

**Non Paper on Robust Compliance and Enforcement procedures for good
functioning of the EU Emission Trading Scheme
by
the Danish Energy Authority and the Danish Ministry of Environment**

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Robust Compliance and enforcement procedures are vital for a well functioning EU ETS Emission Trading Scheme. The experience with implementing the scheme during the first trading period shows differences in monitoring, reporting and verification of CO₂ emissions among member states.

In order to overcome major differences in implementation of the scheme the ECCP working group on emissions trading on review of the EU ETS, explores the need for further harmonisation with respect to accreditation, verification, monitoring and reporting under the EU ETS Emission Trading Scheme. Such a harmonisation would ensure no considerable differences in implementation of the scheme, encourage verification across member state borders to a larger extent, presenting the scheme in a more consistent manner to installations operating in more than one member state, as well as strengthening the possibility of linking with emission trading schemes in third countries.

In order to ensure further harmonisation and at the same time, maintaining an implementation system which takes into account local conditions, the following attempts are suggested:

- Accreditation requirements should be based on a common EU accreditation and verification document prepared by the European co-operation for Accreditation (EA), for example the document “Guidance for recognition of verifiers under the EU ETS Directive (EA-6/03)”.
- Accreditation of verifiers should be handled by any member state based accreditation body, but based on a common EU Accreditation and verification Document, for example the document “Guidance for recognition of verifiers under the EU ETS Directive (EA-6/03)”. In addition to that, the member states should have the option of adding locally specific requirements to the accreditation.
- The Verification Process should be harmonised in order to minimise differences in verification of CO₂ emissions among member states. The verification process should be described in a common EU Accreditation and verification document with further clarification of requirements and content in a guideline, preferable in an EU Monitoring and Reporting Guideline. Requirements to the verification process should not be laid out in a regulation.
- Monitoring and Reporting should still be based on an EU Monitoring and Reporting Guideline, enabling each member state to take into account local conditions. A monitoring and reporting regulation should not be introduced.

The suggestions made in this non paper would require an amendment of the EU Directive 2003/87/EC in order to ensure that member states are obliged to fulfil the suggested requirements on accreditation and would require a review of the existing EU Monitoring and Reporting Guideline in general and with regard to verification, in particular.