

Breakout session III – continuous improvement of information exchange

Naomi Walker
Environment Agency (England, UK)
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AVR Chapter VI Information exchange

- Information exchange is a tool to share information and promote transparency (=trust and confidence)
- Information exchange is valued by CAs and NABs (and verifiers too) but it is just one tool for continual improvement of verifier performance
 - Annual meetings with VBs
 - Conversations with NABs
 - Immediate action for serious complaints
- Has resource implications for all

Dealing with complaints about verifier performance

- EN ISO/IEC 17011 EN ISO 14065:2013 and AVR Articles 61 and 72 describe how to deal with complaints about verifier performance, including roles and responsibilities for NABs and CAs
- Currently no AVR requirement to involve verifiers in information exchange
- 13 MS responded to a questionnaire from the A&V TF:
 - 91% submit AER review findings, there is generally poor or no formal communication from NAB to CA
 - 42% MS currently involve verifiers in one way or another in Article 72 reporting

How do we make information exchange work better?

Do we:

- Change AVR?
- Change information exchange template?
- Improve understanding and implementation of the current approaches (KGN II.10 Information Exchange)?

Discussion points: CA-NAB

- Is the number of issues reported by (some) MS leading to an administrative burden that is too high?
- Is there a lack of information on the reported issues?
- Do NABs feel that it is not their responsibility to assess the issue in detail but that these should be solved between CA and verifier? So that they can limit themselves to investigating if the verifier has dealt with the 'complaint' in a correct way?
- A combination?

Discussion points: involvement of verifiers

- How would involving the verifier in information exchange affect the way NABs respond to the CA?
- Should verifier response be assessed by the CA or by the NAB?
- Whose role is it to assess whether an issue is a non-compliance of the verifier?
- Should the NAB respond to all reported information or only to non-compliances and complaints?

Thank you for listening

Information exchange guidance and templates can be found here:
https://ec.europa.eu/clima/policies/ets/monitoring_en#tab-0-1

Options: change AVR Art 72 (CA to NAB) template?

Relevant results of the review of AER and VR (Article 72 (1) (c) of the AVR)			
Type of issue found:	Type of issue found (only to be completed if the option "Other" in the previous column has been selected)	Has the verifier been informed of the issue found?	Attached evidence
Issues related to the competence of verifiers	<p>Without any information on the type of issue found, there is no context for the verifier or NAB to understand the issue.</p> <p>CA assessment must include reference to AVR/MRR</p>	Yes	
Issues related to the impartiality of verifiers		No	
Other (see next column)		<please select>	

This was intended to reduce the burden on CAs in describing findings but does it give the NAB enough information?

and monitoring plan

You might select 'yes' if you've already returned the AER/VR to the operator to change

The NAB won't necessarily have access to AERs but should have access to verifier's documentation

Information exchange (AVR Chapter VI) (example)

