

# EU ETS -Verification and Accreditation Regulation (EU) No 600/2012

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Maria Martin/Marc Kierans/Annette  
Prendergast  
Climate Change & Environmental  
Research Unit

# Introduction

- Welcome AVR as it strengthens existing good practices and ensures more widespread and harmonised adoption of same.
- Guidance documents - comprehensive aid to implementation. Need to be regularly updated in light of experience.
- Dedicated helpdesk would also assist implementation and feedback into guidance updating and improvement.

# State-of-play in Ireland (1)

Key Element of AVR	Current	Action
Harmonised standards (ISO 17011, ISO 14065) and technical documents (EA 6/03)	EA 6/03 ISO 14065	Clarity on standards to be used.
Risk based approach for verification	Yes	Better documentation by Verifiers
NAB empowered to accredit verifiers, adopt administrative measures and carry out surveillance of verifiers	Yes	Continue work in this area including interaction with other NABs.
NAB must demonstrate conformity with AVR and have undergone successful peer evaluation	INAB in EA incl. peer review	Continue involvement in peer review.

## State-of-play in Ireland (2)

Key Element of AVR	Current	Action
Acceptance of accreditation certificates of verifiers accredited by NAB in other MS	Existing. UKAS verifiers	Verifiers accredited by other NABs may also apply. New challenge.
Acceptance of certified verifiers carried out by a National Authority of another MS	<b>New!</b>	Unhappy ☹️.
NABs and CA's (e.g. EPA) shall establish effective information exchange.	In place	Will continue as more formal programme
NAB set up database accredited verifiers access for other NABs, Verifiers, Operators and CA's	Register on website	All verifiers -extension of scope and submit documents which demonstrate conformance with AVR by December 2012

# Welcome provisions

- Art. 9 - Time allocation must take account of complexity of installation and MP, completeness of data flow and control system; possibility of additional time when required.
- Art.10 – comprehensive data provision by operator to verifier.
- Art.22, Art.23 - Clarity in relation to requirement for Operators to address and correct misstatements and non-conformities and guidance on materiality level.
- Art.34-42 Competence and impartiality: verifier shall be independent from Operator and impartial in carrying out verification activities.
- Art.30 Improvement of the M&R process. Improvements identified by Verifier **shall** be included in Verification report.
- Operator required to submit improvement report to CA by 30 June (unless small emitter). Verifier checks implementation during the following year's verification.

# Site visits

- Current policy in Ireland requires site visits in all cases except for offshore installations
- Reluctant to waive a site visit
- Thorough assessment of Verifier risk analysis for completeness
- Ensure that as a minimum the Commission conditions established for waiving site visits is met