

On Site Inspections

Approach used by NEa Roderik de Ridder





Why 'on site' visits

- Is the installation working conform MP?
- Is complied with all legal requirements?
- Ear and eye function from EA
- It is a risk bases approach to see whether the installation has fulfilled all requirements. If something is not OK, an action will be taken.



Risk analysis

- Ranking the complexity of monitoring in the installation
- Amount of CO₂ emissions

	Emissie					
е	>500000	4	1	11	4	9
d	100000 - 500000	12	4	16	11	6
С	10000 - 100000	114	11	58	16	11
b	5000 - 10000	31	1	18	3	0
а	<5000	55	3	14	1	1
		1	2	3	4	5

complexiteit

- Red: site visit every year
- Orange: site visit every three years
- Yellow: site visit every eight years (once in third period)
- Green: not (just some spot checks)



Preparing the site visit

- Read Monitoring Plan
- Read additional documents
- Search for notifications
- Compare data with previous years
- Compare data with other (similar) companies
- Look for results of former visits
- Choose one or two source streams for detailed discussion with company



On the Site

- In most cases it's not possible to 'see it all'. Therefore risk based approach.
- Try to understand the calculations and check the data
- All aspects can be addressed with a data-trail
- Ask for calculation sheets
- Ask for calibration results
- Lab analysis
- Etc.
- Analyse the data afterwards



What did we find

- Forgotten source streams
- Wrong calculations
 - Hourly values were supposed to be daily values (factor 24)
 - Turn around from last year, still in the system
 - Use of wrong density for calculation activity data

-Problems with tiers

- uncertainty
- frequency of analysis

-Other

- CEMs and EN 14181, EN 15259
- Not able to find the figures from emission-report in system of company
- Etc. etc.



Questions & suggestions for discussion

- How would you organise the inspection in your MS?
- In which cases will inspection of paper documentation such as MP, AER and VR suffice and in which cases not?
- In which cases would in your country site visits add value to the inspection and to safeguarding of EU ETS
- Why is inspection needed to supplement verification