

Role and actions of Competent Authorities in Monitoring and Reporting



Introduction

Role of CA in compliance cycle

Actions CA:

Preparatory work

Validation of monitoring plans & changes MP

Validation of annual emission reports + verification reports

Validation of improvement reports

Inspections

International exchange of information and harmonisation of implementation

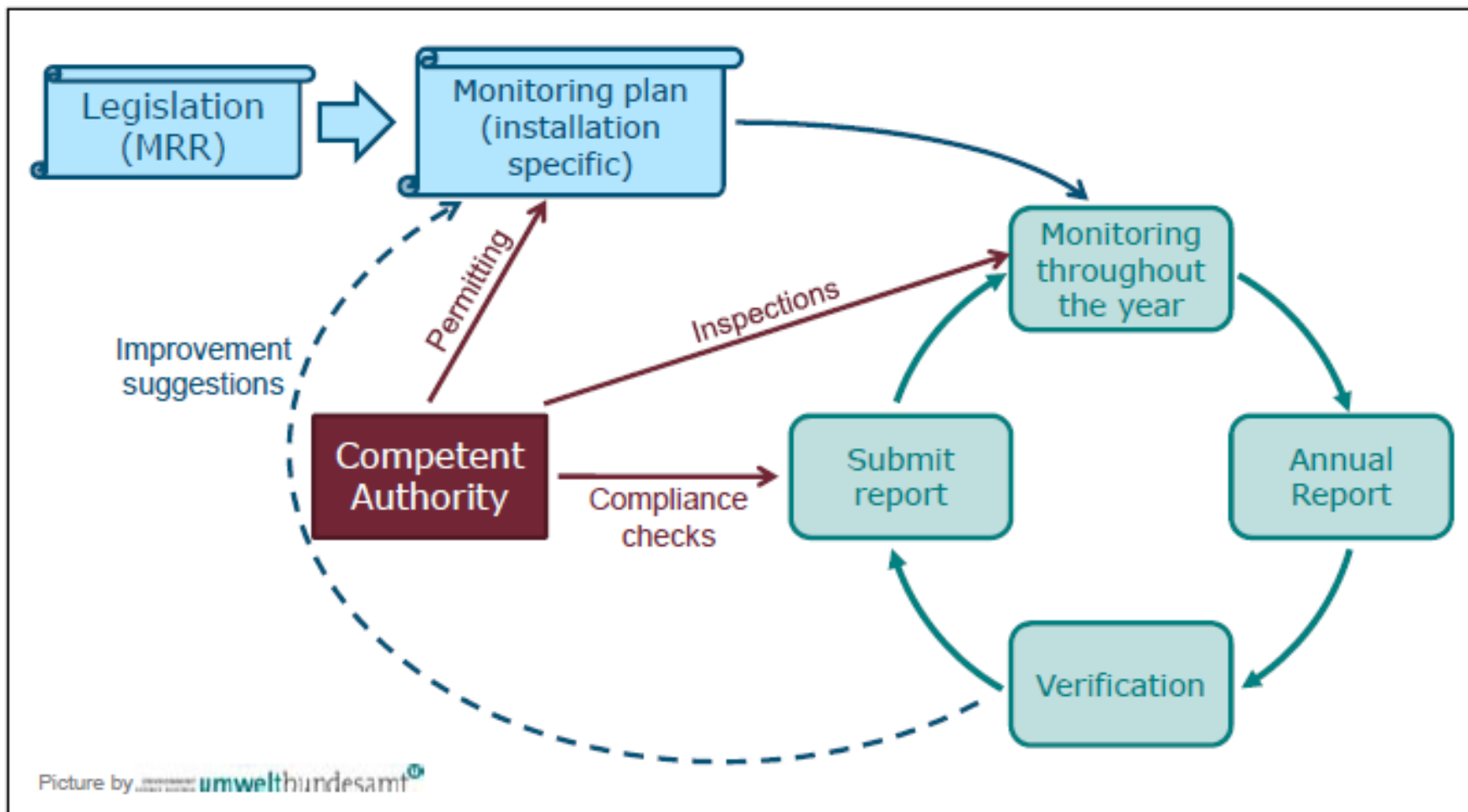
Questions/answers

- CA Wallonia = AwAC
- 120 operators fix installations
- 5 aircraft operators
- ETS-team AwAC
 - 1 coordinator
 - Political part (2)
 - Operational part (3) (sector)
- Inspection / permitting = other regional départements
- Register / Accreditation body = national department

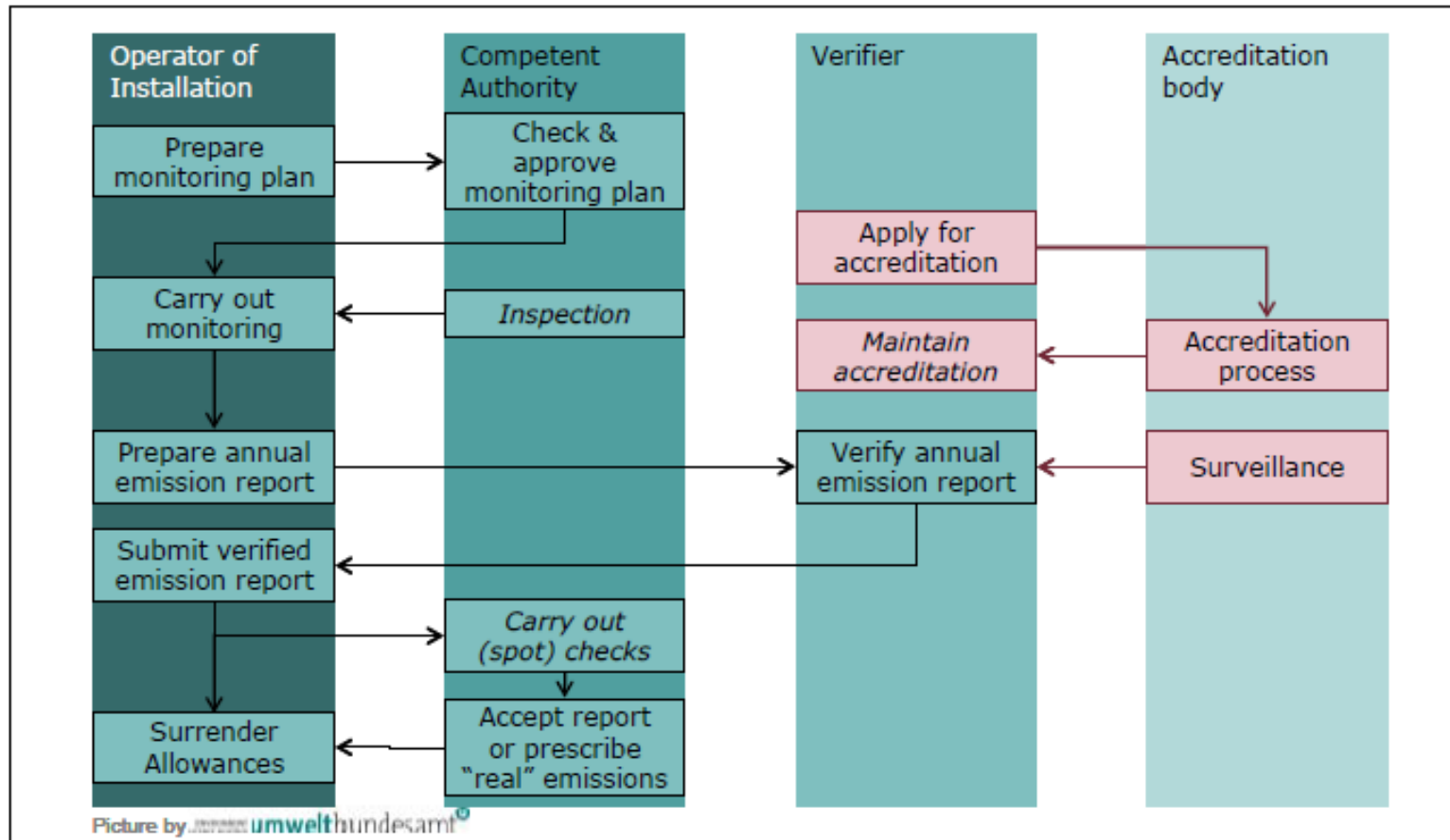


Role of CA in compliance cycle

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Actions CA: preparatory work

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- ☞ Develop national/regional legislation (specific requirements: mandatory attachments, etc)
- ☞ Develop further guidances/templates (simplified MP)
- ☞ Organise data management (IT-system/excell templates/mail)
- ☞ Inform operators of requirements MRR/guidances (workshop/newsletters/helpdesk)
- ☞ Inform verifiers of requirements AVR/guidance (workshop/newsletters)
- ☞ Training of CA members (site visits)
- ☞ Develop internal procedures (checklists, peer review)
- ☞ Contacts with NAB in Belgium (Belac)

Actions CA: validation of MP

Actions CA: Validation of monitoring plans








- 1) Send reception letter (5 days)
- 2) Assessment MP (60 days)
 - 1st step = completeness check (15 days) => letter
 - 2nd step = technical check (45 days) => letter

Who? Responsible CA user + peer reviewer

Tool? IT-system (ETSWAP)

Actions CA: Validation of monitoring plans

Completeness check MP:

-  Mandatory fields completed?
-  Mandatory attachments joined?
 -  Signature delegation to the person authorized to submit the monitoring plan
 -  Source stream diagram
 -  Uncertainty calculations (exception: <25 kton)
 -  Risk analysis (exception: < 25 kton)
 -  Data flow diagram

Actions CA: Validation of monitoring plans

Technical check

 Checklist (basis = requirements MRR)










 Risk based



Actions CA: Validation of monitoring plans

Checklist technical check










Installation description

-  Category installation (A/B/C/low emissions)
-  Estimated total emissions
 -  Source information (mean value 2008-2012 / additional information)
 -  Comparison with verified emissions from the past
-  Consistency source stream diagram <-> rest of the MP
-  Cross-check with other data (former MP, permit)
-  Category source streams
-  Selected method (calculation/measurement/fallback)
-  Emitted GHG (CO2/N2O/PFC)

Actions CA: Validation of monitoring plans

Checklist technical check




Calculation method / Source streams

-  Type source stream (combustion/process)
-  Combustion source stream: commercial standard fuel?
-  Activity data
 -  Approach
 -  Required tier \leftrightarrow proposed tier
 -  If applied tier $<$ required tier \Rightarrow check reasons (unreasonable costs + technically infeasible)
 -  Uncertainty calculation
 -  Metrological control of instruments?
 -  Biomass (pure / mixed + liquid/solid/gaz)





Actions CA: Validation of monitoring plans

Checklist technical check

Calculation factors

-  Required tier <-> proposed tier
-  Default values (tier 1, 2a)
-  If tier 3 (analyses) required/applied:








-  Frequency analyses (annex VII MRR)
-  Sampling plan
-  Accredited laboratory (ISO 17025)
-  Requirements art 32-35 MRR



Actions CA: Validation of monitoring plans

Checklist technical check

Measurement based method

-  Approach
-  Quality assurance levels (QAL)
-  Required tier \leftrightarrow proposed tier
-  If applied tier $<$ required tier \Rightarrow check reasons (unreasonable costs + technically infeasible)
-  Uncertainty calculation





Fallback method

-  Approach
-  *Technically infeasible/unreasonable costs*
-  *Global uncertainty (installation)*

Actions CA: Validation of monitoring plans

Checklist technical check

Management (written procedures)

-  Data flow diagram <-> described approach
-  Risk assessment + control measures
-  Summary procedure <-> requirements MRR
-  No detailed check of internal procedures

⇒ Outcome technical check:

-  **Accept**
-  **Refuse**
-  **Return to operator**

Actions CA: validation of changes MP

Actions CA: Validation of changes MP

- 1) Send reception letter (5 days)
- 2) Assessment proposed changes to MP
 - No completeness check
 - Significant changes => CA check (45 days) => letter
 - No-significant changes => CA check not mandatory (notification)



Temporary changes/data gaps <-> Definitive changes

Who? Responsible CA user + peer reviewer

Tool? IT-system (ETSWAP)

Actions CA: validation of annual emission reports and verification reports

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Deadline operators submission verified AEM

Report: 2nd Thursday of March

Task CA:




- 1) Send reception letter (5 days)
- 2) Assessment AEM Report (<31 March) => letter

Who? Responsible CA user (+ peer reviewer)

Tool? IT-system (ETSWAP)

Actions CA: Validation of annual emission reports and verification reports

Check AEM Report

-  Automatical checks by IT-system
-  Manual checks (checklist)
-  AwAC: check 100% verified AEM Reports



Different approaches in member states regarding assessment AEM reports !

Actions CA: Validation of AEM Report

Checklist technical check

AEM Report

Information AEM Report <=> MP:

-  Emission sources
-  Source streams
-  Category installation
-  Installation <25 kton
-  Approved tiers achieved?
-  Applied default values
-  Trends emissions last years
-  Parameters determined by analyse => in line with past?



Actions CA: Validation of AEM Report

Checklist technical check

AEM Report

-  If fall-back method applied:

 -  Uncertainty calculation for whole installation

Verification Report

-  Total emissions <-> AEM Report

-  Site visits

-  Submission by authorised person (verifier)

-  Scope accreditation of verifier

-  Remarks verifiers (correct category?)

-  Level of materiality

-  Proposed improvements

Actions CA: Validation of AEM Report

Checklist technical check

⇒ Outcome technical check:

 **Accept**

 **Refuse**

 **Return to operator**





Possibility for the CA to determine the emissions based upon a conservative estimation method



Feedback assessment verification reports from AwAC to national accreditation body (BELAC)

Actions CA: validation of improvement reports

Validation of improvement reports






-  due to verifier remarks in AEM report
-  due to achieving lower tier than required by the MRR or due to applying fall-back method

Deadline operators submission improvement report
= 30/06

=> Assessment of proposed improvements + proposed date improvements (no deadline for CA check) (letter)

Actions CA: inspections



Inspections

-  Working point in Wallonia
-  Inspection strategy to develop
-  Collaboration AwAC <-> 'inspection department'
-  Collaboration AwAC <-> 'permit department'
-  Strategy: risk based approach (ex: NeA)

International exchange of information and harmonisation of implementation

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Official communication with EU Commission:

-  Art 21 report < 30/06 (+ consolidation of data with 2 other regions in Belgium)
-  Compliance review (independant consultants)

Harmonisation of implementation and continous improvement

- ☐ Participation to technical working groups + task forces
- ☐ Participation to compliance conferences
- ☐ Participation to development projects (Declare)
- ☐ AwAC = candidate as peer reviewer in 2015
- ☐ Feedback to operators/federations of industry/
verifiers/commission/NAB/EA
- ☐ Participation as technical expert in auditor team as
'observator' during audits of verifiers by NAB

⇒ **SHARE EXPERIENCES**



- Transfer verified reported emissions to BE registry
- Information exchange between 3 regions in Belgium
- Information exchange with NAB's who are responsible for verifiers who are active in Wallonia
- Develop Walloon IT-system

(+ modify allocation of free allowances)

Thank you for your attention!



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