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Inspections of installations under EU ETS

ENVIRONMENT
NATURE &
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DEPARTMENT

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Organisational chart of national EU-ETS implementation in FLANDERS

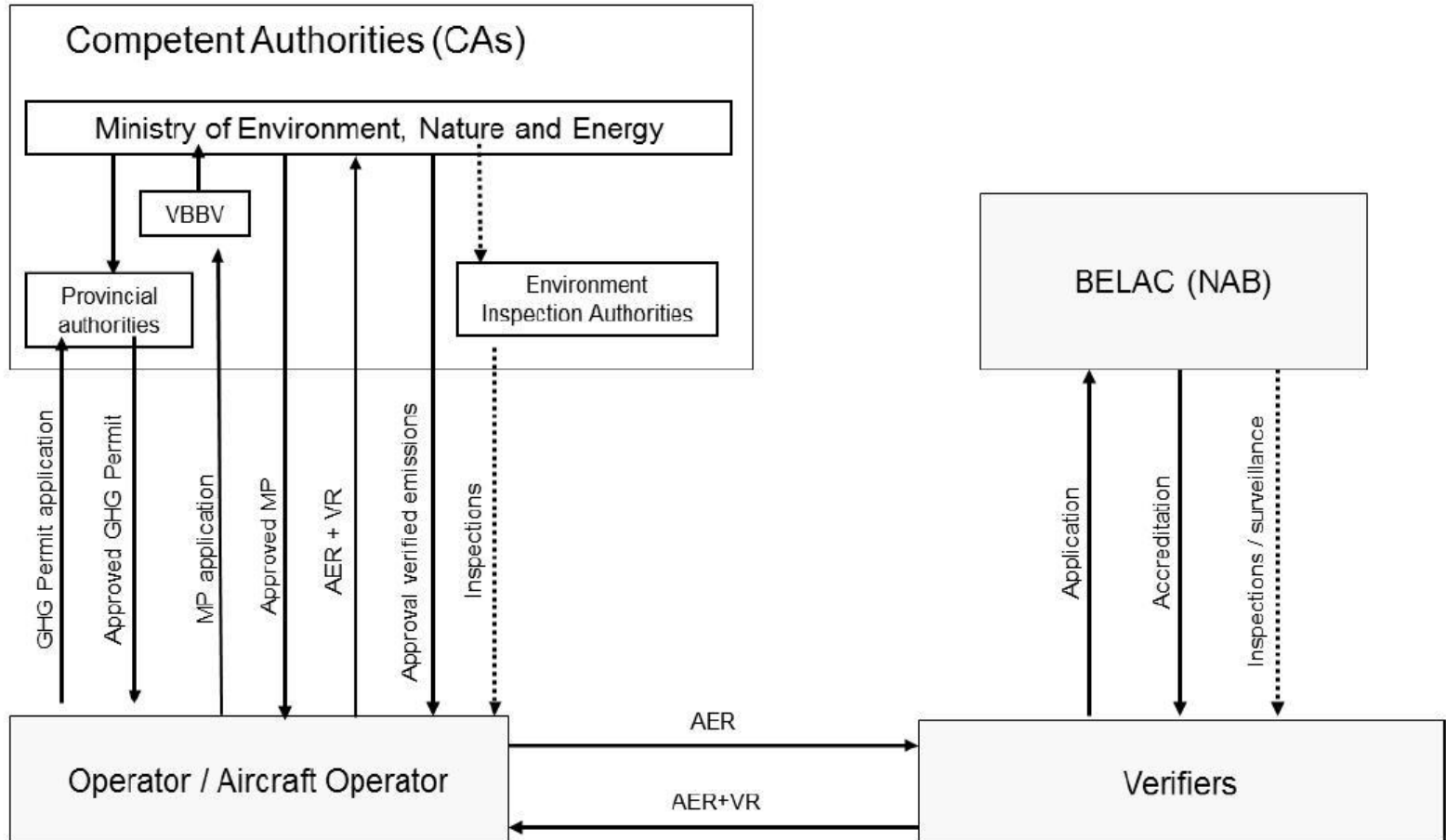– illustrating the hierarchy and/or relations between the actors -

Figure 1   Organisational chart of EU ETS implementation in the Flemish Region

Inspection through conformity audits

▶ conformity audits are performed by Verificatiebureau Benchmarking Vlaanderen (VBBV), commissioned by Flemish Environment, Nature & Energy Department

▶ conformity audits check if the content of the MP (which is yearly updated in FL):
    1. is in line with MRR, and
    2. whether it reflects reality

    (<-> system audits check if the MP is correctly applied)

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Frequency of conformity audits

▸ all ETS installations are audited in the period 2013-2016:
  → category C installations: yearly
  → category B installations: two yearly
  → category A installations: once in 4 years

Installations	Number
Installations with low emissions	111
Category A installations (excluding installations with low emissions)	42
Category B installations	46
Category C installations	18
Total number of installations	**217**

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Preparation of conformity audits

First:

▶ start from risk analysis

▶ does MP contain weak or doubtful points or deviations from MRR?

▶ use improvement plans

▶ check log books of temporary and permanent changes

Then: set up **audit plan**

▶ first audit: all chapters of MP are audited and certainly weak points

▶ next audits: status of remarks from previous audit plus focus on procedures

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Findings from conformity audits

▸ Labs not ISO-17025 accredited or not for the specific analysis
▸ Forgotten or wrongly categorised source streams
▸ Wrong or missing information on metering instruments
▸ Real calculation of activity data differs from description in MP
▸ Incorrect use of tiers and wrong (or techically unfounded) uncertainty calculation
▸ Missing sampling plan and procedure for frequency control
▸ Procedures on management and control of MP are often weak
  → in general: not well understood, often incomplete, unclear, superficial or even missing
  → e.g. dataflow, risk control, data gaps, internal auditing

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Items for discussion

▸ what is the best frequency of inspections?

▸ is the technical knowledge of verifiers sufficient, and if not, how can it be further improved?

▸ how can one bring an operator in line with MRR if operator does not execute what is in his improvement report?

▸ how to handle installations that don't match tiers of fall back?

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