

**Dutch Accreditation Council
(RvA)**

**Specific Accreditation
Protocol (SAP) for
Validation and Verification
of Greenhouse Gases (GHG)
(EN ISO 14065)**

Document code:

RvA-SAP-V001-UK

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1 Relevant documents

1.1 Standard used for accreditation

- EN ISO 14065, Requirements for greenhouse gas validation and verification bodies for use in accreditation or other forms of recognition

1.2 Additional standards

- ISO 14064-3, Greenhouse gases - Part 3: Specification with guidance for the validation and verification of greenhouse gas assertions
- ISO 14066, Greenhouse gases - Competence requirement for greenhouse gas validation teams and verification teams

1.3 Additional documents

- IAF MD 6, IAF Mandatory Document for the Application of ISO 14065:2013
- RvA-T033, Explanation of the requirements for conformity assessment schemes

The current version of these documents can be downloaded from the websites of the relevant organisation(s): IAF (www.iaf.nu), ISO (www.iso.org), RvA (www.rva.nl).

1.4 Documents concerning the conformity assessment to be carried out

- EN ISO 14064-1 or
- EN ISO 14064-2
- Other validation and verification schemes may have their own conformity documents, see the relevant annex to this protocol.

1.5 Specific legal and/or regulatory requirements

Not applicable for voluntary verification according to ISO 14064-1 or -2.

See the relevant annexes for schemes having a relationship with legal requirements.

2 Scope of accreditation

The general rules for defining scopes are laid down in RvA Policy rule RvA-BR003. For this accreditation, the scope is formulated as follows:

Activity	Type of emissions	Sector
E.g. Verification of emission data in accordance with ISO 14064-1 with a limited or reasonable level of assurance Validation of baseline data in accordance with ISO 14064-2 with a limited or reasonable level of assurance.	E.g. GHG gases, or limited to CO ₂	E.g. Chemical installations, Transportation organisations

3 Accreditation assessments

3.1. Documents to be submitted

For the assessments the RvA assessors have to be supplied with the documents as mentioned in RvA-F001, RvA-F105, RvA-F018 and annex 1 to RvA-BR005. In addition to these documents the following documents are required specifically for this type of accreditation.

Additional documents to be submitted	Preliminary assessment	Initial assessment	Scope extension	Assessments in the accreditation cycle
Procedures or instructions for dealing with harmonization of verification/validation, contract review, verifier qualifications and the review process, relevant to emission data verification		√	√	√
A model verification statement (unqualified and qualified)	√	√	√	√
Records to demonstrate the availability and competence of personnel such as verifiers and experts and staff personnel such as contract reviewers and (report) reviewers	√	√		
For witnessing, all documents available to the verification team shall also be made available to the RvA assessment team		√	√	√

3.2. Nature and content of the assessments

In addition to the general rules for the nature and content of the RvA assessments as defined in RvA-BR002 and RvA-BR005, for this accreditation the rules from the following table apply.

Method of assessment	Preliminary assessment	Initial or re-assessment	Surveillance	Scope extension ¹⁾
Document assessment	√	√		√
Office assessment	√ (optional)	√	√	√
Witnessing (per scheme as indicated in the annexes)		Witnessing of at least one complete validation or verification (= system plus data verification) relevant for complexity of the requested accreditation scope. The number of witness verifications depends on the number (and complexity) of the clients. The following is used as guidance: 1 – 20 clients = 1 witness, 20 – 100 = 2 witnesses; 100 or more clients = 3 witnesses.	Witnessing of verification: at the first surveillance assessment and subsequently at least once (system and data verification) during two subsequent years. The number of witness verifications depends on the number (and complexity) of the clients. The following is used as guidance: 1 – 50 clients = 1 witness, 50 or more clients = 2 witnesses.	In case of a critical or complex sector additionally a witnessed verification

¹⁾ Based on the application (form RvA-F105), the RvA will determine the nature of the extension assessment.

In case the validation or verification body (V/VB) already holds an accreditation for EU-ETS based on ISO 14065 or for EMAS the extent of an assessment may be reduced

When a scheme is submitted for RvA accreditation for the first time, the RvA shall determine, in line with IAF MD 6, whether the validation or verification criteria include either ISO 14064-1 or ISO 14064-2, depending on whether the protocol relates to organization level or to project GHG assertions. The resulting validation or verification statement shall clearly state whether the scheme conforms to ISO 14064-1 or ISO 14064-2 and if the scheme does not conform it shall state where the discrepancies are. This shall be reflected in the scope of accreditation.

4 Specific points of attention for the RvA assessment

- impartiality;
- competency of personnel (verification personnel, management);
- verification methodology
 - pre-contract;
 - verification assessment (incl. handling of risk analysis, materiality);
 - reporting;
 - review;
 - statement.

5 Other information

To be specified in the relevant annex of this protocol.

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6 Changes compared with the previous version

Compared to version 3, dated May 2017, the following significant changes have been made:

- risk considerations added to the witnessing policy in 3.2 of annex A.

Annex A: Scheme “EUETS”

Directive 2003/87 EC, establishing a scheme for greenhouse gas emission allowance trading within the Community.

1 Relevant documents

1.1 Standard used for accreditation

- EN ISO 14065, Requirements for greenhouse gas validation and verification bodies for use in accreditation or other forms of recognition

1.2 Additional documents

- Commission Regulation no. 600/2012 on the verification of greenhouse gas emission reports and tonne-kilometre reports and the accreditation of verifiers pursuant to Directive 2003/87 of the European Parliament and of the Council
- Commission Regulation no. 601/2012 on the monitoring and reporting of greenhouse gas emissions pursuant to Directive 2003/87 of the European Parliament and of the Council
- EA-6/03: EA Document for Recognition of Verifiers under the EU ETS Directive.
- Key guidance notes as published by the European Commission, available on the website of DG Clima: http://ec.europa.eu/clima/policies/ets/monitoring/documentation_en.htm

The current version of the EA-6/03 document can be downloaded from the website of the EA (www.european-accreditation.org).

1.3 Documents concerning the conformity assessment to be carried out

Relevant national legislation for the Netherlands:

- Wet milieubeheer, Hoofdstuk 16;
- Besluit handel in emissierechten;
- Regeling monitoring handel in emissierechten.

The Dutch legislation mentioned above implements the following EU directives/guidelines:

- The EU ETS Directive 2003/87/EC (ETS Directive);
- Commission Regulation 600/2012 on the verification of greenhouse gas emission reports and tonne-kilometre reports and the accreditation of verifiers pursuant to Directive 2003/87 of the European Parliament and of the Council;
- Commission Regulation 601/2012 on the monitoring and reporting of greenhouse gas emissions pursuant to Directive 2003/87 of the European Parliament and of the Council.

1.4 Specific legal and/or regulatory documents

Directive 2003/87 EC establishing a scheme for greenhouse gas emission allowance trading within the Community and amending Council Directive 96/61/EC.

2. Scope of accreditation

The general rules for defining scopes have been detailed by RvA in its Policy rule RvA-BR003. For this accreditation, and in line with the AVR requirements Annex I, the scope is formulated as follows:

Verification of emission data in accordance with regulation 600/2012/EC and 601/2012/EC pursuant to Directive 2003/87/EC		
Activity	Type of emissions	Sector
Verification of emission data with a reasonable level of assurance in installations	CO ₂	Combustion of fuels in installations, where only commercial standard fuels as defined in Regulation (EU) No 601/2012 are used, or where natural gas is used in category A or B installations (activity group 1a)
Verification of emission data with a reasonable level of assurance in installations	CO ₂	Combustion of fuels in installations, without restrictions (activity group 1b)
Verification of emission data with a reasonable level of assurance in installations	CO ₂	Refining of mineral oil (activity group 2)
Verification of emission data with a reasonable level of assurance in installations	CO ₂	<ul style="list-style-type: none"> – Production of coke – Metal ore (including sulphide ore) roasting or sintering, including pelletisation – Production of pig iron or steel (primary or secondary fusion) including continuous casting (activity group 3)
Verification of emission data with a reasonable level of assurance in installations	CO ₂	<ul style="list-style-type: none"> – Production or processing of ferrous metals (including ferro-alloys) – Production of secondary aluminium – Production or processing of non-ferrous metals, including production of alloys (activity group 4)
Verification of emission data with a reasonable level of assurance in installations	CO ₂ & PFK	<ul style="list-style-type: none"> – Production of primary aluminium (CO₂ and PFC emissions) (activity group 5)
Verification of emission data with a reasonable level of assurance in installations	CO ₂	<ul style="list-style-type: none"> – Production of cement clinker – Production of lime or calcination of dolomite or magnesite – Manufacture of glass including glass fibre – Manufacture of ceramic products by firing – Manufacture of mineral wool insulation material – Drying or calcination of gypsum or production of plaster boards and other gypsum products (activity group 6)
Verification of emission data with a reasonable level of assurance in installations	CO ₂	<ul style="list-style-type: none"> – Production of pulp from timber or other fibrous materials – Production of paper or cardboard (activity group 7)

Verification of emission data in accordance with regulation 600/2012/EC and 601/2012/EC pursuant to Directive 2003/87/EC		
Activity	Type of emissions	Sector
Verification of emission data with a reasonable level of assurance in installations	CO ₂	<ul style="list-style-type: none"> – Production of carbon black – Production of ammonia – Production of bulk organic chemicals by cracking, reforming, partial or full oxidation or by similar processes – Production of hydrogen (H₂) and synthesis gas by reforming or partial oxidation – Production of soda ash (Na₂CO₃) and sodium bicarbonate (NaHCO₃) (activity group 8)
Verification of emission data with a reasonable level of assurance in installations	N ₂ O & CO ₂	<ul style="list-style-type: none"> – Production of nitric acid (CO₂ and N₂O emissions) – Production of adipic acid (CO₂ and N₂O emissions) – Production of glyoxal and glyoxylic acid (CO₂ and N₂O emissions) – Production of caprolactam (activity group 9)
Verification of emission data with a reasonable level of assurance	Various GHG	<ul style="list-style-type: none"> – Capture of greenhouse gases from installations covered by Directive 2003/87/EC for the purpose of transport and geological storage in a storage site permitted under Directive 2009/31/EC – Transport of greenhouse gases by pipelines for geological storage in a storage site permitted under Directive 2009/31/EC (activity group 10)
Verification of emission data with a reasonable level of assurance	Various GHG	Geological storage of greenhouse gases in a storage site permitted under Directive 2009/31/EC (activity group 11)
Verification of emission data and tonne kilometres data with a reasonable level of assurance in aviation activities	CO ₂	Aviation activities (emissions and tonne-kilometre data) (activity group 12)
Verification of emission data	Various GHG	Other activities pursuant to Article 10a of Directive 2003/87/EC (activity group 98)
Verification of emission data	Various GHG	Other activities, included by a Member State pursuant to Article 24 of Directive 2003/87/EC, to be specified in detail in the accreditation certificate (activity group 99)

3 Accreditation assessments

3.1 Documents to be submitted

For the RvA assessments, its assessors have to be supplied with the documents specified RvA-F001, RvA-F105, RvA-F018, paragraph 3.1 in the general section and annex 1 to RvA-BR005. In addition to these documents the following documents are required for this type of accreditation .

Additional documents to be submitted	Preliminary assessment	Initial assessment	Scope extension	Assessments in the accreditation cycle
For witnessing the following documents should be made available to the RvA assessment team: All documents available to the verification team, but at least the following: operator's MP and permit, ETS data, results of initial risk assessment, reports of previous verifications, verification program and route, personnel records of verifiers involved.		√	√	√

3.2. Nature and content of the assessments

In addition to the general rules for the nature and content of the RvA assessments as defined in in RvA-BR002 and RvA-BR005, for this accreditation the rules from the following table apply.

Method of assessment	Preliminary assessment	Initial ¹⁾ or re-assessment	Surveillance	Scope extension ²⁾
Document assessment	√	√		√
Office assessment	√ (optional)	√ At least one file reviewed per activity group in the scope requested.	√ At least one file reviewed per activity group throughout the cycle for each activity group in the scope.	√ At least one file reviewed per activity group prior to granting.
Witnessing		Witnessing of at least one complete verification (= system plus data verification) relevant for complexity of requested accreditation scope. One witness per cluster of activity groups (see 3.3)	Witnessing of verification: during the first surveillance and subsequently at least one witness per cluster of activity groups (see 3.3)	A witness is required if a cluster of activity groups is added to the scope (see 3.3)
The witnesses will consider the number of (new) verifiers, the complexity of the VB's clients and their spread over different countries. This may increase the total number of witnesses. The risk considerations will be documented in the worksheet used to prepare the RvA work programme in line with the AVR.				

¹⁾ Also see para. 5.3 in this annex.

²⁾ Based on the application (form RvA-F105), the RvA will determine the nature of the extension assessment.

3.3 Clustering for assessment strategy

Cluster	Activity Group	Scope of accreditation
A	1a & 1b & 7	<ul style="list-style-type: none"> - Combustion of fuels in installations, where only commercial standard fuels as defined in Regulation (EU) No 601/2012 are used, or where natural gas is used in category A or B installations. - Combustion of fuels in installations, without restrictions - Production of pulp from timber or other fibrous materials - Production of paper or cardboard
B	6	<ul style="list-style-type: none"> - Production of cement clinker - Production of lime or calcination of dolomite or magnesite - Manufacture of glass including glass fibre - Manufacture of ceramic products by firing - Manufacture of mineral wool insulation material - Drying or calcination of gypsum or production of plaster boards and other gypsum products
C	2 & 8	<ul style="list-style-type: none"> - Refining of mineral oil - Production of carbon black - Production of ammonia - Production of bulk organic chemicals by cracking, reforming, partial or full oxidation or by similar processes - Production of hydrogen (H₂) and synthesis gas by reforming or partial oxidation - Production of soda ash (Na₂CO₃) and sodium bicarbonate (NaHCO₃)
D	3, 4 & 5	<ul style="list-style-type: none"> - Production of coke - Metal ore (including sulphide ore) roasting or sintering, including pelletisation - Production of pig iron or steel (primary or secondary fusion) including continuous casting - Production or processing of ferrous metals (including ferro-alloys) - Production of secondary aluminium - Production or processing of non-ferrous metals, including production of alloys - Production of primary aluminium (CO₂ and PFC emissions)
E	9	<ul style="list-style-type: none"> - Production of nitric acid (CO₂ and N₂O emissions) - Production of adipic acid (CO₂ and N₂O emissions) - Production of glyoxal and glyoxylic acid (CO₂ and N₂O emissions) - Production of caprolactam
F	10 & 11	<ul style="list-style-type: none"> - Capture of greenhouse gases from installations covered by Directive 2003/87/EC for the purpose of transport and geological storage in a storage site permitted under Directive 2009/31/EC - Transport of greenhouse gases by pipelines for geological storage in a storage site permitted under Directive 2009/31/EC - Geological storage of greenhouse gases in a storage site permitted under Directive 2009/31/EC
G	12	<ul style="list-style-type: none"> - Aviation activities (emissions and tonne-kilometre data)
H	98	<ul style="list-style-type: none"> - Other activities pursuant to Article 10a of Directive 2003/87/EC
I	99	<ul style="list-style-type: none"> - Other activities, included by a Member State pursuant to Article 24 of Directive 2003/87/EC, to be specified in detail in the accreditation certificate (Witness or file review to be decided on case by case basis)

3.4 Decision making process

Due to the requirements of AVR, art. 58.3, to ensure appropriate competence in the review and decision making process, the RvA will review all RvA assessment reports after the last renewal prior to taking a decision on the granting, extending or renewing of an accreditation. The person to perform this review shall be qualified by the RvA as an assessor for EU ETS assessments and shall have sufficient knowledge and experience to evaluate the accreditation (i.e. understand the RvA accreditation process and specific AVR requirements related to decision making). The results of the review shall be included in the accreditation file, and the records of the decision making process shall reflect the fact that the results of the review have been included in this process.

4 Specific points of attention for the RvA assessment

Implementation of the AVR (Chapter II and Chapter III) and application and knowledge of Key Guidance Notes as published by the Commission.

4.1 Accreditation for scope 98

As can be seen from the table under para 3.2, the request for an accreditation for scope 98 shall include an office and a witness assessment (as this is considered a separate cluster). During these assessments special attention will be given to the following:

Related to competence:

The verifier's technical sector competence criteria should reflect the aspects mentioned in the Commissions Guidance, KGN II.7 and should, if relevant, further include at least knowledge of the following aspects:

For scope 98, "Other activities pursuant to Article 10a of Directive 2003/87/EC", AVR 600/2012, Annex 1. As this type of activity occurs in one of the activity groups 1 through 9 and 12, the verifier should ensure that any verification team for such an assignment:

- possesses all competencies as listed for the relevant scope (activity group 1 through 9 or 12), as based on the Articles 35 through 39 of the AVR;
- can demonstrate in-depth knowledge of the Commission Decision 2011/278 (CIM), including the guidance documents on the harmonized free allocation methodology for the EU-ETS post 2012;
- can demonstrate in-depth knowledge regarding an installation's intended normal operation, maintenance, common production cycle, emission intensity of inputs and typical capacity utilization in the sector concerned compared to sector-specific information;
- has the ability to evaluate whether the applied energy- or greenhouse gas efficiency and abatement techniques are state of the art.

Related to the performance of the verification:

The EC Guidance n°4 "Guidance Document on the harmonized free allocation methodology for the EU-ETS post 2012 Verification of NIMs Baseline Data Reports and Methodology Reports" provides guidelines for the verification of NIMS baseline data reports and Methodology reports, which are produced as part of the allocation process in preparation for the third trading period by existing installations (CIM, art. 5 until 16). These have taken place in the past (mainly in the Summer of 2011). For the future, further free allocations (or changes in allocation) may occur for new entrants or significant changes in operating or activity levels. For this type of activities, a different reporting format is required by law. With the exception of changes in activity levels, a formal methodology report is also required (pursuant to articles 42 and 47 Regeling handel in emissierechten). For the verification of "Other activities pursuant to Article 10a of Directive 2003/87/EC" (allocation free of charge) the verification body should use all applicable (related to the type of change in the activities, e.g. greenfield, expansion or reduction of activities) guidance from Guidance Document n°4. Where the GD n°4 references the methodology report or the NIMS baseline data report, it should read the relevant information to be submitted (art. 17 to 21 and Annex V of CIM).

The above two aspects (competence and performance) shall be reflected in the RvA extension report for this scope.

5 Other information

5.1 Organisations to be informed by RvA

In accordance with chapter VI of AVR, the RvA will inform the competent authority of every Member State in which the Verification Body carries out EU/ETS verifications. In the Netherlands the competent authority is the Nederlandse Emissieautoriteit (NEa), <https://www.emissieautoriteit.nl>.

5.2. Level of assurance

For the verification of emissions the following has been determined:

- for CO₂ emissions, the verifications shall result in a declaration with a 'reasonable level of assurance'.

5.3. Initial accreditation

In order to enable candidate verification bodies to become accredited the RvA may apply a system of 'temporary accreditation with restricting conditions' as laid down in RvA policy rule BR002.

5.4 Information Exchange

From 1/1/2013 onwards, the requirements from the Commission Regulations 600/2012 and 601/2012 are applicable. Especially the Commission Regulation 600/2012 on Verification and Accreditation has consequences for the exchange of information and the assessment processes. The references below refer to this Regulation.

The Regulation includes information exchange requirements between Member States, competent authorities and national accreditation bodies.

By November 15, the verification body shall send the information required by art. 76 to the RvA. This should be done by completing the templates developed for this purpose by the EU, which can be found at http://ec.europa.eu/clima/policies/ets/monitoring/documentation_en.htm. When changes occur to this schedule, the RvA requires the Verification Body to provide an update by December 10. An update has to be submitted at least every 3 weeks (unless no changes have taken place) and these shall be taken into consideration during the assessments.

By December 31, the RvA shall make available an accreditation work programme to the competent authority of each Member State, containing the list of verifiers accredited by that national accreditation body and notified pursuant to Article 76 for which they intend to carry out verifications in those Member States. The RvA shall use the templates developed for this purpose.

After the trading year, by June 1, the RvA shall make available a management report to the competent authority on its findings during assessment activities, based on templates developed for this purpose.

The time involved with the information exchange requirements of the AVR (chapter VI) is additional to assessment time. The costs of time involved will be invoiced to the VB on actual hours spent. The time involved will depend, among others, on the number of verifications the VB carries out and the number of member states involved. This will be clearly indicated and justified on the RvA invoice.

These information requirements may also result in additional surveillance activities, e.g.:

- by the RvA upon request from other accreditation bodies for verification activities in The Netherlands;
- or upon request of the RvA by local accreditation bodies in other Member States, (see art. 70 and 73).

The information received as a result of these activities shall be taken into account in our own accreditation process (and may influence focus, duration and frequency of surveillance activities).

When information is received from a Member State, that a verifier accredited by the RvA is not complying with the requirements of this Regulation, the RvA shall treat this information as a complaint and shall take appropriate action (see art. 67). The RvA shall inform the relevant authorities of the Member State involved (e.g. competent body or local accreditation body) of the results of the complaint within three months from the date of its receipt.

In line with art. 73.3, where an NAB in another country has been requested by the RvA to provide surveillance activities and where these activities have shown evidence that the verifier is not complying with this Regulation, the RvA will issue the verifier with one (or more) nonconformity reports and will use its regular process for assessment of corrective measures. When such nonconformities have been closed, the RvA shall inform the relevant NAB of the action taken by the verifier, and where relevant and appropriate, the ensuing corrective actions and follow up measures (e.g. suspension or withdrawal of accreditation).

In accordance with article 75, the RvA publishes information about the accredited verifiers. The information is available on the RvA website. Use “accredited organisations” in combination with discipline “greenhouse gas verification bodies” to see all verification bodies that are accredited against EN ISO 14065, choose “V – EMAS/Emissie” as organisation type. The information on the first issue date of the accreditation and the Member States in which the verification body is active, is additional. This information can be found on the information page about the discipline ‘greenhouse gas verification bodies’ in a separate (pdf-) file.

<https://www.rva.nl/en/about-accreditation/disciplines/greenhouse-gas-verification-bodies>

5.5. Contacts within RvA

RvA Expert:

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Annex B: Scheme “MRV Shipping”

The MRV scheme describes the accreditation for the verification and approval of monitoring programs and the verification of emission data in accordance with Regulation (EU) 2015/757 on the monitoring, reporting and verification of carbon dioxide emissions from maritime transport.

1 Relevant documents

1.1 Standard used for accreditation

- EN ISO 14065, Requirements for greenhouse gas validation and verification bodies for use in accreditation or other forms of recognition

1.2 Additional documents

- Commission Delegated Regulation (EU) 2016/2072 on the verification activities and accreditation of verifiers pursuant to Regulation (EU) 2015/757 of the European Parliament and of the Council on the monitoring, reporting and verification of carbon dioxide emissions from maritime transport
- EA-x/x, document with guidance for the use of ISO 14065 for the accreditation of verifiers of emission data in accordance with the MRV (currently under development).

The current version of the EA document can be downloaded from the website of the EA (www.european-accreditation.org) after publication.

1.3 Documents concerning the conformity assessment to be carried out

- Regulation (EU) 2015/757 on the monitoring, reporting and verification of carbon dioxide emissions from maritime transport, and amending Directive 2009/16/EC (29 April 2015).

1.4 Specific legal and/or regulatory documents

See above. Scheme is based on EU legislation.

2 Scope of accreditation

The general rules for defining scopes have been detailed by the RvA in its Policy rule RvA-BR003. For this accreditation, the scope is formulated as follows:

Verification of emission data in accordance with regulation 2016/2072 pursuant to Regulation 2015/757		
Activity	Type of emissions	Sector
Assessment of monitoring plans	CO ₂	Shipping companies with ships as included in the MRV Directive.
Verification of emissions reports with a reasonable level of assurance		

3 Accreditation assessments

3.1 Documents to be submitted

For the RvA assessments, its assessors have to be supplied with the documents specified RvA-F001, RvA-F105, RvA-F018 and para. 3.1 in the general section. In addition to these documents the following documents are required for this type of accreditation .

Additional documents to be submitted	Initial assessment	Assessments in the accreditation cycle
Procedures or instructions for dealing with harmonization of MP assessment/verification, contracting review, verifier qualifications and the review process, relevant to MRV MP assessment and emission data verification	√	√
Records to demonstrate the availability and competence of personnel such as verifiers and experts and staff personnel such as contract reviewers and (report) reviewers	√	
For witnessing the following documents should be made available to the RvA assessment team: All documents available to the verification team, but at least the following: the ship's MP, emission data, results of initial risk assessment, reports of previous verifications, verification program and route, personnel records of verifiers.	√	√

3.2. Nature and content of the assessments

In addition to the general rules for the nature and content of the RvA assessments as defined in RvA-BR002 and RvA-BR005, for this accreditation the rules from the following table apply.

In principle, it is expected that the verification body (VB) already holds an accreditation for EU-ETS based on ISO 14065. Where this is not the case, the nature and extent of an assessment may be increased. Initial assessments will be based on an office assessment and document review, focussing on the VB's preparations for this program and the availability of staff with the appropriate knowledge. As no actual work will be available yet, "real life" witness assessments (and demonstration of competence in practice) are not yet possible.

The accreditation decision following the initial assessment will include additional conditions (in Dutch 'beschikking'). The first condition will be that the body will ensure that RvA is in the position to witness one of the first MP assessments and one of the first emission verifications (i.e. this includes timely - at least 4 weeks in advance - notification of all activity in this field) and review any appropriate file. Upon this notification, the RvA shall perform a witness (and further file reviews where applicable). A second condition is that the accreditation may be suspended immediately upon finding nonconformities (depending on the nature of those nonconformities) during the witnessed assessments. After successful completion of the witness assessment and file review, the accreditation will have the normal period of validity.

The witnesses will be carried out as soon as these become available (i.e. MP assessments from Q3 and Q4 of 2017, and annual emission verifications from Q1 of 2019).

Method of assessment	Initial assessment	Re-assessment	Surveillance
Document assessment	√		
Office assessment	√	√	√
Witnessing	Witnessing to be carried out as soon as MP assessments (expected Q3, 4 2017) or emission verifications (expected Q1 2019) will become available,	Witnessing of at least one complete MP assessment and one verification relevant for complexity of the current clientele. The number of witness verifications is dependent on the number (and complexity) of the ships. The following is used as guidance: < 50 ships = 1 witness, 50 - 500 ships = 2 witnesses; > 500 or more ships = 3 witnesses of an MP assessment and an emissions verification.	Dependent on number of ships included: < 50 ships: once per cycle an MP assessment and an emissions verification 50 – 500 ships: twice per cycle > 500 ships: annually

¹⁾ Based on the application (form RvA-F105), the RvA will determine the nature of the extension assessment.

4 Specific points of attention for the RvA assessment

- application and implementation of requirements from the Delegated Regulation 2016/2072 to MRV, specifically Chapters II (focus in witness) and Chapters III and Annex (focus in office assessment and competence aspects in witness);
- this includes a focus on the VB's:
 - risk assessment process;
 - competence allocation for different types of ships (fuel types);
 - determination of necessity of performing on-site, off-site or on-board verification (especially in verification of MP's);
 - processes for dealing with risks related to mistakes in or inaccuracy of Bunker Delivery Notes;
- VB's processes to follow and implement further EU (ESSF) guidance documents on MRV.

5 Other information

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