

**INTRODUCTION :**

The purpose of this tool is to assist the verifier in determining the eligibility of an installation for a site visit waiver, and also to assess the verification risks associated with not undertaking a site visit where the installation is eligible. This risk assessment is not the formal "Risk Analysis" required under AVR Article 12 but should take account of information identified by the verifier during the formal strategic analysis (SA) and risk analysis (RA). It should be noted that in some Member States the deadline set for application for approval of site visit waiver may mean that this risk assessment is done BEFORE the start of the strategic analysis; in such a case the information will be based upon the prior year verification work and the verifier may subsequently need to conduct a site visit if the Article 11-12 SA&RA indicate that in fact the circumstances have changed since the prior year and a site visit is warranted.

The tool is structured in five parts, as follows :

**Section 1** - covers the background information related to the installation and its prior visit status

**Section 2** - covers the eligibility rules laid out in the EC guidance

*This section is completed in two stages; firstly respond to questions 2.1 - 2.3, if no mandatory site visit is required, go onto respond to question 2.4 which has four options*

a) Respond to each of the questions by entering yes or no into the orange "Response" box

b) Evaluate each response by following the instructions in the "Evaluation Instruction" column and enter the result in the blue evaluation box

c) The "Notes on Evaluation" column will give you an indication of whether a mandatory site visit is required.

**Section 3** - covers the verifiers assessment of the verification risks associated with not doing a site visit

*This section is completed if the overall result in Section 2 indicates that the site IS eligible for a site visit waiver. The risk assessment should cover all areas of likely risk to the verification related to on site work such as inspecting meters and emissions sources etc. Each year the waiver risk assessment should be started anew being based upon the position in the year being verified, it is not acceptable to take last year's risk assessment and simply change the dates etc!*

**Section 4** - covers the verifier's conclusion in relation to the verification risk and acceptance that a waiver of site visit is applicable

**Section 5** - covers the instructions on the "Next Steps" once the site visit waiver tool has been completed

<b>Verification Year</b>		<b>2016</b>	<b>Date of Last Site Visit</b>		<b>16 November 2015</b>												
<b>1(A) Identification of the Installation</b>			<b>1(B) Prior visit status</b>														
1.1	<b>Operator</b>	Frontier Fuels Ltd	Operator Name														
1.2	<b>Installation Details</b>	Lonesome Terminal Wilderness Complex	Installation name Site name														
1.3	<b>Address</b>	##### ##### ##### ### #####	Street address  Town County Postcode														
1.4	<b>EU ETS Main Contact Person</b>	I. Mincharge Email: #####@MM-plc Phone: #####															
1.6	<b>Activities according to Annex 1 of the EU ETS Directive</b>	<table border="1"> <thead> <tr> <th>Number</th> <th>Name of activity (Annex I of the ETS Directive)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)</td> </tr> <tr> <td>2</td> <td></td> </tr> <tr> <td>3</td> <td></td> </tr> <tr> <td>4</td> <td></td> </tr> <tr> <td>5</td> <td></td> </tr> </tbody> </table>				Number	Name of activity (Annex I of the ETS Directive)	1	Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)	2		3		4		5	
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2																	
3																	
4																	
5																	
			<b>NOTE</b> - This means the accredited or certified verifier not the individual Lead ETS Auditor														
<b>2 AVR Criteria for Waiver - respond to all questions, unless the installation is a Category C, in which case 1 Options 1 &amp; 2 under 2.4 are not applicable</b>			<b>EVALUATION INSTRUCTIONS</b>	<b>Evaluation - Criteria Met?</b>	<b>EVALUATION NOTES</b>												
<b>QUESTIONS</b>			<b>RESPONSE</b>														
2.1	<b>Emissions from Installation</b>	327864	Category	B	If Category is "C" enter No, otherwise enter Yes → <b>YES</b> <b>If No, ignore Options 1 and 2 under question 2.4 below</b>  If "Response" = No enter Yes, otherwise enter No → <b>YES</b> <b>If No, CA approval is NOT required</b>												
	<i>Note: this MUST be prior year's verified emissions. If it is a new site for this Verifier then a visit is mandatory</i>																
	Is the installation classified as one with 'Low Emissions' (as defined in MRR Article 47(2))?			No													
2.2	<b>Access to data</b>		AVR Reference														

2.3	Based upon the risk analysis of operator's monitoring and control system, and this risk assessment, can relevant data be accessed remotely?	A31(1)(b)	<input type="button" value="Yes"/>	If "Response" = Yes enter Yes, otherwise enter No → <input type="button" value="YES"/> <b>If No, then a site visit IS required</b>  If "Response" = No enter Yes, otherwise enter No → <input type="button" value="YES"/> <b>If No, then a site visit IS required</b>  If "Response" = Yes enter Yes, otherwise enter No → <input type="button" value="YES"/> <b>If No, then a site visit IS required</b>  If "Response" = No enter Yes, otherwise enter No → <input type="button" value="YES"/> <b>If No, then a site visit IS required</b>
	<b>Obligatory site visit?</b>			
	Is this verifier conducting verification for the first time on this installation?	A31(3)(a)	<input type="button" value="No"/>	
	Has a site visit been carried out in the immediate prior two years, by this verifier?	A31(3)(b)	<input type="button" value="Yes"/>	
	Have there been significant modifications of the monitoring plan since the prior verification?	A31(3)(c)	<input type="button" value="No"/>	
2.4	<b>EC conditions for waiving site visit</b>			<b>(I) EC initial requirements - overall result</b> If any evaluation results for 2.2-2.3 above is No then a site visit is required - go to section 4 below and complete the relevant parts of the conclusion
	<b>Option 1 (for Category A or B installations only)</b>			
	i) Single Source Stream using Natural Gas where monitoring of activity data is based on fiscal metering by the gas supplier?		<input type="button" value="No"/>	
	ii) Default calculation factors?	AND	<input type="button" value="No"/>	
	iii) One or more de-minimis source streams which aggregated do not exceed the threshold (Article 19 MRR)	AND/OR	<input type="button" value="No"/>	
	<b>Option 2a (for Category A or B installations only)</b>			
	i) Single Source Stream using a fuel without process emissions; fuel is either - · solid fuel directly combusted without intermediate storage; or · liquid/gaseous fuel which may have intermediate storage		<input type="button" value="No"/>	
	ii) Activity data derived from fiscal metering or based solely on invoice data (taking account of stock changes - if relevant to above point)?	AND	<input type="button" value="No"/>	
	iii) Default calculation factors?	AND	<input type="button" value="No"/>	
iv) One or more de-minimis source streams which aggregated do not exceed the threshold (Article 19 MRR)	AND	<input type="button" value="No"/>		
v) CA allowed use of a simplified Monitoring Plan (in accordance with MRR Article 13) for the installation?	AND	<input type="button" value="No"/>		
<b>Option 2b (only for Installations with Low Emissions)</b>				
i) Single Source Stream using a fuel without process emissions; fuel is either - · solid fuel directly combusted without intermediate storage; or · liquid/gaseous fuel which may have intermediate storage		<input type="button" value="N/A"/>		
ii) Activity data derived from fiscal metering or based solely on invoice data (taking account of stock changes - if relevant to above point)?	AND	<input type="button" value="N/A"/>		
iii) Default calculation factors?	AND	<input type="button" value="N/A"/>		
iv) One or more de-minimis source streams which aggregated do not exceed the threshold (Article 19 MRR)	AND	<input type="button" value="N/A"/>		
			<b>Option 1 result</b> If all "Responses" = Yes or if only (iii) = Yes, enter Yes; otherwise enter No → <input type="button" value="NO"/> <b>If No, then a site visit IS required</b>	
			<b>Option 2a result</b> If all "Responses" = Yes enter Yes, otherwise enter No → <input type="button" value="NO"/> <b>If No, then a site visit IS required</b>	
			<b>Not Applicable to this Installation</b>	
			<b>Option 2b result</b> If applicable and all "Responses" = Yes enter Yes, otherwise enter No → <input type="button" value="N/A"/> <b>If No, then a site visit IS required</b>	

**Option 3**

Unmanned site with telemetered data sent directly to another location where all data is collected, processed, managed and stored and with the same person responsible for all data management and recording for the site?

No

AND

Meters have already been inspected (by the operator or a laboratory) on site in line with MRR Article 59 and signed evidence (which may include date stamped photographic evidence) received of no changes since that inspection?

No

**Option 4**

Site is at a remote or inaccessible location and there is a high level of centralisation of data collected from that site and transmitted directly to another location where the data is processed, managed and stored with good quality assurance?

Yes

AND

Meters have already been inspected (by the operator or a laboratory) on site in line with MRR Article 59 and signed evidence (which may include date stamped photographic evidence) received of no changes since that inspection?

Yes

**Option 3 result**

If all "Responses" = Yes enter Yes, otherwise enter No → **NO** **If No, then a site visit IS required**

**Option 4 result**

If all "Responses" = Yes enter Yes, otherwise enter No → **YES** **If No, then a site visit IS required**

**(II) EC Option conditions - overall result**

If any evaluation results for 2.4 Options 1 to 4 above is "Yes" - the installation IS eligible for site visit waiver and you should completed Sections 3 and 4 below

**If the "Overall Results" in the right hand column above indicate that the installation is eligible for a site visit waiver, conduct an assessment of the verification risks related to not going to site using section 3 below and if acceptable complete the waiver request in Section 4 for submission to the CA by the installation Operator. This waiver risk assessment must take account of the verifier's overall risk analysis of the operators monitoring and control systems as required under Article 12 of the AVR.**

**If the waiver application is being made early for planning reasons (ie before the completion of the current year's strategic analysis and risk analysis) the most up to date Article 12 risk analysis used in the prior year's verification must be taken into account.**

**If the Installation meets the criteria for Low Emissions and Option 2b is being applied; approval of the CA is not required, but a copy of this Risk Assessment should be maintained with the Verification work papers as evidence of evaluation of the risks.**

**3 Site Visit Risk Assessment Required? - NO**

**Severity** relates to the severity of the impact upon the of planning and delivery of the verification. Low risk would mean no (or minimal impact); high risk could mean verification work and/or assurance level is compromised (eg the output would be limited assurance)

**Low** means there is a robust control in place which would provide an acceptable alternate to on-site inspection and minimal likelihood that the control would breakdown or be mis-applied.

**Likelihood** relates to the chance that the risk would occur. Is it highly likely or not?

**1) Inherent Risk**

		Severity		
		L	M	H
Likelihood	L	Low	Low	Low
	M	Low	Medium	Medium
	H	Low	Medium	High

**2) Control Risk**

L	M	H
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**3) Verification Risk**

		Control		
		L	M	H
Inherent	L	Very Low	Low	Medium
	M	Low	Medium	High
	H	Medium	High	Highest

Verification Activity	Description of Risk Area	Type of Potential Risk	Direct relevance?	Inherent Risk			Verifier's Assessment of alternate control activities & effectiveness	Control Risk	Verification Risk	Mitigation	Residual Risk Acceptable?	Comments
				Severity	Likelihood	Risk						

**THIS IS NOT AN EXHAUSTIVE OR PRESCRIPTIVE LIST OF ACTIVITIES AND RISK AREAS. This section must be updated with the list of verification activities relevant to and according to the needs of this specific installation verification; describe the risk area and type of risk for each verification activity and complete the remainder of the table columns**

Strategic Analysis	Unable to complete strategic analysis due to inaccurate or incomplete information	Verification plan comprised	Yes	H	M	M	Strategic Analysis will not be compromised as VB has visited site previously and has good knowledge of the installation allowing strategic analysis to be updated offsite with additional information provided by the operator.	L	LOW	Require clear information on any changes. Review of current on-line information to identify any undeclared changes (past year or planned)	Yes	
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Scope/Boundary Checks	Cannot view all emission sources and source streams therefore boundary scope conclusions incorrect	Incorrect Monitoring Plan description & accounting	Yes	M	L	L	Detailed 'Piping & Instrumentation Diagrams', installation layout plans, process flow diagrams, photos and online 'mapping' of the installation available	L	VERY LOW	Require additional information to be submitted for strategic review in relation to boundaries. Require signed management declaration of no significant changes since prior inspection.	Yes	
Changes affecting the Monitoring Plan	Unable to confirm whether changes in the Monitoring Plan are realistic on the ground; and also whether changes on the ground have been reflected in an updated Monitoring Plan and approved by the CA.	Non-compliance with regulations; failure to update Monitoring Plan properly.	Yes	M	H	M	Discussed during prior year's verification and all amendments needing approval were agreed.	L	VERY LOW	Review updated Monitoring Plan against prior year workpapers.	Yes	
Measurement of flow/mass	Unable to confirm physical measurement instruments meet the description in Monitoring Plan. Unable to check whether changes to Monitoring Plan have occurred which have not been approved by CA	Incorrect measurement, non compliance with tier requirements	Yes	H	M	M	Instruments inspected during previous visits along with prior year planned calibration/maintenance regimes and results. Results of Orifice Plate inspections during shutdown available. The operator has confirmed that no changes have occurred since the meters were installed	M	MEDIUM	Require signed management declaration of no change since prior verifier inspection; site photos of instruments in situ (including serial numbers of all elements), copies of planned maintenance etc and results for the reporting year. Copies of prior internal inspections in accordance with MRR Article 59.	(Yes)	Notify client that if results of detailed verification work indicate an issue a site visit may subsequently be required
Measurement of flow/mass	Unable to confirm maintenance of measurement instruments meets requirements or planned procedures	Incorrect measurement, non compliance with tier requirements	No	L	L	L	This information is provided electronically from another location and a site visit is irrelevant to its verification. Responsible person not based on site.	L	VERY LOW	Confirmation that all planned maintenance work is done by third party/ competent internal technicians. Require signed management declaration of no change since prior inspection; Copies of prior internal inspections in accordance with MRR Article 59.	Yes	
Measurement of flow/mass	Unable to confirm validity of information used to calculate uncertainty level	Incorrect measurement, non compliance with tier requirements	No	L	L	L	This information is provided electronically from Head Office and a site visit is irrelevant to its verification. Responsible person not based onsite	L	VERY LOW	Cross reference uncertainty calculation to input data from third parties and HQ. Copies of results of prior internal inspections in accordance with MRR Article 59 to match to input data.	Yes	
Analysis of fuel/material composition	Unable to confirm validity of information used to calculate emissions factor etc	Insufficient sampling, incorrect analysis or manipulation of data to produce EF; non compliance with tier requirements	Yes	H	M	M	Source information is from either - a) online analysers feeding data into plant information system b) external accredited laboratory	M	MEDIUM	a) Photos of analysers (& gas bottles) in situ (including serial number), cross check to results of planned maintenance/ calibration activities for online analysers & their calibration gas certificates b) confirm accreditation status of lab, review results of last accreditation inspection (if internal lab) and review lab reports to check transfer into accounting spreadsheets etc	Yes	
Data handling (ie transfers of data along the data flow)	Unable to check the effectiveness of data handling	Potential missing data, incompleteness, incorrect measurement or manipulation of data. non-conformance with control requirements and/or procedures	Yes	M	L	L	This activity is not handled on site as data sent to alternate location via telemetry; VB has previously interviewed responsible persons at their location. Prior year improvement recommendations to increase robustness have been implemented and checked.	L	VERY LOW	Detailed cross checks offsite of data transfers across spreadsheets etc. Telephone interview with key personnel as required	Yes	
Data handling (ie transfers of data along the data flow)	Unable to check the effectiveness of installation control procedures	Potential missing data; Non compliance with tier requirements, incorrect measurement or manipulation of data, non-conformance with control requirements and/or procedures	Yes	M	L	L	This activity is not handled on site as data sent to alternate location via telemetry; VB has previously interviewed responsible persons at their location. Prior year improvement recommendations to increase robustness have been implemented and checked.	L	VERY LOW	Review results of internal secondary checks and internal audits. Evaluate results of cross checks under task above to confirm internal checks are resulting in minimal anomalies. Telephone interview with key personnel as required	Yes	

Data Verification (ie data checking & analysis)	Unable to undertake "walkthrough tests", conduct interviews, cross check with data sources	Incorrect verification opinion	Yes	M	M	M	Data not held on site. VB can do detailed checks of spreadsheets offsite to confirm data taken from plant information systems and telemetry is manipulated and aggregated appropriately.	M	MEDIUM	Detailed cross checks of spreadsheets. Fresh download of primary source data from central plant information system	Yes
Data Verification (ie data checking & analysis)	Expression of incorrect Opinion format or language	Incorrect verification opinion	No	L	L	L	Reporting through online reporting portal with specified VOS format etc; site visit thus irrelevant to this activity	L	VERY LOW	Detailed cross checks between reporting portal and site spreadsheets	Yes
Additional activity 1											
Additional activity 2											

**4 Verifier's Conclusion and Attestations**

4.1	Installation initial conditions met? (see 2.1 - 2.3 above)					Yes	If No, then the site is either NOT ELIGIBLE for a waiver OR does NOT require CA approval
4.2	Commission conditions met? (see 2.4 above)					Yes	If No, then the site is NOT ELIGIBLE for a waiver
4.3	Evidence reviewed :	We have reviewed the <b>evidence to demonstrate that the quality of the calibration, management and inspection of the monitoring equipment is sound</b> ; and confirm that it is appropriate and supports the status declared. (e.g. by calibration certificates, supplier contracts, calibration reports and maintenance reports etc)				Yes	If No, then the basis of the risk assessment is not robust and a site visit may be required
		For Options 3 and 4 (where applicable to this installation) we have reviewed the evidence that the <b>meters have been inspected on site by the operator or a laboratory in line with the MRR, and have obtained a signed document and/or date stamped photographic evidence from the operator that demonstrates that no metering or operational changes have occurred at the installation since that inspection</b> . We confirm that the evidence is appropriate and supports the status declared				Yes	State N/A unless Option 3 or 4 are invoked above.
4.4	Overall conclusion	Based on the above site visit waiver risk assessment, taking account of the Article 12 risk analysis of the operator's monitoring and control system, the verifier is confident that a site visit is not needed and accepts the verification risk of not undertaking such a visit.				Yes	This cannot be yes if the response to 4.1 or 4.2 is No.
	Supplementary comments (if relevant)						
	Lead Verifier	<b>Myo Pionon</b>				Date	15th August 2016
	On behalf of :	<b>Experts@Verification Ltd</b>					

**5 Next Steps -**

<p>If Overall Conclusion is No -</p> <p>Notify operator that a site visit will need to be arranged</p>	<p>If Overall Conclusion above is Yes -</p> <p>Send a pdf copy to the Operator</p> <p><b>Instruction to Operator :</b></p> <p>Please submit this Site Visit Waiver Risk Assessment to your Competent Authority and request their approval of the waiver of the site visit for this reporting year.</p> <p>This submission should be made in advance of the Competent Authority's stated cut off date; submissions made after that date may be automatically rejected and a site visit will need to be arranged</p> <p>Where required by your Competent Authority, this application should be accompanied by the supporting evidence defined on page 7 of KGN II.5 (and as specifically outlined in 4.2 above) - SEE BELOW</p> <p>Please send the approval (or denial) of waiver from the Competent Authority to your nominated Lead Verifier as soon as you receive it</p>
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**KGN II.5 Page 7 : Obtaining the Competent Authority's approval**

The application for a waiver of a site visit shall be accompanied by evidence that all conditions have been met. The evidence should at least include:

- the outcome of the verifier's risk analysis justifying the conclusion that the inherent and control risks are low and a site visit is not needed to check the accuracy of the data and the implementation of and compliance with the MP
- a statement from the verifier that it is confident that the site visit is not needed based on its risk analysis, and it accepts the risks of not undertaking a site visit
- a statement from the verifier that, based on the verifier's risk analysis, all data can be remotely accessed
- a statement from the verifier stating which criterion set by the Commission applies
- evidence that the quality of the calibration, management and inspection of the monitoring equipment is sound, e.g. by providing calibration certificates and referring to supplier contracts, calibration reports and maintenance reports
- for Criteria III and IV, evidence that the meters have been inspected on site by the operator or a laboratory in line with the MRR, and a signed document or date stamped photographic evidence from the operator that demonstrates that no metering or operational changes have occurred at the installation since that inspection
- a statement from the verifier that the conditions for refusing approval by the CA, listed in the paragraph below, are not applicable

**Reference**

This document

This document

This document

This document

Covered in 4.2 as reviewed by Verifier; plus actual copies of evidence if required

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This document