustainability Ordinance cannot be submitted, if they do not show greenhouse gas emissions or if they are ineffective and cannot be recognised.

The proof contained in the Nabisy database is therefore of essential importance. To disregard them when checking the mass balance would thus not only be unjustified, but would also deprive the entire German system of its basis for offsetting greenhouse gas reductions against the quota thanks to the use of sustainable fuel.

Based thereon, it is the certification body's task to verify the system / scheme requirements and to include the information provided in the database (i.e. the Nabisy proofs of sustainability with their corresponding data) in the verification of the mass balance. If it turns out that the number of proofs of sustainability exceeds the quantity of goods produced or received, or if other improbabilities occur, appropriate measures (documentation in the audit report, cause analysis, initiate discharging proofs) must be taken.

In this context, we would like to point out that in the context of mass balance checks, the proofs of sustainability contained in Nabisy must always also be considered, insofar as the company concerned provides information in this context.



35 I have entered my password incorrectly too often and blocked my access. Who can help me and how?

You have entered your password incorrectly five times, so your account has been blocked automatically. This precaution has been implemented to protect against misuse.

To unlock your account, please contact nabisy@ble.de with the following information:

- your name,
- the subscriber ID of the company you wanted to register with (e.g. EU-BM-99-SSt-1234678 or EU-BM-88-Lfr-87654321) and
- the information whether you still know the last assigned password.

We can then unlock your account so that you can reuse the last assigned password.