

Information exchange: Year 1 experiences

Naomi Walker

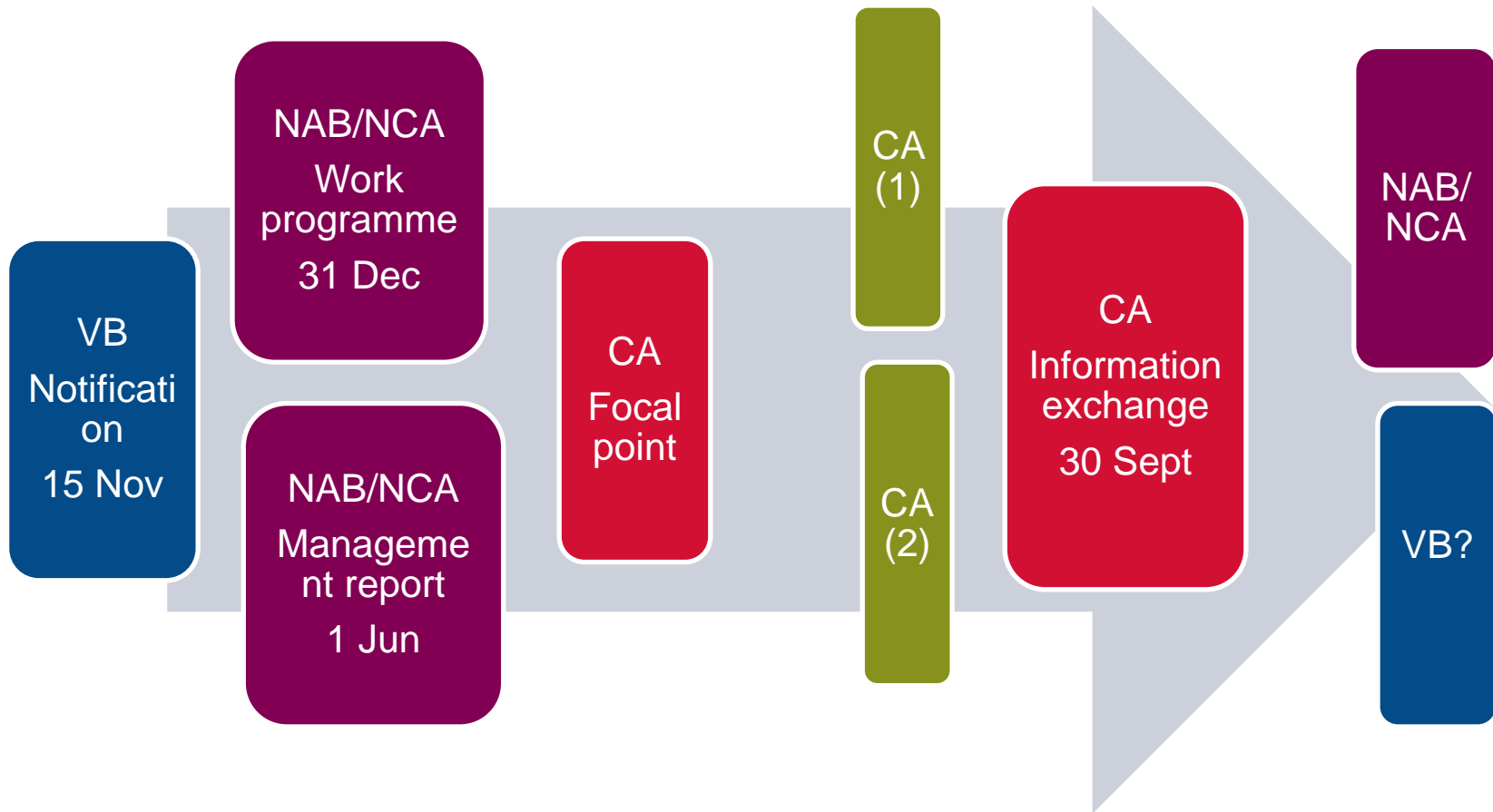
Technical Advisor, EU ETS MRV, UK

2014 Accreditation and Verification Forum

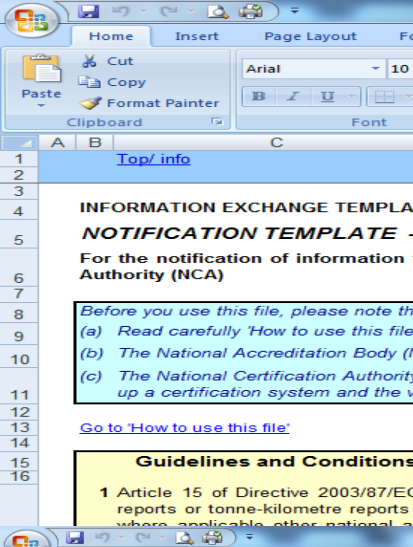
Overview

- ➔ Overview of AVR requirements
- ➔ Practical experience of using the templates
- ➔ Proposals for changes to some templates
- ➔ Benefits of information exchange – views of the Task Force on Accreditation and Verification
- ➔ Where to look for help

Information exchange (AVR Chapter VI)



Commission Information Exchange templates: notification, work programme, management report and information exchange from CA



INFORMATION EXCHANGE TEMPLATE
NOTIFICATION TEMPLATE - to be submitted to the CA
 For the notification of information from verifiers to the National Authority (NCA)

Before you use this file, please note the following:
 (a) Read carefully 'How to use this file' with instructions for filling this template.
 (b) The National Accreditation Body (NAB) mentioned in this template is the NAB that has accredited the verifier.
 (c) The National Certification Authority (NCA) mentioned in this template is the NCA that has certified the verifier if a MS has set up a certification system and the verifier concerned is a certified natural person.

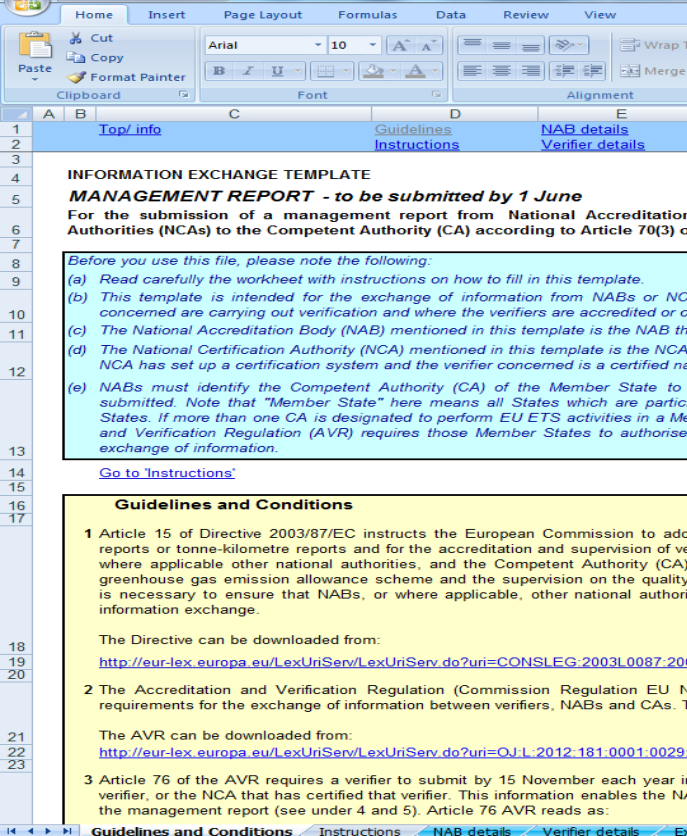
Go to 'How to use this file'.

Guidelines and Conditions

1 Article 15 of Directive 2003/87/EC instructs the European Commission to require reports or tonne-kilometre reports and for the accreditation and supervision of verifiers where applicable other national authorities, and the Competent Authority (CA) to ensure that NABs, or where applicable, other national authorities are carrying out verification and where the verifiers are accredited or certified.

INFORMATION EXCHANGE TEMPLATE
WORK PROGRAMME - to be submitted by 31 December
 For the submission of the work programme from National Accreditation Bodies (NABs) or National Certification Authorities (NCAs) to the Competent Authority (CAs) according to Article 70(1) of the AVR

Before you use this file, please note the following:
 (a) Read carefully the worksheet with instructions on how to fill in this template.
 (b) This template is intended for the exchange of information from NABs or NCAs to the CA of the MS where the verifiers concerned are carrying out verification.
 (c) The National Accreditation Body (NAB) mentioned in this template is the NAB that has accredited the verifier.
 (d) The National Certification Authority (NCA) mentioned in this template is the NCA that has certified the verifier if a MS has set up a certification system and the verifier concerned is a certified natural person.
 (e) NABs must identify the Competent Authority (CA) of the Member State to which the work programme needs to be submitted. Note that "Member State" here means all States which are participating in the EU ETS, not only EU Member States. If more than one CA is designated to perform EU ETS activities in a Member State, Article 69(2) of the Accreditation and Verification Regulation requires those Member States to authorise one of those CA as the focal point for the exchange of information.



INFORMATION EXCHANGE TEMPLATE
MANAGEMENT REPORT - to be submitted by 1 June
 For the submission of a management report from National Accreditation Authorities (NCAs) to the Competent Authority (CA) according to Article 70(3) of the AVR

Before you use this file, please note the following:
 (a) Read carefully the worksheet with instructions on how to fill in this template.
 (b) This template is intended for the exchange of information from NABs or NCAs concerned are carrying out verification and where the verifiers are accredited or certified.
 (c) The National Accreditation Body (NAB) mentioned in this template is the NAB that has accredited the verifier.
 (d) The National Certification Authority (NCA) mentioned in this template is the NCA that has certified the verifier if a MS has set up a certification system and the verifier concerned is a certified natural person.
 (e) NABs must identify the Competent Authority (CA) of the Member State to which the work programme needs to be submitted. Note that "Member State" here means all States which are participating in the EU ETS, not only EU Member States. If more than one CA is designated to perform EU ETS activities in a Member State, Article 69(2) of the Accreditation and Verification Regulation requires those Member States to authorise one of those CA as the focal point for the exchange of information.

Go to 'Instructions'.

Guidelines and Conditions

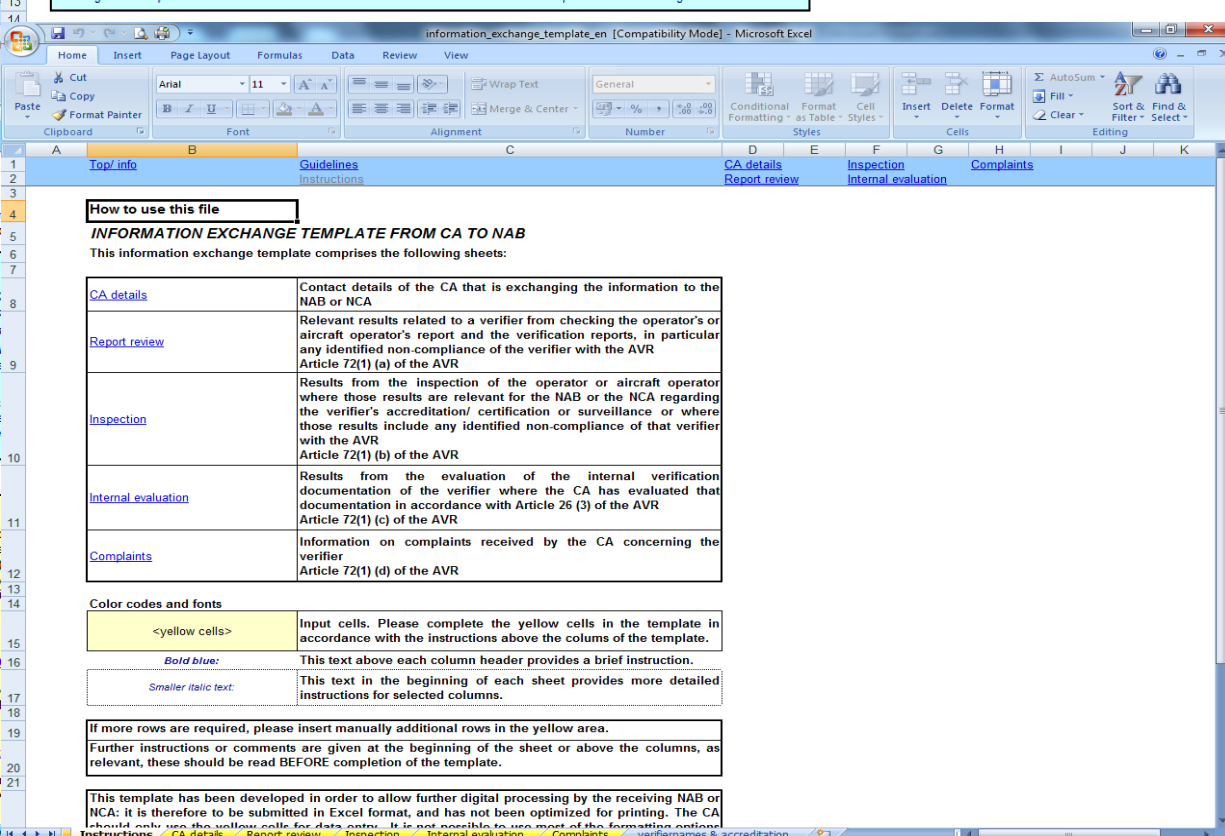
1 Article 15 of Directive 2003/87/EC instructs the European Commission to require reports or tonne-kilometre reports and for the accreditation and supervision of verifiers where applicable other national authorities, and the Competent Authority (CA) to ensure that NABs, or where applicable, other national authorities are carrying out verification and where the verifiers are accredited or certified.

The Directive can be downloaded from:
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG.2003L.0087.20050101-1>

2 The Accreditation and Verification Regulation (Commission Regulation (EU) No 1117/2012) can be downloaded from:
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ.L.2012.181.0001.0029>

The AVR can be downloaded from:
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ.L.2012.181.0001.0029>

3 Article 76 of the AVR requires a verifier to submit by 15 November each year a management report to the CA, or the NCA that has certified that verifier. This information enables the CA to ensure that NABs, or where applicable, other national authorities are carrying out verification and where the verifiers are accredited or certified.



How to use this file

INFORMATION EXCHANGE TEMPLATE FROM CA TO NAB
 This information exchange template comprises the following sheets:

CA details	Contact details of the CA that is exchanging the information to the NAB or NCA
Report review	Relevant results related to a verifier from checking the operator's or aircraft operator's report and the verification reports, in particular any identified non-compliance of the verifier with the AVR Article 72(1) (a) of the AVR
Inspection	Results from the inspection of the operator or aircraft operator where those results are relevant for the NAB or the NCA regarding the verifier's accreditation/ certification or surveillance or where those results include any identified non-compliance of that verifier with the AVR Article 72(1) (b) of the AVR
Internal evaluation	Results from the evaluation of the internal verification documentation of the verifier where the CA has evaluated that documentation in accordance with Article 26 (3) of the AVR Article 72(1) (c) of the AVR
Complaints	Information on complaints received by the CA concerning the verifier Article 72(1) (d) of the AVR

Color codes and fonts

<yellow cells>	Input cells. Please complete the yellow cells in the template in accordance with the instructions above the columns of the template.
Bold blue:	This text above each column header provides a brief instruction.
<i>Smaller italic text:</i>	This text in the beginning of each sheet provides more detailed instructions for selected columns.

If more rows are required, please insert manually additional rows in the yellow area.
 Further instructions or comments are given at the beginning of the sheet or above the columns, as relevant, these should be read BEFORE completion of the template.

This template has been developed in order to allow further digital processing by the receiving NAB or NCA: it is therefore to be submitted in Excel format, and has not been optimized for printing. The CA should only use the yellow cells for data entry. It is not possible to use most of the formatting options available in Excel.

Notification from VB to NAB/NCA (Art 76)

- ➔ Used by NAB/NCA to draft work programme
- ➔ Update of information dependent on NAB requirements
 - ➔ e.g. UKAS requested monthly submission updates
- ➔ Reviewed by EA EU ETS Network Group.
 - ➔ EA EU ETS Network feedback to A&V Task Force: we need more information so that we can sample our surveillance activities

NAB/NCA Work programme (1) (Art.70)

- ➔ Informs the CA of the surveillance activities to be undertaken for accredited verifier
- ➔ What do I do with this information?
- ➔ Are all verifiers listed?
 - ➔ Clues on verifier capacity
- ➔ Are all operators listed?
 - ➔ Clues on whether operators have engaged with a verifier, or not (may be a reminder is needed)

NAB/NCA Work programme (2)

- ➔ Do any of our operators use foreign verifiers?
 - ➔ Should I have a work programme from all NABs (Art. 73)?
 - ➔ Have we ensured that they are aware of any national rules (Art 70(2))?
- ➔ Has each verifier been selected for surveillance activities?
- ➔ Which NAB is undertaking the surveillance?
 - ➔ Domestic or other (Art. 74)
- ➔ Is it always the same client or a different client?
 - ➔ Important to check competencies for all accredited scopes
- ➔ A&V TF feedback to EA EU ETS Network: we want to know that the full scope of a verifier's accreditation is being sampled (over time).

NAB/NCA Management report (Art. 70)

- ➔ Informs the CA of the outcomes of surveillance activities of verifiers
- ➔ Were there any findings, if so what were they?
- ➔ Were there any findings that could impact upon the validity of the operator's AER?
 - ➔ Administrative measures?
- ➔ Were there any complaints that could not be resolved?

Information exchange by the CA (Art. 72)

- ➔ Inform NAB/NCA of relevant results from CA checks
- ➔ Did any one verifier make more mistakes than others?
- ➔ Were there common mistakes?
- ➔ Do we need to provide training or guidance?
- ➔ A&V TF feedback: verifiers confuse misstatement, non-conformance and recommendations for improvement

Proposals for changes based on first year experiences

- ➔ EA EU ETS Network Group and the A&V Task Force propose changes to the notification template, and the work programme.
- ➔ Notification template: proposal for verifiers to include the scope of verification and the lead verifiers
 - Implement for 2014 notifications
- ➔ Work programme template: proposal for NAB to include the verifier's scope of accreditation.

Benefits of information exchange (1)

- ➔ AVR formalises information exchange between CA and NAB
- ➔ Improved co-operation and co-ordination between CA and NAB
- ➔ CA has a role in improving the quality of verification through its feedback on report checks.
- ➔ Exchange of information is harmonised across MS and NABs, irrespective of MS where verifier is accredited.

Benefits of information exchange (2)

- ➔ Greater transparency of surveillance activities
- ➔ Allows CA to decide if they would like to be present on a witness site assessment
- ➔ Improved understanding of the level of assessment and surveillance of verifiers
- ➔ Identifies any outstanding issues with verifiers

These are the first year thoughts and we expect the benefits to get better with experience

- ➔ **Information exchange templates and guidance (KGN II.10):**
http://ec.europa.eu/clima/policies/ets/monitoring/index_en.htm
- ➔ **A&V Task Force Manager – Margreet Kleijn**
- ➔ **Convener EA CC EU ETS Network Group – Niels-Christian Dalstrup**