**MINUTES OF PROJECT MEETING**

**ODS and F-gases**

**Brussels – 19 and 20 January 2012**

Participants 05/07/2012: Aléxandros Kiriazis (DG CLIMA), Eva Goossens (EEA), Tom Dauwe (VITO), Wolfram Jörß (Öko-Institut), Enriko Käsper (tripledev), Rait ??? (tripledev)

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# Agenda:

1. Data flow & storage principles (webform/BDR, address master file, FDB/ODS-DB) (**cross-cutting F-gases & ODS)**:  
   Issues raised at and conclusions from the IT meeting 18 June in CPH
2. Features for user-friendliness of web-form (saving / printing options etc.) (**cross-cutting F-gases & ODS)**  
   Tiers of checks for automatic QC (**cross-cutting F-gases & ODS)**
   * + - company/ address data (obligatory confirmation/change on opening the webform)
       - QC on entry of data (correct type of information, figure, order of magnitude, alphabetic etc)
       - QC consistency cross check on (attempted) submission
3. Discussion / approval of specific proposed quality checks **(F-gases specific)**
4. F-Gas indicator **(F-gases specific)**
5. QA rules for data entry **(ODS specific)**
6. Outstanding issues of ODS reporters **(ODS specific)**
7. Draft ODS annual summary report **(ODS specific)**

# Session 1&2: Data flow & storage principles / localisation of QC checks in the workflow General features for user-friendliness of web-form

Eva Goossens gives a short report on the IT-focused meeting 18 June 2012 in Copenhagen: Mostly technical details had been discussed there.

The webform is embedded in the CDR. After creating an envelope, reporter can open the webform. The data entered in the webform is stored in a XML file. The XML file can be visualised as an HTML. A conversion to a PDF file would be the preferred option. Printability and decent page breaks are a ey issue for user friendliness. Conversion into an XLS file is not regarded as necessary, as this might be confused by reporters with the previous xls-based reporting form.

The Printout file should contain error messages! Reporters need to have the option to print and or download the printout file

* **ACTION** EEA & Tripledev will clarify whether and how a conversion of the HTML to PDF if feasible.

There might be a danger/possibility that companies download the xml file, manipulate/edit that ‘at home’, re-upload the XML into the envelope and thus by-pass the envisaged workflow and QC procedures. An idea might be not to show the xml to users, which would make it more difficult (however not impossible) to download it. Instead, an HTML or PDF file containing the visualisation of the XML might be visualised in the envelope in order to prevent it from appearing empty. Eventually an xml schema check would need to be run..

* **ACTION** EEA & Tripledev will the respective workflow.

Companies wishing to revise their submission and companies asked by the ETC/ACM to revise their submission need to have the option to load their previous submission into a new envelope in order not to need to start from scratch. The workflow might build on a ‘reject submission’ function which opens (if ETC wants a resubmission). And/Or a ‘copy envelope’ functionality in the BDR for companies which want to resubmit by themselves.

* **ACTION** EEA & Tripledev will clarify how this can be organised.

**Conclusion on QC checks on their roles/positions in the data flow:**

There are three types of automatic QC checks:

1. Confirmation of company related data on opening the webform
2. Basic validations on the fly directly while entering the data (e.g. correct data format, no negative figures (where applicable))
3. Consistency checks after finalisation of the full report (checks which need several pieces of information spread over the webform.

For QC type 1, only a confirmation of pre-loaded company information is possible and necessary for proceeding to fill the form. IN case any detail of the company information needs to be changed, the filling of the webform is cancelled. First, the company information has to be updated in a separate dialogue with the EEA / BDR Helpdesk

* **ACTION** EEA will clarify how the process of updating company information will be handled.

For QC type 2, the error message will be displayed immediately. QC type 3 is triggered by clicking on a designated button. QC type 3 error messages will be displayed after the QC 3 routine has run. Two suboptions of QC type 3 error messages are possible: a)reporters definitely need to change defined pieces of information or b) reporters may give an explanation which is saved with the respective piece of data and which will be accepted to pass that specific automatic QC check.

* **ACTION** EEA & Tripledev will clarify the exact positioning of the QA type 3 routine within the workflow of the BDR envelopes. The preferred result is that it is impossible for reporters to release an envelope containing an dataset which has not passed ALL QC checks. This eventually includes renaming and/or linking of buttons that start the QC3/finalisation of webform/release of envelope functionalities.

It was discussed that it might be useful to keep the finalisation of the webform (including QC) apart from the release of the envelope in order to allow companies to add files if they want.

Date of submission should be set automatically on submission/release of envelope and should not be editable by the reporter.

# Session 3: F-gas specific aspects of the webform & F-gas specific QC checks

Enriko Käsper presents the present draft version of a webform for F-Gases

Alexandros Kiriazis comments on general layout:

The webform should resemble the regulation as much as possible. All the textual parts need to be included. A Top-down workflow on the web pages is preferred, i.e. something like a “next form” functionality at the bottom instead of the full set of sheets on the top. Only those sheets which are applicable to the reporters choice of activities and gases should be displayed.

For the webform, it is okay, to display data fields only for those gases which the reporter has chosen. In the webform the HFC producer & importer forms 1&2 can be merged. In the (HTML) printout version however, all gases shall be displayed like in the regulation.

Order of HFCs in the dropdown menu will be aligned by numbers (not by alphabet). However, newly selected gases appear on the right-hand side of the screen on the webform in the order as chosen by the reporter. In case reporters select HFC-134 or HFC-143 (which will appear in the dropdown list right before the more common HFC-134a & HFC-143a) reporters will be asked to confirm that they really wish to report on that gas. (In the 2012 reporting season, ALL reports containing HFC-134 or HFC-143 were mistakes!)

Sheet general information:

* The term ‘confirm or modify’ in the heading should be deleted.
* ‘no reporting’ will be relabelled as ‘not obliged to report (NIL report)’
* **ACTION** ETC/ACM will update FDB: Nil reports have to be accounted in the FDB in future

**Automatic QC rules are discussed one by one based on the list distributed by Wolfram Joerss on 4 July 2012 (Annex to the minutes): Conclusions/Decisions as follows:**

| **No** | **Check name** | **Conclusion/ Decision** | **Comment** |
| --- | --- | --- | --- |
| 1 | Company user name | approved |  |
| 2 | Company name | Not needed | Company information should not be changeable.  If changes are necessary, this must be done through a different process (manually or automatically)  Just one confirm or modify button: on modify: webform is cancelled |
| 3 | Company address data | Not needed |
| 4 | Contact person data | Not needed |
| 5 | certification box | approved |  |
| 6 | Submission date | Not needed | Submission date will by entered automatically on submission of report. |
| 7 | Transaction year | approved | For the Transaction year, the brackets with the explanation as in the regulation should be taken over. The allowed range of years is 2007 until current year (latest reporting year +1, i.e. 2013 for the webforms’s application in 2013); the transaction year is prefilled by default with the recent reporting year. |
| 8 | Production / import boxes | approved |  |
| 9 | Deletion of data in unnecessary sheets | approved | Modification: issue of warning-pop-up: box can only be unticked if data in respective form are deleted first. |
| 10 | Figures only | approved |  |
| 11 | Non-negative figures | approved |  |
| 12 | Figure format | approved | Up to three decimals.  Display in the webform: aligned to the left, as many decimals as reported.  Display in the printout version: aligned to the decimal point, as many decimals as reported.   * **ACTION:** Tripledev will find a reader-friendly solution for display in the printout version |
| 13 | Order of magnitude | To be checked | Restriction to non-producers:   * **ACTION:** ETC/ACM checks how many non-producers reported figures above 1,000 this year. * **REPLY: In 2012, five non-producing companies reported values above 1,000 tonnes (next to six producers). Thus, I conclude, we will not have an ‘on the fly’ warning on the matter of possible confusion of units, but rather handle that after the submission in the FDB.**   Based on that it will be decided whether such a check is implemented (on the fly QC type 2 or as consistency QC type 3 check) or whether high values will just be flagged for manual evaluation after submission. |
| 14 | Rounding rule | rejected | Rounding rule shall apply only at stock consistency check, see QC check No. 24 |
| 15 | EXPORTER: Plausibility of Totals | approved |  |
| 15a  **(new check)** | HFC-134 & HFC-143 confirmation | approved | **NEW CHECK (compared to list in Annex):**  In case reporters select HFC-134 or HFC-143 (which will appear in the dropdown list right before the more common HFC-134a & HFC-143a) reporters will be asked to confirm that they really wish to report on that gas. |
| 16 | Export figures coherent on different forms | approved | Principle of check approved.   * **ACTION:** tripledev investigates options for automatic synchronisation   Implementation as automatic synchronisation probably to complicated / resource intensive. If that’s not possible, There will be no automatism.  Anyway, we’ll need an implementation of the check as consistency QC type 3 |
| 17 | NON-PRODUCERs: block producer-only lines | Approved |  |
| 18 | NON-PRODUCERs: producer-only lines empty? | Approved |  |
| 19 | Co-producer name | Approved |  |
| 20 | Co-producer name availability | Approved | Change of workflow in webform: Co-producer name fields a generated by klicking on a button (separately for purchases & sales); Name must be entered in that process. |
| 21 | Adding a new preparation | approved | In the webform, the tem ‘preparation’ should be used instead of ‘blend’.   * **ACTION:** ETC/ACM will consolidate blend composition list with Alexandros Kiriazis   Brand names must not appear in dropdown list!,  Basically, only R-numbered blends should appear in the list. In case other blends were reported, that need to go into the dropdown, a neutral name (Mix composition) will be used.   * **ACTION:** ETC/ACM will rename blends (and correct spelling to minor letters) using the Mix composition as the name & will check which blends of the long list were actually used in the 2012 reporting season. * **ACTION:** ETC/ACM will send updated list in established format (access & Excel) to tripledev. |
| 22 | Explanation for 'other/unknown' intended application | Approved | A general comment field is not deemed necessary.   * **ACTION:** tripledev: Layout of comment field (applies to other comment fields as well) in webform: Indication of its availability by klickable icon close to the respective data field. Layout in printout version: Footnote style at bottom of page. |
| 23 | Own feedstock use except HFC23 producer? | rejected | ‘suspicious’ data should be flagged, though for manual follow-up be ETC |
| 24 | Comparison of stocks: 1st Jan vs. 31st Dec previous year | approved | Rounding tolerance is to applied   * **ACTION:** Alexandros Kiriazis should decide on amount of rounding tolerance to be applied. |
| 25 | Increase of stocks: 1st Jan until 31st Dec | approved |  |
| 26 | Compare “Calculated Total” with “Total POM” | approved |  |
| 27 | NON-PRODUCER: Production > 1t | approved |  |
| 27 | NON-IMPORTER: Import > 1t | approved |  |
| 28 | NON-EXPORTER: Export > 1t | approved |  |
| 28A | PRODUCER: production = zero | approved |  |
| 28B | PRODUCER: sum of production <= 1t (but >0) | rejected | No warning in web form, just flag for restricted use in data base! |
| 29 | IMPORTER: import = zero | approved |  |
| 30 | IMPORTER: sum of imports <= 1t (but >0) | rejected | No warning in web form, just flag for restricted use in data base! |
| 31 | EXPORTER: export = zero | approved |  |
| 32 | EXPORTER: sum of Exports <=1 t (but > 0) | rejected | No warning in web form, just flag for restricted use in data base! |
| 33 | For each “visible” (i.e. mandatory report on exports) ‘amount of total exports’ in the Exporter form | approved | Not visible to reporter anyway. |

* **ACTION** ETC/ACM will update list of automatic QC checks and distribute that.

# Session 4: F-gas indicator

The indicator might build on a metric like ‘consumption’ (defined as for ODS) in addition to emissions

* **ACTION** ETC/ACM will explore options for the definition of such an indicator in a short paper in September

# Session 5:

# ODS webform

Enriko Käsper presents the draft version of the webform for ODS. The objective is to sufficiently outline and define the webforms to the forms can be implemented. These will be fine-tuned later with DG CLIMA at the end stage. This will only cover minor changes and textual input.

Close-to-final version for ODS needs to be available by the **end of September** to allow for presentation in the ODS Committee meeting (in the period 3-5 October). The webform could be tested at a later stage by companies/countries on voluntary basis to provide input and potential problems. External testing could be done in November at the time of the Montreal MOP (9-12 November). Decisions at MOP could have small effect on design of webform. This includes additional use categories and inclusion of source country for import.

The webform can deviate significantly from the current Excel webforms. The different sheets and tables could be merged, so no information has to be asked twice (see below).

Company information: Disclaimer on entry page different from F-Gases: each legal entity needs to complete an individual form (this is in line with the text included in the ODS Excel file). Activities that can be selected should be: production – import – export – destruction – feedstock use – process agent use (the latter should be split, although the form is the same). After each type, an explanation should be given.

Selection of substances: Selection of substances is done in a separate sheet at the start. This deviates from F-gas draft webform, where substances can be selected at each separate sheet.

* **ACTION** TripleDev: inform Wolfram on idea/request to have the substance selection at the general level and not on the specific pages. Substance selection at the start (bring in line with ODS approach). On the specific pages (e.g. PFCs) a link to the substance selection page will be included.

Destruction facilities have often difficulties in separating mixtures and therefore report on mixtures. To prevent this, the substances list should only include individual substances and not mixtures. A text box related to the destruction will be foreseen.

* **ACTION** ETC will draft a list of substances (both virgin and non-virgin). Not for all substances this distinction will be made. If a company wants to report a virgin/non-virgin which is not in the list, then this needs to be added to the list of values. DG CLIMA will check the list.

Presentation of numbers: All data are reported in kg therefore no digits (behind the point) are allowed. The values will be aligned to the right for readability.

Tables selection of uses, etc.: A dynamic approach should be used as much as possible, adding rows and selection from drop down boxes.

Calculation of totals: In the Excel forms sums are included in each table (both in rows and columns). At the moment these will not be added: the sums at the right hand side of the tables are not necessary to keep, the sums at the bottom might be kept (if technically feasible and not too costly). Decision will be taken when the draft web tool is developed.

Comment box: An overall comment box on the end form should be included – before certifying correctness of the data (not in the general form). Apart from this comment box, additional comment boxes need to be foreseen after specific tables (e.g. in stock table).

Import in database: The design of the webform will probably create numerous empty or NIL cells. These cells will not be integrated into the database when the XML (through sql insert statements) will be imported in the Access database.

Production, import, export (PIE) Table 3: the table lay-out should be always kept the same. A dynamic table, where uses can be selected and rows added. The selection of uses differs among the different tables.

* **ACTION** the ETC will provide Tripledev with a list of uses for each Table.

PIE Table 4 and PIE Table 5: do not occur much. The same approach should be used as in Table 3.

PIE Table 6: This will be important table in forms. In revised webform it will be used by producers, importers, exporters, destruction facilities and feedstock/process agent users. There has been difficulties this reporting year with companies recovering ODS, whether or not this falls under Table 6. This will be included as new use type.

PIE Table 8: This will be the table top be used by all reporting companies to report quantities in stock at start and end of the year. Important QA is to compare stocks in 1/1/year x with stocks in 31/12/year x-1. A tolerance will be accepted of 1%:

* Below tolerance: the information will be accepted and a feedback will be provided after the QA run (posted in BDR)
* Above tolerance: the information will not be accepted without a comment in comment box for stocks.

PIE Table 9: This table only needs to be filled in by producers. Stocks for export for BDN (field 903) can be deleted, as this is no longer allowed.

PIE Table 11: A full list of countries is needed to select from.

* **ACTION** the ETC will provide Tripledev with a list of possible destination countries.

PIE Table 12: Quantities used for feedstock or process agent can be deleted from this table, as this will be included in the table to feedstock and process agent use.

Feedstock/process agent use: Each new feedstock use reported by a company needs to be flagged to DG CLIMA because it needs to be verified and if accepted needs to be integrated in the reporting manual.

For selection of substance/use combination: Combination of possible feedstock uses per substance.

Table 3 of the process agent use and feedstock use form will be kept but all information reported elsewhere is deleted out. Therefore the remaining fields are only make-up and emissions (312 and 313). The table layout has not yet been decided.

Option a: keeps the logic of other tables (each substance in one column) but could be misleading because it will have many empty cells.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  |  | Substance A | Substance B | Substance C |
| Process a | Make-up | 1 |  |  |
|  | Emission | 2 |  |  |
| Process b | Make-up | 3 |  |  |
|  | Emission | 4 |  |  |
| Process c | Make-up |  |  | 5 |
|  | Emission |  |  | 6 |

Option b:

|  |  |  |  |
| --- | --- | --- | --- |
|  |  | Make-up | Emissions |
| Substance A | Process | 1 | 2 |
| Substance A | Process | 3 | 4 |
| Substance C | process | 5 | 6 |

* **ACTION** ETC/TripleDev: ETC will provide QA checks required and TripleDev will evaluate the technical options. Option of Aléxandros will be chosen if the costs for both options are very similar.

If the company is only a feedstock user – the company will get a number of tables in which they have to select feedstock as use (e.g. purchases). They could report data incorrectly. The implications will be assessed in 2013 and a change for the reporting tool will be evaluated/decided accordingly.

QA/QC: If emissions are lower than 0.1% than a comment is mandatory. Emissions of 0 are not accepted. If emissions are above the EC restrictions (only for process agent use) a comment should be given in the comment box.

Note: the comment boxes will be provided but filling in will only be mandatory under certain conditions. The QA run will highlight this.

PIE Table 13: This table will be merged with the destruction form. Fields 1303 and 1304 will be moved to Table 10, so this table only covers destruction of ODS in the facility of the reporting company. In the destruction table 3, some of the fields can be deleted because included in other tables. This is the case for fields 301 (included in PIE Table 8), 302 (included in PIE Table 7), 303 (included in PIE Table 6), 306 (included in PIE Table 8). Selection of the destruction technology (destruction table 4 and also PIE field 1302) should be integrated into one table for destruction and should allow for a selection of the destruction technology for each substance individually.

Destruction Table 5: Not clear if this is still necessary for companies to report.

* **ACTION** DG CLIMA will evaluate if this table is needed n future reporting and will come back on this.

Workflow: During the meeting it became apparent that the workflow for QA would be very difficult (especially for F-Gases to include on the fly data checks). A technical solution could be to do most of the checks at the end, as a QA run of the full XML file.

The final decision on the quality checking will still have to be taken and will take into account:

* Cost-effectiveness in the long term (taking into account development and maintenance cost of the IT tool as well as the workload for the ETC)
* User-friendliness for the ETC and the reporters

At present the advantages and disadvantages seen are as follows:

* + On-the-fly:
    - (+) information related to the checks can be written into the XML file
    - (-) high maintenance cost since the code is spread over the webform
    - (+) information provided to the reporter at the time of filling-in of the webform
  + QA run on XML file
    - (+) cost-efficient for development and maintenance
    - (-) feedback information cannot be written directly into the XML file (could be harvested in a database – cost to be assessed by TripleDev)
    - (-) no information provided to the reporter at the time of filling in but a full overview is provided on the basis of the draft delivery

The work flow in case of QA check on the XML file will have to be further clarified. An XML file (data delivery) with blocking errors should not be accepted as a delivery and should not be uploaded in the database. The present workflow of BDR (and of CDR) does not foresee for this. The submissions can namely not be put back to draft.

* **ACTION** EEA/TripleDev: find technical solution acceptable for DG CLIMA – HIGH PRIORITY
* **ACTION** TripleDev: evaluate the feasibility and cost to include information on the wrong fields in the HTML file (output file for the reporters) in the case of QA run on the full XML file

In the present workflow, the “Submit” button on the form should be changed into “certify correctness”. This step of certification needs to be done before the envelope can be reported. Change wording of “Release” into “Submit the delivery to DG CLIMA and EEA”.

When a company has made a mistake and a new delivery is required, the option to reload the data of the wrong delivery in a new delivery should exist. The final workflow around this is still to be decided (who decides on the creation of a new envelope on the basis of an old delivery). It is however foreseen that in the case where a delivery is rejected, a new envelope will be created on the basis of the latest delivery (automatically or by the ETC).

* **ACTION** for ETCs: Check on the transparency of the feedback provided to companies. Normally the final envelopes should contain the feedback on potentially persisting issues. This is to ensure full transparency between all stakeholders. Way forward especially for next year will be further discussed in a later phase.

# Session 6:

# ODS QA/QC

QA/QC rules for ODS. Note that numbering is based on current Excel forms and not on the adjusted tables for the webform.

For automatic validation rules, see table below. As requested, 3 responses are foreseen if validation was not passed:

1. block the data delivery,
2. allow for data delivery but provide a failure in terms of QA/QC and will therefore be an “non-compliant” delivery,
3. allow for data delivery and inclusion of a feedback file which will point out (potential) issues in the dataset which need further investigation (e.g. stocks of former years that are not in in line with stocks of 1st January)

|  |  |  |
| --- | --- | --- |
| **Report form/Field** | **Validation** | **Response (a/b/c)** |
|  | All numerical fields should contain values higher than or equal to zero. No decimal signs allowed, only natural numbers. | A |
| **Table 1** |  |  |
| 101 | Name of the company should be prefilled from BDR – if name changed, this should result in inquiry by ETC/ACM on VAT number. In case the VAT number was the same – allow submission and change name in BDR. In case the VAT number changed – a new registration is needed and reports have to be submitted for both. | B |
| 102 | Full address should be prefilled from BDR – change in address is possible, but needs to be clarified by ETC/ACM and updated in BDR | C |
| 103-106 | Prefilled from BDR – change in contact person should be changed and updated in BDR. | No need for response to company – but should be highlighted to ETC/ACM. |
| 107 | Should this be replaced by BDR entry date? |  |
| **FDST** |  |  |
| F201 | The process should be selected from the drop-down list.  “Other” is an option, but in this case ODS, end-product and CAS n° should be specified in P203.  Perhaps it would be better to split P203 into three separate fields: one for ODS, one for end product and one for CAS n° of end product? | A  Message: specify the feedstock process |
| F301 | In all cases the supplier (name and address) must be identified and for each the quantity supplied reported. This information should be split-up in:   * one field for supplier * one field for the quantity.   This could replace F304 because purchases (F304) should equal the sum of quantities purchased from each supplier. | A |
| F302 | Compare with total stock at 31/12 of previous year *(in database)*. Should be the same. | C  message: check again, give explanation in comment box, ask for resubmission data previous year (if applicable) |
| F302 | The stocks for destruction should be included in the total stocks. F302 >= F303. | A  message: total stocks should include stocks for destruction |
| F303 | Compare with stock for destruction at 31/12 of previous year *(in database).* Should be the same. | C  message: check again, give explanation in comment box, ask for resubmission data previous year (if applicable) |
| F304 | Should equal sum of quantities reported in F301, or remove. | A |
| F305 | PAU: Compare with maximum restrictions of EC (*external data*) | C  Message: make-up exceeds maximum, please provide explanation in comment box. |
| F308 | A common mistake is that waste collectors are reported here. Is it possible to change open text field into an drop-down list with the known destruction facilities + field “other”. In this case also a field has to be added where name and address of “other” is specified. | C  Message: please make sure to report the destruction facility and not intermediary waste collector. |
| F309 | PAU: quantity should be equal or lower than maximum restrictions of EC (*external data*). | C  Message: emissions exceeds maximum, please provide explanation in comment box. |
| F309 | FDST+PAU:  The emission should be more than 0.1% F309/F305\*100 > 0.1% | A  Message: is reported emission correct? |
| F311 | The stocks for destruction should be included in the total stocks. F310 >= F311 | A  Message: total stocks include stocks for destruction |
| Accounting destruction | F303 – F307 =< F311 | C |
| Accounting | F302 + F304 = F305 + F306 + F307 + F310 (FDST) | C |
| **DEST** |  |  |
| D203 | Provide possibility to report mixtures (“other”), but in case mixtures are reported this should lead to failed QA/QC. | B  Message: should report individual substances |
| D301 | The quantity reported here should be the same as the stock at 31/12 of previous year (*in database*). | C  message: check again, give explanation in comment box, ask for resubmission data previous year |
| D302 | Should be the same as PIE702 | A  Message: if you imported waste for destruction, please also fill in report on imports of controlled substances |
| D303 | D303 >= sum(D304) | A  Message: total quantity of waste obtained from companies inside EU is smaller than or equal to total reported quantity of high volume deliveries. |
| D304 | For each company delivering more than 1000 kg a quantity should be reported. One field for company name and address + one field for quantity received, for each high volume delivery. |  |
| D401 | Destruction technology selected from the list, if other was selected, D402 needs to be filled in. | A  Message: please provide a description of the used destruction technology |
| D501 | The quantities reported in Table 5 cannot exceed quantities reported in Table 3: D501 + D502 + D503 =< D305 | A  Message: please check quantities reported in table 5 and table 3 again. |
| Accounting | D301 + D302 + D303 = D305 + D306 | B  Message: please check quantities again or provide explanation in comment box |
| **P,IMP,EXP** |  |  |
| **Table 2** |  |  |
| P201 | Only individual substances, both new and controlled, virgin and non-virgin | A |
| **Table 3** |  |  |
| P Table 3 | Check substance – use combination  Critical uses: only halons  Feedstock: all substances  Lab uses: check with licences (*external data*), but no licences required for new substances  PAU: only for CTC, CFC-12 and CFC-113  Foam Blowing: only new substances and HCFCs  QPS: not allowed  Refrigerant: only new substances and HCFCs  Solvent: only new substances and HCFCs | Will not be part of automatic QA. We should allow companies to report non-compliant production, import, export or sales. |
| P302 | Discriminate between feedstock use in EU and feedstock use outside EU |  |
| P3101 | If “other” is selected in P310, P311 should be filled in. The use should be checked by ETC/ACM afterwards. | A  Message: please specify the use (resale or re-export is not considered a use). |
| **Table 4** |  |  |
| P401 | Company name and address + use should be filled in for each quantity (is rare). | A  Message: please specify the use (resale or re-export is not considered a use). |
| P405 | In case “other” is selected in P401, this should be specified in field P404. | A  Message: please specify the use (resale or re-export is not considered a use). |
| **Table 5** |  |  |
| P Table 5 | Table 5 should only be filled in by producers, not by importers or exporters. If nothing is reported in fields P301 to P310, table 5 should also be empty. | A  Message: do not report recovery of substances from products and/or equipment |
| **Table 6** |  |  |
| P601 | For each supplier (name and address) a use must be selected from drop-down list. | A  Message: specify for each supplier the use |
| P601 | If refrigeration, foam blowing or solvent use, company should be a re-packager (*external data*) | B |
| P601 | If “other” is selected as use, field P604, has to be filled in. The use should be checked by ETC/ACM afterwards. | A  Message: please specify the use (resale or re-export is not considered a use). |
| **Table 7** |  |  |
| P701-710 | Check with import licence database *(external data)*. The licence database will need to be compiled to allow for comparison. If import is higher than licences OR import is lower than licences (only if difference is more than 30% and more than 100 kg). But only for controlled substances, not new substances. | B (in case more imported than licensed)  C (in case less was imported than licensed)  Message: check data again or provide explanation in comment box |
| P701-710 | Both source country and customs procedure must be filled in. | A |
| P701-710 | Not all controlled substances can be used for all uses:  Critical uses: Only halons can be reported here  Foam blowing: Only new substances and HCFCs, if HCFCs customs procedure must be re-export or transit  PAU: only CTC, CFC-12 and CFC-113  QPS: Only MB with customs procedure re-export or transit  Refrigeration: only new and HCFCs, if HCFCs custom procedure must be re-export or transit  Solvent: only new and HCFCs, if HCFCs custom procedure must be re-export or transit | Will not be part of automatic QA. We should allow companies to report non-compliant production, import, export or sales. |
| P711 | When quantities are reported in P710, also P711 needs to be filled in. | A  Message: please specify the use (resale or re-export is not considered a use). |
| **Table 8** |  |  |
| P801-P803 | Quantities reported here should be the same as reported in fields P805-807 previous year (*in database*)  CHANGE OF STOCKS – fdst report & pie report | C  message : check data again, provide explanation in comment box , adjust report of previous year. |
| **Table 9** |  |  |
| P Table 9 | This can only be filled in by producers. | A |
| P901, P902 | P901 + P902 =< P805 | A |
| P903 | Is this still necessary? |  |
| **Table 10** |  |  |
| P1001-P1005 | Recipient name and address reported for each quantity reported. | A |
| P1004 | Select from drop-down list of registered re-packagers? |  |
| P1006-1010 | Not all controlled substances can be placed on the market for all uses:  Critical uses (1006): only halons  Foam blowing (1007): only new substances  PAU (1002): CTC, CFC-12 and CFC-113, only to registered process agent users.  QPS (1009): no longer allowed (- should be deleted).  Refrigeration (1010): only new substances and non-virgin HCFCs  To EU re-packagers: only HCFCs (for refrigeration and solvent)  Solvent (1011): only new substances | Will not be part of automatic QA. We should allow companies to report non-compliant production, import, export or sales. |
| P1012 | This field needs to be filled in, when quantities reported P1003-P1005. | A  Message: please specify the use (resale or re-export is not considered a use) |
| **Table 11** |  |  |
| P1101-P1111 | For each use and quantity, destination country needs to be specified. | A |
| P1101 | Not all controlled substances can be exported for all uses:  Critical uses (1101): only non-virgin controlled halons  Destruction (1102): only new substances  Foam blowing (1104): only new substances and HCFCs, but it must be coming from re-packager of producer.  PAU (1106): only CTC, CFC-12 and CFC-113  QPS (1107): only MB, only if it is import.  Refrigeration (supply to non-EU vessels) (1108): only new substances and HCFCs, but it must be coming from re-packager or producer.  Refrigeration (servicing of non-EU vessels) (1109): only new substances and HCFCs, but it must be coming from re-packager or producer.  Solvent (1110): only new substances and HCFCs, but it must be coming from re-packager of producer. | Will not be part of automatic QA. We should allow companies to report non-compliant production, import, export or sales. |
| P1101-1111 | Check with export licence database (*external data*). Licence database needs to be compiled to allow for comparison. If exported quantity is higher than licences OR import is lower than licences (only if difference is more than 30% and more than 100 kg). But only for controlled substances, not new substances. | B (in case more imported than licensed)  C (in case less was imported than licensed)  Message: check data again or provide explanation in comment box |
| P1112 | This field needs to be filled in, when quantities reported in P1111. | A  Message: please specify the use (resale or re-export is not considered a use) |
| **Table 12** |  |  |
| P1201 | If this is filled in also feedstock use report should be filled in | A |
| P1201 | P1201 = F305 for feedstock processes using same ODS by same company | C |
| P1202 | If this is filled in also process agent use report should be filled in | A |
| P1202 | P1202 = F305 for process agent using same ODS by same company | C |
| P1209 | If quantities are reported in P1208, this needs to be filled in | A  Message: please specify the use |
| **Table 13** |  |  |
| P1304 | A common mistake is that waste collectors are reported here. Is it possible to change open text field into an drop-down list with the known destruction facilities + field “other”. In this case also a field has to be added where name and address of “other” is specified. | C  Message: if this was a destruction facility or waste collector |
| Accounting destruction | P803 + P309 + P702 = P807 + P1102 + P1301 + P1303 | B  Message: check data again or provide explanation in comment box (e.g. rounding of data) |
| Accounting total | P312 + P605 + P712 + P809 = P1013 + 1113 + 1210 + 1305 | B  Message: check data again or provide explanation in comment box (e.g. rounding of data) |

# Session 7:

# ODS report

Feedback Aléxandros and Eva on most important comments on draft ODS report. Importantly report should contain more discussion and analysis of the results. The section on feedstock use should be expanded (cfr. BiPro report) as this contains important information for policy.

* **ACTION** ETC will prepare a revised draft of the report and provide this to DG CLIMA and EEA no later than 30th August. The 25th September the final draft version will be delivered. Language check and adjusting figure and table lay-out will be done afterwards.

# Annex: List of automatic QC checks for F-gases, version 04 July 2012

| **No** | **Type** | **Check name** | **Applies to sheet(s)** | **Checks** | **Timeframe** | **Follow-up action** | **Comment** | **IT status** | **To be discussed with DG CLIMA** |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| 1 | Identity of company / contact info | Company user name | Company information |  |  |  | BDR username (e.g.fgas12345) might be prefilled (in additional data field) when form is opened.  Change of username impossible. | EEA checks options for coupling/linking of company data storage files: BDR, master file, FDB | x |
| 2 | Identity of company / contact info | Company name | Company information | Obligatory confirmation or change of prefilled company name | On opening the form | In case of changed name: Launch Dialogue on VAT number:   * In case of new VAT number: Stop reporting process, ask company to apply for a new user account in BDR * In case of constant VAT number: Launch info on changes to address master file | Company name might be prefilled based on address master file when form is opened.  Change of company name possible with dialogue & confirmation that VAT number remained the same  **Synchronisation of Company name with list in FDB as well??** | x |
| 3 | Identity of company / contact info | Company address data | Company information | Obligatory confirmation or change of prefilled company address | On opening the form | Launch info on changes to address master file | Company address data might be prefilled based on address master file when form is opened.  Change of company address possible.  **Change of country possible without switch of legal identity??** | x |
| 4 | Identity of company / contact info | Contact person data | Company information | Obligatory confirmation or change of prefilled contact person data | On opening the form | Launch info on changes to address master file | Contact person info data might be prefilled based on address master file when form is opened.  Change of contact person data possible. | x |
| 5 | Completeness | certification box | Company information | Certification complete box ticked | On submission of report | Block submission, ask for ticking the box | A button “submit report” should be added to that sheet. |  | - |
| 6 | Completeness | Submission date | Company information | Enter date | On submission of report |  | Submission date might by entered automatically on submission of report. |  | - |
| 7 | Completeness | Transaction year | Company information | Obligatory confirmation or change of prefilled transaction year;  Data must be an integer between 2007 and the present reporting year | On opening the form |  | Transaction year might be prefilled with current reporting year |  | - |
| 8 | Completeness | Production / import boxes | Company information | Production & import boxes are ticked/unticked automatically in case at least one/none of the gas groups is ticked respectively | On completing the company information form |  | The “generate reporting forms” button would be renamed “complete company information”. Before moving to other sheets containing the reported data, the clicking of that button would be obligatory. |  | x |
| 9 | Consistency | Deletion of data in unnecessary sheets | Company information + data sheets | Check whether data have already been entered in sheets which are not needed based on the choice of production/import/export activities. | On completing the company information form | Launch warning box, ask for confirmation or change of activity choices. After confirmation, delete data in unnecessary sheets. |  |  | x |
| 10 | Plausibility | Figures only | All data sheets | Allow only figures to be entered (exception: preparation names, co-producer names and comment fields) | On entering of data | Block data entry, ask for figure |  |  | **-** |
| 11 | Plausibility | Non-negative figures | All data sheets | Allow only non-negative figures (exception: data on intended applications and preparation names and comment fields) | On entering of data | Block data entry, ask for non-negative figure |  |  | x |
| 12 | Plausibility | Figure format | All data sheets | Check number of digits after decimal point | On entering of data | Launch warning box, if digits exceed agreed max for storage and/or visibility | The number of visible digits after the decimal point has to be decided; applies to storage of data and visibility in pdf-printouts that should be made available to the reporting company |  | x |
| 13 | Plausibility | Order of magnitude | All data sheets | On entry of numerical values: Is the figure above 1000? | On entering of data | Launch pop-up, asking for confirmation that the value is really reported in tonnes, not kilograms. Accept value after confirmation. Else block entry. | Allow for a “don’t warn me again for values above 1000” function in order to deactivate that check in the present session. |  | x |
| 14 | Consistency | Rounding rule | All data sheets | - |  |  | For many consistency checks, a tolerated deviation (e.g. due to rounding errors) should to be defined, **this might be e.g. 0.1 tonne (or 0.5 tonnes; 1.0 tonnes?)** |  | x |
| 15 | Consistency | EXPORTER: Plausibility of Totals | Exporter Form | For EXPORTERS: check if the total amount exported for recycling, reclamation and /or destruction is smaller than or equal to the exported totals of the respective substance. | On submission of report | In case of reports failing to pass the check: block submission, ask for adjustment of data | Apply rounding tolerance |  | - |
| 16 | Consistency | Export figures coherent on different forms | Across data sheets | For companies being both EXPORTER and at least one of the remaining categories of PRODUCERS or IMPORTERS: Check if the “Annual total exported from the European Community" (Exporter Form) is equal to the "Amount exported for sale outside the Community) (Producer/Importer Forms) for all gases /blends (including manually added blends on either of the forms). | On submission of report | In case of reports failing to pass the check: block submission, ask for adjustment of data | Apply rounding tolerance**?**  An automatic transfer of export values entered in the producer/importer forms to the exporter form (and vice versa) would be nice. How can that work in cases when one of the sheets is not activated (by choice of production/import/export activity) at the moment the data is entered?  Addition of new preparations would need to be synchronised between these forms as well!  To be discussed! |  | x |
| 17 | Consistency | NON-PRODUCERs: block producer-only lines | All data sheets (exception Exporter form) | Prevent NON-PRODUCERS from entering data for transactions exclusively for producers (i.e. “new production” and “Amount purchased from other Community sources” in the Producer/Importer Forms & “Purchases from/ sales to Co-Producers” in the Co-Producer Forms) | On entering of data | Block data entry, ask for ticking producer box(es) first | Apply check separately for each F-gas category (HFCs, PFCs, SF6) |  | x |
| 18 | Consistency | NON-PRODUCERs: producer-only lines empty? | All data sheets (exception Exporter form) | Check if the transactions exclusively for producers (i.e. “new production” and “Amount purchased from other Community sources” in the Producer/Importer Forms & “Purchases from/ sales to Co-Producers” in the Co-Producer Forms) are filled out by importers or exporters which did not tick the producer box. | On submission of report | In case of data <>0 ‘forbidden’ transactions : block submission, ask for adjustment of data | Don’t apply rounding tolerance.  Check needed in case of change of activity status during the filling process. |  | x |
| 19 | Consistency | Co-producer name | Co-Producer Forms | Check if Co-producer name consisting of two characters minimum, at least one of them alphabetic | On entering of co-producer name | In case of names failing to pass the check: block entry, ask for rephrasing |  |  | - |
| 20 | Consistency | Co-producer name availability | Co-Producer Forms | Check if Co-producer name is already provided for the respective row | On entering of data | If co-producer name is missing, block entry of value, ask for entry of co-producer name first. |  |  | - |
| 21 | Consistency | Adding a new preparation | HFC blend importer form, PFC producer/importer form & exporter form | If a new blend/preparation is added… | On entry of new preparation/blend name | Offer lookup list (based on present FDB contents) of additional blends, including composition;  For new (on top of that list) blends, offer lookup list for F-gas components of that new blend (including one item “other: sum of substances not covered by the F-gas Regulation”; obligatory dialogue on selection of components including percentage;   * **check whether sum is 100% (no rounding tolerance!), if <>100%, refuse acceptance** * **check whether composition is identical to one already in the list; in that case ask for confirmation or choice of blend in lookup list.**   Enter composition information in blend-specific comment field (which is later attached to each transaction value in the XML transfer to FDB.)  Synchronise new blend (incl. composition information) with “master blend list” in FDB & attribute respective gas\_ID in FDB! | No more additional preparations allowed in HFC producer/importer form 2!  The layout of the web-form must ensure that no data fields are visible which do not have a defined gas/preparation name!  Organise synchronisation of added (and removed!) preparations between exporter form on one hand and HFC/PFC import forms on the other hand!  Block removal of additional blends/preparations as long as any values are entered for that blend in any of the concerned form. Delete these values after confirmation only!  Composition information should be organised blend-specific in the web-form, no longer sheet-specific as it used to be in Excel file.  Layout for pdf-printout needs to be clarified!  In case synchronisation of newly added blend with FDB blend list cannot be managed, XML file cannot be automatically imported into FDB! Meta information necessary! | EEA checks options for coupling/linking of blend list & blend composition information in BDR/webform, & FDB | x |
|  |  |  |  |  |  |  |  |  |  |
| 22 | Consistency | Explanation for 'other/unknown' intended application | All data sheets (exception co-producer forms & Exporter form) | If an amount for “Other or unknown” intended application is entered… | On entering of data | Start dialogue box with company: Ask for description/explanation:   * If described/explained (at least X? alphabetic characters) save answer in **value-specific comment field** & accept data entry (at the moment the comment in the documentation box is unspecific and redundantly linked with all values of the respective sheet in the database).   Else, block entry! | Description/Explanation on “other or unknown” intended application should be organised specific for each single “other/unknown” value in the web-form, no longer sheet-specific as it used to be in Excel file.  Layout for pdf-printout needs to be clarified!  The meaningfulness of a description/explanation can hardly be checked automatically. A list of usual explanations might be offered in a look-up list. However, this list cannot be exhaustive. Neither, it can be automatically checked, whether the description given for an ‘other’ intended application leads to the assumption that this ‘other’ application in fact belongs to one of the categories explicitly listed in the form (e.g.: ‘extruded foam polystyrene’ belongs to the ‘Foams’ category). All this will need to be checked “manually” afterwards in the FDB. Else, such manual checks might abandoned as they “only” concern the distribution of POM (Placing on the market)between intended applications, usually in minor cases.  Reporters should find a hint in the web-form that they can leave a (gas/blend specific) comment if they enter any value (even a zero) for “other/unknown” intended application. Reporters would then have the opportunity to leave gas-specific general comments on their data (some companies did that; and the information was useful!) |  | x |
| 23 | Consistency | Own feedstock use except HFC23 producer? | HFC producer & importer Form 1&2; HFC blend importer form | If an “Amount used as feedstock by your company” is entered, and this is NOT HFC-23… | On entering of data | Start dialogue box with company: Ask for confirmation:   * If confirmed, ask company to explain feedstock use & save answer in value-specific comment field & accept data entry * Else, block entry! | In the XML-transfer to the FDB, for the explanation the same date-base field should be used as for the descriptions/explanations for “other/unknown” intended applications.  Layout for pdf-printout needs to be clarified! |  | x |
| 24 | Consistency | Comparison of stocks: 1st Jan vs. 31st Dec previous year | All data sheets (exception co-producer forms & Exporter form) | For each gas, compare “Stock increase 1st January “stocks with “31st December stocks” from previous year. Those should be equal. | On submission of report | Start dialogue box with company, ask company to revise 1st January stock data or to provide an explanation   * In case of explanation (at least X? alphabetic characters), accept figure and store explanation in description/explanation field specific to the 1st January stock figure * Else block submission! | Condition:  31st December stocks of previous year are available to web-form (by XML export from FDB)  **Apply rounding tolerance!**  In the XML-transfer to the FDB, for the explanation the same date-base field should be used as for the descriptions/explanations for “other/unknown” intended applications.  Layout for pdf-printout needs to be clarified! |  | x |
| 25 | Consistency | Increase of stocks: 1st Jan until 31st Dec | All data sheets (exception co-producer forms & Exporter form) | For each gas, Compare Stock increase 31st Dec vs. 1st January with, production (P), imports (I), Collection for Reclamation & Destruction (CRD), purchases from Co-producers (PCP) and other EU purchases (OEUP):   * If the company is PRODUCER, the stock increase should be smaller than or equal to P+I+CRD+CPP+OEP * If the company is NOT a PRODUCER, the stock increase should be smaller than or equal to the imports. | On submission of report | Stop submission, ask company to revise stock data or to provide an explanation   * In case of explanation, accept figure and store explanation in description/explanation field specific to the 31st December stock figure * Else block submission. | **Apply rounding tolerance!**  In the XML-transfer to the FDB, for the explanation the same date-base field should be used as for the descriptions/explanations for “other/unknown” intended applications.  Layout for pdf-printout needs to be clarified! |  | x |
| 26 | Consistency | Compare “Calculated Total” with “Total POM” | All data sheets (exception co-producer forms & Exporter form) | Compare for each gas “Calculated Total net amount available for sale” with “Total amount placed on the market”:   * If the company is PRODUCER: “Calculated Total” must be >= “Total POM” (exception: in “HFC blend importer form, “Calculated Total” must be equal “Total POM”) * If the company is NOT a PRODUCER: “Calculated Total” must be equal “Total POM | On submission of report | In case of reports failing to pass the check: block submission, ask for adjustment of data | Apply rounding tolerance  For PRODUCERS: Upper Limits for deviation between N & V per producers: Sum of “other” EU purchases /line G and 1st January stocks (as stocks theoretically might contain amounts from previous year’s line G); yet to be discussed! |  | x |
| 27 | Consistency | NON-PRODUCER: Production > 1t | Across data sheets | For IMPORTERS which have not ticked to be an PRODUCER as well:  Check if the sum of all rows “Total new production from your facility/ies” **(in Producer/Importer Forms!)** exceeds one tonne. | On submission of report | In case of reports failing to pass the check: block submission, ask for adjustment of production data or to tick the respective producer box(es) | No rounding tolerance needed. |  | - |
| 27 | Consistency | NON-IMPORTER: Import > 1t | Across data sheets | For PRODUCERS which have not ticked to be an IMPORTER as well:  Check if the sum of all rows “Amount imported into the Community” **(in Producer/Importer Forms!)** exceeds one tonne. | On submission of report | In case of reports failing to pass the check: block submission, ask for adjustment of import data or to tick the respective importer box(es) | No rounding tolerance needed. |  | - |
| 28 | Consistency | NON-EXPORTER: Export > 1t | Across data sheets | For PRODUCERS and/or IMPORTERS which and they have not ticked to be an EXPORTER as well:  Check if the sum of all rows “Amount exported for sale outside the Community” **(in Producer/Importer Forms!)** exceeds one tonne. | On submission of report | In case of reports failing to pass the check: block submission, ask for adjustment of export data or to tick the exporter box | No rounding tolerance needed. |  | - |
| 28A | Consistency | PRODUCER: production = zero | Across data sheets | Check if a company has ticked to be a producer, and no production at all is reported in the sheets "HFC Producer & Importer Form 1", "HFC Producer & Importer Form 2", "PFC Producer & Importer Form" and "SF6 Producer & Importer Form"). | On submission of report | Block submission, ask to untick producer box(es) or to change production data | No rounding tolerance needed.  Apply check separately for each F-gas category (HFCs, PFCs, SF6) |  | - |
| 28B | Thresholds | PRODUCER: sum of production <= 1t (but >0) |  | Check if a company has ticked to be an importer, and the sum of all imports reported in the sheets "HFC Producer & Importer Form 1", "HFC Producer & Importer Form 2", "PFC Producer & Importer Form" and "SF6 Producer & Importer Form") is below or equal 1 tonne. | On submission of report | Launch warning box on plausibility & threshold and ask to   * confirm low production and willingness to report or * untick producer box(es) or * change production data   **In case of confirmed low production and willingness to report:**   * If the company has ticked to be **both importer and producer**, all data on production contained in the "HFC Producer & Importer Form 1", "HFC Producer & Importer Form 2", "PFC Producer & Importer Form" and "SF6 Producer & Importer Form") are flagged as “non-mandatory / non visible” in the XML-file for import to the FDB * (If the company has ticked to be **producer and NOT** ticked to be a **importer**, all data contained in all submitted producer and/or importer sheets and all data contained in the Co-producer forms are flagged as “non-mandatory / non visible” in the XML-file for import to the FDB |  |  | x |
| 29 | Consistency | IMPORTER: import = zero | Across data sheets | Check if a company has ticked to be an importer, and no import at all is reported in the sheets "HFC Producer & Importer Form 1", "HFC Producer & Importer Form 2", “HFC Blend importer form”, "PFC Producer & Importer Form" and "SF6 Producer & Importer Form"). | On submission of report | Block submission, ask to untick importer box(es) or to change import data | No rounding tolerance needed.  Apply check separately for each F-gas category (HFCs, PFCs, SF6) |  | - |
| 30 | Thresholds | IMPORTER: sum of imports <= 1t (but >0) |  | Check if a company has ticked to be an importer, and the sum of all imports reported in the sheets "HFC Producer & Importer Form 1", "HFC Producer & Importer Form 2", “HFC Blend importer form”, "PFC Producer & Importer Form" and "SF6 Producer & Importer Form") is below or equal 1 tonne. | On submission of report | Launch warning box on plausibility & threshold and ask to   * confirm low import and willingness to report or * untick importer box(es) or * change import data   **In case of confirmed low import and willingness to report:**   * If the company has ticked to be **both importer and producer**, all data contained in the “HFC Blends Importer Form” are flagged as “non-mandatory / non visible” in the XML-file for import to the FDB * (If the company has ticked to be **importer and NOT** ticked to be a **producer**, all data contained in all submitted producer and/or importer sheets are flagged as “non-mandatory / non visible” in the XML-file for import to the FDB |  |  | x |
| 31 | Consistency | EXPORTER: export = zero | Across data sheets | Check if a company has ticked to be an exporter, and no export at all is reported in the exporter form (i.e. sum of column “Annual total exported from the European Community”). | On submission of report | Block submission, ask to untick exporter box or to change export data | No rounding tolerance needed. |  | **-** |
| 32 | Thresholds | EXPORTER: sum of Exports <=1 t (but > 0) | Exporter Form | the sum of the mass of all exported F-gases and Preparations (i.e. sum of column “Annual total exported from the European Community” on the sheet “Exporter Form”) is less or equal one tonne  & company is Exporter | On submission of report | Launch warning box on plausibility & threshold and ask to   * confirm low export and willingness to report or * untick exporter box or * change export data   **In case of confirmed low export and willingness to report:**  all data contained in the exporter form (total exports & exports for recycling, reclamation or destruction) need to be flagged as “non-mandatory / non visible” in the XML-file for import to the FDB | No rounding tolerance needed. |  | x |
| 33 | Consistency | For each “visible” (i.e. mandatory report on exports) ‘amount of total exports’ in the Exporter form | Exporter Form | Check if for the specific gas/blend the same “visible” (i.e. not flagged as non-mandatory due to import or production threshold) amount is available in the respective importer form. | On submission of report | If available, set “Export\_for\_Supply\_Flag” to “no/0”, in the XML file  if not available, set “Export\_for\_Supply\_Flag” to “yes/1”, in the XML file |  |  | **-** |