



11TH EU ETS COMPLIANCE CONFERENCE
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NAB experiences with Virtual Site Visits

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PRELIMINARY REMARKS

EU-ETS Verifications for AER 2019 have been completed almost exclusively without using virtual site visits during first Covid-19 lockdown period in March-June 2020.

Only few EU-ETS-verifications in late February – March 2020 have been executed by using remote auditing methods.

The situation was different in EU-MRV-Maritime Scheme (EU-Reg. 757/2015), since considerable verification workload has been scheduled during Covid-19 lockdown period in March–April 2020.

Verification Bodies active and accredited Certification Bodies adapt remote auditing processes quickly and gain experience during 2020.

Conclusion: Experience of Verifiers and NABs using virtual site visits in EU-ETS verification is limited but experience is available from other conformity assessment schemes.

PREREQUISITS ON VIRTUAL SITES VISITS

Remark: the following conditions required for execution of virtual site visits do not substitute the requirements of new AVR Article 34a regarding virtual site in situations where physical site visits are not possible because of force majeure:

- Specific risk-analysis and justification for virtual site visit approved by the verification body.
- Verification Body Procedure for planning and execution of virtual site visits (including IT-solutions used for video and remote data access, data security and protection).
- Instruction and training of verifiers on virtual site visits.
- Evidence of virtual site visits in the audit / sampling plan (audit schedule, contact persons, random samples, etc.).
- Notification of planned / performed virtual site visits to NAB included in Art. 77 AVR – List by dates agreed with the NAB.

LIMITATIONS ON VIRTUAL SITES VISITS

- Availability of information primary emission/activity data evidence (hard copies on site), contact persons, IT-availability, quality of remote technology (connection), quality assurance and measuring equipment access.
- Virtual site visits shall be excluded in case of change of the verifier and in case an initial verification of operators is performed.
- Difficulties how to ensure that approved methods (inspection of system boundaries, sampling etc.) - especially for operations of complex installations with various cross-installation material-& heat flows (e.g. change in process management) – this should be part of on-site verification plan.
- Difficulties to verify data interfaces e.g. from the central process control system or from central installation control room - due to the amount of data. This should be part of on-site verification plan.
- Restrictions regarding use of electronic equipment during virtual site visits in an installations (data protection, safety requirements).

ADVANTAGES ON VIRTUAL SITES VISITS

- The Operator is more challenged to demonstrate the system to comply with the monitoring plan and the quality assurance of installation operation.
- The attention during remote verification is expected to be higher for all participants regarding effective communication between verifier, installation ETS-personnel, consultants – precondition is the availability of an agreed audit plan.
- More effective use of the verification activity saving time for on-site safety preparations and time consuming on-site inspections when transfers from site to site are necessary.

CONCLUSIONS ON VIRTUAL SITES VISITS

Conclusions:

- For non-complex, simple installations using experienced verifiers virtual site visits are expected to be effective and equivalent compared to on-site visits.
- Virtual site visits will be used to complement onsite Verification activities.
- NABs shall assess/witness the verifiers methods and competencies on virtual site visits during verification of AER 2020 & activity data reports 2019/2020.

THANK YOU FOR ATTENTION - QUESTIONS?