

# *Implementation of Shipping MRV Regulation*

Verification Procedures and  
Accreditation of Verifiers

Day 2 – 21 January 2016

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# *Agenda*

## *I Verification procedures*

1. Documents to be provided by companies to verifiers
2. Site visits
3. Uncertainty
4. Materiality
5. Misstatements and non-conformities
6. Content of the verification report
7. Recommendations for improvement

## *II Accreditation of verifiers*

1. Scope of accreditation
2. How accreditation for shipping activities can be requested
3. Requirements for national accreditation bodies in order to be competent to provide accreditation to verifiers for shipping activities
4. How verifiers will be assessed by the national accreditation bodies in order to issue an accreditation certificate
5. NABs' surveillance to confirm continuation of verifiers' accreditation
6. Communication between NABs and the Commission



# *I Verification Procedures*

# 1. Documents to be provided by companies to verifiers (1/6)

## Potential need for rules

<b>Issue:</b>	<b>Documents to be provided by companies to verifiers are not specified in the EU MRV Regulation</b>	
<i>Actors involved:</i>	VERIFIERS <i>(requesting info)</i> COMPANIES <i>(providing info)</i>	According to Article 15.4 of the EU MRV Regulation, the company shall provide the verifier with any additional information that enables it to carry out the verification procedures
<i>Rules needed for:</i>	DOCUMENTATION	The delegated act could specify which documents the company has to provide to the verifier, while Article 15.4 already enables the verifier to ask for additional documentation if needed for the purpose of verification
<b>Impact on shipping company</b>	<b>Specifying documents that shipping companies are required to provide to verifiers contributes to a level playing field where verifiers generally ask for similar documents when performing verification activities for the EU MRV Regulation. This is a benefit for shipping companies, as they are aware of the most relevant requests verifiers are likely to make.</b>	
<i>Relevant internationally accepted standards:</i>	EU MRV Regulation ISAE3000 EN ISO 14065	Article 4.4 Para 24b(III) Section 7.3
<i>Relevant EU legislation:</i>	EU ETS Accreditation and Verification Regulation 600/2012	Article 10

# ***1. Documents to be provided by companies to verifiers (2/6)***

*Options for rules to be recommended by the subgroup*

## **Document availability**

	<b>Description</b>
<b>Option</b>	The delegated act will require shipping companies to <b>have at least a copy of the documents listed above in the office for verification purposes.</b>

**Based on feedback received from stakeholders, a preference has been expressed for this option. This means that the Delegated act will specify that for documents only kept onboard ships, it is acceptable for the purpose of verification that copies of these documents are available in the office of the shipping company.** This could enable efficiency as it could prevent verifiers from having to perform site visits on board ships.

# ***1. Documents to be provided by companies to verifiers (3/6)***

*Options for rules to be recommended by the subgroup*

## **Retention of documents**

	<b>Description</b>
<b>Option</b>	The retention period for documents as set by international maritime laws will be respected. This is considered to be <b>three years for most documents listed</b> . In case international maritime laws require for certain documents a retention period of more than three years this will be followed accordingly.

**Based on the feedback received from stakeholders, the Delegated should include a retention period of a minimum of three years for all information used for the preparation of the emissions report.**

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# ***1. Documents to be provided by companies to verifiers (4/6)***

## ***Options for rules to be recommended by the subgroup***

### **Confidentiality of documents**

Documents provided to verifiers may contain commercially sensitive information.

EN ISO 14065 Section 7.3 requires verifiers to treat all documents obtained from clients confidential and to ensure that information obtained during the verification process is only available for staff involved in the verification for that engagement.

In addition, verifiers cannot use information obtained from the shipping company not publicly available for other purposes without consent of the shipping company. Verifiers shall ensure that confidentiality of information obtained or produced for the verification is safeguarded.

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# *1. Documents to be provided by companies to verifiers (5/6)*

## *Options for rules to be recommended by the subgroup*

### **Specification of documents to be provided**

The delegated act should specify a **minimum list of documents that shipping companies shall provide to verifiers** (provided that these documents are applicable to the specific ship to monitor and report for the EU MRV Regulation).

**Based on the Ecofys study and feedback received from stakeholders so far, the following documents have been identified (non-exhaustive list and specific documents are relevant only for certain ship types): see next slide**



# 1. Documents to be provided by companies to verifiers (6/6)

## Options for rules to be recommended by the subgroup

Cat*	Document	In Advance	Available during verification	Provided upon request	Provided upon request for a sample of voyages
R	Monitoring plan	✓			
R	Documentation / description of ships installation, flow meters used (if applicable) procedures and processes / flowcharts to which is referenced in the monitoring plan (if applicable)	✓			
R	List of all EU MRV voyages including information for each voyage about dates, ports of call, fuel type and consumption data, distance, time spent at sea, cargo carried and applicable conversion & emission factors**	✓			
A	Overview of IT landscape (if applicable)	✓			
R	Official Logbook (copies of relevant sections) and if separate the Oil Record Book (ORB)		✓		✓
A	Evidence of maintenance & accuracy / uncertainty of measurement equipment / flow meters (e.g. calibration certificates)		✓	✓	
R	Copies of bunkering documents (BDN, BDN Summaries)		✓		✓
A	Extract of activity data about fuel consumption from flow meters (if applicable)		✓	✓	
A	Copy of evidence of fuel tank meter readings (if applicable)		✓		✓
A	Extract of activity data from direct emissions measurement systems (if applicable)		✓	✓	
R	Copies of documents containing information about the number of passengers transported / amount of cargo carried		✓		✓
A	Copies of information received through weather routing systems about voyages (if this would provide information needed about distance travelled and time spent at sea not already recorded in the official log book)		✓		✓
R	Annual Emissions Report		✓	✓	

## 2. Site Visits (1/4)

### Potential need for rules

<b>Issue:</b>	<b>The EU MRV Regulation does not specify in which cases site visits should be performed</b>	
<i>Actors involved:</i>	VERIFIERS	According to Article 15.4 the verifier may conduct spot checks to determine the reliability of the reported data and information
<i>Rules needed for:</i>	NEED OF SITE VISITS	The delegated act could clarify in which case site visits would be needed and in which location (head office vs. on-board), and therefore provide the definition of site
<b>Impact on shipping company</b>	<b>Visiting clients to perform verification activities on the premises of companies (sites and/or offices) is assumed relevant for GHG emissions verification in general. Shipping companies should expect verifiers to visit the company and should accommodate visits based on the request of and in agreement with verifiers. A common approach on site visits contributes to a level playing field in verification, limiting the administrative burden for shipping companies.</b>	
<i>Relevant internationally accepted standards:</i>	EN ISO 14065, via EN ISO 14064-3  ISAE3410	Section A.2.6.2 (guidance)  Para 31
<i>Relevant EU legislation:</i>	EU ETS Accreditation and Verification Regulation 600/2012	Article 21

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## 2. Site Visits (2/4)

### *Options for rules to be recommended by subgroup*

Based on feedback received from stakeholders, there is no consensus on a preference for one of the proposed options. Consensus has been expressed about removing the option of mandatory site visits to the ship and that the need of **site visits should be based on the outcome of the risk assessment**.

**It is suggested that the Delegated act specifies the following rules for site visits:**

- Site visit **based on risk assessment** and at least during the first year
- Location is determined based on **where critical mass of data is kept**
- If critical mass of information is spread over more than one location, the verifier shall consider visiting all relevant locations
- Copies of documents that are kept on the ships are centrally stored
- **Verifiers shall carry out at the minimum the following activities:**
  - Interview staff involved in reporting process
  - Review documents that are required in the context of the EU MRV
  - Assess procedures as described in the MP
  - Test control activities (if applicable)
  - Obtain physical evidence through assessment of monitoring systems and processes
- If extra verification work is needed (e.g. onboard verification), this should be noted in the verification report
- Site visits may be waived when:
  - Limited size and complexity of ships and operations apply
  - All information can be obtained remotely
  - Should verifiers decide to waive the side visit, this consideration has to be documented

### 3. Uncertainty (1/2)

#### Potential need for rules

<b>Issue:</b>	<b>The EU MRV Regulation does not specify how verifiers should check that the level of uncertainty indicated in the monitoring plan is met</b>	
<i>Actors involved:</i>	VERIFIERS	<p>According to 6.2.f.iv, Annex I.B and Article 11.3.c, the company should indicate in the monitoring plan and emission report the level of uncertainty associated with monitoring methods used and have a procedure in place to ensure that the total uncertainty of fuel measurements is consistent with the requirements of the EU MRV Regulation (provided that quantitative requirements for the total uncertainty have been established, e.g. by Delegated Acts amending Annex I to the MRV Regulation).</p> <p style="text-align: center;"><i>therefore</i></p> <p>when assessing the monitoring plan and emission report the verifier should check that the levels of uncertainty are specified and – if applicable – the requirements are met and that such procedure is in place</p>
<i>Rules needed for:</i>	ASSESSMENT OF CONFORMITY OF UNCERTAINTY LEVEL WITH MP	The delegated act could include provisions on how the verifier should check that the level of uncertainty associated with the monitoring methods are specified and the relevant procedure in place
<b>Impact on shipping company</b>	<b>Specifying procedures for checking how uncertainty information is provided contributes to a level playing field in verification. Shipping companies should expect verifiers to request information about estimated uncertainty thresholds in the monitoring plan and actual uncertainty applied in reporting emissions.</b>	
<i>Relevant internationally accepted standards:</i>	EN ISO 14064-3	Section A.2.4.6.3 (guidance)
	ISAE3410	Para 23b(i)c, A54 –A59
<i>Relevant EU legislation:</i>	EU ETS Accreditation and Verification Regulation 600/2012	Article 19

### **3. Uncertainty (2/2)**

#### *Options for rules to be recommended by subgroup*

Based on feedback received from stakeholders, there has been **no consensus** on either option. However there has been consensus about the fact that requirements for uncertainty for shipping companies should be dealt with in the Monitoring subgroup.

**The following option is suggested on further specification of rules related to uncertainty in the Delegated act for verification activities:**

	<b>Description</b>
<b>Verifiers shall</b>	Verify whether the uncertainty thresholds described in the monitoring plan are <b>compliant with the EU MRV Regulation</b> (as they either use default values provided by guidance documents or establish specific values); verify that shipping companies <b>adequately disclose the applied uncertainty levels</b> in the emissions report.

## 4. Materiality (1/2)

### Potential need for rules

<b>Issue:</b>	<b>The EU MRV Regulation does not define materiality and does not specify the acceptable materiality level when verifying the emissions report</b>	
<i>Actors involved:</i>	VERIFIERS	According to Article 13.3, where the verification assessment concludes, with reasonable assurance from the verifier, that the emissions report is free from <b>material</b> misstatements, the verifier shall issue a verification report stating that the emissions report has been verified as satisfactory
<i>Rules needed for:</i>	VERIFICATION OF QUANTIFIED INFORMATION IN THE EMISSIONS REPORT	The delegated act could provide a definition of materiality and the level of materiality that could be acceptable to reach reasonable assurance
<b>Impact on shipping company</b>	<b>Specifying materiality thresholds contributes to a level playing field in verification. Applying a materiality threshold enables more efficient verification and lower verification cost for shipping companies.</b>	
<i>Relevant internationally accepted standards:</i>	EN ISO 14065 via EN ISO 14064-3  ISAE3410	Section 4.3.5  Para 20 -22
<i>Relevant EU legislation:</i>	EU ETS Accreditation and Verification Regulation 600/2012	Articles 3.9 and 23

## 4. Materiality (2/2)

### *Options for rules to be recommended by subgroup*

	Description
Option	The level of materiality is prescribed by the delegated act

**Based on the discussions with and feedback received from stakeholders, consensus has been reached that option 2 is preferable. The following thresholds are suggested:**

- **CO<sub>2</sub> emissions: 5%**
- **Transport work: 5%**
- **Other relevant information: 5%**

**The suggested definition of materiality, in line with the AVR, could be as following:**

- ‘materiality level’ means the quantitative threshold or cut- off point above which misstatements, individually or when aggregated with other misstatements, are considered material by the verifier.

## 5. Misstatements and non-conformities (1/2)

### Potential need for rules

<b>Issue:</b>	<b>The EU MRV Regulation specifies only partly how verifiers should deal with misstatements and it does not specify if all misstatements and non-conformities should be corrected or only those material</b>	
<i>Actors involved:</i>	VERIFIERS	Article 13.4 of the EU MRV Regulation provides how verifiers should deal with misstatements and non-conformities in terms of timing for requesting revision of the emissions report by the company to correct them
<i>Rules needed for:</i>	VERIFICATION OF THE EMISSIONS REPORT	The delegated act could further specify how the verifier should deal with misstatements and non-conformities
<b>Impact on shipping company</b>	<b>Specifying rules for dealing with non-conformities and misstatements contributes to a level playing field in verification. Shipping companies should be aware that when the verifier identifies non-conformities and/or misstatements, the verifier has the obligation to request the shipping companies to correct all material issues in order to verify the emissions report as satisfactory.</b>	
<i>Relevant internationally accepted standards:</i>	ISAE3410	Para 47; 49-56; 78
<i>Relevant EU legislation:</i>	EU ETS Accreditation and Verification Regulation 600/2012	Articles 3.27 and 22



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## **5. Misstatements and non-conformities (2/2)**

### *Options for rules to be recommended by subgroup*

Based on feedback obtained from stakeholders, no consensus has been reached on a preferred option.

The following way forward is suggested to be included in the Delegated act:

- **Before verifiers can provide their assurance opinion**, the shipping company **shall correct at least all non-compliances and all material non-conformities and misstatements**.
- **Verifiers can accept uncorrected non-conformities and misstatements if individually or aggregated these are considered not material based on quantitative and qualitative evaluation**. The verifier can still provide recommendations for improvements in the verification report concerning the areas of non-material misstatements and non-material non-conformities, in order to help the company avoid such misstatements and non-conformities in the future.

## 6. Content of the verification report (1/3)

### Potential need for rules

<b>Issue:</b>	<b>The EU MRV Regulation does not specify the details of the verification report</b>	
<i>Actors involved:</i>	VERIFIERS	According to Article 13.3, the verifier shall issue a verification report stating that the emissions report has been verified as satisfactory and the verification report shall specify all issues relevant to the work carried out by the verifier
<i>Rules needed for:</i>	VERIFICATION OF THE EMISSIONS REPORT	The content of the verification report could be further specified in the delegated act. The need of a template could also be considered, to ensure harmonisation
<b>Impact on shipping company</b>	<b>Specifying further rules on the content of the verification report contributes to a level playing field in verification.</b>	
<i>Relevant internationally accepted standards:</i>	EN ISO 14065	Section 4.9
	EN ISO 14064-3	Section A.2.9.1.1 (guidance)
	ISAE 3410	Para 76 -77
<i>Relevant EU legislation:</i>	EU ETS Accreditation and Verification Regulation 600/2012	Article 27

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## ***6. Content of the verification report (2/3)***

### ***Options for rules to be recommended by subgroup***

Based on feedback received from stakeholders so far no consensus has been reached on the proposed options. It is suggested to at least include a **minimum set of requirements** based on relevant information specified by **internationally accepted standards**. These requirements could be:

#### **1) General information:**

- Basic information on the company and the ship
- Basic information about the verification engagement
- Information on the emissions of the relevant reporting year
- Key relevant requirements being met by the annual emissions report
- Verification opinion

#### **2) Findings:**

- Non-conformities
- Misstatements (corrected and uncorrected)
- Recommendations for improvements

#### **3) Summary of the basis of work**

#### **4) Summary of changes identified during the reporting year in the monitoring plan and activity data**

#### **5) Other relevant information to be required has been identified based on EU ETS and could be:**

- Information on performed site visits
- Verification team
- Data gaps

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## ***6. Content of the verification report (3/3)***

### ***Questions***

 ***Do you agree with the suggested required content of the verification report?***

***Do you agree with the need of a template provided by the Commission?***

## 7. Recommendations for improvements (1/2)

### Potential need for rules

<b>Issue:</b>	<b>The EU MRV Regulation does not specify the details of the recommendations for improvements</b>	
<i>Actors involved:</i>	VERIFIERS	According to Article 4.7 of the EU MRV Regulation, companies shall endeavour to take account of the recommendations included in the verification reports in their subsequent monitoring and reporting
<i>Rules needed for:</i>	VERIFICATION OF THE EMISSIONS REPORT	The delegated act could specify what kind of recommendations for improvements the verifier can make
<b>Impact on shipping company</b>	<b>Specifying further rules on the recommendations for improvements that the verifiers can make will further ensure potential conflicts of interest are avoided.</b>	
<i>Relevant internationally accepted standards:</i>	ISAE 3410	Para 77
<i>Relevant EU legislation:</i>	EU ETS Accreditation and Verification Regulation 600/2012	Article 30

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## ***7. Recommendations for improvements (2/2)***

### *Options for rules to be recommended by subgroup*

Based on feedback received from stakeholders, **no consensus has been reached** on these options.

**It is suggested to include a rule for the extent to which recommendations could be specified by verifiers. In addition, it is suggested to include a rule that verifiers shall provide a recommendation in relation to uncorrected non-conformities and misstatements (which are not material).**

Furthermore, additional guidance could be developed including examples of recommendations that could be provided by verifiers (e.g. best-practices in the monitoring and reporting processes).



## *II Accreditation of Verifiers*

# 1 Scope of Accreditation (1/3)

## Potential need for rules

<b>Issue:</b>	<b>The EU MRV Regulation does not specify the scope of accreditation for relevant verifiers</b>	
<i>Actors involved:</i>	VERIFIERS & NABs	According to Article 16 of the EU MRV Regulation, verifiers that assess monitoring plans and emissions reports, and issue verification reports and documents of compliance shall be accredited for activities under the scope of the Regulation by a national accreditation body pursuant to Regulation (EC) No 765/2008
<i>Rules needed for:</i>	ACCREDITATION	The delegated act could specify the scope for accreditation under the EU MRV Regulation
<i>Relevant internationally accepted standards:</i>	EN ISO 17011 EN ISO 14065	Section 7.2
<i>Relevant EU legislation:</i>	Accreditation Regulation 765/2008	
	EU ETS Accreditation and Verification Regulation 600/2012	Articles 43 & 44



# ***1 Scope of accreditation (2/3)***

## ***Dual role of verifiers***

	<b>Description</b>
<b>Option</b>	<b>One single accreditation</b> activity for both assessing the MP and carrying out verification of the emissions report (ER)

**Based on the feedback received from stakeholders, this is the preferred option.**

**However, additional rules need to be specified with regard to safeguarding impartiality and independence of the verifier. In this context the requirements on avoidance of conflict of interest in EN ISO 14065 shall be taken into account.**

# ***1 Scope of accreditation (3/3)***

## ***Accreditation sub-scope of GHG emissions verification***

	<b>Description</b>
<b>Option</b>	<b>One single accreditation for all monitoring methods and all types of vessels</b>

**Based on the feedback received from stakeholders, this is the preferred option.**

**It is suggested that the Delegated act will specify that the accreditation of verifiers covers all monitoring methods and types of vessels.**

## ***2 How accreditation for shipping activities can be requested (1/3)***

### ***Potential need for rules***

<b><i>Issue:</i></b>	<b>The EU MRV Regulation does not specify how verifiers can request accreditation under the Regulation</b>	
<i>Actors involved:</i>	VERIFIERS & NABs	According to Article 16 of the EU MRV Regulation, verifiers that assess monitoring plans and emissions reports, and issue verification reports and documents of compliance shall be accredited for activities under the scope of the Regulation by a national accreditation body pursuant to Regulation (EC) No 765/2008
<i>Rules needed for:</i>	ACCREDITATION	The delegated act could specify how verifiers can request accreditation under the EU MRV Regulation, also with regard to non-EU verifiers
<i>Relevant internationally accepted standards:</i>	EN ISO 17011 EN ISO 14065	Section 7.2
<i>Relevant EU legislation:</i>	Accreditation Regulation 765/2008	
	EU ETS Accreditation and Verification Regulation 600/2012	Article 45

## ***2 How accreditation for shipping activities can be requested (2/3)***

### *Allocation of verifiers to NABs*

	Description
<b>Option</b>	Non-EU Verifiers are allowed to choose freely an EU NAB

**Based on the feedback received from stakeholders, this is the preferred option.**

- There is no need identified for a non-EU based verifier to have a local EU office to perform its duties.
- EU based verifiers shall apply for accreditation to the NAB in the Member State where the verifier is registered.
- In case the NAB in that Member State is not providing accreditation services for the EU MRV Regulation, the Member State shall, as far as possible, have recourse to a NAB from another Member State, to which the verifier may apply for accreditation.
- If the Member State has no recourse with a NAB, the verifier is free to choose to which NAB he will apply for accreditation.

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## ***2 How accreditation for shipping activities can be requested (3/3)***

### ***Requesting accreditation for verification for the EU MRV Regulation***

**NABs, Members of EA, in the EU follow a harmonized standard for the accreditation of GHG emissions verification. EN ISO 17011 specifies the requirements for the application for accreditation.**

#### **Suggested option:**

**It is suggested to use Article 45 of the AVR to specify rules for requesting an accreditation for the EU MRV Regulation and to tailor it to maritime.** In addition, it is suggested to make reference to the harmonized standard, referred to in the Accreditation Regulation 765/2008, where specific requirements are detailed and used by NABs.

### ***3 Requirements for national accreditation bodies in order to be competent to provide accreditation to verifiers for shipping activities (1/2)***

*Potential need for rules*

<b><i>Issue:</i></b>	<b>The EU MRV Regulation does not specify requirements for NABs</b>	
<i>Actors involved:</i>	NABs	According to Article 16 of the EU MRV Regulation, verifiers that assess monitoring plans and emissions reports, and issue verification reports and documents of compliance shall be accredited for activities under the scope of the Regulation by a national accreditation body pursuant to Regulation (EC) No 765/2008
<i>Rules needed for:</i>	ACCREDITATION	The delegated act could specify requirements for NABs for providing accreditation under the EU MRV Regulation
<i>Relevant internationally accepted standards:</i>	EN ISO 17011	Section 6
<i>Relevant EU legislation:</i>	Accreditation Regulation 765/2008	Article 8(7)
	EU ETS Accreditation and Verification Regulation 600/2012	Chapter V, Articles 57, 58 & 59

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## ***3 Requirements for national accreditation bodies in order to be competent to provide accreditation to verifiers for shipping activities (2/2)***

*Options for rules to be recommended by the subgroup*

**Based on feedback received from stakeholders, there is no need for additional competencies to be added apart from the following:**

To successfully accredit verifiers for the maritime sector, NABs need to:

- understand all requirements for the maritime MRV system;
- build capacity, knowledge, experience and resources;
- understand the characteristics of different types of vessels;
- understand the characteristics of the different monitoring methods;
- train their own staff to obtain the required competence or make use of (sector) specialists when performing accreditation activities.

# 4 How verifiers will be assessed by the national accreditation bodies in order to issue an accreditation certificate (1/4)

*Potential need for rules*

<b>Issue:</b>	<b>The EU MRV Regulation does not specify how NABs will assess verifiers to issue an accreditation certificate</b>	
<i>Actors involved:</i>	NABs & Verifiers	According to Article 16 of the EU MRV Regulation, verifiers that assess monitoring plans and emissions reports, and issue verification reports and documents of compliance shall be accredited for activities under the scope of the Regulation by a national accreditation body pursuant to Regulation (EC) No 765/2008
<i>Rules needed for:</i>	ACCREDITATION	The delegated act could specify how NABs will assess verifiers to grant an accreditation certificate under the EU MRV Regulation
<i>Relevant internationally accepted standards:</i>	EN ISO 17011	Section 7.5 – 7.9 Process for initial assessment
<i>Relevant EU legislation:</i>	Accreditation Regulation 765/2008	
	EU ETS Accreditation and Verification Regulation 600/2012	Article 46 - 48



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# ***4 How verifiers will be assessed by the national accreditation bodies in order to issue an accreditation certificate (2/4)***

*Options for rules to be recommended by the subgroup*

## **Performing accreditation assessments**

Suggested option:

**EN ISO 17011 specifies how NABs shall assess accreditation applications. In the AVR, articles 46 - 48 summarise the required procedures NABs have to follow in the processes of assessing verifiers applying for accreditation.**

**It is suggested to include a similar summary with references to the harmonized standard in the Delegated act. This summary could consist of:**

- Preparation for the assessment;
- Assessment, including:
  - Review of relevant information and documents provided by verifiers in the application;
  - A visit to the premises of the verifier to review a sample of verification documentation and the implementation of the quality management system in practice;
  - Witnessing a representative part of the requested scope of accreditation and the performance and competence of staff from the verifier;
- Report findings and non-conformities and request for response;
- Review responses and corrective actions;
- Decision on accreditation and issuing a certificate.

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## ***4 How verifiers will be assessed by the national accreditation bodies in order to issue an accreditation certificate (3/4)***

*Options for rules to be recommended by the subgroup*

### **Witness visits**

The harmonized standard EN ISO 17011 require visits to the verifiers premises to be performed in order to assess conformity with the accreditation criteria, EN ISO 14065 and any additional criteria defined in the Delegated Act. This also includes witness in the field, to witness the performance of the verifier's staff to provide assurance of the competence of the verifier across the scope of accreditation.

Guidance could be provided to NABs concerning witness visits. Where possible, NABs could ask other EU NABs to perform the witness visits on their behalf. EA has procedures in place to provide for this possibility. A potential option would be to organize witness visits via videoconference or similar technical solutions.

**No further rules are required.**

# ***4 How verifiers will be assessed by the national accreditation bodies in order to issue an accreditation certificate (4/4)***

*Options for rules to be recommended by the subgroup*

## **Validity of accreditation certificate**

	<b>Description</b>
<b>Option</b>	Accreditation certificates could be given a validity period with a maximum of five years

**Based on the feedback received from stakeholders, this is the preferred option.**

This would include an annual witness ‘surveillance’ visit (both in the office and in the field) that is followed by a reassessment if the verifier wants to continue to perform the accredited task.

## **First year accreditation**

A process and timeline for the first year accreditation needs to be in place, and additional guidance is needed on how to achieve the accreditation during the initial phase (due to “chicken and egg” situation).

# 5 NABs' surveillance to confirm continuation of verifiers' accreditation (1/2)

*Potential need for rules*

<b>Issue:</b>	<b>The EU MRV Regulation does not specify how NABs will perform surveillance</b>	
<i>Actors involved:</i>	NABs	According to Article 16 of the EU MRV Regulation, verifiers that assess monitoring plans and emissions reports, and issue verification reports and documents of compliance shall be accredited for activities under the scope of the Regulation by a national accreditation body pursuant to Regulation (EC) No 765/2008
<i>Rules needed for:</i>	ACCREDITATION	The delegated act could specify how NABs should perform surveillance to confirm continuation of accreditation of the accredited verifiers
<i>Relevant internationally accepted standards:</i>	EN ISO 17011	Section 7.11
<i>Relevant EU legislation:</i>	Accreditation Regulation 765/2008	
	EU ETS Accreditation and Verification Regulation 600/2012	Article 49

## ***5 NABs' surveillance to confirm continuation of verifiers' accreditation (2/2)***

*Options for rules to be recommended by the subgroup*

	<b>Description</b>
<b>Option</b>	As the EU MRV Regulation has a number of new elements compared to other established systems, annual surveillance of all verifiers, including an office visit could be necessary to safeguard quality, especially given the dual task of the verifier.

**Based on the feedback received from stakeholders, there is a preference for annual witness 'surveillance' (both in the office and in the field). This is common practice under EN ISO 17011 for the accreditation of verifiers performing GHG verification under EN ISO 14065 and AVR 600/2012.**

# 6 Communication between NABs and the Commission (1/2)

## Potential need for rules

<b>Issue:</b>	<b>The EU MRV Regulation does not specify how NABs should communicate to the Commission about accreditations, withdrawals or suspensions of accreditations</b>	
<i>Actors involved:</i>	NABs	According to Article 16 of the EU MRV Regulation, verifiers that assess monitoring plans and emissions reports, and issue verification reports and documents of compliance shall be accredited for activities under the scope of the Regulation by a national accreditation body pursuant to Regulation (EC) No 765/2008
<i>Rules needed for:</i>	ACCREDITATION	The delegated act could specify information exchange between the Commission and NABs about the identification of accredited verifiers and of potential problems with the accreditation of verifiers
<i>Relevant internationally accepted standards:</i>	Not applicable	
<i>Relevant EU legislation:</i>	Accreditation Regulation 765/2008	
	EU ETS Accreditation and Verification Regulation 600/2012	Chapter VI

## 6 Communication between NABs and the Commission (2/2)

### *Potential need for rules*

	Description
Option	The status of accreditation of verifiers will be communicated by the individual NABs to the Commission by use of a standardized format. A list of accredited verifiers will be published by the individual NABs and the EA through providing direct links to each NABs list of accredited verifiers under the EU MRV Regulation.

Based on the feedback received from stakeholders, there is a need for transparency on which verification body is accredited. **This option has been identified as the most efficient as it ensures a standardized communication about the status of accreditation between the parties involved.** From the perspective of the shipping companies this option would also be the most efficient as the EA provides a direct link to each NAB's list of accredited verifiers under the EU MRV Regulation.

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# *Thank you for your input*

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