Lessons learned on MRR in phase 3

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19 November 2014
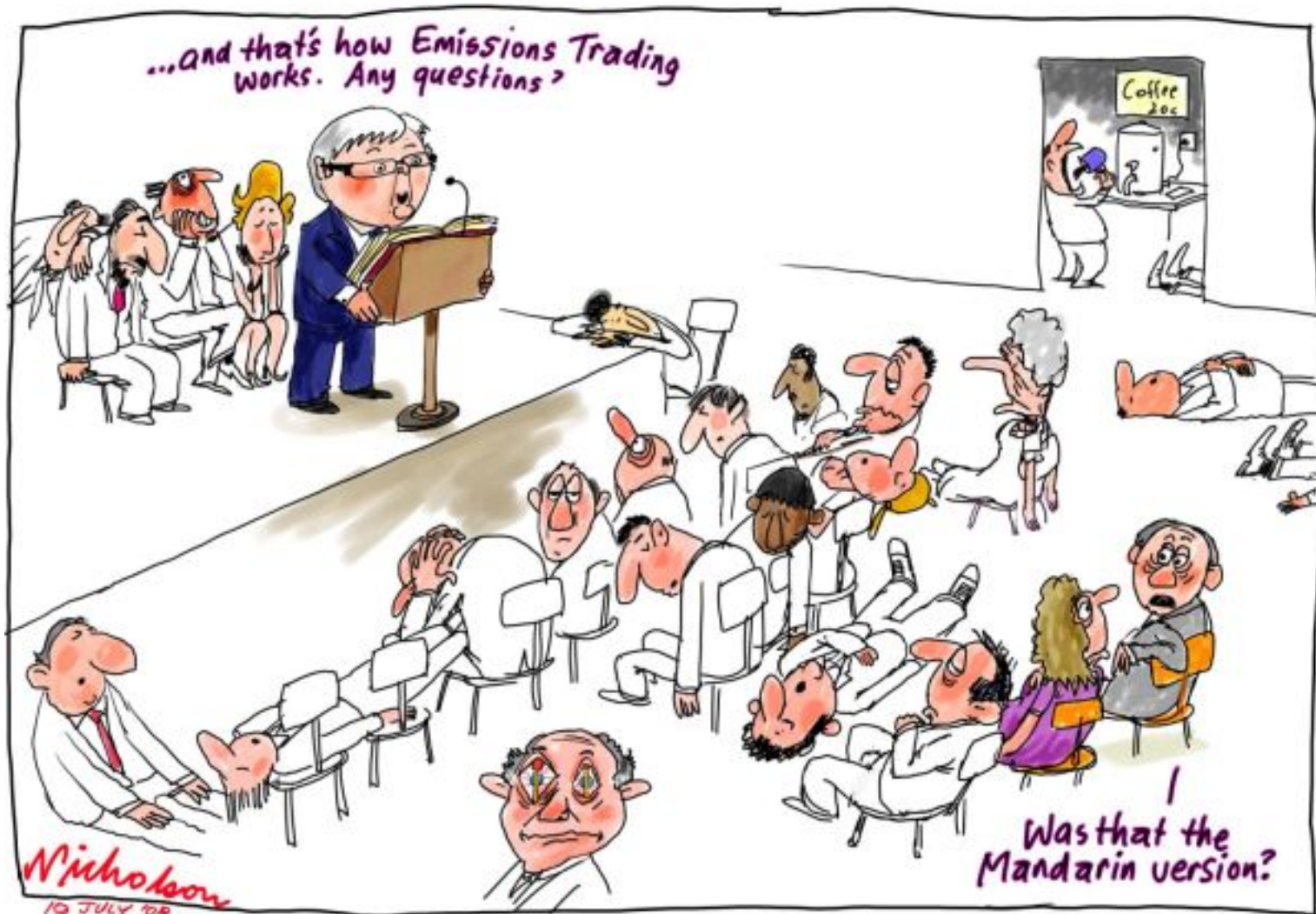
◎ Introduction

◎ Practical experiences MRR phase III
- ◎ MP: process + content
- ◎ AEM Report + verification report: process + content
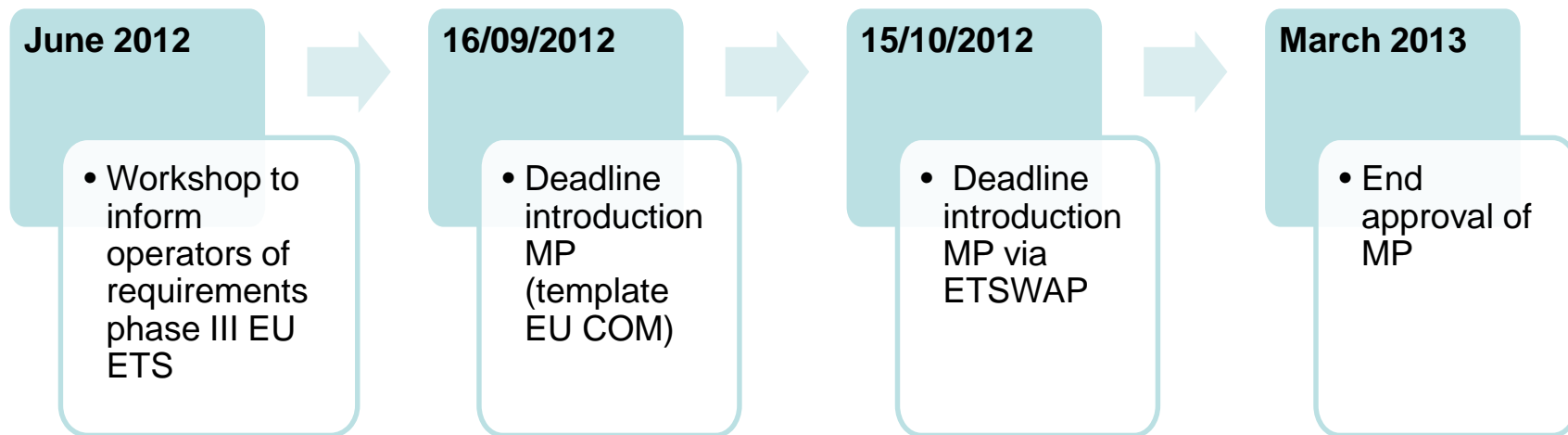- ◎ What about the future (2014-2020)?

◎ Questions/answers

Phase II	Phase III (> 01/01/2013)
• MRG • No templates • Verifiers approved by AwAC (competences) • Paperwork	• MRR (new rules, > documents) • Templates • Verifiers accredited by NAB in EU • IT-system

$\Rightarrow$ Nov 2014: lessons learned, based upon experiences AwAC + other member states

=> Very useful for countries who start with implementation of MRR!

Goal = all MP's approved before 01/01/2013

June 2012	16/09/2012	15/10/2012	March 2013
• Workshop to inform operators of requirements phase III EU ETS	• Deadline introduction MP (template EU COM)	• Deadline introduction MP via ETSWAP	• End approval of MP

◉ Draft versions encouraged (1/3 operators)

◉ Submission date difficult to respect for operators

  ◉ New rules, lots of (detailed) information requested

  ◉ Operators started (too) late

- MRR/AVR 21/06/2012 <-> 31/12/2011
- Guidances not available in French
- Arrival guidances (ENG) step by step
- Lack of guidances => requirements not clear when CA asked operators to start their MP

Practical experiences phase III
Process MP

- Time needed for approval by CA underestimated
  - Quality MP insufficient
  - Several 'returns to operator' to correct/complete information
- Harmonised assessment => internal discussions + information from other member states!
- Communication to operators if repeated errors
- Help operators a maximum
  - Possibility to send draft MP < submitting official version
  - Meeting to discuss MP for complex installations
  - Meeting with asphalt industry (new in phase III)

Practical experiences phase III Process MP

◉ Help operators a maximum

   ◉ Examples writen procedures (small emitters)

   ◉ Help for uncertainty calculations

   ◉ Flexibility in approval process
- ◉ Risk based
- ◉ Task of verifier to check written procedures in detail

  ◉ IT-system

⚠ Other member states developed also further guidances + in local language => very useful !!!
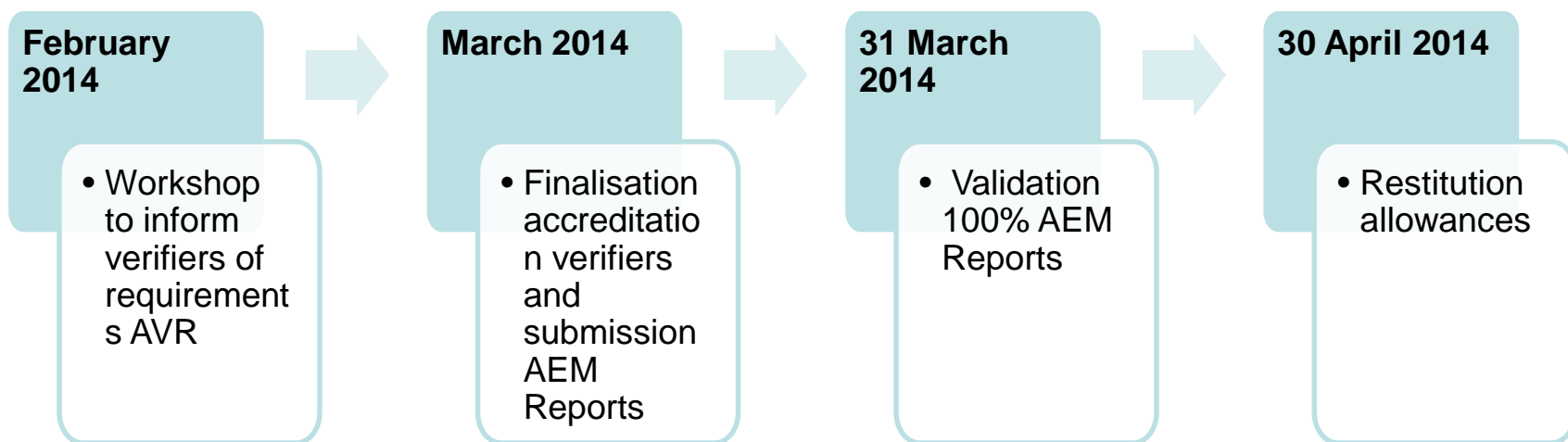
- Source stream diagram = basis to 'understand' the installation 'remotely'
  - Source streams
  - Emission sources
  - Measurement instruments (primary data)
  - ≠ diagram used for allocation process (benchmarks, subinstallations, etc)
- Primary data collection process <-> control measures
- Uncertainty calculation = difficult + help needed!
- Written procedures = 'administrative burden'

Practical experiences phase III
Process AEM Report + verification

Goal = verified AEM reports validated by CA before 31/03/2014

February 2014	March 2014	31 March 2014	30 April 2014
• Workshop to inform verifiers of requirements AVR	• Finalisation accreditation verifiers and submission AEM Reports	• Validation 100% AEM Reports	• Restitution allowances

⦿ Submission date difficult to respect for operators

⦿ But… Goal achieved!

Practical experiences phase III
Process AEM Report + verification

- Accreditation verifiers
  - Slow process
  - Uncertainty about accreditation when signing contracts
  - No list with overview of accredited verifiers for whole EU
  - Limited number of accredited verifiers in Belgium (2) => uncertainty about workload verifiers

- Verification activities
  - New processess regarding peer review, submitting of AEM Report by authorised person, mandatory site visit, etc.

⇒ Communication between CA - NAB – operators – verifiers important!

Experiences AEM Report

- Applied default values <-> approved default values
- Differences in emission sources
- Emission factor pure biomass
- Operator forgot often to contact CA in case of temporary changes/data gaps => lots of requests for modification of MP's in period January-March 2014 => increased workload of CA
- Conservative method in case of data gap
- ETSWAP = help for operators

Practical experiences phase III
Content AEM report + verification report

- Experiences verification report:
  - Differences between quality of work verifiers
  - Mistakes in category remarks verifiers (annex 1A) => impact on improvement report (FAQ)
  - Materiality level
  - IT-tool (ETSWAP) = help for operators

- General experiences
  - Costs/time verifications = challenge
  - Difference between theory (MP) and practice
  - Important to include 'operational' staff of operators in ETS reporting, not only environmental coordinator

General experiences CA

- Technical 'assistance' in auditor team NAB useful
- Limited number of verifiers in Belgium, but also verifiers accredited in France, the Netherlands and UK are active in Wallonia
- Harmonisation verification should be enforced
- 100% check AEM Reports = useful
- Feedback on quality verifiers to NAB => feedback NAB to accredited verifiers
- Independency CA/verifiers important!

Practical experiences phase III
What about the future (2014-2020)?

- Stability needed => existing documents updated as less as possible
- Development of further guidances/FAQ/tools
- Some examples:
  - Guidance for CA: approval of improvement reports
  - Guidance for CA: approval of conservative methods (data gaps)
  - Guidance for CA: approval of sampling plans
  - FAQ for verifiers: category of remarks in VR
  - IT-tool: Declare
- Projects Wallonia: translation IT-tool (2015: FR) + developing inspection strategy

Learn by doing!

Share experiences!

Let's improve together!

Thank you for your attention!