



EU ETS Verifier Accreditation

Technical Workshop – Belgrade
12-13th April 2016

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Technical Expert Trainer -

Lucy Candlin, Director, Planet & Prosperity :

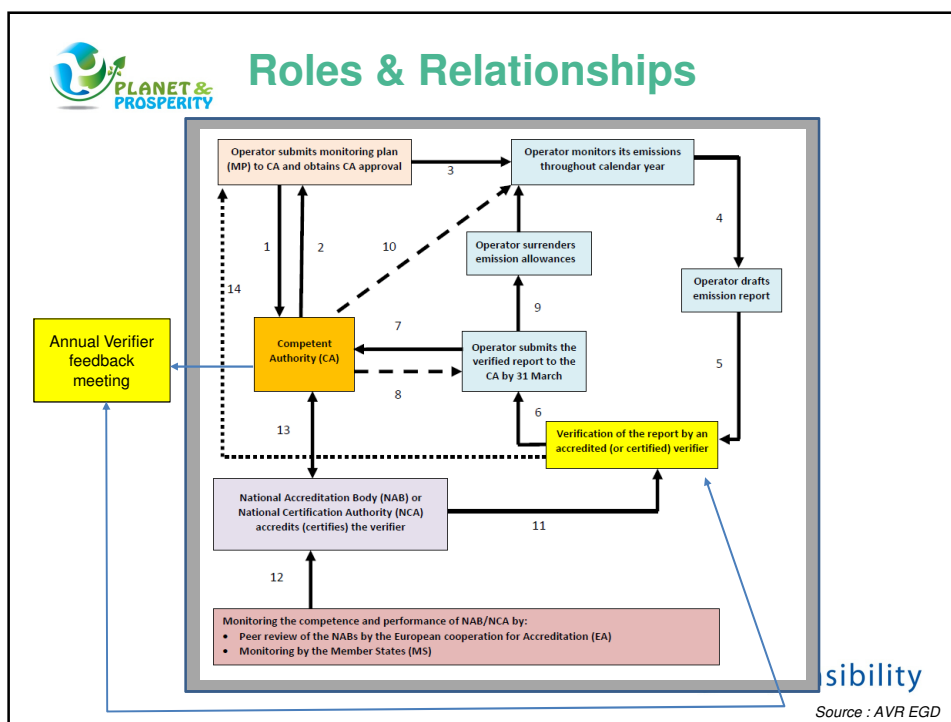
- **Practicing Lead Verifier** & Independent Technical Reviewer subject to rules of ~ 5 UKAS accredited VBs
- **Accreditation Assessor/Technical Expert** – Ireland
- Past **Advisor to UKAS** on development of their EU ETS accreditation system, inc CIS5 guidance on ETS, and Assessor briefings
- **Helped establish 2 Aviation specific Verification Bodies** subject to UKAS & COFRAC accreditation (+ accredited verification processes for 2 VBs)
- **Co-wrote/reviewed the ECs AVR guidance** and exemplars
- **Wrote the 'Guide to Accreditation to ISO14065'** for The Climate Registry in California, working with ANAB
- Sit on the UKAS MS-TAC as a GHG specialist
- Sit on a VB Impartiality Committee as a GHG/EU ETS specialist
- Chair UK ETGs MRVA Working Group ...taking responsibility

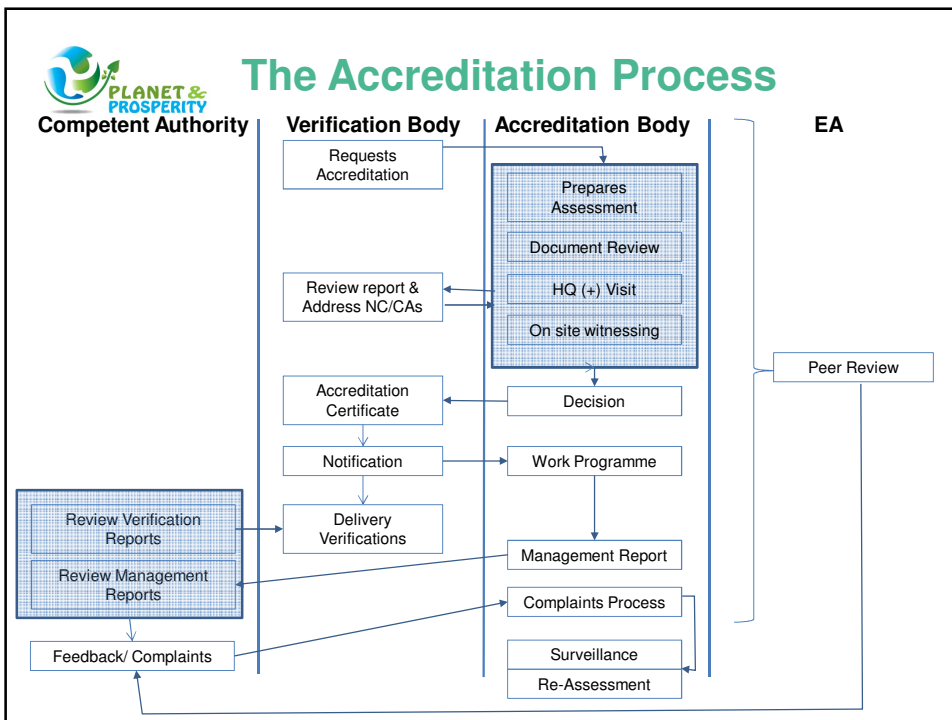
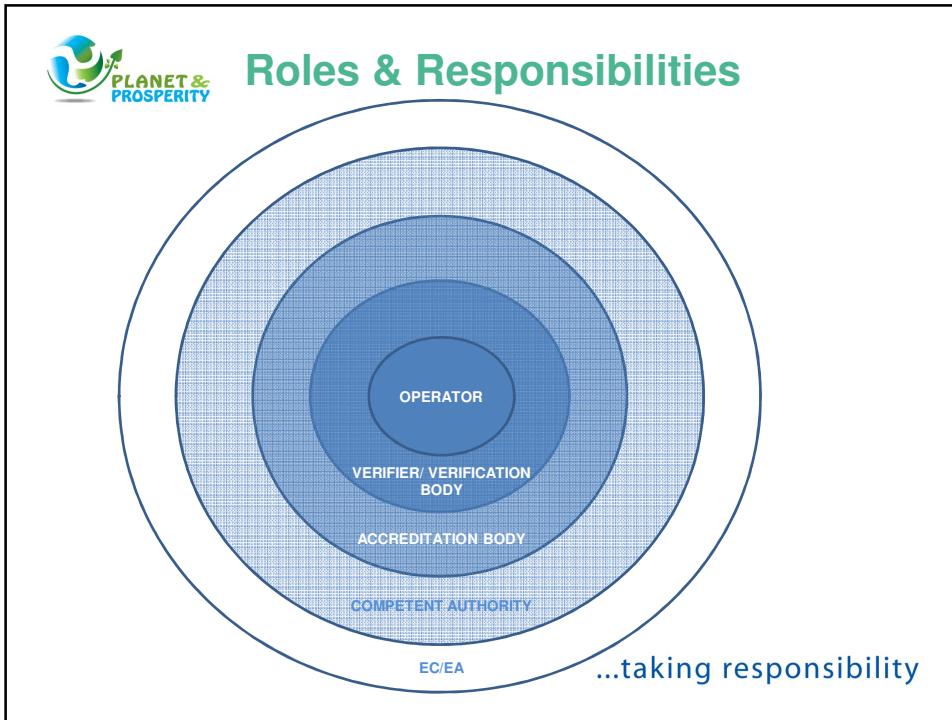


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The process of accreditation

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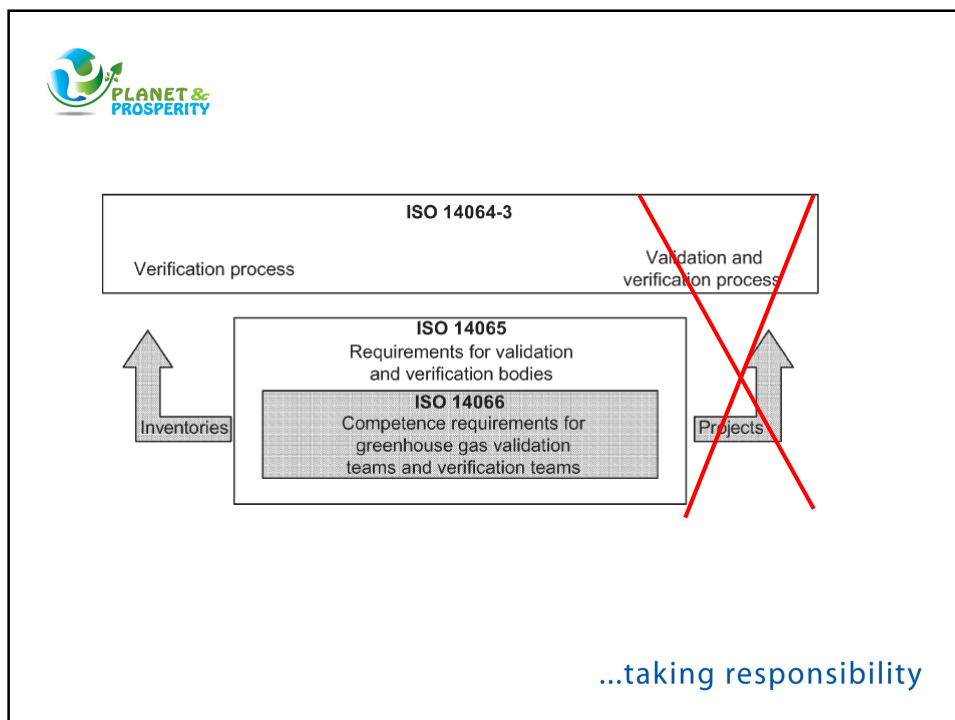




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Requirements of I.S. /EN/ ISO
14065:2013

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14065 Requirements.

5.1 & 5.2	Legal status & enforceable legal agreements Retain authority & responsibility
5.3	Top management responsibility & documented structures etc Clear relationship to other parts of the same legal entity
5.4 5.5	Impartiality : Avoid Conflict of Interest (actual/perceptual); Independent Oversight Evaluation of associated financial risks
6.1 6.2	Management & personnel competency processes & documentation & records Sufficient, competent, persons in all relevant functions & processes for selecting, training, authorising, monitoring them
6.3 6.4 & 6.6	Teams deployed have all relevant skills etc; specifically – technical, data & information auditing Control of sub-contracted personnel & outsourced processes
7.1 & 7.2 7.3 7.4	Communications & information to client & assignment of responsibilities Mechanisms etc for safeguarding confidential information – legally enforceable Records of activities, including – audit outcomes, complaints & appeals etc
8 8.2 & 8.3 8.4 8.5	Verification process – pre-engagement (contract review) – document review, team selection, time allocation; legal agreement Verification planning (for ETS based on document & strategic review) Verification (for ETS – Process Review, Analytical Procedures, & data/methodology verification) Independent Technical Review
12	Quality Management System – to support & demonstrate achievement of requirements

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AVR additional requirements...

EN ISO 14065	AVR requirements
Section 3 Definitions	Article 3 of the AVR (EU ETS specific definitions)
Section 4 Principles	
Section 5.1 Legal Status	
Section 5.2 Legal and contractual matters	
Section 5.3 Governance and management commitment	
Section 5.4 Impartiality	Article 42 of the AVR
Section 5.5 Liability and financing	
Section 6.1 Management and personnel	Article 35 of the AVR
Section 6.2 Competencies of personnel	Article 35 to 39 of the AVR
Section 6.3 Deployment of personnel	Article 35 to 39 of the AVR
Section 6.4 Use of contracted verifiers	Article 42(5) of the AVR
Section 6.5 Personnel records	Article 41(1) of the AVR referring to EN ISO 14065
Section 6.6 Outsourcing	Article 42(5) of the AVR
Section 7.1 information provided to a client	Article 41(2) of the AVR referring to EN ISO 14065
Section 7.2 Communication of responsibilities	Article 41(2) of the AVR referring to EN ISO 14065
Section 7.3 Confidentiality	Article 41(3) of the AVR referring to EN ISO 14065
Section 7.4 Publicly accessible information	Article 41(2) of the AVR referring to EN ISO 14065
Section 7.5 Records	Article 26 of the AVR
Section 8 Verification process	Chapter II of the AVR



AVR additional requirements...

Section 8.7 Facts discovered after verification statement	Article 70 of the MRR ³
Section 9 Appeals	
Section 10 Complaints	
Section 11 Special verifications	
Section 12 Management system	
Annex A relationship between application of EN ISO 14065 and ISO 14064	
Annex B Impartiality guidance	
Annex C Example of management system documentation	

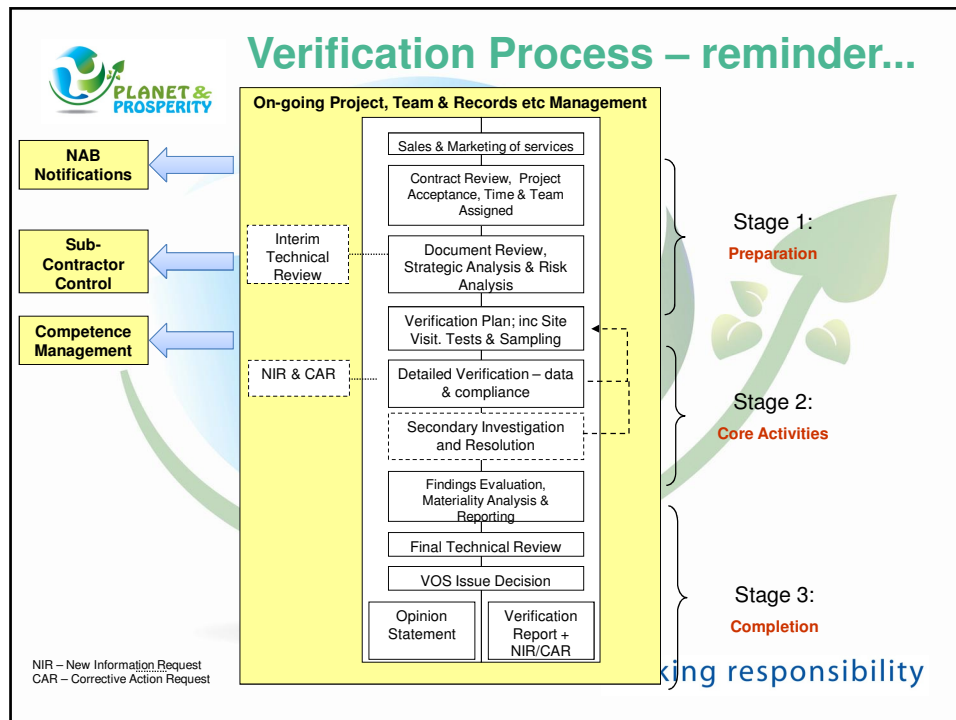
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Assessment & Surveillance Activities

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Brainstorm....

What are the key things the NAB needs to check –

- During document review?
- During the HQ visit/ assessment?
- During the witnessing visit?


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Assessment Team & Competencies


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Brainstorm.....



1) What do you think the Verification Body Personnel need to know/ have competence in?



2) And so, what do you think the NAB Assessors need to have competence in?


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NAB Work Programme,
Management Report &
Information Exchange

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Information Exchange (1)

- Purpose?
 - Planning
 - Transparency
 - Continual Improvement
- Means –

Action	Responsible Party	Why.....
Notification	VB to NAB (by 15/11/Ry)	Supports Work Plan development & dates for witnessing*
Work Programme	NAB to CA (by 31/12/Ry)	Allows CA to decide if they will witness*
Management Report	NAB to CA (<i>in country of operation</i>) (by 1/6/Ry+1)	Summary of VB surveillance, activities VB carried out & any issues
VOS/Report Review	CA to NAB (<i>in country of operation</i>) (&VB)	Summary of any issues identified with the VBs work



Information Exchange

Review example completed templates –

- Work Programme
- Management Report

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Information Exchange (2)

- Information Exchange requirements :
 - Effective process for exchange between CA(s) and NAB
 - If multiple CAs, a central focal point to co-ordinate
 - Database of accredited VBs
- Other information to be Exchanged :
 - By CAs
 - By NABs

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Information Exchange (3)

Action	Party Notified
Administrative measures (AdM) eg- <ul style="list-style-type: none"> • Suspension, withdrawal or reduction of accreditation • Termination of accreditation suspension • Successful appeal against imposition of AdM 	<ul style="list-style-type: none"> • CA in MS where accredited • CA and NAB in MSs where VB carries out work
Inform accrediting NAB (re AVR NCs)– <ul style="list-style-type: none"> • Results of AER & VOS review • Results of relevant Installation&Op /AOp inspections • Results of evaluation of VB internal work papers • Complaints about the VB 	CA where VB carries out work <i>Such notifications to be considered a complaint by the NAB, investigated & responded to CA within 3 months</i>
Surveillance on behalf of accrediting NAB -	MS NAB to accrediting NAB
Inform MS of VB establishment – Provide copies of work programme and management report; and info on AdM	Accrediting NAB to CA in MS of establishment

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Time Allocation & Manday Guidance

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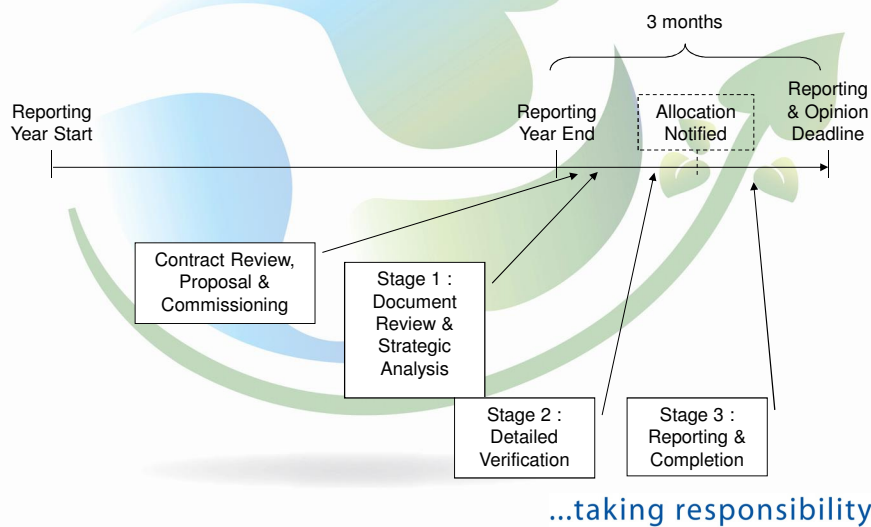


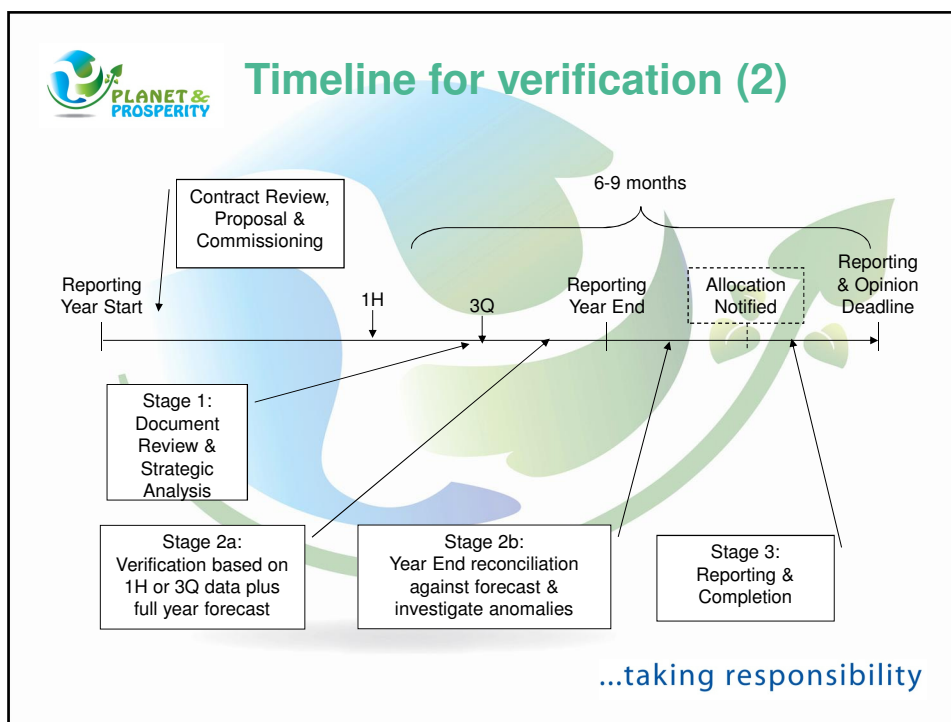
Man Day Challenges....


- **Sufficient time for verification?**
 - Boundary & Scope etc
 - Complexity – installation and/or MP and/or Data Flow
 - Location(s) of information & numbers of people involved
 - Robustness of Internal Controls
 - Materiality level & magnitude of potential errors
 - £ race to the bottom (but enough time?)
 - Forgetting internal work eg Technical Review!
 - Mandatory T&C clause on extra time
 - Guidance for NAB on expected time required
- **Timeliness – CA, Operator, Verification, Accreditation Assessment –**
 - ? When will verification start?
 - Q1 RY+1?
 - Q3-4 RY?
 - Advantages of a 2 stage verification..... *...taking responsibility*



Timeline for verification (1)





 **Man Day Guidance (1)...**

Step I – Number of emission sources	Points to score for step I
1 to 3	1
3 to 6	2
More than 6	3

Step II – Number of source streams	Points to score in step II
1 to 3	1
3 to 6	2
6 to 9	5
More than 10	10

Step III – Source stream type	Points to score in step III
Only commercial standard fuels or biomass where the biomass fraction is 97% or more in accordance with Article 38(4) of the MRR	1
Only liquid fuels, biomass where the biomass fraction is 97% or more in accordance with Article 38(4) of the MRR ⁴ or natural gas	4
Any combination of fuels (liquid, solid and/or gaseous fuels and materials, mixed biomass)	8



Man Day Guidance (2)...

Step IV – Total annual emissions		Points to score in step IV			
Annual emissions equal to or less than 25,000 tCO _{2(e)}		0			
Annual emissions equal to or less than 50,000 tCO _{2(e)}		1			
Annual emissions equal to or less than 500,000 tCO _{2(e)}		8			
Annual emissions more than 500,000 tCO _{2(e)}		15			

Step V – Level of complexity and control		Point to score in Step V			
Very low complexity and good controls in place		2			
Moderate complexity and good control		8			
High complexity but good control		16			
Moderate/High complexity and poor control		30			

Sum of the points allocated per step	Up to 8	8-23	24-35	36-50	>50
Minimum verification man-days	1.5	2-3	4-5	6-7	8-9

Step VII – Number of verifications carried out for the same operator		Reduction time			
1 st Verification		No time may be subtracted from the total number of days allocated			
2 nd verification in a row		0.5 to 1 day may be subtracted from the total number of days allocated or the minimum value of the indicated range			



Questions & Answers

- Questions?



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Thank you...

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