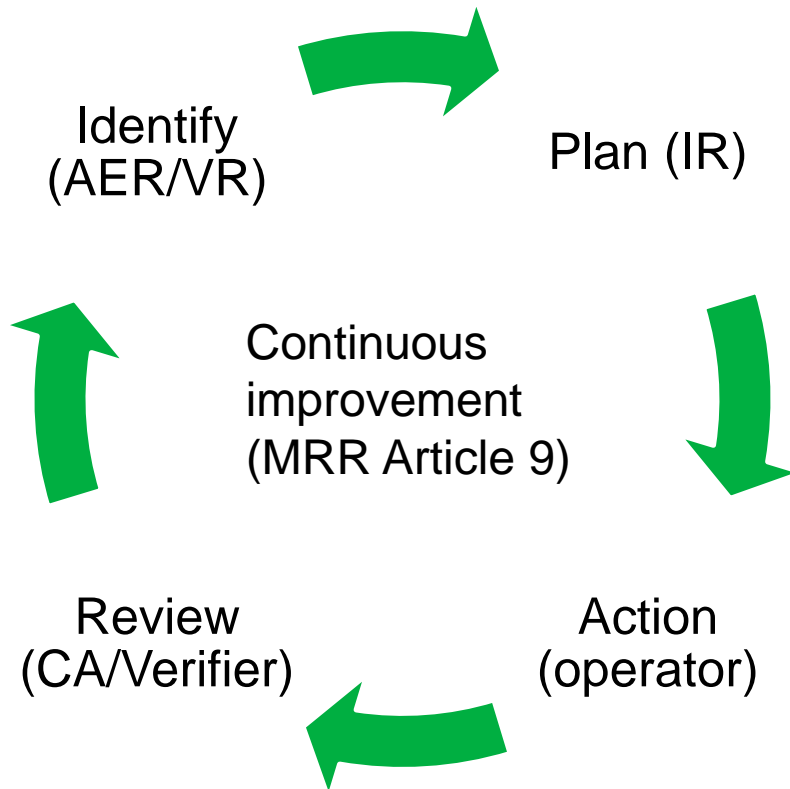


# **Breakout session III – reporting on improvements**

**Iain Weatherall  
Environment Agency (England, UK)  
Compliance Conference  
8 November 2017**

# Overview of improvement reporting in England



- 2016: 221 IRs submitted
  - Tiers = 53 reports
  - Verifier = 168 reports
- This is not an insignificant amount of work for the CA!
- But we believe submission to the CA and CA approval is the best way to deliver continuous improvement
- Examples?

# Example 1: Combined Heat and Power Plant (Cat B)

## Article 69(1) Improvement Report 2017

- Major source stream Natural Gas. Approved MP states tier 2a for NCV and EF
- Previously in 2013 and 2015 operator used unreasonable costs to justify not moving to tier 3
- In 2017 initially same justification provided, but CA put greater focus on requiring updated evidence to support unreasonable costs
- Operator provided quote for purchase and installation of analyser and unreasonable cost no longer justified
- Operator agreed to install on-line analyser and move to tier 3

# Example 1: Combined Heat and Power Plant (Cat B)

GC Analyser

## Average Emissions

Source stream reference (e.g. F1)

	Year	Emissions (tCO <sub>2</sub> )
Annual emissions for source stream in three most recent years (tCO <sub>2</sub> ):	2014	71866
	2015	74000
	2016	76271
Average Emissions (tCO <sub>2</sub> ):		74046

1% Improvement Factor:

Improvement Factor \* 20 euros:

## Costs

Type of Cost	Number of Depreciation Years	Cost, €
Investment Cost	5	24750
Investment Cost	5	3000
Annual Operating and Maintenance cost		5000

Exchange Rate Used

(Euro/Pound - e.g. if the exchange rate is 1.24 euros to the pound then input "1.24". If your costs are already quoted in euros then input "1")

Cost per year:

Justification acceptable:

# Example 2: Natural Gas Processing Terminal (Cat B)

## Article 69(4) Improvement Reports 2014-2017

- Early in phase several non-conformities and recommended improvements recorded by verifier each year
- Poor compliance with MRR requirements – data gaps
- Sampling frequencies, calibration and maintenance of measurement devices and instruments, laboratory accreditation issues
- Active involvement of CA in improvement report process, driving improvements and their timing
- In 2017 only one recommended improvement – no recent compliance issues

# Added value from the CA

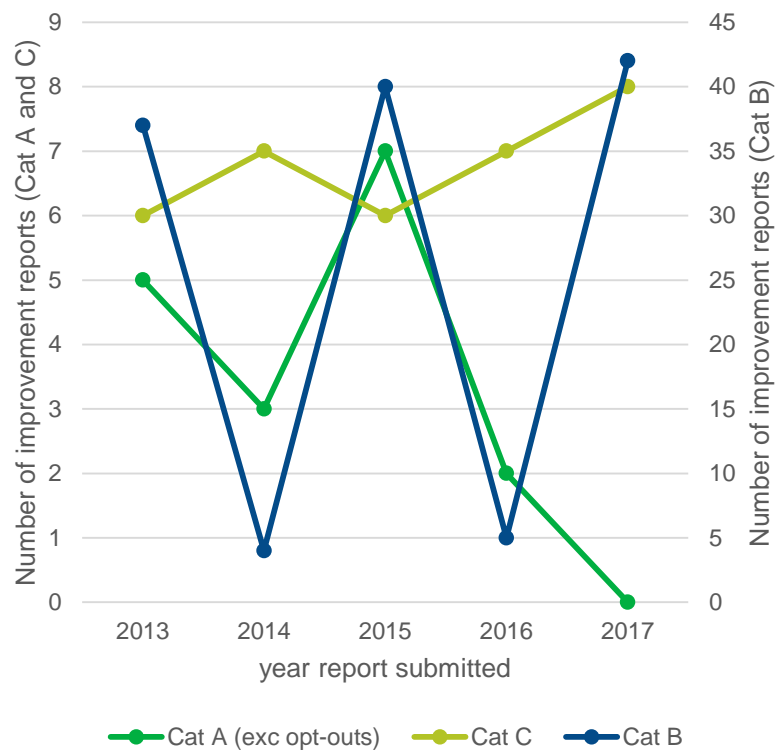
- Requirement to submit improvement report by 30 June keeps control over the timing of process
- Over course of phase technology moves forward – prices rise and fall. These justifications should be reviewed by CA periodically
- CA oversight of the operator's responses to verifier findings ensures they address the issue raised by the verifier
- CA can ensure action is completed within reasonable timeframe
- CA makes decision where operator proposes not to address verifier findings

**Thank you for listening**

**Any questions?**

# Overview of improvement reporting in England

Article 69(1) improvement reports relating to tiers submitted in England



Article 69(4) improvement reports addressing verifier recommendations (England)

