



Main take-aways from the September AV Training Event

Outcome AV Training Event

Machtelt Oudenes
SQ Consult BV

Compliance Conference
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AV Training event on 16 September

- Over 250 persons from CA, NABs and verifiers participated in a shared discussion
- Morning dedicated to verification of annual activity level data
 - Time allocation
 - Scope of verification and roles of different parties
 - Checks on annual activity level data
 - How to verify heat benchmark related data? What to consider?
 - Application of the materiality concept
 - How to report and follow-up on issues reported by the verifier
- Afternoon dedicated to various verification topics
 - Update of MRVA guidance material for the 4th trading period
 - Experiences on virtual site visits
 - Verifier capacity
 - Remaining questions on annual activity level data

Main conclusions on training (1)

- Time allocation during ALCR verification was challenging in some cases
 - Majority of verifiers at the event was either short of time or had just enough time
 - Main problem was late delivery of documents by operators and unfamiliarity with new rules
 - Inability to extend deadline for ALCR submission in 2022 could increase problems
 - Some verifiers asked whether it was possible to change the 31 March deadline but this will be difficult to realise as it requires a change of legislation
 - Importance of starting early (e.g. checking control activities in 2021)
- Role of verifier and CA with respect to identification and reporting non-compliance
 - MMP is starting point but verifier will also have to do cross checks against FAR
 - Any identified non-compliance must be reported in verification report, even if issue is approved in MMP
 - Importance for verifiers to maintain professional scepticism and be alert to potential issues
 - Differences on how verifiers are informed if the CA identifies missed non-compliance in AER/VR

Main conclusions on training (2)

- Heat Benchmark data verification is complex and requires specific checks
 - Request for guidance on heat BM monitoring and checks to be carried out verifier
 - Many questions were raised on the interpretation of FAR heat BM rules
 - Additional training on MRV ALCR would be welcomed
- Some elements are the same for ALCR and AER verification, other elements are different because of specific characteristics in the data and BM concepts
 - Tailored plausibility checks needed to spot errors in data sets and ALCR reports
 - Same materiality principles apply but the data to which materiality level relates differ and the impact of the factors in the qualitative assessment of materiality can differ

Main conclusions on training (3)

- Majority of MS preferred further training compared to additional guidance
 - Additional guidance on heat BM verification would however be welcomed
 - Need to capture results of training
 - Preference for training based on practical case studies
 - Update roadmap to guidance so specific information can be easily traced
- Majority of MS expected the role of the verifier to become more complex in 4th trading period (in particular due to time pressure and lack of capacity)
- Importance to train new auditors and lead auditors to increase capacity of competent auditors and lead auditors
- Importance of training operators to increase quality of monitoring and procedures
- Importance of training NAB assessors to properly assess competence of auditors

Main conclusions & future training

- Generally there were no real problems encountered with virtual site visits
 - No particular problems in the application of Article 34a conditions
 - Virtual site visits have limitations so these should not become the common standard
 - Physical site visits to be preferred
 - Hybrid site visits could be an option in future, in particular for small and simple installations and when there is familiarity with the site
- Future training events between NABs, verifiers and CAs welcomed
 - Variety of Phase IV topics could be a topic for these training events

Training documentation

- Training documentation will contain slides and key conclusions
- Training documentation will be sent to you soon and then published on the Commission's Website:
https://ec.europa.eu/clima/policies/ets/monitoring_en#tab-0-1
- Training documentation can be cascaded further in the organisation

Thank you for your attention



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