**INTRODUCTION:**

The purpose of this tool is to assist the verifier in determining the eligibility of an installation for a site visit waiver, and also to assess the verification risks associated with not undertaking a site visit where the installation is eligible. This risk assessment is not the formal “Risk Analysis” required under AVR Article 12 but should take account of information identified by the verifier during the formal strategic analysis (SA) and risk analysis (RA). It should be noted that in some Member States the deadline set for application for approval of site visit waiver may mean that this risk assessment is done BEFORE the start of the strategic analysis; in such a case the information will be based upon the prior year verification work and the verifier may subsequently need to conduct a site visit if the Article 11-12 SA&RA indicate that in fact the circumstances have changed since the prior year and a site visit is warranted.

The tool is structured in five parts, as follows:

1. **Section 1** - covers the background information related to the installation and its prior visit status
2. **Section 2** - covers the eligibility rules laid out in the EC guidance
   - This section is completed in two stages; firstly respond to questions 2.1 - 2.3, if no mandatory site visit is required, go onto respond to question 2.4 which has four options
     - **a)** Respond to each of the questions by entering yes or no into the orange “Response” box
     - **b)** Evaluate each response by following the instructions in the “Evaluation Instruction” column and enter the result in the blue evaluation box
     - **c)** The “Notes on Evaluation” column will give you an indication of whether a mandatory site visit is required.
3. **Section 3** - covers the verifier’s assessment of the verification risks associated with not doing a site visit
4. **Section 4** - covers the verifier’s conclusion in relation to the verification risk and acceptance that a waiver of site visit is applicable
5. **Section 5** - covers the instructions on the “Next Steps” once the site visit waiver tool has been completed

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### Verification Year 2016

<table>
<thead>
<tr>
<th>Identification of the Installation</th>
<th>Date of Last Site Visit</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1.1 Operator</strong> Frontier Fuels Ltd</td>
<td>16 November 2015</td>
</tr>
<tr>
<td><strong>1.2 Installation Details</strong> Lonesome Terminal Wilderness Complex</td>
<td></td>
</tr>
<tr>
<td><strong>1.3 Address</strong> 1 Mincharge</td>
<td></td>
</tr>
<tr>
<td><strong>1.4 EU ETS Main Contact Person</strong></td>
<td></td>
</tr>
<tr>
<td><strong>1.5 Email</strong> FRONTMEMS plc</td>
<td></td>
</tr>
<tr>
<td><strong>1.6 Activities according to Annex 1 of the EU ETS Directive</strong></td>
<td></td>
</tr>
<tr>
<td>Number</td>
<td>Name of activity (Annex I of the ETS Directive)</td>
</tr>
<tr>
<td>1</td>
<td>Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)</td>
</tr>
<tr>
<td>2</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td></td>
</tr>
</tbody>
</table>

**EVALUATION INSTRUCTIONS**

**RESPONSE**

If Category is “C” enter No, otherwise enter Yes → YES

If No, ignore Options 1 and 2 under question 2.4 below

If "Response" = No enter Yes, otherwise enter No → YES

If No, CA approval is NOT required

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**Exemplar - Site Visit Risk Assessment ETS Phase 3 - version 8 (160913) - clean.xls**

Site Visit Waiver Eligibility Verifier's Risk Assessment Tool

13/09/2016/11:16

1/6
2.3
Obligatory site visit?

If this verifier conducting verification for the first time on this installation?

Has a site visit been carried out in the immediate prior two years, by this verifier?

Have there been significant modifications of the monitoring plan since the prior verification?

2.4
EC conditions for waiving site visit
Option 1 (for Category A or B installations only)

i) Single Source Stream using Natural Gas where monitoring of activity data is based on fiscal metering by the gas supplier?

ii) Default calculation factors?

iii) One or more de-minimis source streams which aggregated do not exceed the threshold (Article 19 MRR)

Option 2a (for Category A or B installations only)

i) Single Source Stream using a fuel without process emissions; fuel is either:
   - solid fuel directly combusted without intermediate storage; or
   - liquid/gaseous fuel which may have intermediate storage

ii) Activity data derived from fiscal metering or based solely on invoice data (taking account of stock changes - if relevant to above point)?

iii) Default calculation factors?

iv) One or more de-minimis source streams which aggregated do not exceed the threshold (Article 19 MRR)

v) CA allowed use of a simplified Monitoring Plan (in accordance with MRR Article 13) for the installation?

Option 2b (only for Installations with Low Emissions)

i) Single Source Stream using a fuel without process emissions; fuel is either:
   - solid fuel directly combusted without intermediate storage; or
   - liquid/gaseous fuel which may have intermediate storage

ii) Activity data derived from fiscal metering or based solely on invoice data (taking account of stock changes - if relevant to above point)?

iii) Default calculation factors?

iv) One or more de-minimis source streams which aggregated do not exceed the threshold (Article 19 MRR)
### Option 3

Unmanned site with telemetered data sent directly to another location where all data is collected, processed, managed and stored with the same person responsible for all data management and recording for the site?

Meters have already been inspected (by the operator or a laboratory) on site in line with MRR Article 59 and signed evidence (which may include date stamped photographic evidence) received of no changes since that inspection?

### Option 4

Site is at a remote or inaccessible location and there is a high level of centralization of data collected from that site and transmitted directly to another location where the data is processed, managed and stored with good quality assurance?

Meters have already been inspected (by the operator or a laboratory) on site in line with MRR Article 59 and signed evidence (which may include date stamped photographic evidence) received of no changes since that inspection?

---

<table>
<thead>
<tr>
<th>Verification Activity</th>
<th>Description of Risk Area</th>
<th>Type of Potential Risk</th>
<th>Direct Relevance?</th>
<th>Inherent Risk</th>
<th>Control Risk</th>
<th>Verification Risk</th>
<th>Mitigation</th>
<th>Residual Risk Acceptable?</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Strategic Analysis</strong></td>
<td>Unable to complete strategic analysis due to inaccurate or incomplete information</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Strategic Analysis will not be compromised as VB has visited site previously and has good knowledge of the installation allowing strategic analysis to be updated offsite with additional information provided by the operator.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Scope/Boundary Checks</td>
<td>Incorrect Monitoring Plan description &amp; accounting</td>
<td>Yes</td>
<td>M</td>
<td>L</td>
<td>L</td>
<td>Detailed wiring &amp; instrumentation diagrams, installation layout plans, process flow diagrams, photos and online 'mapping' of the installation available</td>
<td>L</td>
<td>VERY LOW</td>
<td>Require additional information to be submitted for strategic review in relation to boundaries. Require signed management declaration of no significant changes since prior inspection.</td>
</tr>
<tr>
<td>-----------------------</td>
<td>-------------------------------------------------</td>
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<td>----------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Changes affecting the Monitoring Plan</td>
<td>Non-compliance with regulations; failure to update Monitoring Plan properly.</td>
<td>Yes</td>
<td>M</td>
<td>H</td>
<td>M</td>
<td>Discussed during prior year's verification and all amendments needing approval were agreed.</td>
<td>L</td>
<td>VERY LOW</td>
<td>Review updated Monitoring Plan against prior year workpapers.</td>
</tr>
<tr>
<td>Measurement of flow/ mass</td>
<td>Unable to confirm changes in the Monitoring Plan are realistic on the ground; and also whether changes on the ground have been reflected in an updated Monitoring Plan and approved by the CA.</td>
<td>Yes</td>
<td>H</td>
<td>M</td>
<td>M</td>
<td>Instruments inspected during previous visits along with prior year planned calibration/maintenance regimes and results. Results of On-Off Plate inspections during shutdown available. The operator has confirmed that no changes have occurred since the meters were installed</td>
<td>M</td>
<td>MEDIUM</td>
<td>Require signed management declaration of no change since prior verifier inspection; site photos of instruments in situ (including serial numbers of all elements), copies of planned maintenance etc and results for the reporting year. Copies of prior internal inspections in accordance with MR &amp; Article 59.</td>
</tr>
<tr>
<td>Measurement of flow/ mass</td>
<td>Unable to confirm physical measurement instruments meet the description in Monitoring Plan. Unable to check whether changes to Monitoring Plan have occurred which have not been approved by CA</td>
<td>Yes</td>
<td></td>
<td></td>
<td></td>
<td>Unable to confirm maintenance of measurement instruments meets requirements or planned procedures</td>
<td>No</td>
<td>L</td>
<td>L</td>
</tr>
<tr>
<td>Measurement of flow/ mass</td>
<td>Unable to confirm validity of information used to calculate uncertainty level</td>
<td>No</td>
<td>L</td>
<td>L</td>
<td>L</td>
<td>This information is provided electronically from another location and a site visit is irrelevant to its verification. Responsible person not based on site</td>
<td>L</td>
<td>VERY LOW</td>
<td>Cross reference uncertainty calculation to input data from third parties and HQ. Copies of results of prior internal inspections in accordance with MR &amp; Article 59 to match to input data.</td>
</tr>
<tr>
<td>Analysis of fuel/material composition</td>
<td>Insufficient sampling, incorrect analysis or manipulation of data to produce EF; non-compliance with tier requirements</td>
<td>Yes</td>
<td>H</td>
<td>M</td>
<td>M</td>
<td>Source information is from either - a) online analysers feeding data into plant information system b) external accredited laboratory</td>
<td>M</td>
<td>MEDIUM</td>
<td>Photos of analysers (&amp; gas bottles) in situ (including serial number), cross check to results of planned maintenance/calibration activities for online analysers &amp; their calibration gas certificates b) confirm accreditation status of lab, review results of last accreditation inspection of internal lab and review lab reports to check transfer into accounting spreadsheets etc</td>
</tr>
<tr>
<td>Data handling (ie transfers of data along the data flow)</td>
<td>Potential missing data, incompleteness, incorrect measurement or manipulation of data, non-conformance with control requirements and/or procedures</td>
<td>Yes</td>
<td>M</td>
<td>L</td>
<td>L</td>
<td>This activity is not handled on site as data sent to alternate location via telemetry; VB has previously interviewed responsible persons at their location. Prior year improvement recommendations to increase robustness have been implemented and checked.</td>
<td>L</td>
<td>VERY LOW</td>
<td>Detailed cross checks offline of data transfers across spreadsheets etc. Telephone interview with key personnel as required</td>
</tr>
<tr>
<td>Data handling (ie transfers of data along the data flow)</td>
<td>Potential missing data; non-compliance with tier requirements, incorrect measurement or manipulation of data, non-conformance with control requirements and/or procedures</td>
<td>Yes</td>
<td>M</td>
<td>L</td>
<td>L</td>
<td>This activity is not handled on site as data sent to alternate location via telemetry; VB has previously interviewed responsible persons at their location. Prior year improvement recommendations to increase robustness have been implemented and checked.</td>
<td>L</td>
<td>VERY LOW</td>
<td>Review results of internal secondary checks and internal audits. Evaluate results of cross checks under task above to confirm internal checks are resulting in minimal anomalies. Telephone interview with key personnel as required</td>
</tr>
</tbody>
</table>
### Site Visit Waiver Eligibility Verifier's Risk Assessment Tool

| Data Verification (in data checking & analysis) | Unable to undertake “walkthrough tests”, conduct interviews, cross check with data sources | Incorrect verification opinion | Yes | M | M | M | Data not held on site. VB can do detailed checks of spreadsheets offline to confirm data taken from plant information systems and telemetry is manipulated and aggregated appropriately. | M | MEDIUM | Detailed cross checks of spreadsheets. Fresh download of primary source data from central plant information system | Yes |
| Data Verification (in data checking & analysis) | Expression of incorrect Opinion format or language | Incorrect verification opinion | No | L | L | L | Reporting through online reporting portal with specified VOS format etc; site visit thus irrelevant to this activity | L | VERY LOW | Detailed cross checks between reporting portal and site spreadsheets | Yes |
| Additional activity 1 |  |  |  |  |  |  |  |  |  |  |  |  |
| Additional activity 2 |  |  |  |  |  |  |  |  |  |  |  |  |

#### 4. Verifier's Conclusion and Attestations

**4.1 Installation initial conditions met? (see 2.1 - 2.3 above)**

- Yes

**4.2 Commission conditions met? (see 2.4 above)**

- Yes

**4.3 Evidence reviewed:**

- Yes

We have reviewed the evidence to demonstrate that the quality of the calibration, management and inspection of the monitoring equipment is sound, and confirm that it is appropriate and supports the status declared. (e.g. by calibration certificates, supplier contracts, calibration reports and maintenance reports etc)

For Options 3 and 4 (where applicable to this installation) we have reviewed the evidence that the meters have been inspected on site by the operator or a laboratory in line with the MRR, and have obtained a signed document and/or date stamped photographic evidence from the operator that demonstrates that no metering or operational changes have occurred at the installation since the inspection. We confirm that the evidence is appropriate and supports the status declared.

**4.4 Overall conclusion**

- Yes

Based on the above site visit waiver risk assessment, taking account of the Article 12 risk analysis of the operator's monitoring and control system, the verifier is confident that a site visit is not needed and accepts the verification risk of not undertaking such a visit.

**Supplementary comments (if relevant)**

- Yes

State N/A unless Option 3 or 4 are invoked above.

This cannot be be Yes if the response to 4.1 or 4.2 is No.

**Lead Verifier**

Experts@Verification Ltd

**On behalf of:** Myo Pionion

**Date** 15th August 2016

#### 5. Next Steps -

- If Overall Conclusion is No - Notify operator that a site visit will need to be arranged
- If Overall Conclusion above is Yes - Send a pdf copy to the Operator

**Instruction to Operator:**

Please submit this Site Visit Waiver Risk Assessment to your Competent Authority and request their approval of the waiver of the site visit for this reporting year.

This submission should be made in advance of the Competent Authority's stated cut off date; submissions made after that date may be automatically rejected and a site visit will need to be arranged.

Where required by your Competent Authority, this application should be accompanied by the supporting evidence defined on page 7 of KGN II.5 (and as specifically outlined in 4.2 above) - SEE BELOW

Please send the approval (or denial) of waiver from the Competent Authority to your nominated Lead Verifier as soon as you receive it.
The application for a waiver of a site visit shall be accompanied by evidence that all conditions have been met. The evidence should at least include:

- the outcome of the verifier’s risk analysis justifying the conclusion that the inherent and control risks are low and a site visit is not needed to check the accuracy of the data and the implementation of and compliance with the MP
- a statement from the verifier that it is confident that the site visit is not needed based on its risk analysis, and it accepts the risks of not undertaking a site visit
- a statement from the verifier that, based on the verifier’s risk analysis, all data can be remotely accessed
- a statement from the verifier stating which criterion set by the Commission applies
- evidence that the quality of the calibration, management and inspection of the monitoring equipment is sound, e.g. by providing calibration certificates and referring to supplier contracts, calibration reports and maintenance reports
- for Criteria III and IV, evidence that the meters have been inspected on site by the operator or a laboratory in line with the MRR, and a signed document or date stamped photographic evidence from the operator that demonstrates that no metering or operational changes have occurred at the installation since that inspection
- a statement from the verifier that the conditions for refusing approval by the CA, listed in the paragraph below, are not applicable

<table>
<thead>
<tr>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>This document</td>
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<tr>
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<tr>
<td>This document</td>
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<tr>
<td>Covered in 4.2 as reviewed by Verifier; plus actual copies of evidence if required</td>
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