



Experiences from
ALC 2021 & -22

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Overview (ALC 2021 numbers)

- 120 ALC reports (out of a total of 145 ETS installations)
 - 6 non-material misstatements
 - 25 non-compliances
 - 24 non-conformities
 - 1 complaint to the Norwegian NAB (one verifier, two verification reports)

We wish to talk about the quality of the verification reports..



Verification reports - deficiencies

- Obvious errors not detected (~2-5%)
- Incorrect assessments (~5-15%)
- Contradictory conclusions in the first and second part of the verification report (~2-5%)
- Conflicting information in the verification report and the allocation report (~10%)
- Reference to outdated sources (~5%)



Documentation / communication of findings

Non-compliances, non-conformities, misstatements and recommended improvements

- Violations not worded as an actual “violation from a regulation/MMP”
- Misclassifications of recommendations of improvement that were actually non-conformities or vice versa
- Insufficient / lacking reference to the regulation
- Missing details on size and nature of misstatements
- Not sufficiently concise and complete information



(To us) these findings indicate:

Indications of a need for the verifiers to increase their;

- professional and technical competence
- competence relating to verification / control
- thoroughness



Communication with NAB and verifier

- Annual meeting with NAB and annual contact meeting with NAB and verification bodies
- Our impression (based on our findings) was supported
- Different perspectives in between CA, verification bodies and NAB
- Somewhat unclear understanding of responsibility for follow-up



Why this matters..

- Indicates insufficient verification (the parts we do not see)
- Considerable risk of misunderstandings
- Risk of sub-optimal follow-up
- Enforcement should not be made on the basis of assumptions



Interested in further information exchange

- Your experiences on this
 - (in both allocation and emissions reporting)
- Approaches
 - How to contribute to increased verification competence and thoroughness
 - How to obtain an overall effective control of compliance.
Achieving an expedient interaction between the different types of control (CA document control, verification and CA inspections)



Thank you

