

EU ETS -Verification and Accreditation Regulation (EU) No 600/2012

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Introduction

- Commission Regulation (EU) No 600/2012 of 21 June 2012 on the verification of greenhouse gas emission reports and tonne-kilometre reports and the accreditation of verifiers pursuant to Directive 2003/87/EC of the European Parliament and of the Council (AVR) applies from the 01 January 2013.
- The AVR governs the verification of annual emission reports (AER) for 2013 emissions onwards and all New Entrant and significant capacity decrease applications for phase III.
- 2012 emissions will be verified under existing system.

Introduction

- An overall framework of rules for accreditation of verifiers is necessary to ensure the verification of greenhouse gas emissions reports is carried out by verifiers that possess the technical competence to perform the task in an independent and impartial manner and in conformity with the requirements and principles of the AVR.

Key strategic issues

- The AVR draws on best practices from application of harmonised standards (ISO 17011, ISO 14065) and technical documents (EA 6/03)
- Introduces a risk based approach for verification
- Avoids unnecessary burden for small emitters with low risk through risk based simplifications of verification
- The National Accreditation Body (INAB) is empowered to accredit verifiers that are competent to perform specific verification activities in compliance with AVR, adopt administrative measures and carry out surveillance of verifiers.
- NAB must demonstrate conformity with AVR and have undergone successful peer evaluation.

Key Strategic issues

- Member States (MS) shall accept accreditation certificates of verifiers accredited by NAB in other MS and respect right of verifiers to carry out verification for their scope.
- Where certification of verifiers carried out by a National Authority MS shall accept the certificate and respect the right of certified verifiers to carry out verification for their scope of verification.
- NABs and CA's (e.g. EPA) shall establish effective information exchange.
- NAB set up database accredited verifiers access for other NABs, Verifiers, Operators and CA's.

Operator Requirements

- Operator must appoint a verifier accredited in accordance with AVR for correct scope set out in Annex I AVR. Obtain a current copy of accreditation certificate.
- As detailed on INAB all verifiers required to apply for extension of scope and submit documents which demonstrate conformance with AVR by December 2012 .
- Art.8.1(b) AVR requires the Operator to provide the verifier with all relevant information to enable the verifier to obtain a proper understanding of the activity and assess whether it can undertake the verification (scope, competence, time, resources etc.).

Operator Requirements

- Time allocation must take account of complexity of installation and MP, completeness of data flow and control system. Where misstatements, insufficient data, other unforeseen issues identified during verification verifier contract shall provide for the possibility of additional time.
- Art.10 AVR Before strategic analysis and throughout verification Operator shall provide the verifier with :
- GHG permit, MP (current and previous versions, record of modifications), data flow activity description, risk assessment, MP procedures, AIER, sampling plan, improvement reports, previous verification reports, all relevant correspondence, any other relevant information.

Operator Requirements

- The Operator should become familiar with, in particular, the following requirements of the AVR
- The different steps in the verification process. Art.11- Art.20 AVR. Strategic analysis, risk analysis, verification plan, verification activities, analytical procedures, data verification, verify correct application of monitoring methodology, verify methods applied for missing data, uncertainty assessment, sampling.
- Site visit requirements Art. 21.
- Art.22, Art.23. The requirement for Operators to address and correct misstatements and non-conformities and guidance on materiality level.

Operator Requirements

- Art. 27 Content of the verification report and the different verification opinion findings that can be issued by Verifier.
 - ❑ The report is free from material misstatement and verified as satisfactory
 - ❑ or the report contains material misstatements and is verified as not satisfactory
 - ❑ or is too limited in scope due to missing data, inadequate information made available by the Operator for verification, no approved monitoring plan etc. and is verified as not satisfactory
- Art. 31 Verification of small and simple installations.

Operator Requirements

- Art.30 Improvement of the monitoring and reporting process. Verifier improvements can be included in Verification report relating to Operator risk assessment, data flow and control activities and procedures, monitoring and reporting improvements to achieve higher tiers, reduce risks and enhance efficiency.
- Operator required to submit improvement report to EPA by 30 June (unless small emitter). Verifier checks implementation during the following years verification.
- Art.34-42 Competence and impartiality of a verifier. A verifier shall be independent from Operator and impartial in carrying out verification activities.

Operator Requirements

- The Operator should regularly check database of accredited verifiers, which is to be set up by National Accreditation Bodies or where appropriate National Certification authorities. This will contain information on name and address of each verifier, the Member State in which the verifier is carrying out accreditation, each verifiers scope of accreditation, date of grant and expiry date of accreditation, information on any administrative measures that have been imposed on verifier.

Information Sources

- http://ec.europa.eu/clima/policies/ets/monitoring/documentation_en.htm
- <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2012:181:0001:0029:EN:PDF>
- The EU Commission are developing the following guidance documents (GD).
- Explanatory guidance on the articles of the AVR (EGD I)
- Key guidance notes on specific verification and accreditation issues (KG II). For example KGD II.2 Verifiers risk analysis, KGD II.5 site visits, KGD II.6 verification report, KGD II.7 Verifier Competence.
- Templates for the verification report and information exchange requirements.