

# Inspection of Stationary Installations 7<sup>th</sup> Compliance Conference

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# Overview

- Why conduct site visits
- The Process for ETS dedicated Inspections
- Inspection follow up
- Conclusion

# Why conduct site visits?

- Art. 14(3) of the EU ETS Directive: Member States shall ensure that Operators monitor and report emissions in accordance with the MRR and AVR.
- Inspections are an important tool in ensuring Operator compliance.
- Recommendation 4 of the European Court of Auditors Report states that Member States should:
  - ❑ implement coherent, effective control frameworks, including inspections for monitoring, reporting and verification activities;

# ETS dedicated Inspections

## The Process

- A risk assessment process prioritises site inspections based on:
  - ❑ installation size, number of emission points,
  - ❑ no. of non compliances;
  - ❑ notifications/meter failures,
  - ❑ complexity of activity, range of fuels/materials used,
  - ❑ new staff,
  - ❑ AEM issues raised by Verifier, whether AEM was resubmitted,
  - ❑ free allowance application.
- In addition site visits are generally conducted for New Entrants and where serious issues are detected in the AEM report.

# The Process continued

- Dedicated workflow on ETSWAP for site inspections.
- Operator notified in advance with outline of issues to be covered.
- Health and Safety requirements confirmed with Operator.
- Desk based review of all correspondence/notifications, AEM reports, verifier's findings, monitoring plan and permit, previous site visit reports, annual activity level and capacity change data and information for preparation of detailed questionnaire.
- A detailed questionnaire is completed during the site inspection. Relevant personnel are interviewed, a detailed site inspection of infrastructure such as emission sources, source streams, and metering arrangements is undertaken.

# The Process continued

- The aim is not to duplicate the Verifiers role.
  - ❑ Focus on for example, application of correct calculation methodology and data validation
  - ❑ Procedure implementation
  - ❑ Compliance with agreed sampling and analysis procedures, calibration and maintenance of meters
  - ❑ Justification of uncertainty values, changes in capacity and activity level
  - ❑ Inclusion of all emission sources and source streams.
- Findings of site visit presented to Operator at closing meeting.
  - ❑ Senior Management are invited to ensure staff are supported with necessary resources to implement recommendations.
  - ❑ Operator reminded of legal obligations, availability of guidance material and updated on current developments.

# Follow up after Inspection

- Following the visit an improvement report is issued through ETSWAP with dates for close out of actions.
- Close out is tracked through the system with reminders issued to the Operator and CA.
- For significant issues a follow up site visit is undertaken to confirm closeout.
- Implementation of recommendations is checked by the Verifier and CA during the update of the monitoring plan and review of AEM report and at subsequent site visits.

# Conclusions

- Site Inspections are an effective tool to assess Operator compliance but require resources.
- They are not intended to duplicate the work of the Verifier.
- Site visits aid the continuous improvement of monitoring methodology. Senior Management are made aware of requirements for compliance and support implementation.
- Site visits confirm installation boundary for New Entrants and ensure monitoring and reporting requirements can be met.
- Site visits aid in the better understanding of complex significant capacity changes.