



National coordination between Competent Authorities

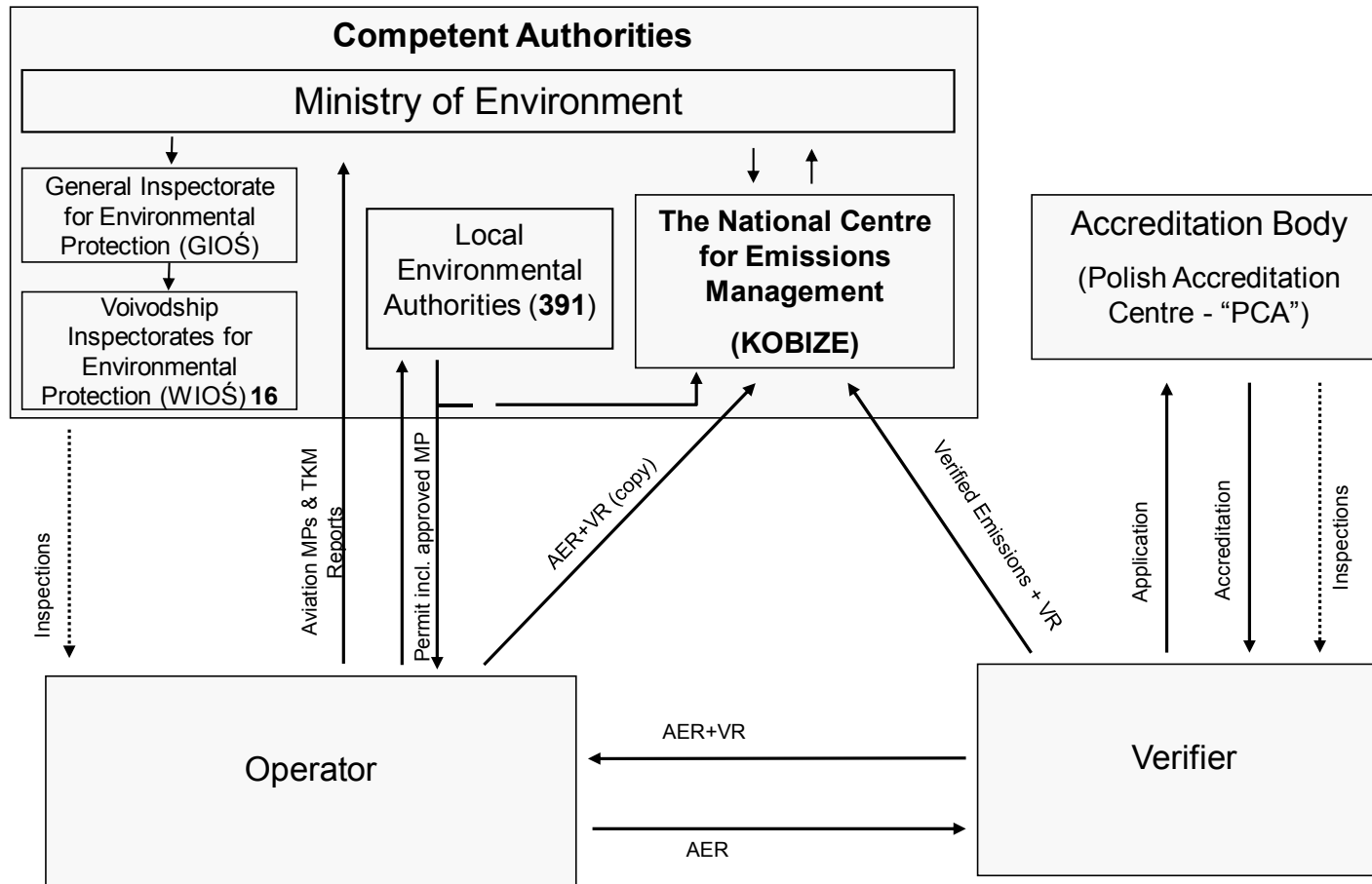
Brussels, 08.02.2012

Tomasz Karpiński

The National Center for Emissions Management

Institute of Environmental Protection - National Research Institute

National background:



Responsibilities

Ministry of Environment:

- Climate policy;
- Implementation of legislation
- Formal acceptance of aviation emission and TKM monitoring plans
- Supervision over the system

WIOŚ – inspection:

- EU ETS related inspections
- Fines
- Support in determination of emission by CA

KOBIZE:

- Acceptance and assessment of verified emission reports (both stationary and aviation);
- Technical assessment of aviation emission and TKM monitoring plans
- Management of verifiers list;
- Allocation, benchmarks, registry etc.

Local Environmental Authorities:

- Issuing of permits;
- Acceptance and assessment of stationary monitoring plans
- Acceptance and assessment of updates of stationary monitoring plans

PCA - Polish Accreditation Body

- Accreditation of national verifiers
- Acceptance of foreign verifiers
- Supervision of Verifier work;

Main Problems:

- Number of institution involved – over 400 and over 1000 people around country;
 - Number of other duties – in case of local CA (all permits related to wastes, air quality, noise reduction, regional policies)
 - 1000 people = different interpretation of MRV rules, different internal procedures; different approaches to the same problems;
- Lack of proper channels to exchange knowledge, experience and best practices;
- Lack of IT system dedicated to application/acceptance/ update of monitoring plan;
- **Lack of „legal force” to supervise regional CAs by KOBIZE**

Current tools and experience:

4 different channels of co-operation:

KOBIZE – Ministry of Environment

- very close and effective cooperation on technical level in case of acceptance of aviation emission and TKM monitoring plans – **procedure based on national law**

KOBIZE – WIOŚ (inspection)

exchange on information in selected cases:

- installation without emission report, **KOBIZE → WIOŚ**
 - process of surrender of allowances in registry is not in line with emission from emission reports, **KOBIZE → WIOŚ**
 - determination of emission by CA; **WIOŚ → KOBIZE**
 - important EU ETS information was found during other inspection :
 - installation should be covered by EU ETS; **WIOŚ → KOBIZE, local CAs**
 - installation should be excluded from EU ETS; **WIOŚ → KOBIZE, local CAs**
 - source of emission not included in MP; **WIOŚ → KOBIZE, local CAs**
- (most of above procedures of information exchange based on national law)**

Current tools and experience:

KOBIZE – PCA (Polish Accreditation Body)

- annual exchange of information about mistakes in AER (simple EXCEL template)
-> based on that PCA update their supervision inspection plan;
 - annual workshops (together with verifiers) dedicated to mistakes found in reports and changes in legislation (MR AV regulations, Verification of NIMs);
 - exchange information about accreditation status (active, suspended);
- (all procedures based on voluntary co-operation)**

KOBIZE – local CAs

- set of workshops dedicated to changes in law (EU and national);
- informal co-operation on approval of MP;
- informal phone helpdesk;
- official announcements in most important issues (interpretation of legislation);

(all procedures based on voluntary co-operation)

New regulations and obligation

- Art. 10 MR Regulation:

„Where a Member State designates more than one competent authority pursuant to Article 18 of Directive 2003/87/EC, it shall coordinate the work of those authorities undertaken pursuant to this Regulation. ”

- Art. 69 AV Regulation:

„1. The Member State shall establish an effective exchange of appropriate information and effective cooperation between their national accreditation body, or where applicable, the national authority entrusted with the certification of verifiers, and competent authority.

2. Where more than one competent authority is designated pursuant to Article 18 of Directive 2003/87/EC in a Member State, the Member State shall authorise one of those competent authorities as the focal point for the exchange of information, for coordinating the cooperation referred to in paragraph 1, and for the activities referred to in this Chapter.”

Way forward:

- **More structured approach is needed!**
- Some ideas to implement during 2012 and beyond:
 - **Improvement of interinstitutional procedures** for exchange of information
 - **Dedicated electronic templates** for regular exchange of information between KOBIZE, PCA, WIOŚ
 - **Regular meetings** (annually or twice per year) – discussion on improvement
 - **Regular regional workshops** for local CA dedicated to MRV;
 - **Guidance's for local CA** with step by step procedures related to acceptance and update of MP;
 - **Translation** of all MRV guidance's into national language;
 - System of **joint site visits** for representatives of all types of CAs;
 - **Official phone helpdesk;**

Way forward:

- Any other ideas, national experience?
- Coordination should be based on national law or interinstitutional voluntary co-operation?
- Is there a need for dedicated European guidance on cooperation?

Thank you for your attention

tomasz.karpinski@kobize.pl

www.kobize.pl

Tel.: +48 22 569 65 28