# Czech Verifiers preparing for the challenges of the 3<sup>rd</sup> Trading Period

Conference Centre Borschette, Rue Froissart 36, Brussels 31st October 2013



**Czech Accreditation Institute** 

"Accredo - put faith in"

## Documentation base



#### △ It is quite extensive

- AVR, MRR, EN ISO 14065, EN ISO 14066, EN ISO 14064-3, IAF MD6, EA6/03
- Explanatory Guidance Document, Guidance Documents,

#### △ Templates found as very useful (if translated)

- How to deliver VR from verifier to CA in electronic form?

#### △ Many documents

- Will not contribute to the harmonization, unless documents are made available in national language
- During accreditation it is therefore not possible to assess knowledge of all documents for all EU ETS auditors
- More time is needed for learning and collecting experiences.



#### Yesterday, I received this question:

△ 5. Based on Article 3 (3) of the AVR and Article 7 of Regulation No. 765/2008, we are interested in your understanding of the following: are verifiers - accredited in another Member State - allowed to verify reports of your countries' installations and aircrafts without registering or informing your National Accreditation Body? Or do you understand these Articles so that your National Accreditation Body also has to be included in this process in every case?

# Timing



- △ If new guidance documents / quick guides / examples / legislations are prepared and published it is hard for verifiers to be up-to-date
- $\triangle$  Change of GWP for N<sub>2</sub>O, CF<sub>4</sub>, C<sub>2</sub>F<sub>6</sub>
  - If valid during January/February 2014, than 2 different values can be used!
- △ Information about this Forum was delivered late
  - All auditors / verifiers has to plan for more than 1 month
- △ EN ISO 14065:2013 listed as harmonized standard in mid September
  - In the Czech Republic all accreditation were in process
  - There is very limited time to update national accreditation system

## Monitoring plans



#### △ New structure / system

- Brings on the beginning higher possibility of mistakes
- Harmonized template will simplify cross-border verification

#### Use of non accredited laboratories

- CA / MoE had limited time and expertise for assessment (MRR art.34 (3))
- Role of verifiers is not fully clear

## Witnessing



- Operators should be informed by CA/MoE that annual witnessing is mandatory
- △ The requirement of annual witnessing (AVR art. 49 1b) for small-medium enterprises (SME) is additional and a significant burden
  - In some cases (e.g. in the case that the verifier is focused only on 1a and 1b / or 1a, 1b and 6/7) the benefities of this requirement is rather limited

## Cooperation



- △ Cooperation among (EC -) CA NAB verifier
  - Very important is direct contact between CA verifiers
  - AVR set up important and powerful communication tool for EU ETS repairs / improvements,
  - "Properly used"
    - Data from the emissions reports will be handled electronically by competent experts
    - △ Results will be available to CA / NAB
    - △ Periodical face-to-face meeting will be organized

### △ EA CC EU ETS Network Group

- key element for NAB harmonization

## Thank you for your attention!



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