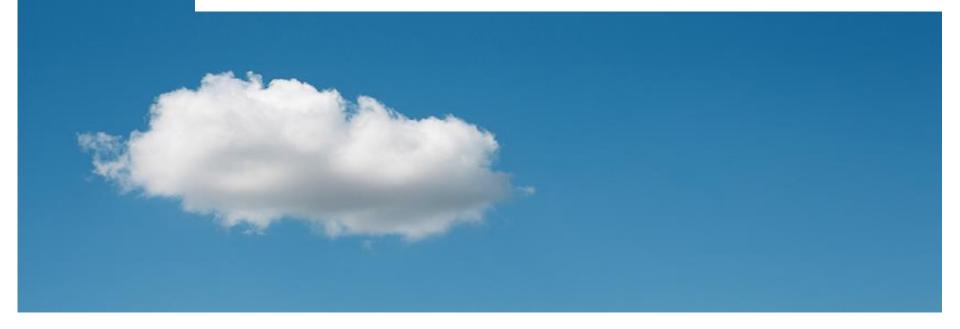


DEHStDeutsche
Emissionshandelsstelle

7th EU ETS Compliance Conference 8/9 November 2016 Brussels



Waiver of site visits: CA approval required?

Alexander Handke



Introduction

- Art. 21 AVR requires the verifier to conduct at least one site visit during the verification process (site = installation & head office)
- Art. 31 AVR provides for an opportunity to waive the site visit, if...
 - justified based on the outcome of the risk analysis
 - all relevant data can be accessed remotely
 - criteria set by the Commission (<u>KGN II.5</u>) are met
 - verification is not carried out for the first time
 - site visit has not been waived for the two preceding reports
 - there are no significant changes to the monitoring plan
 - the CA has approved the waiver (installations ≥ 25.000 t CO2e p.a.)



Reasons for the approval requirement

- Operators
 - ...have to bear the costs for the verification of the AERs
 - ...attempt to reduce verification costs
- Waiving of site visits may reduce verification costs
- ⇒ Operators sometimes put pressure on the verifier to waive the site visit
- ⇒ CA approval should
 - ...lower the pressure put on verifiers
 - ...assure that the conditions for waivers are met



Arguments against the approval requirement

- Approval procedure rather laborious and formalistic with limited added value
 - Verifier confirms conditions; operator applies for the waiver and CA has to decide in any case (approval/refusal)
 - CA can just check the formal conditions but not the appropriateness of the waiver (risk analysis, remote access to all relevant data etc.)
- Alternative
 - CA checks the conditions for waivers whilst assessing the verified AER
 - Waivers not in line with the AVR constitute a non-compliance of the verifier and should be reported to the NAB
 - Verifiers have to be aware that the NAB shall (at least) suspend the accreditation in cases of persistent/repeated breaches of the AVR requirements
- Advantage: Reduced administrative burden for all parties involved



Thank you for your attention!

Alexander Handke

E-Mail: emissionstrading@dehst.de

Internet: www.dehst.de

