



Compliance Review and Round Robin Test

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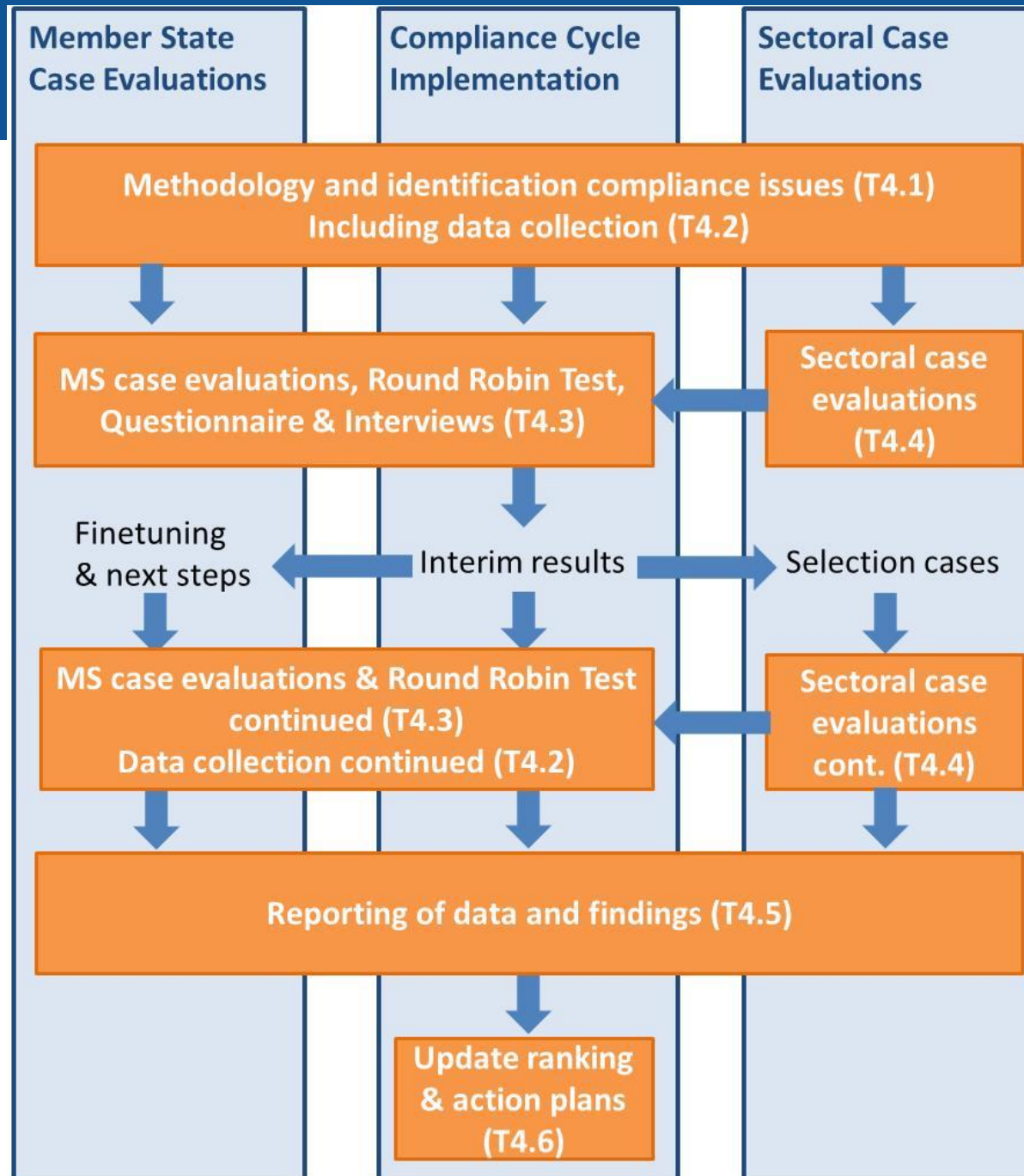
5th Compliance Cycle Evaluation

- *Complete and in-depth analysis of each MS's MRVA implementation status*
- *Serving several aims*
 - Improvement of all aspects in the compliance cycle
 - Confidence in harmonised compliance cycle implementation
 - Support MS awareness concerning available simplifications and further improve efficiency
 - Support identification of further need for support and guidance
 - Provide specific tools, exemplars, etc.
- *Building on previous Compliance Reviews, in particular on the 2015-2016 Review, 2016 actions plans, ranking table*

Methodology CCEV 5

Key elements:

- Analysis of 2015-2016 CCEV information, Art 21 reports
- Survey to complement missing information
- Information collected from other sources
- MS case evaluations (analysing MP, AER, VR, IR of 1 installation/AO)
- Case evaluation of information exchange between NAB and CA
- Round Robin Test
- Sectoral case evaluations (12 sectors)
- Ranking table and MS-specific action plans



Preliminary observations

- *CA organisation varies between MS*
 - Different CA team sizes ranging from very small to large teams
 - MS with smaller teams have in some cases implemented measures to manage the work flow (e.g. IT system/ hiring experts)
 - Different approaches in coordination between personnel, communication with operators and ensuring technical trail of CA decisions
 - If multiple CAs are involved there can be differences between local CA → coordinating with the central CA is important in those cases
- *Increase of use of IT systems since 2016 but the type of IT systems differ between MS*
- *For some MS the procedures and approaches for installations are different than for aviation*
- *Some issues in MP approval process remain difficult: e.g. uncertainty assessment, sustainability of biomass, sampling*

Preliminary observations

- *Procedures for assessing AER and VRs seem to be more focused*
 - Some MS changed their approach for assessing AER and VR (e.g. risk based approach, using IT systems)
 - Awareness of misclassification of outstanding issues in VR increased
 - There seems to be an improvement on how issues identified in the AER/VR assessment are followed-up
- *Typical issues identified in AER/VR assessment across MS*
 - Misclassifications, missing source streams and sources
 - Inconsistencies between AER and VR, miscalculations, incorrect tiers
 - Errors in calculation factors/ units of measurement
- *Not many administrative measures imposed on verifiers by NAB*
- *Not many waive of verifier's site visits → most waives of site visits are applicable to small installations*

Preliminary observations

- *Increase of verifiers working across borders*
- *Information exchange between NAB and CA improved since 2016*
 - Parties seem to be more aware of requirements
 - Commission templates widely used
 - Timeliness of information exchange increased
 - CA more inclined to check and use information from NABs and vice versa
 - Inconsistent feedback from NAB to information/complaints shared by CA
 - Differences in the level of detail included in information exchange reports
 - Verifiers sometimes also approached in the information exchange
- *Since 2016 more MS have been doing EU ETS dedicated inspection
→ there are however different inspection approaches*
- *Differences in size of penalties and how enforcement action is taken
on operators and AOs*

Preliminary observations

- *Examples of sector specific issues identified*
 - Application of biomass and transfer of CO₂ in certain sectors
 - Uncertainty assessment of stock changes
 - Application of mass balance and default values in certain sectors
 - Continuous emission measurement
- *Some sector specific issues are already being discussed in TFs or it could be useful to discuss those in TFs*
- *Some general follow-up actions have already been identified: e.g.*
 - Assessment on the need to adapt COM information exchange templates
 - Topics for future training events, identification of good practices
- *Further assessment needed to identify the need for more Guidance/FAQ or topics for future training events*

Status of CCEV activities

- *Analysis of 2016 information and survey completed*
- *The team is currently analysing the MS case evaluations*
 - MS cases selected based on specific criteria (Article 21 information, size installations, issues identified in 2016 etc.)
 - MS case evaluations carried out based on a checklist → checking completeness, consistency, whether it meets COM template etc.
 - Results are one of the sources to take into account in the ranking
- *Sector specific issues are being identified from questionnaire responses, 2016 information and MS case evaluations*
 - Sectors include: power generation plants, small combustion plant, cement, lime, integrated steel/iron, oil refinery, primary aluminium, secondary metals, glass, ceramics, nitric acid, aircraft operator
 - More in-depth analysis to address specific sectoral compliance issues and identify good practices

Next steps

- *Finalise analysis from data collected in Compliance Review, MS case/ sector evaluations and Round Robin test*
- *Determine preliminary ranking and identify areas of improvement in December/ January*
- *Focus further analysis on areas of improvement and carry out follow-up actions in 2019*
 - Further information gathering through selected interviews, requests for additional documents and information to complete gaps
 - Making recommendations and potential follow-up with MS to discuss these recommendations
 - Identifying general follow-up actions: follow-up in guidance, task forces or future training events
- *Update ranking table and MS action plans*

Round Robin Test

- *The Round Robin Test aimed to triangulate CCEV findings (questionnaire, case evaluations,..)*
- *Bias or inequality may result from the fact that installations reviewed across MS are different; hence the complexity of execution of various steps in the compliance cycle may differ*
- *In the test all CAs are requested to conduct a review for fictitious, but realistic installation, based on their own regular review approach*
- *Project team acted as plant operator submitting its MP, AER, VR and IR → the CAs sent their feedback to the team*
- *26 CAs participated in the test → active participation*
- *Test results are one of the sources to provide input on further need for support, guidance, training, etc.*

Results of Round Robin test

MS	MP	AER/VR	IR/MP	Total	
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27	did not participate				
28					
29					
30					
31					
32					

Training Round Robin Results (14 & 15 Nov)

- *Aim of training is to have in-depth discussion on results and identify good practices*
- *Agenda for afternoon session (14 November)*
 - 14.30 -14.45: Opening and welcome and agenda
 - 14.45 -15.15: Introduction to installation focusing on MP, uncertainty assessment, risk assessment and sampling plan
 - 15.15 -16.15: Group discussion on these issues and what if scenarios
- *Agenda for day II on 15 November*
 - 9.30 - 9.45: Opening and welcome and agenda
 - 9.45 -10.30: Plenary discussion – main findings by each group
 - 10.30 -10.45: Coffee break
 - 10.45 -11.10: Introduction to initial AER and VR

Training Round Robin Results (14 & 15 Nov)

- *Agenda for day II continued*
 - 11.10 -12.00: Group Discussion on AER and VR and what if scenarios
 - 12.00 -13.00: Lunch
 - 13.00 -13.30: Model answers on AER and VR
 - 13.30 -14.00: Plenary Discussion – main findings of each group
 - 14.00 -14.15: Introduction to initial IR and MP update
 - 14.15 -14.45: Group Discussion on IR/ MP update and what if cases
 - 14.45 -15.00: Tea break
 - 15.00 -15.15: Model answers on IR and MP update
 - 15.15 -15.45: Plenary discussion – main findings of each group
 - 15.45 –16.00: Final remarks and close of M&R training event
- *Slides training event will be distributed for future cascading of training*



Further contact on this project

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