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# Waiver of site visits: CA approval required?

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# Introduction

- Art. 21 AVR requires the verifier to conduct at least one site visit during the verification process (site = installation & head office)
- Art. 31 AVR provides for an opportunity to waive the site visit, if...
  - justified based on the outcome of the risk analysis
  - all relevant data can be accessed remotely
  - criteria set by the Commission ([KGN II.5](#)) are met
- verification is not carried out for the first time
- site visit has not been waived for the two preceding reports
- there are no significant changes to the monitoring plan
- **the CA has approved the waiver (installations  $\geq 25.000$  t CO<sub>2</sub>e p.a.)**

# Reasons for the approval requirement

- Operators
    - ...have to bear the costs for the verification of the AERs
    - ...attempt to reduce verification costs
  - Waiving of site visits may reduce verification costs
- ⇒ Operators sometimes put pressure on the verifier to waive the site visit
- ⇒ CA approval should
  - ...lower the pressure put on verifiers
  - ...assure that the conditions for waivers are met

# Arguments against the approval requirement

- Approval procedure rather laborious and formalistic with limited added value
  - Verifier confirms conditions; operator applies for the waiver and CA has to decide in any case (approval/refusal)
  - CA can just check the formal conditions but not the appropriateness of the waiver (risk analysis, remote access to all relevant data etc.)
- Alternative
  - CA checks the conditions for waivers whilst assessing the verified AER
  - Waivers not in line with the AVR constitute a non-compliance of the verifier and should be reported to the NAB
  - Verifiers have to be aware that the NAB shall (at least) suspend the accreditation in cases of persistent/repeated breaches of the AVR requirements
- Advantage: Reduced administrative burden for all parties involved

**Thank you for your attention!**

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