



**RENAR's EXPERIENCE ON
ACTIVITY LEVEL REPORTS VERIFICATION**

LEGAL BASIS

- Governmental Decision no. 287/2021 regarding the establishment of measures for the application of the Implementing Regulation (EU) 2019/1842
- Designates NEPA as CA for the implementation of ALCR
- Sets up tasks for CA and defines obligations for operators
- Provides the level of penalties and designates the controlling authority
- Deadlines for submitting the reports using COM template
 - 2021 – 31st of March
 - starting from 2022 – 1st of March each year

RESPONSIBLE AUTHORITIES

- **MINISTRY OF ENVIRONMENT, WATERS AND FORESTS** – responsible for coordination EU ETS scheme
- **NATIONAL ENVIRONMENT PROTECTION AGENCY** – responsible for implementation of EU ETS scheme
- **NATIONAL ENVIRONMENT GUARD** – responsible for inspection, control and sanctions/penalties
- **RENAR** – responsible for accreditation of the Verification Bodies

- RENAR – Romanian Accreditation Association is responsible for the accreditation of the Verification Bodies according to EN ISO 14065
- 131 installations active in phase 4 of EU ETS
- 5 Verification Bodies accredited since 2013 for most activity groups according to AVR (except 10, 11 and 99), and also
- Accredited for the scope defined in activity group 98 including verification of:
 - NIMs baseline data report (FAR);
 - Annual activity level report (ALCR)
- VB accredited against the scope 98 also have to be accredited in the scope(s) of the technical sector(s) related to the installation

ACTIONS TAKEN BY RENAR FOR IMPLEMENTING ALCR

- Trained its assessment personnel (internal and external, as well as decision making people) on ALCR, on the specific template for the verification report, on GD 7 and other relevant guidance documents
- Revised internal documents (specific regulation, reporting forms) in order to update those to the new European regulation, new GD and requirements
- Starting from 2021, during the annual surveillance at the verifier's office, the AE and AL verification was assessed for each activity group sampled for file review, as well as interviews were held with auditors related to ALC
- In 2022 for each VB more witness assessments were performed both for AE and ALC verifications

ACTIONS TAKEN BY VERIFICATION BODIES – checked by RENAR

- In principle the verification process, from the pre-contract stage up to issuing the verification report - follows the same steps as for verification AER
- VBs adapt their verification process according to the requirements for verification related to free allocation and activity level data
- VBs revised their verification procedure/prepared a new procedure in order to include the new requirements
- VBs trained their staff (lead auditors, auditors, technical experts and independent reviewer) on the ALCR, GD7, other relevant guidance documents, verification report template
- VBs reviewed the existing contracts/concluded new contracts for this new activity
- Usually, VBs performed the AL verification activity back-to-back to the annual emissions verification

ASPECTS IDENTIFIED BY VERIFIERS/NEPA

- In 2021, errors were identified in the AER for 2020, which led to revision and issuing of a revised AER, VR and also a reconsideration of the ALCR
- Reports submitted with incomplete data/wrong data (GHG permit number, wrong ETS activities/additional activities mentioned for which the installation was not authorized, wrong name of the installation/operator)
- Different activity level in the verification report vs activity level in the operator report
- Important errors leading to the change of the activity level and sometimes even to change of allocation (i.e. the inclusion of losses in the activity level of a sub-installation resulting in a higher activity level and a larger number of allowances)

THANK YOU FOR YOUR ATTENTION!