Development of Guidance to Support the AV Regulation

2nd 2012 Compliance Forum Event

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Relations between the guidance documents

User Manual and Explanatory Guidance (EDG I)

Templates:
- *Verification report*
- *Information exchange*

Key Guidance Notes (KGD II):
- *Scope of verification (II.1)*
- *Verifier's risk analysis (II.2)*
- *Process analysis (II.3)*
- *Sampling (II.4)*
- *Site visits during verification (II.5)*
- *Verification report (II.6)*
- *Competence of verifiers (II.7)*
- *Relation AVR and EN ISO 14065 (II.8)*
- *Relation AVR and EN ISO/IEC 17011 (II.9)*
- *Information exchange templates (II.10)*
- *Certification (II.11)*
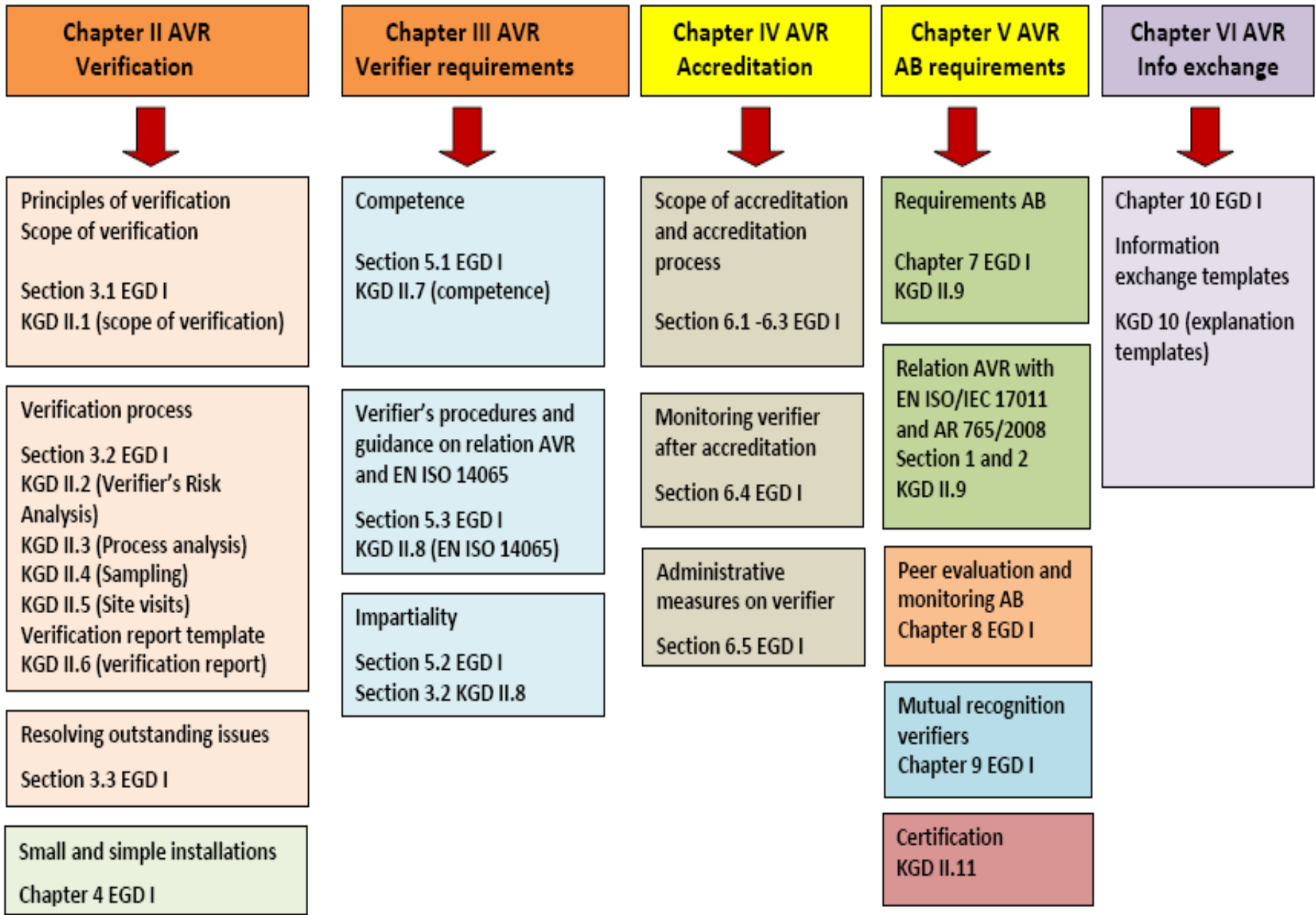
Aviation verification guidance (GD III)

Exemplars: filled-in templates

Exemplars and Frequently Asked Questions

Climate Action

Criteria for developing guidance material

- *Existing documents taken into account:*
    - ✓ *EA 6/03, IETA verification protocol, Accountancy Standards*
    - ✓ *EA and IAF Guidance*
    - ✓ *Best practices from MS (e.g. Verification Report Template)*
    - ✓ *Compliance Forum 's Verification aviation guidance*

- *Compatibility with MR Regulation (MRR), AV Regulation (AVR) and other relevant legislation*

- *Compatibility with EN ISO 14065 and EN ISO/IEC 17011*

- *Consistency with MR guidance*

- *Cost efficient approaches for small and simple installations and small emitters in aviation*

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Explanatory Guidance (EGD I)

- *Assists verifiers, NABs, NCAs, CAs and operators/aircraft operators in understanding of AVR issues*

- *User-friendly explanation of every article in the AVR: e.g.*
  - ✓ *User manual guides reader through guidance material*
  - ✓ *Articles are mentioned next to guidance text*
  - ✓ *Important issues are highlighted with symbols*

- *Explains relation between AVR, AR 765/2008 and EN ISO 14065 and EN ISO/IEC 17011*

- *Explains issues where MRR and AVR are interconnected: e.g. improvement report and recommendations made by verifier*

Chapter II AVR Verification	Chapter III AVR Verifier requirements	Chapter IV AVR Accreditation	Chapter V AVR AB requirements	Chapter VI AVR Info exchange

Chapter II AVR Verification

Principles of verification
Scope of verification

Section 3.1 EGD I
KGD II.1 (scope of verification)

Verification process

Section 3.2 EGD I
KGD II.2 (Verifier's Risk Analysis)
KGD II.3 (Process analysis)
KGD II.4 (Sampling)
KGD II.5 (Site visits)
Verification report template
KGD II.6 (verification report)

Resolving outstanding issues

Section 3.3 EGD I

Small and simple installations

Chapter 4 EGD I

Chapter III AVR Verifier requirements

Competence

Section 5.1 EGD I
KGD II.7 (competence)

Verifier's procedures and guidance on relation AVR and EN ISO 14065

Section 5.3 EGD I
KGD II.8 (EN ISO 14065)

Impartiality

Section 5.2 EGD I
Section 3.2 KGD II.8

Chapter IV AVR Accreditation

Scope of accreditation and accreditation process

Section 6.1 -6.3 EGD I

Monitoring verifier after accreditation

Section 6.4 EGD I

Administrative measures on verifier

Section 6.5 EGD I

Chapter V AVR AB requirements

Requirements AB

Chapter 7 EGD I
KGD II.9

Relation AVR with EN ISO/IEC 17011 and AR 765/2008 Section 1 and 2
KGD II.9

Peer evaluation and monitoring AB
Chapter 8 EGD I

Mutual recognition verifiers
Chapter 9 EGD I

Certification
KGD II.11

Chapter VI AVR Info exchange

Chapter 10 EGD I

Information exchange templates

KGD 10 (explanation templates)

KGNs on technical verification issues

KGN II.1 on scope of verification explains Art. 7 (4)-(6) AVR

- *What verifier needs to assess during verification*
- *To what extent verifier checks compliance with MRR*
- *Diagram specifying what to do if there is no approved MP, MP has not been updated or does not reflect actual situation*
- *What to do if verifier has identified non-compliance with MRR*

KGN II.2 on risk analysis explaining Art. 12 and 13 AVR

- *What steps to undertake in the risk analysis → iterative process*
- *Explanation and examples of verification risk and its components*
- *Guidance on how to assess magnitude of inherent and control risk*
- *Guidance on how inherent risk, control risk and detection risk determine the detail and nature of verification*
- *Relation between operator's risk assessment and verifier's risk analysis*

KGN II.7 - Competence – main issues

Guidance on EU ETS specific competence requirements and their relation to EN ISO 14065

- *Examples and guidance on each key requirement from Article 36 – 39 AVR*

- *Explanation provided on:*
  - ✓ *Competence of the verification team*
  - ✓ *Competence of the EU ETS lead auditor*
  - ✓ *Competence of the EU ETS auditor*
  - ✓ *Competence of the technical expert & independent reviewer*
  - ✓ *How competence can be demonstrated*

- *For this guidance use was made of ISO 14066 and IAF guidance on application of EN ISO 14065 and EA 6/03*

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KGNs on relation AVR and ISO standards

KGN II.8 explains relation between EN ISO 14065 and the AVR

- *Explains the contents of EN ISO 14065 and what provisions in this standard have been made EU ETS specific in the AVR*

- *Gives guidance on how to interpret EN ISO 14065 for single verifiers*

- *Explains presumption of conformity with Chapter 2 and 3 AVR if verifier demonstrates compliance with EN ISO 14065*

KGN II.9 explains relation between EN ISO/IEC 17011 and the AVR

- *Explains the contents of EN ISO/IEC 17011 and which provisions in this standard have been made EU ETS specific in AVR*

- *Explains synergy between AVR and AR 765/2008 and which requirements from AR 765/2008 are applicable*

- *Compliance with AVR, AR 765/2008 and EN ISO/ IEC 17011 needs to be assessed during peer evaluation*

Verification Report template

- *Harmonised, consistent and transparent way of reporting:*
  - ✓ *Reporting on verification approach and issues found*
  - ✓ *Confirming required checks have been carried out and no non-compliance was found*

- *Facilitates comparability of reports and enhances user's confidence in verification opinion statement*

- *Practical interpretation of Article 27 AVR requirements*

- *Addresses verification of installations and aircraft operators*

- *Based on UK best practice and is user-friendly*

- *KGN explains sections of the template and how to complete it*

- *MS encouraged to use the template for 2012 emission reports and test its functionality*

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Templates on information exchange

- *Templates provide a practical implementation of Ch. VI AVR:*
  - ✓ *Notification from verifier to NAB/ NCA by 15 November*
  - ✓ *Work programme from NAB/ NCA to CA by 31 December*
  - ✓ *Management report from NAB/ NCA to CA by 1 June*
  - ✓ *Information exchange from CA to NAB/ NCA → recommended by 30 Sept.*

- *Uniform way of reporting information required by AVR*

- *Templates only ask for high level information*

- *Templates are user-friendly e.g. drop down box and instructions*

- *TWG in support of starting to gain experiences with templates*

- *KGN II.10 explains how to complete the templates*

Guidance material to be completed

- *KGN II.3 on process analysis explaining*
  - ✓ *testing of data flow and control activities and procedures*
  - ✓ *detailed data testing e.g. analytical procedures, data verification*
  - ✓ *specific issues e.g. data gaps, uncertainty assessment, biofuels*

- *KGN II.4 on sampling explaining sampling techniques and factors that impact sampling size*

- *Update of Verification Aviation Guidance to MRR and AVR*

- *Exemplars and FAQ*

Where can guidance material be found?

You can find the MRR and AVR and the guidance material & templates on the Commission's website:

http://ec.europa.eu/clima/policies/ets/monitoring/documentation_en.htm