



Update on 4th ETS MRAV Compliance Review Project

**5th EU ETS Compliance Conference:
promoting best practice through
knowledge sharing and cooperation**

Agenda

- 1. High level findings**
- 2. Sample recommendations**
- 3. Next steps**

1. Selected high-level findings

- *MRAV system is working*
 - **Improvements from Phase II to III in all areas**
- *Significant harmonisation achieved*
- *Guidance and clearer requirements facilitated common understanding*
- *Some variations in areas not specified in AVR or MRR to be expected; for example:*
 - **EU ETS combined with other necessary inspections vs. EU ETS-specific inspections**
 - **Integrating EU ETS permit into other permits vs. separate**

1.1 Findings: Monitoring

- *MS use flexibility provided in MRR for low emitters to different degrees*
- *Simplification was not always achieved*
- *Low uptake of CEMS*
- *Permitting & MP approval process was a challenge*
 - **Not all MPs approved in time for verification**
 - **Approach to improvement reports inconsistent**

1.2 Findings: Verification

- *Overall there is a much more consistent approach*
- *Yet, wide variety in the quality of verification reports*
- *Verifiers may not always understand materiality or document consistently*
 - **Not enough understanding of their role to check that the MP is in line with the MRR and that non-conformities are highlighted.**

1.3 Findings: Reporting

- *Greater harmonisation on content of AER through frequent use of Commission template*
- *IT systems for reporting enhance the reporting and review process*
- *Review approach ranges from basic to extensive*

1.4 Findings: Accreditation

- *NABs that are part of EA appointed in most MS*
- *Generally, good information exchange between NABs and CAs*
- *Room for improvement on cross border information exchange*
- *Certification of verifiers that are natural person no longer plays significant role*
 - **Only 1 in the entire EU ETS**

2. Sample Recommendations: Guidance

- *Need for further guidance on some topics*
 - **Inspection**
 - **Uncertainty assessment**
- *Need to make guidance more accessible*
 - **Through examples for different scenarios**
 - **Decision tree/mapping/indexing to quickly find relevant guidance and skip what is not critical**

3. Next Steps

- *Share draft final report with MS mid-November during week before the workshop*
- *MS Workshop, BU-5 Brussels, 25/11/2014*
- *Final report delivered by end of November*

Thank you for your attention!

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