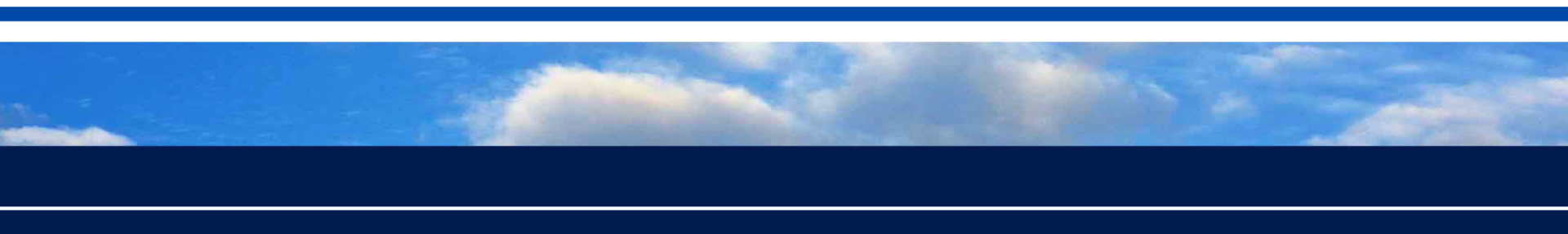


Types of verifier recommendations

Margreet Kleijn



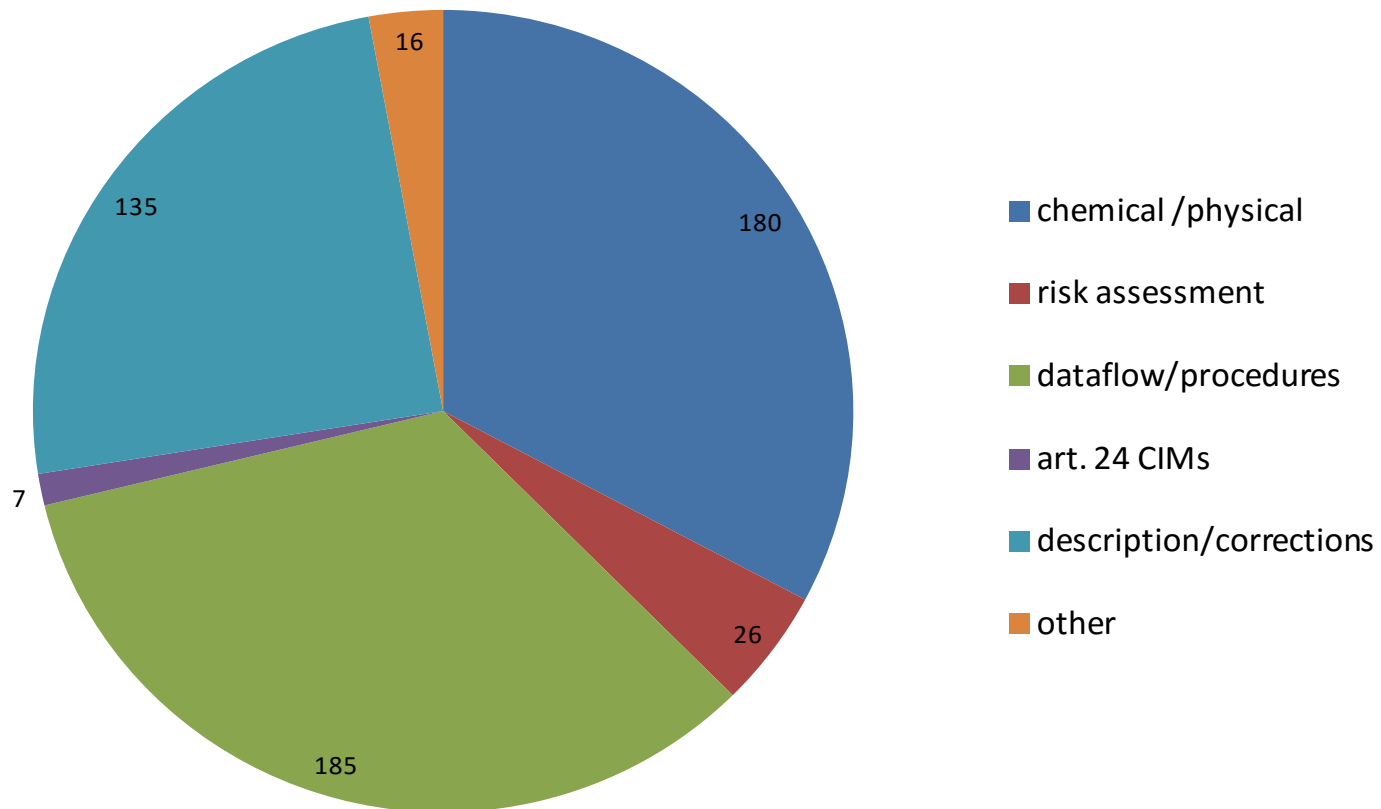
Inventory of types of recommendations for improvement

- The TF A&V is compiling a survey of types of recommendations made by verifiers in the 2015 VRs
- Aim: get better knowledge of how the instrument is applied in different MS
- How: a questionnaire was sent out to the TF-members
- The questionnaire was returned by 10 CAs (FI,DK,NO,SE,IE,NL,EE,HR,SK,PT)
- This is a presentation on the first results; more detail will be provided in the next TF A&V meeting

Questionnaire

	Category of recommendation	Number of recommendations made in this category	Examples	Remarks	% leading to a higher tier	% leading to better / more efficient monitoring
1	Chemical or physical aspects/ calculation					
2	Risk assessment					
3	Data-flow activities/control-activities /procedures					
4	Requirements art. 24(1) Decision 2011/278/EU					
5	Description of monitoring methodology, updates, corrections					
6	Other					

Outcome I: distribution accross categories



Outcome II

- The majority of the respondents felt that the recommendations made in categories 1 and 3 lead to better monitoring (a score of 80-100%)
- Recommendations in category 5 have a lower score in terms of better monitoring (around 30%)
- In general recommendations do not lead to achieving a higher tier
- One CA mentioned that in many cases the recommendations did not make sufficiently clear what should be improved
- Some recommendations (especially in category 1) probably should have been labelled as non-conformities or non-compliances (Note: Commission FAQ on correct categorisations was yet available during the verification 2014)

Questions for discussion

- Do recommendations in general provide sufficient information for the CA?
- What are your experiences with regard to recommendations that should have been classified as non-conformities or non-compliances? Has there been an improvement compared to 2013?
- What are your experiences with the approval of improvement reports that address recommendations on issues that are difficult for the CA to assess, e.g. on underlying procedures that are not included in the monitoring plan?
- In your experience do the positive effects of recommendations on improvement outweigh the extra administrative burden for operators and CAs?