



CA experience of Virtual Site Visits Compliance Conference 2020

Annette Prendergast
Environmental Protection Agency Ireland
a.prendergast@epa.ie

Virtual site visits CA Experience



Overview

- Verifier site visits were completed as normal for 2019 reporting.
- Verifiers and Operators have been requesting guidance and information from the CA on our policy in relation to site visits during COVID-19 restrictions.
- At the highest level of restrictions imposed as part of public health measures, physical attendance at workplaces is only permitted for those providing essential services, where such services can only be provided in person and cannot be delivered remotely.
- In addition passengers entering Ireland from red, orange and grey regions are requested to restrict their movements for 14 days.
- Operators of some essential services have put additional restrictions in place to limit on-site visitors to reduce risks to on-site workers and the service provided. Non-essential services are closed.

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Current approach by the EPA (CA)

- Draft guidance was issued to all Operators and Verifiers in October. This is subject to update following revision of the AVR and to any changes to Government Policy and Requirements.
- It is EPA policy that site visits are carried out in line with Government Guidelines.
- Internal EPA policy is that EPA staff should never jeopardise health and safety in completion of site inspections. The same principle is applied to site visits by Verifiers.
- Where the Level of restrictions at the time of the site visit prevents the Verifier from carrying out a physical site visit and where these circumstances cannot, after using all reasonable efforts, be overcome, the verifier may decide, subject to compliance with all the following conditions to carry out a virtual site visit in lieu of a physical site visit.

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Current approach by the EPA (CA)

- The decision to carry out a virtual site visit shall be based on the outcome of the risk analysis and after determining that the conditions below can be met. The Operator submits this information to the CA when submitting the Verified report.
- The verifier shall take measures to reduce the verification risk to an acceptable level. (Obtain reasonable assurance that the report is free from material misstatement)
- Evidence that current restrictions prevent a site visit must be available.
- Information on how the virtual visit is conducted to ensure relevant data can be accessed, operation of measurement devices and monitoring systems assessed, interviews conducted, boundaries of installation and completeness of source streams assessed, for activity level reports boundaries of the installation, sub-installation(s) as well as completeness of source streams, emission sources, and technical connections assessed.

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Current approach by the EPA (CA)

- The verified report should also contain details of the dates and duration of the virtual visit.
- The CA may reject annual emission reports and annual activity level reports if all the requirements are not met. In such cases the Operator will be required to organise for the reverification of the report to include a site visit when restrictions are lifted and submit the reverified report to the EPA. The EPA will update emissions on the registry following acceptance of the updated report.
- Relevant findings will also be reported to the accreditation body, as part of information exchange by the CA.

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Experience to date with Verifier virtual visits

- A successful virtual visit was conducted by a Verifier for a final AEM report for a site closure in October.
- All the required evidence was submitted to justify the virtual visit.
- The level of restrictions at the time of the site visit prevented the visit.
- The Verifier was able to provide a verification report with reasonable assurance that there were no material misstatements.
- Information on how the visit was carried out and the outcome of the risk analysis was submitted.

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Virtual visits carried out by the CA

- Purpose of the visits, to assess permit applications and monitoring plans for greenfield sites prior to permit issue. Conducted using a video call with both party agreement. WIFI was available to enable live video streaming to be used.
- The CA needs to be well prepared in advance and test IT equipment.
- Familiar with all site information and detailed site plan, submitted in advance.
- Set out clearly in advance with the Operator what areas will be observed (emission sources, source stream metering, overview of processes, boundaries etc) so that there are no delays with access and safety measures observed. Relevant personal available for interview. Follow up interviews can be organised. Future physical visit if required.

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Conclusions

- A virtual site visit does not replace a real site visit but is necessary in the current crises to ensure reporting obligations can be met by Operators and Verifiers.
- A virtual site visit can work well. A flexible approach is required.
- The CA needs to be clear with the Operator and Verifier on what is required so that the objectives of a site visit can be met.
- A contingency plan needs to be in place where issues are identified during report review with the quality of the virtual visit and reported data and information.