

Carbon Constraint Initiatives



# ISO 14065 & Accreditation and Verification Regulation (AVR)

ECRAN

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# Technical Expert Trainer

- Founder of Carbon Constraint Initiatives (CCI) and a founding member of Verico SCE (active Germany, UK, Spain, Belgium).
- Lead verifier EU ETS several scopes and verified the yearly emission report for numerous installations across Europe (>70).  
Achieved accreditation Verico AVR/ISO14065 and ISO50001 DaKKs.
- He has been involved in the verification of several product benchmarks for the purpose of allocations in the 3<sup>rd</sup> phase (e.g. steam cracking, nitric acid, ammonia, soda ash...).
- In addition he worked closely with the Commission in assessing the requests (NIMs) for free allocation for all installations covered by the EU ETS.
- Co-wrote/reviewed AVR guidance documentation (eg. verifier risk analysis, handbook completing VOS, case-studies)
- Currently involved in supporting the Commission and the MS in implementation of the monitoring and reporting regulation and the accreditation and verification regulation.
- Expert RvA

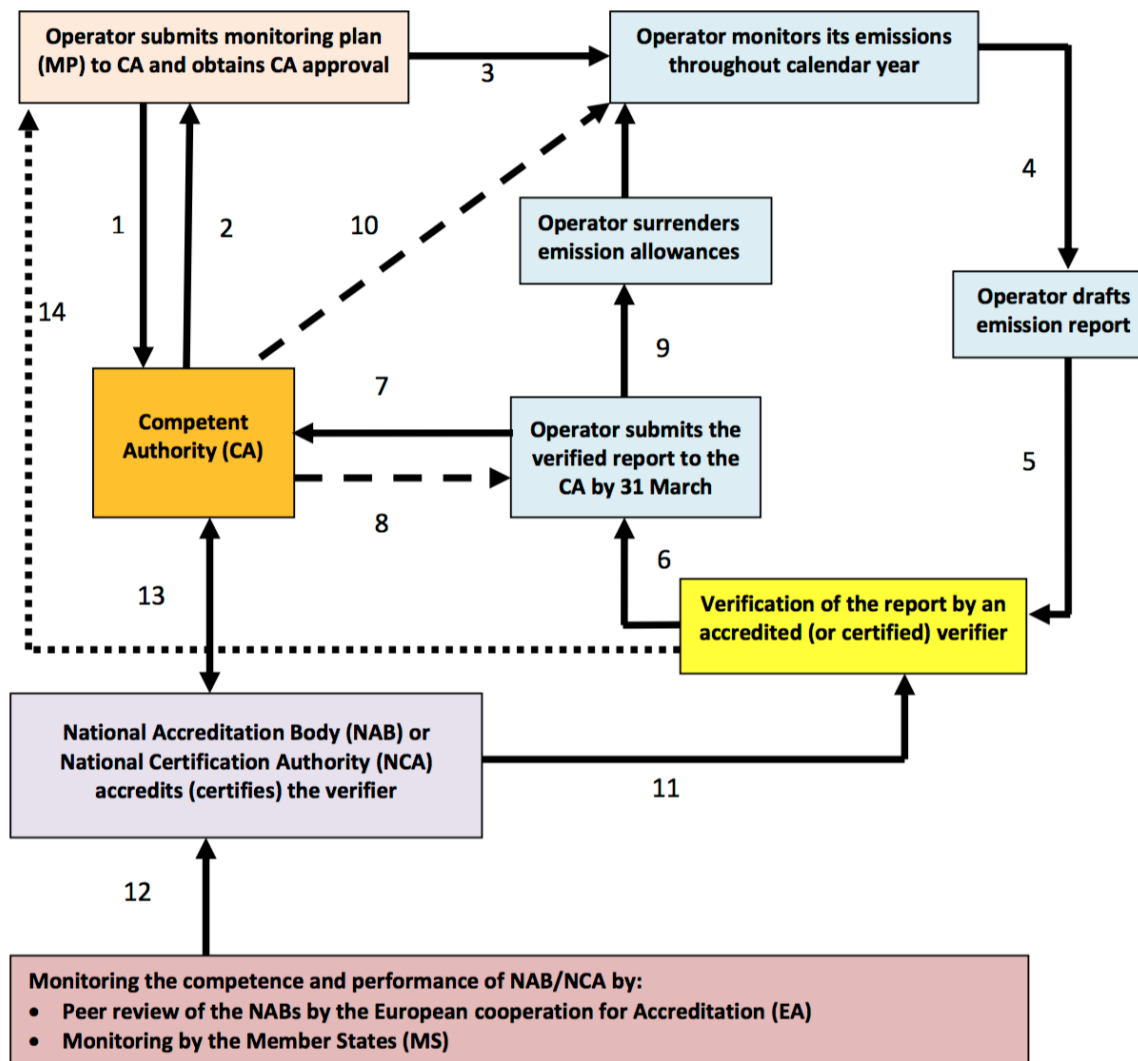
# Topics

- ✓ Background
- ✓ Compliance Cycle
- ✓ Regulations, standard and guidance
- ✓ ISO 14065 and AVR
- ✓ Requirements for verifiers, NAB, peer evaluation, info exchange

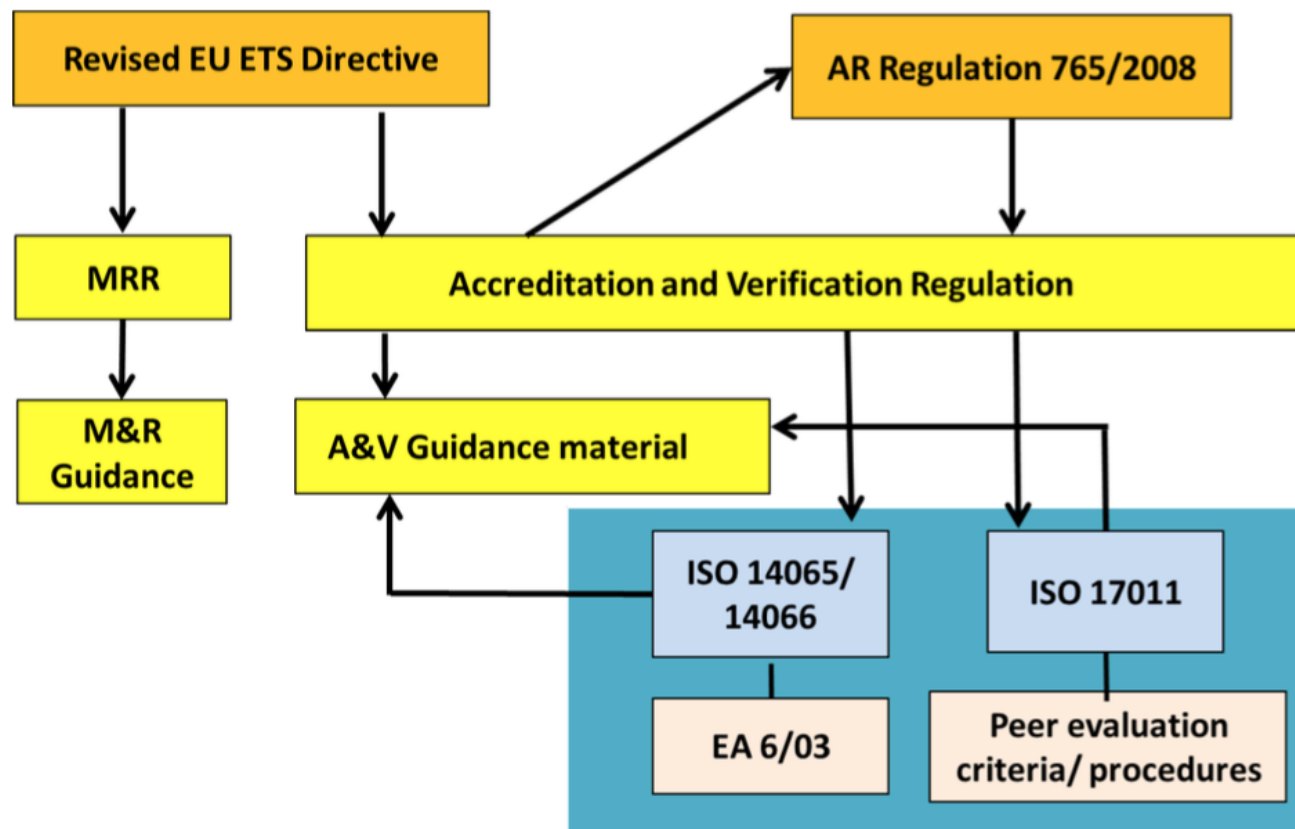
# Background

- ✓ Previous legislation had minimum requirements on verification, and no legal framework on accreditation
- ✓ Today, Accreditation and Verification are used according to European standards. Verification is done in accordance to AVR and EN ISO 14065 which specifies principles and requirements for companies that undertake validation or verification of greenhouse gas (GHG) emissions. Accreditation is done with accordance to the AVR and EN ISO/IEC 17011 that specifies general requirements for accreditation bodies assessing and accrediting conformity assessment bodies.

# Compliance Cycle: Roles & Responsibilities



# Interrelation between regulation, standards and guidance

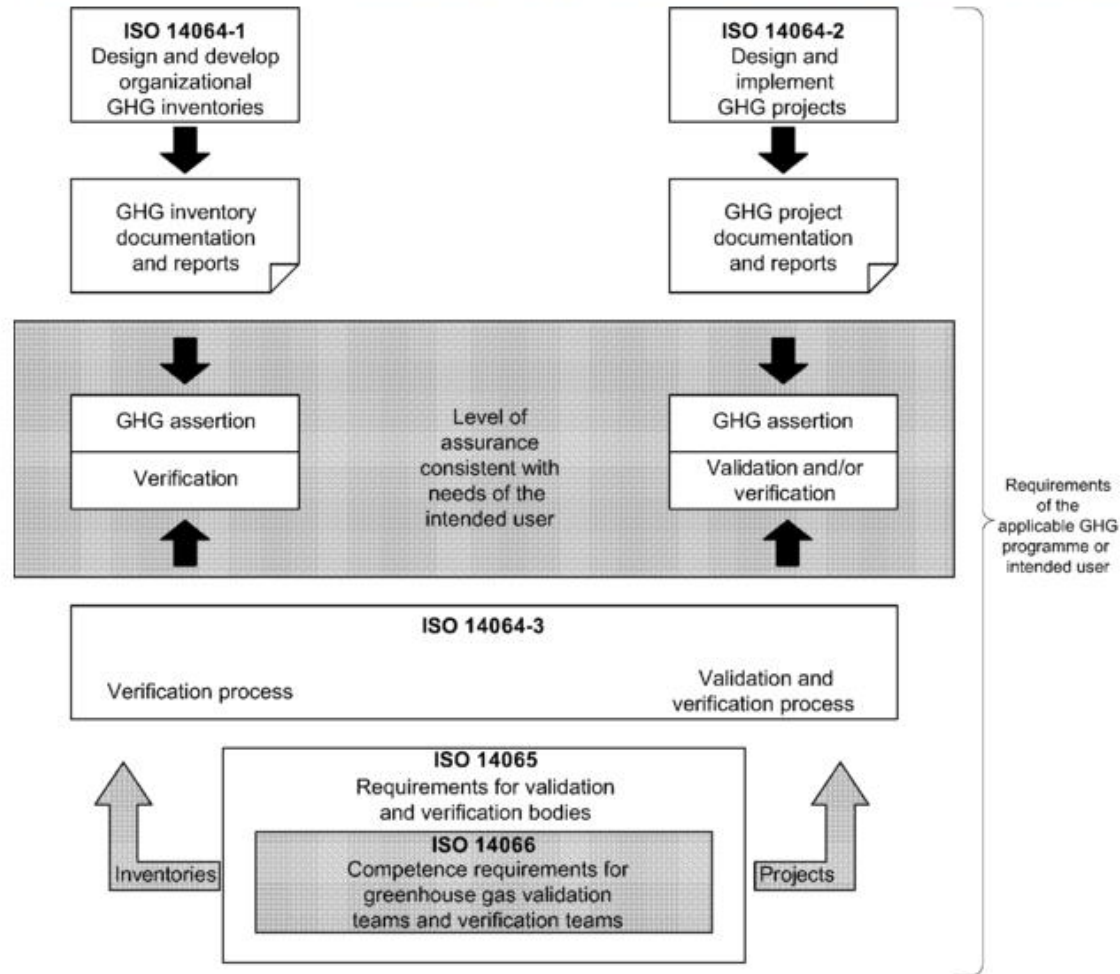


# ISO 14065

- ✓ EN ISO 14065 provides requirements for legal persons and legal entities that undertake GHG verification (and validation).
- ✓ It contains a number of principles that these legal persons and legal entities should be able to demonstrate and provides specific requirements that reflect these principles (impartial, competence, objective evidence, confidentiality safeguards, timely manner)
- ✓ The requirements concern not only the verification process but also internal procedures of the verifier, its legal structure and its responsibilities.
- ✓ EN ISO 14065 is GHG programme neutral.  
This means that if a specific GHG programme or trading scheme is applicable, the requirements of that GHG programme or scheme (eg. EU ETS) are additional to the requirements of EN ISO 14065.



# ISO 1406x series

Figure 1 — Framework for using ISO 14065 with ISO 14064-1, ISO 14064-2, ISO 14064-3, and ISO 14066






# ISO 14065

 Search 

**ISO 14065:2013(en)** Greenhouse gases — Requirements for greenhouse gas validation and verification bodies for use in accreditation or other forms of recognition

 **Table of contents**

- Foreword
- Introduction
- 1 Scope
- 2 Normative references
- 3 Terms and definitions
  - 3.1 Terms related to greenhouse gases
  - 3.2 Terms related to people and organizations
  - 3.3 Terms related to validation and verification
  - 3.4 Terms related to recognition and assurance
- 4 Principles
  - 4.1 General
  - 4.2 Impartiality
  - 4.3 Competence
  - 4.4 Factual approach to decision making
  - 4.5 Openness
  - 4.6 Confidentiality
- 5 General requirements
  - 5.1 Legal status
  - 5.2 Legal and contractual matters
  - 5.3 Governance and management commitment
  - 5.4 Impartiality
  - 5.5 Liability and financing
- 6 Competencies
  - 6.1 Management and personnel
  - 6.2 Competencies of personnel
  - 6.3 Deployment of personnel
  - 6.4 Use of contracted validators or verifiers
  - 6.5 Personnel records
  - 6.6 Outsourcing
- 7 Communication and records
  - 7.1 Information provided to a client or responsible party
  - 7.2 Communication of responsibilities to a client or responsible party
  - 7.3 Confidentiality
  - 7.4 Publicly accessible information
  - 7.5 Records
- 8 Validation or verification process
  - 8.1 General
  - 8.2 Pre-engagement
  - 8.3 Approach
  - 8.4 Validation or verification
  - 8.5 Review and issuance of validation or verification statement
  - 8.6 Records
  - 8.7 Facts discovered after the validation or verification statement
- 9 Appeals
- 10 Complaints
- 11 Special validations or verifications
- 12 Management system
- Annex A Relationships between the application of ISO 14065 and ISO 14064-1, ISO 14064-2, ISO 14064-3, and ISO 14066
- Annex B Impartiality

# ISO 14065 & AVR

- ✓ AVR requirements additional to ISO 14065

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

# ISO 14065 & AVR

EN ISO 14065	AVR requirements
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
Section 8.7 Facts discovered after verification statement	Article 70 of the MRR <sup>3</sup>
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	

# AVR – Requirement on Verifiers (excerpt)

## ✓ Article 42 on Impartiality and Independence

- A verifier shall be independent from an operator or aircraft operator and impartial in carrying out its verification activities.
- A verifier shall be organised in such a manner as to safeguard its objectivity, independence and impartiality.
- A verifier shall not carry out verification activities for an operator or aircraft operator that poses an unacceptable risk to its impartiality or that creates a conflict of interest for it.
- A verifier shall not outsource the independent review or the issuance of the verification report
- The verifier must be independent from bodies that are trading emission allowances
- A verifier shall establish, document, implement and maintain a process to ensure continuous impartiality and independence of the verifier, parts of the same legal entity as the verifier, other organisations referred to in paragraph 4, and of all personnel and contracted persons involved in the verification.

# AVR – Requirement on Verifiers (excerpt)

- ✓ Article 42 on Impartiality and Independence– Practice
  - Availability of a written statement of the company's policy on impartiality and how the verifier manages potential conflicts of interests.
  - Existence of a process to analyse and manage potential risks to impartiality (3 levels: on-site/client; review; company policy level)
  - Impartiality committee (or equivalent mechanism which should deliver similar outcomes)
  - Independent review of verification work
  - Independence of the verification team on site/ contact with client

# AVR – Requirement on Verifiers (excerpt)

- ✓ Article 35 Continued competence process
  - The AVR contains EU ETS specific requirements on the competence of the verification team and the members of that team: the EU ETS lead auditors, EU ETS auditors and technical experts.
  - Specific competence requirements have also been laid down for independent reviewers.
  - Specific requirements have been included in the competence process that verifiers have to establish, document, implement and demonstrate to the NABs; and to maintain on an on-going basis, to ensure that all personnel entrusted with verification activities are competent for the tasks that are allocated to them.

# AVR – Requirement on Verifiers (excerpt)

- ✓ Article 41 regarding Records and Communication
  - The verifier must keep up to date records to demonstrate compliance with the AVR. This includes, for example, records related to the competence process (e.g. training, competence criteria, monitoring competences of its personnel), records related to the competence and impartiality of individual personnel and their relations with other organisations etc., records on contracted personnel, outsourced activities, records on clients, documentation on appeals, complaints and corrective action.

# AVR – Requirement on Accreditation (excerpt)

- ✓ Chapter IV AVR, Article 43
- ✓ See afternoon session.



# AVR – Requirements for NAB

- Accreditation of verifiers is carried out by the single NAB that a MS has appointed according to Regulation 765/2008. That NAB must be:
  - a member of the European cooperation for Accreditation (EA). This means that the NAB has to sign the Multilateral Agreement of the EA and meet its procedural requirements;
  - have public authority with respect to the operation of accreditation services and be granted formal recognition by the MS where accreditation is not operated directly by a public authority. This means that certain national legislation could become applicable to the NAB organisation: e.g. legislation concerning public access to information, legislation concerning the archiving of documents.
- NABs have to meet the following requirements when carrying out their activities:
  - the requirements laid down in the AVR;
  - accreditation requirements of AR regulation 765/2008 as far as they have not been covered already by the AVR;
  - the requirements laid down in EN ISO/IEC 17011.

# AVR – Peer evaluation and CAR MS

- ✓ Article 64 Peer evaluation, Art. 65 Corrective Action
- Asses whether the NAB that is undergoing the peer evaluation organised by the EA:
  - carries out its accreditation activities in line with the AVR, including the requirements laid down in EN ISO/IEC 17011;
  - meets the requirements laid down in the AVR, including the requirements laid down in EN ISO/IEC 17011.
- The outcome of the peer evaluation (whether or not it is successful), must be shared:
  - with the Commission,
  - the national authorities that are responsible for that NAB and thus can take corrective actions against the NAB

# AVR – Mutual recognition of verifiers

## ✓ Article 66 Mutual Recognition of verifiers

- If an NAB has undergone a successful peer evaluation, MS must accept the accreditation certificate of verifiers accredited by that NAB and recognise the equivalence of the accreditation issued by that NAB. Those verifiers must be allowed to carry out verification in other MS for the scope of activities for which they have been accredited.
- A MS is not allowed to impose additional requirements in national law that would restrict foreign verifiers from operating in their MS and that would discriminate these verifiers against its national verifiers, e.g. requiring verifiers to register, requiring all individual team members to speak the language of the MS in which they are operating while not allowing them to use an interpreter.

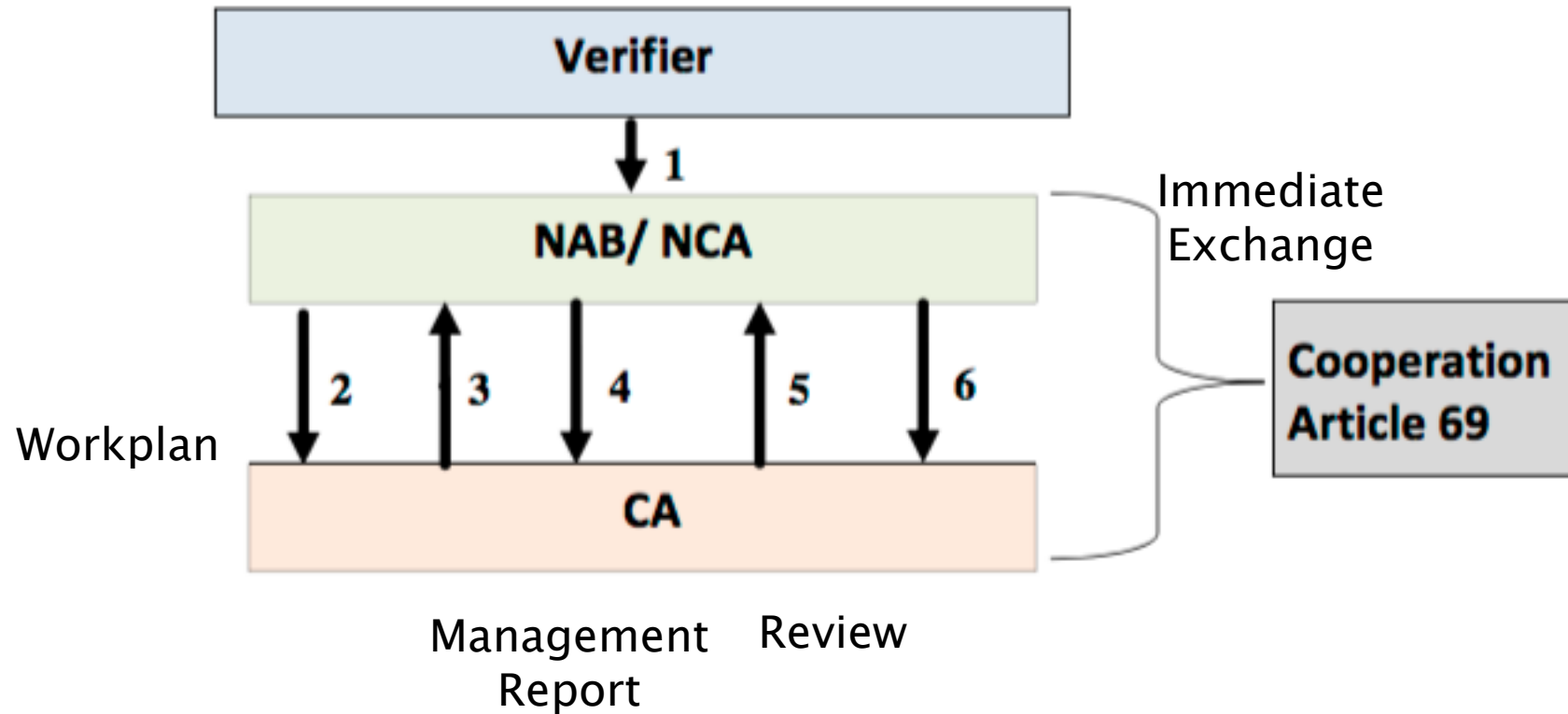
# AVR – Information Exchange

- ✓ Article 69 – MS are required to establish an effective information exchange and cooperation between their NAB and CA
- ✓ Article 76 – Notification (latest 15 November) (verifier details, accreditation ID, installation details, timing of planned verifications).
- ✓ By end Dec the NAB submits a work programme to the CA (verifier details, assessments planned, ...)
- ✓ The CA provided the NAB with necessary information (legislation, MS specific info, ...)

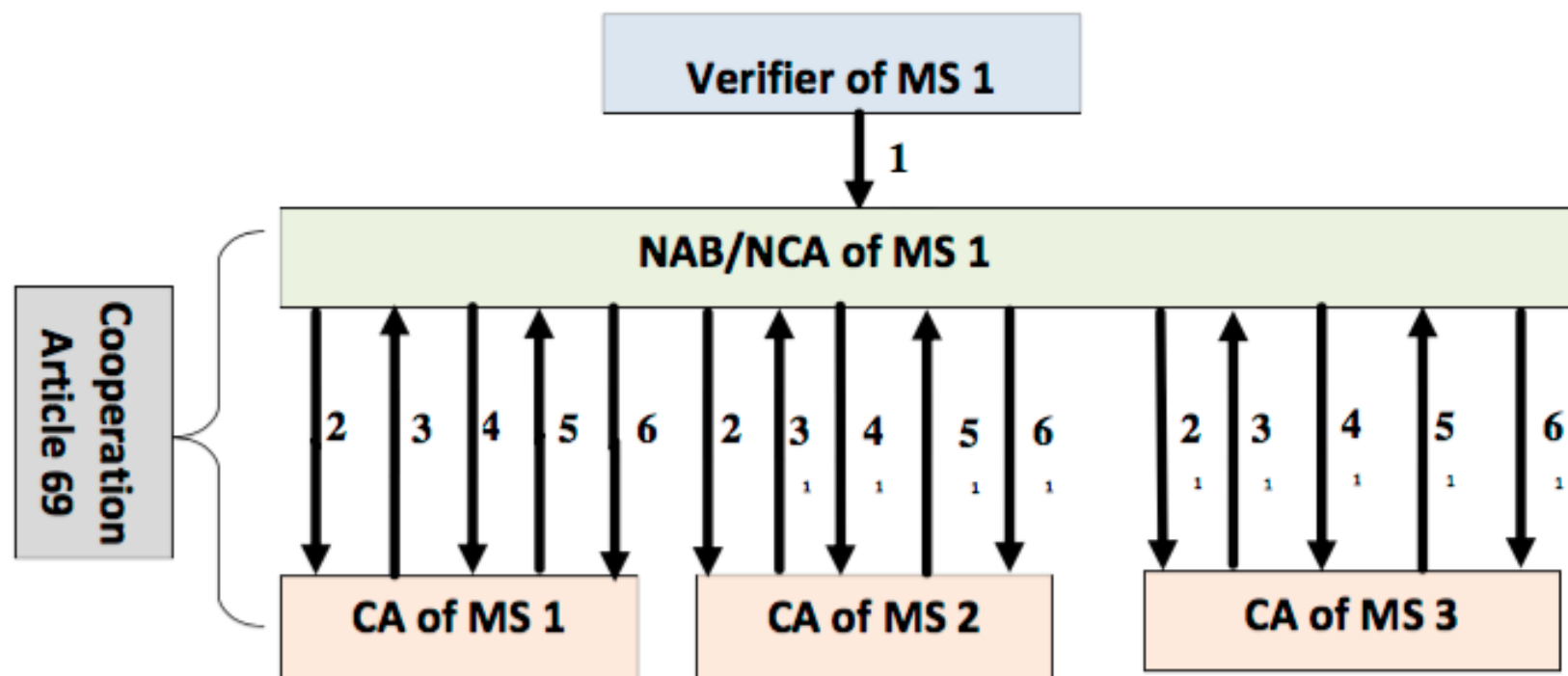
# AVR – Information Exchange

- ✓ Article 70 – Management Report (NAB) to CA and MS where verifier is accredited ( by 1 June each year) (summary of surveillance activities, findings, changes in scope, admin measures ...)
- ✓ Article 72 – Info exchange from CA to NAB (or NCA) (by September each year) (summary of issues identified during VOS/Report review, inspections, internal evaluation, complaints)
- ✓ Article 71 – immediate info exchange (NAB) to CA of the MS (measures, suspension, ...)

# AVR – Information Exchange



# AVR – Information Exchange Cross Border







- ✓ Work programme template

# AVR – Information Exchange

## ✓ Management Report

### Management report template

Management report to be submitted from the NAB or NCA to the Competent Authority (Article 70(3) of the AVR)

Please provide for each row the information per verifier

Accreditation ID number or certification ID number: Please select per verifier the ID number in the accreditation certificate or the certification certificate in the case of certification. If the verifier is a new verifier that goes through an initial accreditation or certification, this number does not have to be provided (yet).

Type of outstanding non-conformity: Please specify in a few words the type of outstanding non-conformity (e.g. non-compliance with competence, requirements, non-compliance with impartiality requirements, material misstatements missed, non-conformities not identified)

Company / organisation name/ natural certified person	Mandatory	Include at least first name and surname. Optional: title, job title	Mandatory	Please use the international phone number format	Mandatory	Mandatory	Optional	Mandatory	Optional	Mandatory	Mandatory
Verifier Details											
Verifier name:	Accreditation ID number or certification ID number:	Contact person:	Telephone number:	Email address:	Address Line 1:	Address Line 2:	City:	State/Province/Region:	Postcode/ZIP:	Country:	

Mandatory	Date (preferably day, at least month)	Mandatory	Please specify in a few words the types of outstanding non-conformities	Mandatory	mandatory to also fill worksheet "Extraordinary (Management)"	mandatory to also fill worksheet "Complaints (Management)"	Mandatory	Mandatory	Mandatory	imposed, (if applicable) when suspension was terminated (if applicable), whether and when decision on appeal has reversed the decision of the NAB or NCA to impose the administrative measure	Only if applicable
Assessments per Verifier (Article 70(3) of the AVR)											
Assessment type:	Date of assessment:	Findings:	Type of outstanding non-conformities	Has a scope change taken place?	Has an extraordinary assessment been performed?	Has any complaint against the verifier been lodged?	Have administrative measures been imposed?	Type of administrative measure imposed	Has the information on the administrative measure already been shared with the CA	If information on the administrative measure has not been shared with the CA, please provide further details:	NAB has requested that another NAB performs the surveillance and witnessing activities
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# AVR – Information Exchange

## Information exchange template

Information exchange from the CA to the NAB or NCA (Article 72 of the AVR)

Please provide for each row the information found (note: multiple issues (thus rows) for the same verifier, operator/ aircraft operator's report or verification report is possible)

Relevant results of the review of the operator's or aircraft operator's reports and verification reports (Article 72(1) (a) of the AVR)

Accreditation ID number/ certification ID number Please select per verifier the ID number in the accreditation certificate or the certification certificate in the case of certification

Which operator report it concerned Please indicate in this section the operator or aircraft operator name; the unique ID number as in the NIMS or the aircraft operator's CRCO number; and the report type (emission report or verification report)

Attached evidence Evidence to support the information in this template should be clearly referenced and the file name/ reference number provided below.

Company / organisation name/ natural certified person Mandatory		Please make reference to at least operator /aircraft operator name, ID number and report type Mandatory		Please specify in a few words the type of issue found if the option "Other" was selected in the previous column Mandatory		Please indicate whether the verifier has been informed of the issue found (as specified in the previous columns) Mandatory		Please describe the attached evidence (like file name, where it can be found, reference number etc.) Mandatory	
Verifiers Details		Relevant results of the review of AER and VR (Article 72 (1) (a) of the AVR)							
Verifier name:	Accreditation ID number or Certification ID number	Which Operator/ Aircraft Operator 's report or verification report it concerned:	Type of issue found:	Type of issue found (only to be completed if the option "Other" in the previous column has been selected)	Has the verifier been informed of the issue found?	Attached evidence			
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## Information exchange template

Information exchange from the CA to the NAB or NCA (Article 72 of the AVR)

Please provide for each row the information found (note: multiple issues (thus rows) for the same verifier, operator/ aircraft operator's report and/or verification report is possible)

Relevant results of inspection (Article 72(1) (b) of the AVR)

Accreditation ID number/ certification ID number Please select per verifier the ID number in the accreditation certificate or the certification certificate in the case of certification

Which operator report it concerned Please indicate in this section the operator or aircraft operator name; the unique ID number as in the NIMS or the aircraft operator's CRCO number; and the report type (emission report or verification report)

Attached evidence Evidence to support the information in this template should be clearly referenced and the file name/ reference number provided below.

Company / organisation name/ natural certified person Mandatory		Please make reference to at least operator /aircraft operator name, ID number and report type Mandatory		Please specify in a few words the type of issue found if the option "Other" was selected in the previous column Mandatory		Please indicate whether the verifier has been informed of the issue found (as specified in the previous columns) Mandatory		Please describe the attached evidence (like file name, where it can be found, reference number etc.) Mandatory	
Verifiers Details		Relevant results of inspection (Article 72 (1) (b) of the AVR)							
Verifier name:	Accreditation ID number or Certification ID number	When the inspection has taken place	Which Operator/ Aircraft Operator 's report or verification report it concerned:	Type of issue found:	Type of issue found (only to be completed if the option in the previous column has been selected)	Has the verifier been informed of the issue found?	Attached evidence		
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# Any Questions?

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