

Overview of changes in the AVR

Compliance Conference 2019, break out session 2



AVR 2012→AVR 2019

- 'Old' AVR (Regulation (EU) 600/2012)) repealed from 1-1-2019
- 'New' AVR (Implementing Regulation (EU) 2018/2067) applies from 1-1-2019)
- However, old AVR continues to apply to the verification of emissions that took place before 1-1-2019→
- Old AVR applicable to the verification of emissions reports 2018 and new AVR to the verification of FAR data-reports and the verification of emissions reports from 2019.

What has changed in the AVR?

- Three categories of changes:
 - ✓ Inclusion of rules for the verification baseline data reports and new entrant reports required by the FAR
 - ✓ Changes related to CORSIA
 - ✓ Improvements and clarifications
 - proposed by TF AV

Rules for verification of data reports

- Scope of AVR is widened to the verification of data relevant for the updates of benchmarks and for the determination of free allocation to installations → accreditation scope 98 required from 1-1-2019
- By and large the requirements for the verification of emissions reports and baseline data reports are the same. Some specific requirements for FAR verification and accreditation have been added.
- FAR verifications will be addressed in more detail by the next speakers

CORSIA

- The new AVR takes into account the CORSIA SARPS
- CORSIA related amendments to the AVR are:
 - ✓ the aircraft operator to provide to the verifier information on data used for monitoring and reporting, including those from Eurocontrol *or another relevant organisation* (= ICAO CERT)
 - ✓ the EU ETS lead auditor that undertakes six annual GHG verifications for the same aircraft operator, has to take a three year break from working for that operator. The six year period has started on 1-1-2019.
- KGN II.7 has been updated with specific CORSIA requirements for verifiers competences

Main improvements and clarifications (1)

- **Amendment of rules for the verification** (chapter II):
 - ✓ Addressing misstatements, non-conformities *and non-compliance*:
 - ❖ AVR now sets rules for addressing non-compliances
 - ❖ Same approach as for misstatements and non-conformities (verifier requests correction and assesses the impact of an uncorrected non-compliance on the reported data)
 - ❖ Difference: notification of non-compliances to the CA and immediate correction.

Main improvements and clarifications (2)

- ✓ Simplified verification for installations:
 - ❖ the verifier shall always carry out site visits if there has been a significant change to the monitoring plan. **New exception** : this rule is not applicable if the significant change is only a change of the default value for a calculation factor

- ✓ Conditions for not carrying out site visits:
 - ❖ existing conditions have been transferred from Guidance to the AVR to improve the legal basis. The content has not changed.

Main improvements and clarifications (3)

- **Requirements for accreditation bodies (chapter V)**

- ✓ Complaints

- ❖ A deadline for the handling of complaints: NAB has to handle a complaint about a verifier within a reasonable time *but no later than three months from the date of its receipt*

Main improvements and clarifications (4)

• Information exchange (chapter VI)

✓ NAB → CA, improvements:

- ❖ If there are changes in the accreditation work programme, the NAB has to send the CA an updated work programme by 31 January
- ❖ The management report has to contain details of the action taken by the NAB in response to the information about verifiers shared by the CA

Future changes to the AVR

- Verification of annual activity level reports will be included in the AVR
- From 2021: two reports verified by 31 March → impact on verifier capacity
- Similar approach as for the verification of baseline data reports
- Specific rules for the waiver of site visits for annual activity level reports
- Rotation of verifiers for stationary installations ?
- Discussion on related issues in afternoon session

QUESTIONS?