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## Emission News 10-2014

Practical Information for Emission Trading  
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### Message regarding Carbon Leakage status to be reported until 01.10.2014 - Recalculation of allocations for Airlines

After returning from their summer holidays, most plant operators can expect a “To Do” from the DEHSt, with a deadline for completion by 1st October 2014.

With the addition of several PRODCOM-numbers more than 10% of industrial operators will get a chance to be added with their products to the Carbon-Leakage-List (and thus doubling their free allocation in part) according to estimates by Emissionshändler.com®. Therefore it may be necessary to resubmit the required information to the DEHSt by the aforementioned date.

But even if there is only a very slim chance of a higher allocation according to an assessment of Emissionshändler.com®, at least half of the German plants operators will still have to create an appropriate notice in accordance with Regulation of 05. August 2014. Assistance and information about this topic and also about the specifics of the reorganization of free allocation to airlines you will find in our current **Emission News 10-2014**.

#### Review of the introduction of the Carbon Leakage (CL) Instrument.

During the first and the second trading period 2005-2012 operators received CO2 emission allowances for free. The amount of which was mainly being determined according to historical

emissions. For the third trading period (2013-2020) a completely different scheme for the determination of the quantities of free allocations was introduced. Its main characteristics are:

- The free allocation amount will no longer be determined on basis of historical emissions of an operator, but according to the specific emissions, based on the activity level, which corresponds to the average of the top 10% of the most efficient plants in Europe. Such a value is set per various sectors.
- The now determined amount is not yet allocated for free but will be reduced by an initial starting amount of 20% and will be subjected to an annual reduction. All for the ultimate objective to stop issuing the free allocation by 2012 altogether:

#### Free allocations without considering a CL-status

The formula for the reduction, meaning the reduction for those plants without the CL-status is for the third trading period as follows.

Referring to the calculated reference quantity the actual allocation in the years of the third trading period will only be for the following units

Year	2013	2014	2015	2016	2017	2018	2019	2020
Allocation Factor	0,8000	0,7286	0,6571	0,5857	0,5143	0,4429	0,3714	0,3000

This means that for the year 2020 only 30% of the calculated reference quantity will be allocated free of charge. Summing up over the years, the allocation will be reduced to 55% of unimpaired reference quantity.



When this statutory rule was issued at that time, it was assumed that the price per ton of CO<sub>2</sub> emissions would be hovering about 17 EUR or more. This would have led to a significant financial burden for certain operators, which would then have to buy the no longer assigned amounts in the market. This in turn would have led to a significant financial disadvantage compared to competitors outside of the European countries and the EU emissions trading system.

This effect would have led to a migration of production into other countries, where the result would have been at least the same CO<sub>2</sub> emissions, or even higher, due to less advanced production facilities used there. This would in the end have led to a "Leakage" on CO<sub>2</sub> trading system and its detectable emissions.

Therefore the Commission decided to create a so-called carbon-leakage-list (CL-list), in which the industries are listed which are impaired by a distortion of competition. This list was adopted in December 2009 under the condition to be reviewed every 5 years and to be revised as appropriate. This review has now been performed and the new list (known as pre-release version) is valid with effect from 1.1.2015.

The operators whose products are on the CL-list, are not subject to the formula for reduction and receive their free allocation by a factor of 1.0 for the calculated reference quantity, unless a general correction factor would be implemented which however would affect each operator with free allocations. Thus, operators not listed with their products and Prodcom-Numbers on the CL-list do have a significant advantage over those who are not on the CL list.

### **The Investigation into whether a plant operator and his company can obtain (or lose) the CL-status with its products from 2015 onwards**

In its monthly reports to the statistical State Agency for product characterization, each company is using the so-called 8-digit PRODCOM-numbers. It may be that such a number is valid for the entire company. It may also be that different numbers are used within the company for various product divisions.

The allocation of numbers is performed by the statistical offices of the State Agency. The first 4

digits of 8-digit PRODCOM-numbers indicate to which NACE-code the product belongs.

It should be noted that there is a fundamental difference between the CL-lists of 2009 and 2014:

- The CL-list of 2009 refers to the NACE-code of 2003.
- The CL-list of 2014 refers to the NACE-Code of 2008, as well as to some PRODCOM- numbers also from the new list.

### **Comparison between the new and the old CL-list**

The NACE-codes of 2003 and 2008 do not have any methodological reference to each other. They can only connect using a freely available on the Internet table indicating for the same product categories respectively the old and the new number. A comparison of the old with the new list, however, is essential if you want to determine whether product categories have been eliminated or whether new ones have been added. Such a comparison is only possible via the included product categories. But since the list is sorted by ascending order of the NACE-numbers, any attempt for a comparison will end in chaos.

The comparison is only possible when arranging old and new list by name of the product categories. Emissionshändler.com® has done just this for its readers which can be seen in the following illustration. But beforehand Emissionshändler.com® must mention that that these results do not acclaim to official accuracy. The results shall only provide information hint to possible conclusions to be drawn by the operator. In no means shall the resulting list replace the due diligence review for each operator on its individual scenario!

Our audit was conducted on the basis of the two lists in English. And this is the way the results are displayed. Another point to be mentioned on the systematic of the results should also that the majority of product categories mentioned in the CL-lists refers to the four-digit NACE numbers. For those whole families of PRODCOM-numbers are listed, all of which have the first four digits in common. But for some the eight-digit PRODCOM-numbers are mentioned. This means that the CL-status refers only to the corresponding product and the other products, which, according to their first four digits of the PRODCOM-number belong for the same NACE-family, do not have the CL-status.



## The result of the comparison: New candidates for the CL-list from 2015 onwards!

As a result of our audit, we found that in the CL-list of 2009, only one category in the new CL-list of 2014 no longer appears, namely: "other publishing" or in the German list of 2009 "Sonstiges Verlagswesen" named as publishing.

On the other hand the comparison of CL-Lists yielded several new product categories, which previously had to accept a steady reduction of its allocation and now can claim much higher allocation. Some of these categories were, however, were already in use by the Commission for the year 2014, which probably was known not to each of the operators concerned. Below is the mentioned overview of Emissionshändler.com®:

Neue NACE-Nummer oder Prodcod	englisch	deutsch
10311300	<u>Dried potatoes in the form of flour, meal, flakes, granules and pellets</u>	Mehl, Grieß, Flocken, Granulat und Pellets aus Kartoffeln, nicht zubereitet oder haltbar gemacht
10311130	<u>Frozen potatoes, prepared or preserved (including potatoes cooked or partly cooked in oil and then frozen; excluding by vinegar or acetic acid)</u>	Verarbeitete Kartoffeln, ohne Essig zubereitet oder haltbar gemacht, gefroren
1622	<u>Manufacture of assembled parquet floors</u>	Parketttafeln aus Holz
1086	<u>Manufacture of homogenised food preparations and dietetic food</u>	Homogenisierte Nahrung
2822	<u>Manufacture of lifting and handling equipment</u>	Maschinen zum Laden und Fördern
2910	<u>Manufacture of motor vehicles</u>	Herstellung von Kraftfahrzeugen
2752	<u>Manufacture of non-electric domestic appliances</u>	Nichtelektrische Haushaltsgeräte
3109	<u>Manufacture of other furniture</u>	Möbel
2362	<u>Manufacture of plaster products for construction purposes</u>	Gipsezeugnisse für den Bau
25501134	<u>Open die forged ferrous parts for transmission shafts, camshafts, cranks and cranks etc.</u>	Freiformschmiedestücke aus Stahl
8122250	<u>Common clays and shales for construction use (excluding bentonite, fireclay, expanded clays, kaolin and kaolinic clays); andalusite, kyanite and sillimanite, mullite, chamotte or dinas earths</u>	Grobkeramischer Ton und Tonstein für Ziegeleierzeugnisse; Andalusit, Cyanit, Sillimanit; Mullit; Schamotte (gebrannter feuerfester Ton)
2931	<u>Manufacture of electrical and electronic equipment for motor vehicles</u>	Elektrische und elektronische Ausrüstung für Fahrzeuge
2572	<u>Manufacture of locks and hinges</u>	Schlösser und Haken
2219	<u>Manufacture of other rubber products</u>	Produkte aus Gummi

*The new product categories for a CL-status versus the old list from 2009 (possibly incomplete)*

Note that the foregoing table does not claim to official validity. It points to sectors and areas, which are particularly interesting for some operators because they offer a very good chance for an additional allocation. This, however requires to work closely with the relevant national authority's demands and timelines. Otherwise, the possible additional allocation is lost. However, this table can in no way replace an individual test by each operator.

Since the new assignment of the operator is performed by the national authority only on the basis of additional information, the DEHSt for Germany has issued extensive provisions,

explaining which additional information has to be provided.

According to the notice in the Federal Gazette on 05.08.2014, BAnz AT 12.08.2014 B8, Section I, No.1 letter g and No.2) the provision of the additional information has to take place until 01.10.2014.

The information has to be provided in an in a complex excel form, available [online](#), that has to be submitted to the DEHSt on 26.08.2014. In some cases even a confirmation by the verifier must be provided. A formal deadline extension is not possible.

In the three mailings from 06.08, 14.08. and 28.08.2014 the DEHSt gives more information about editing, especially in a 13-page [guide](#) and a reference to external documents.

These documents are extensive and therefore we cover only the most important points. In more complicated situations the individual plant operator must perform a due diligence analysis to assure, not to miss anything, which can lead to a possibly higher allocation.

After evaluating all the information available the following general deductions can be made:

1. Adjustments of allocation amounts because of a change of carbon-leakage-status of products take place by law (§ 9, Section 3, Sentence 3 Allocation Regulations 2020, ZuV 2020), which applies to both increases and reductions for the allocation amounts. The means that the authority in turn is checking for all previous allocations whether through the announcement of the new CL-List from 1.1.2015 the allocation from the year 2015 must be corrected. In case of that, the authority will perform this correction, without requiring a separate application to be submitted by the operator.
2. However, the operator must ensure that the authority receives all the information required to enable such a decision.
3. When a notification is required, this must be done in the provided "Excel form for the detection of Carbon-Leakage-Status" until the 1st October 2014 (submission via the VPS).
4. The notifications made have to be on the basis of the allocation elements for which the individual
  - a) PRODCOM-numbers,
  - b) Activity rates;
  - c) Installed initial capacities, etc.

must be indicated. If during the third trading period multiple allocation elements were used, then these messages are correspondingly large.



5. Messages are in principle not required if there is no free allocation or the allocation application for the third trading period is based on product benchmarks based (if current). In this case, the authority is already has all necessary information from the allocation application for the 3rd HP.
6. But if the allocation application for the third trading period contains allocation elements of the so-called Fall-back-Approach (heat emission level, fuel emission value, process emissions), then the change in the Carbon-Leakage-Status of products requires a remapping of allocation parameters relevant to the allocation of elements with and without Carbon-Leakage-Risk. The overall activity rate of an allocation approach does not vary by Carbon-Leakage-Adaptation, it will only be divided differently depending on the location in the PRODCOM-numbers.
7. Plant operators are required to examine whether Fall-back-Allocation elements of their plants are affected by a change of the Carbon-Leakage-Status. This also includes an assessment whether the relevant national authority has received all the data necessary for the adjustment of the allocation. This assessment has to be performed based on the information, the PRODCOM-numbers used in the report to the statistical State Office and the numbers contained in the new CL-list made in the allocation application for the third trading period.
8. For the notification regarding the Carbon-Leakage-Status it is mandatory to use the published DEHSt excel form.

Based on the above mentioned principles about 50% of operators who receive a free allocation in Germany will not have to provide a notification. No message does not automatically imply, that operators could not come on the newly created CL-list and can get a higher allocation.

This could be due to the fact that the authority has already all the available data and is then in a position to arrange the increase by itself. The operator still has to ensure that Prodcom-number he currently uses are known (by statistical State Agency), so that a possible increased allocation will not be missed. For this reason, the submission of a notification is still quite useful.

If you look at the newly added NACE respectively PRODCOM-numbers in the table on page 3, then one can assume that in the areas of the potato processing industry and also the area of the dairy industry (homogenization) as well as in the area of the clay and ceramics industry, most of the possibly positively affected companies will reside. But the

rubber and automotive supplier industry can be hopeful, as well as some metal-processing operations.

Here will become visible to what extent these industries quickly and properly gather the necessary data and submit to the Authority or automatically will benefit in case all PRODCOM-numbers were present already.

### **Infobox** **Evaluation of the notification obligation and outsourcing the notification to a 3<sup>rd</sup> party**

*For operators who are not sure to what extent they are affected by the notification requirement or that are hoping for a place on the new CL-list because of the changed PRODCOM-numbers and operators that do not want to take any risk of incorrect or incomplete notification because of the associated financial opportunities - Emissionshändler.com® has this subsequent offer.*

**Examination of the notification obligation:** Examination whether a notification requirement to the DEHSt is present or not. This is done with the help of three essential information pieces from the owner. This is the allocation application 2013-2020 as xml-file, the allocation notice 2013-2020 and the complete set of PRODCOM-numbers that are used by the operator since 2013 for its reports to the statistical State Agency.

*As a result, the operator receives a document which indicates whether a duty of a notification exists and how many additional free allocations the plant would receive. In addition we would provide the information how much effort it would be to create requested notification. The cost for the examination: 1.0 man day's rate.*

**Creation of the notification:** For an effort calculation, we need the above three information or documents. On these grounds we can make an offer, which is likely to result in 1.5 to 3.0 man day's rates depending on the plant situation.

### **Requirement of verification of data**

A re-verification may be only omitted only if a complete division of all relevant PRODCOM codes on the entire allocation approach was already part of the verified application documents for the third trading period and therefore the DEHSt is in position to make a judgement about the "Non-CL" to "CL" status by itself. Should there still be a need



for a change notification to the DEHSt, the operator must send the changed data in the prescribed excel file on the VPS to DEHSt.

In case the division from the application documents has not been done completely and the resulting allocation leads to changes, then the specified excel file and any further documents must be verified and must also be forwarded from the verifier to the DEHSt.

### Conclusion to the notification obligation

The fact that the DEHSt saw the need for, a 12-page document, "Instructions for adapting the allocation" describing the allocation speaks for itself. So it is once again a rather complicated procedure became to meet the requirements, which can lead to an increase in the allocation due to additions in the new CL-list.

As a result all operators requesting an allocation for the third trading period on the grounds of heat- or fuel type - emissions or on process emissions, an individual examination will be mandatory. These examinations must yield whether the allocation application for the third trading period contains all information required by the DEHSt for their decisions on the new CL-list (or not).

The responsibility to provide the required data to the DEHSt until the 1st October 2014 lies with the operator. The decision whether to send a message to DEHSt or not must be made by the operator, keeping in mind that in case of no notification a possible higher allocation will be lost.

Operators who are aware of the full consequences of a possible "lost allocation increase" but who are restrained due to technical issues or lack of or time to perform such an evaluation by themselves should turn to an external expert consultant for a detailed evaluation of their situation. Read more on page 4 on this in the infobox section.

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### Regulation (EU) 421/2014 changed the delivery and allocation for Airlines

EU Regulation 421/2014 of 16 April 2014, entered into force on 30.04.2014, has changed the Directive 2003/87/EC. The change affects all aviation activities in the period 01 January 2013 to 31 December 2016.

For the above time period a reduced obligation to surrender certificates for emission regarding flights within the EEA countries (EU + Iceland, Liechtenstein and Norway) has been set, which also affects the obligation to submit emission reports.

The obligation to submit a verified annual emissions report for the reporting year 2013 has been postponed by one year to 31 March 2015 and the deadline to surrender certificates has been postponed from 30 April 2014 to 30 April 2015. Because of the fact that the allocation of free allowances is proportional result to the reduced obligation to surrender certificates – it is advisable that the aircraft operators deal with these changes intensively and that they should study the new allocation, after its publication thoroughly.

#### Infobox

##### *The previous system of free certificate allocation*

*Each aircraft operator subject to emissions trading was entitled to apply for a free allocation of emission allowances. Together with the **emissions report for 2010**, a onetime verified report on the transport performance (tonne-kilometre report) of 2010 was submitted. This tonne-kilometre report was the operator's application for the issuance of free emission allowances for flights, which are part of regulation.*

*The report stated the transport volume per aerodrome pair. In the summary of that report the transportation volume for 2010 was displayed by flights on the departure and destination per EEA State and per non-EEA State. Based on these data, the aircraft operator can calculate its transport performance (tonne-kilometres) for flights within the EEA and for flights to and from third countries. In determining the allocation of free allowances, the total transport performance (tonne-kilometres) of the year 2010 was used as a basis. The allotment and issuance of allowances to aircraft operators has its grounds in the Directive 2003/87 / EC where the calculation is based on the verified tonne-kilometre data per relevant period.*

*Regarding the free allocations, the EU Commission has published the guideline values (benchmarks) for the calculation of aircraft operators on 26.09.2011. On average the value equalled 0.6797 allowances per 1,000 tonne-kilometres for the emission year 2012 and 0.6422 allowances per 1,000 tonne-kilometres from 2013 to 2020. The list of free allocations to managed aircraft operators of Germany was published in December 2011 for the reference years 2012 and the years 2013 to 2020. Each aircraft operator received an allocation decision on the allocation of free allowances for the trading period 2012 and 2013 to 2020.*



### Change in the allocation for the years 2013-2016

The amendment of the Emissions Trading Directive by Commission Regulation (EU) No. 421/2014 has the following consequence. The allocation of free allowances has been reduced in proportion to the reduction of the surrendering obligation, which in itself has been reduced as a result of the significantly downsized geographical scope (Intra-EU flights only). As a result of this a recalculation of the free allocation of allowances must be made which considers the flights are excluded reporting (and thus from the allocation).

### The obligation to surrender allowances does not apply to:

- all emissions resulting from flights between an aerodrome in the EEA and an aerodrome in a country or territory outside the EEA during the calendar year 01 January 2013 to 31 December 2016;
- flights between an aerodrome in an outermost region of the EU and an aerodrome in the EEA but outside the outermost region of arrival or departure in each calendar year from 01 January 2013 to 31 December 2016. Part if the outermost regions are in accordance with the policy, the Canary Islands, the Azores, flights across the Atlantic, Greenland, Switzerland and all the states of the former Yugoslavia, unless they are already in the EU.

For the purposes of this directive flights between airports in EEA countries and countries that have recently become members of the Union in 2013, are considered as flights between airports in EEA countries. An aircraft operator will now receive a number of free allowances that has been reduced proportionally to the reduction of the delivery obligations with consideration to the above exemptions.

### The calculation procedure for the allocation of free allowances in accordance with the Regulation (EU) 421/2014

The result of the new regulation's calculation should be examined by each airline including the associated and modified delta (surplus or shortage of certificates), based on the once reported TKm for 2010. Only then an operator can verify the newly defined allocation quantity for correctness. The necessary steps are as follows:

1. Determination of tonne-kilometres for all affected flights (airport pairs) by the amended delivery obligation from the emission report for 2010;
2. The value determined shall be multiplied with the benchmark of 0.6422 per 1,000 Tkm;
3. The calculated value is then to be subtracted from the previous annual allocation amount;
4. As a result of the subtraction you receive the reduced (new) allocation amount of annual allocation of free allowances.

The following is a numerical example illustrating the old calculation methodology and the now adapted calculation of free allocation to airlines for 2013-2016.

#### Previous calculation for the year 2012 (Stop the Clock):

a) Sum of tonne-kilometres (Tkm) in 2010:	220.000.000
b) Part of "Non EEA Tkms" from the report of 2010:	105.000.000
c) Part of Tkms relevant for emissions trading from the report of 2010:	115.000.000
d) Former, percentage of relevant Tkm for emissions trading:	100.000%
e) Former (non-EEA) percentage of Tkm for emissions trading:	47.72%
f) Former (EEA) percentage of Tkm for emissions trading:	52.28%
g) Former, free allocation a) x Benchmark 0.6797/1,000 Tkm in 2012:	149.534
h) Proportionality free allocation c) x Benchmark 0.6797/1,000 Tkm in 2012:	78.166

#### New updated calculation of allowances per year in the period 2013-2016:

a) Sum of tonne-kilometres (Tkm) in 2010:	220.000.000
b) Part of "Non EEA Tkms" from the report of 2010:	105.000.000
c) Additional reduced quantity of Tkm in the EEA*:	47.900000
d) Resulting new quantity of Tkm in the EEA Report 2010 (b - c):	67.100.000
e) New percentage of relevant Tkm for emissions trading:	30.50%
f) New free allocation d) x benchmark of 0.6422/1,000 Tkm for 2013-16:	43.091

\* The additional reduced quantity of Tkm results from the old definition EEA territory from 2010 to the new definition of the EEA in accordance with the Regulation (EU) 421/2014 from 16.04.2014, meaning without outermost regions of the EU and for flights where emissions trading is no more mandatory until 2016.

The percentage of the reduced allocations for the 2013-2016 in emissions trading for aviation had to be published in accordance with Regulation 421, Article 28 by each Member State for the it airlines administers, until 01.08.2014. Many Member States failed to adhere to that deadline. The new allocations for Germany were published on 28.08.2014 ([allocation list for Germany here](#)).

The new allocation list contains besides the columns for the operator ID and name, three more columns: Annual allocation of free allowances, Coverage percentage for reduced scope and Reduced annual allocation of free allowances to be issued for 2013. These column headers can certainly be seen misleading, so its content is briefly explained below.

*The calculation is as follows: "reduced allocation amount divided by original allocation amount". The result is the specified percentage. The reduced*



*allocation quantity is in fact the new, free allocation per year for the period 2013-2016.*

One will find significant differences when looking at the allocation percentages between the individual airlines. These percentages also constitute the proportion of transport volume at the reduced scope. The obvious reason for these differences lies in the fact that some airlines have carried out almost exclusively intra-European flights EEA in 2010 while other airlines have had almost exclusively non-European flights only in the former reporting year; or had a high proportion of Azores and Canary Islands flights. This in consequence lead to the fact that in times of a changed proportion (Intra-EU flights vs Non EU Flights) the relevant aircraft operators will now be relatively disadvantaged or favoured with the free allocations in 2013-2016.

In any event the own calculation and verification of the allocation amounts by the operator is now possible via simple math. This helps operators to be prepared in advance for the official publication of the revised allocation decisions in December 2014. The notification of the individual allocation decision for operator is expected by 31.12.2014.

Certificates that have been allocated in excess to the operator for 2013, will be reclaimed by the authority of the Member State.

The allocations for the years 2013 and 2014 are expected to be posted to the registry account of the operator most likely in February 2015. According the unofficial statements of authorities, that also applies to the allocation of free allowances for year 2015.

### **The changes for the annual report**

For the preparation and submission of the annual report, three important points should be noted. Operators who have dutifully filed the verified emissions report until 31 March 2014 for all emission related to flights in 2013, the German

DEHSt does not required to create a new report. For your own safety, we recommend to request a written confirmation you're your administering national authority whether this is also the case for your member state. Furthermore we recommend to operators that have not yet submitted the verified annual emissions report for 2013 to initiate verification better sooner than later because in the time left until March 2015 two emission reports (2013 + 2014) will have to be produced, verified and submitted.

Operators that have only submitted a verified emissions report for EEA flights by 31<sup>st</sup> March 2014 should, in each case immediately contact their administrating member state authority.

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Kind emission regards

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