

PROCEDURE PG.-07.1.2

VERIFICATION REGULATION GAS EMISSIONS GREENHOUSE ACCORDING TO THE STANDARD ISO 14064-1

STATE OF DOCUMENT

REV.	PAR.	PAG.	DESCRIPTION	Data REV.
01			Emission	17/02/2022

CONTROLLED COPY N°.

NON CONTROLLED COPY N°.

PREPARED	SEEN AND APPROVED
Minutes of an extraordinary meeting n.1 of 17/02/2022	Minutes of an extraordinary meeting n.1 of 17/02/2022

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0. NORMATIVE REFERENCES

- ISO 14065 "Greenhouse gases — Requirements for greenhouse gas validation and verification bodies for use in accreditation or other forms of recognition"
- ISO 14064-1: "Greenhouse gases Part 1.' Specification with guidance at the organization level for quantification and reporting of greenhouse gas emissions and removals"
- IAF MD6: Application of 14065
- ESYD GD-GHG/01/OO/: Guidance for the of GHG verification bodies according to ISO 14065 and Regulation (accreditationEI))
- ISO 19011 "Guidelines for inspection of quality management systems and/or environmental management systems".

In the last revisions.

Legal framework:

- Regulation 600/2012/EU on the verification of reports on greenhouse gas emissions and tonne-kilometres and on the accreditation of verifiers in accordance with Directive 2003/87/EC of the European Parliament and of the Council,
- Regulation 601/2012/EU: on the monitoring and reporting of greenhouse gas emissions pursuant to Directive 2003/87/EC of the European Parliament and of the Council,
- Directive 2003/87/EC establishing a scheme for greenhouse gas emission allowance trading within the Community and amending Council Directive 96/61/EC,
- Directive 2009/29/EC amending Directive 2003/87/EC with a view to improving and extending the trading system,
- JMD IOP. 5440912632/27-12-2004: Transposition of Directive 2003/87/EC into Greek legislation,
- J.M.D. H.P. 57495/2959IO3 (Government Gazette 2030IV129-I2-IO): Incorporation of Directive 2009/29/EC into Greek legislation,
- Decision 2011/278/EU laying down transitional union rules for harmonised free allocation of emission allowances in application of Article 10a of Directive 2003/87/EC of the European Parliament and of the Council.

1. INTRODUCTION

This document defines the objectives and methods for providing the audit of verification regulation gas emissions greenhouse that ICDQ provides to its customers.

The ICDQ is exclusively a certification body and does not provide consultancy services for the realization or improvement of the same. The granting of the certification and its maintenance are subject, in addition to the final results of the initial and surveillance audits, to compliance with this document, the general contract conditions (Doc. CG-PG.03.2) and the payment of the amounts invoiced by ICDQ.

The Organization must make available to the ICDQ audit group in charge, and any accompanying observers, all the documentation of the system subject to certification

and ensure free access to all its areas, offices, and sectors concerned. ICDQ, upon request, will provide any further information and clarification on this procedure and on any other aspect relating to its business.

The content of this document and of all the procedures referred to, is mandatory and must be implemented and respected in its entirety by all those who provide and receive services to / from ICDQ IKE from now ICDQ.

2. PURPOSE AND SCOPE

This Regulation determines the application of the Regulation of Operation of ICDQ VERIFICATION BODY (of which it is an integral part) to the subject of verification and validation of quantified data and reports related to the greenhouse gas emissions of an organization.

The company's policy is:

- To inform the Customer about the inspection process through an Offer.
- Communicate to them the results of the verification
- To inform him of his obligations through the contract and this verification regulation.

This regulation concerns all those involved in the verification and validation of quantified data and greenhouse gas emissions reports of any organisation wishing to verify its emissions in accordance with the requirements of ISO 14064-1.

In case the organization falls under the requirements of Directive 2003/87 / EC and Regulation 601/2013 / EU, the relevant regulation of ICDQ Verification Body for EIJ-ETS also applies.

3. GENERALITY

The procedure describes the activities that both the Certification Body and the organization must carry out to initiate the Verification process.

4. CONDITIONS

Any organization can access the ICDQ certification process without any discrimination.

5. PROCEDURAL STEPS FOR CARRYING OUT VERIFICATION OF GREENHOUSE GAS EMISSION REPORTS

5.1. GENERAL DESCRIPTION OF THE VERIFICATION PROCESS

The process of verifying/validating quantified data and greenhouse gas emissions reports is summarised in the figure below.

Figure 1: Verification process stages - DIAGRAM



5.2 STAGE BEFORE THE SIGNING OF THE CONTRACT

This step applies to new customers wishing to verify the emission reports. For this purpose, as well as for the formulation of the relevant financial offer, the interested party fills in the form: AFPRET01 "Application for the verification of a greenhouse gas emissions report" and attaches all the information listed therein. writings. The information collected at this stage shall ensure that the organisation has provided the satisfactory information, on the basis of which the scope and objectives for validation can be confirmed.

The Director of the Management Systems Directorate shall assign to an appropriate lead verifier, on the basis of the technical verifiers assigned to the EU-ETS, the task of reviewing the verification application. the lead verifier carries out a preliminary strategic analysis and risk analysis and completes the relevant forms, these two analyses are updated and improved throughout the verification process.

Following the positive decision of the General Manager, the Customer Support Department, draws up and sends to the client the "Contract for the Validation / Verification of Emission Reports".

5.3 STAGES AFTER THE SIGNING OF THE CONTRACT VERIFICATION TEAM

This step applies to existing and new customers wishing to verify the emissions reports. In any case, the Director of the Management Systems Directorate assigns the verification task to an appropriate verification team, based on the assigned technical fields of ETS verifiers and the calculation of AH Verification.

Thereafter, and in any case a new and existing customer, the lead verifier shall review the signed contract.

STRATEGIC ANALYSIS

At this stage, the lead verifier, in cooperation with the rest of the inspection team, assesses the type, scale and complexity of the verification work, conducting a strategic analysis of all the activities of the organization. This requires the lead verifier to have performed an overview of all the activities and their importance for broadcasts. terms that in an appropriate form, while the content of the form is completed and improved throughout the verification process, after collecting more detailed data or after modifying any data affecting the type, scale and complexity of the verification work. which, if necessary, shall be amended accordingly.

The strategic analysis addresses the following three aspects:

- the nature, scale and complexity of the equipment and processes that have led to emissions, including the measurement and recording of energy flows and materials and external assignments, during the emissions reporting period;
- the data management system from the measurement and recording of material and emission flows
- the organizational environment including the structure of the organization that manages the operation, maintenance, accounting systems, within which emission information is generated.

The following elements are covered within the strategic analysis:

- the relevant monitoring methodology
- general product information and procedures
- changes in organisational structure throughout the year (e.g. acquisitions, disposals, product changes, process changes, production growth)
- changes in the monitoring methodology and the requirements for the documentation of reports which) have been reported to the competent authority, as well as their justification
- Identification and evaluation of emission sources and their data
- The existence of an environmental or other environmental management or control system that includes the appropriate systems for documenting greenhouse gas emission data
- Management of emission data and processing of data from specific emission sources
- The system for monitoring and recording emission data must be sufficient to identify and understand:
 - (a) the facts, transactions and practices which may have a significant impact on the environmental information on which the verifier will rely, and
 - (b) how this information is processed and taken into account in the organisation's greenhouse gas emissions report.

The verification process does not proceed until the lead verifier has received and evaluated a sufficient amount of relevant information on which to base the strategic analysis.

RISK ANALYSIS

The lead verifier, in cooperation with the rest of the inspection team, taking into account all the evidence so far and the results of the strategic analysis, carries out an assessment of the operational risk, which is related to the specific requirements of the organization's production process. An assessment shows that the operator has identified the inherent risks and control risks included in the specific verification work and that it has developed a work-related approach to ensure that the fields of customary work offered are in line with the risks identified.

VERIFICATION PLAN

On the basis of the results of the strategic analysis and the risk analysis, the lead verifier draws up an inspection plan, which consists of the following:

- A verification programme describing the nature, type and scope of the verification activities, as well as the timing, manner and participants in the implementation of these activities (i.e. the need to be audited and how the verification inspection will be carried out).
- Test plan of control activities and procedures describing the scope and methods (e.g. interviews, visit to the premises, collection of documents) for the test by the verification team of the control activities and related procedures describing the control activities implemented by the organization. The test plan shall examine compliance with the monitoring methodology and other relevant requirements.
- Data sampling point describing the scope and methods for sampling data on emissions and in relation to their collection points.

DETAILED VERIFICATION | PROCESS ANALYSIS — ON-SITE VISITS

Process analysis

The purpose of this stage is to collect and document detail evidence, on the basis of which the lead verifier will then base his conclusions on the verification. During the detailed verification, the verification team carries out an analysis of the process, implementing the verification plan and performing the following tasks:

- carry out meaningful data tests, which consist of:
 - analytical procedures, i.e. analysis of data variance and trends, including data that are inconsistent with existing information and that deviate from the predicted numbers (e.g., temporal comparison of data with past years, cross-referencing with production data),
 - data verification, through the application of various methods (e.g. tracking of the data backwards to the primary data, cross-checking of internal and external data sources, recalculations of parts of the calculations of the total emissions) according to,
 - control of the monitoring methodology, checking the correct application of the monitoring methodology (e.g. through technical calculation sheets, recalculation of the reported data given in the emissions report), including how

- to make up for missing data. This audit is also part of the control of the implementation of the monitoring methodology.
- monitor the application of the monitoring methodology, i.e.:
 - the data flow activities and systems used in the data flow, including information technology systems, studying the sequence and interaction of data flow activities, from primary source data to the preparation of the agency's report.
 - appropriate documentation. implementation and maintenance of the agency's control activities, as well as the effectiveness of these activities in mitigating the inherent hazards and
 - the effectiveness of the processes included in the monitoring plan in mitigating the risks inherent and risks of control, as well as the implementation, adequate documentation

DETAILED PROCESS VERIFICATION/ANALYSIS – ON-SITE VISITS

Process analysis

The purpose of this stage is to collect and document in detail evidence, on the basis of which the lead verifier will then base its conclusions on the verification. During the detailed verification, the verification team conducts process analysis, implementing the plan verification and the Sampling Plan. During detailed verification carry out meaningful data and process tests by performing the following tasks:

- Detailed tests, which the verifier designs with in mind:
 - (a) the ability of each analytical test to reduce or mitigate the identified risk;
 - (b) the reliability of the data to be analysed;
 - (c) the likelihood that the analytical tests will identify essential tests;

Inaccuracies.

If analytical tests identify variations or relationships that are incompatible with other relevant information or significantly different by expectations, the verifier investigates such differences by acquiring additional evidence and carrying out other activities collection of evidence. Such analytical tests and procedures, is the analysis of data variance and trends, including data that are inconsistent with existing information and that deviate from the predicted numbers (e.g. temporal comparison of data with past years, cross-referencing with production data)

- Audit tests, during which the verifier must design and implements evidence-gathering activities for the testing the operational effectiveness of controls. In case of detection of deviations, the verifier evaluates whether the deviations affect the ability to rely on these tests if additional testing of checks is required and if they need to be applied and other evidence-gathering activities. If the characteristics of the data are such that they can only control checks are used, the verifier draws and implements evidence-gathering activities to establish the operational effectiveness of these controls. At if deviations are detected, the verifier shall assess whether the deviations affect the ability to rely on these tests and if additional control tests are required.
- Calculation tests, which have a significant impact on the overall. A TDI declaration, for which the verifier assesses:
 - (a) the appropriateness of the assessment methodology;

- (b) the application of assumptions to the assessment;
- (c) the quality of the data used in the assessment.

The verifier shall assess whether any estimates are made comply with the criteria and whether the calculation methods:

- have been consistently implemented from previous periods;
- have changed from previous periods;
- are suitable.
- Sampling, in which the verifier examines the purpose of the evidence-gathering activities and characteristics of the population from which the sample will be taken in the design of the sample.

Property assessment, where the verifier assesses whether the a responsible person possesses or is entitled to claim emission reductions, or removal improvements expressed in the TDI declaration.

Where appropriate, the verification team shall:

- combined application of various test methods on a case-by-case basis and verification, such as observation, research, analytical tests,
- confirmation, examination, confirmation of control, sampling, assessment of tests, tracing the data backwards to the primary data, cross-referencing internal and external data sources, recalculated parts of the calculations of the total.

Emissions:

- control of the monitoring methodology, checking the correct application the monitoring methodology (e.g. through technical sheets calculation, recalculation of the data reported in the report emissions), including how to replenish missing data.
- satisfaction check of the ISO14064-1 or -2 standard: by proceeding to the completing the relevant questionnaire.
- control of data flow activities and systems that are used in the data feed, including information technology systems, studying the sequence, and the interaction of dataflow activities, from the data primary source until the emission report is drawn up.
- examination of the suitability of documentation, implementation and preservation the control activities of the company / establishment, as well as the mitigation effectiveness of these activities the risks inherent, and
- an examination of the effectiveness of the procedures included in the a monitoring plan to mitigate the risks inherent, and the risks of control, as well as implementation, adequate documentation and proper maintenance of these processes (including uncertainty study and the sampling plan).

The organisation must assess the uncertainty associated with the quantification approaches (e.g.: data used for quantification and models) and conduct an evaluation which determines the uncertainty at the level of categories of the Gas Inventory Inventory greenhouse and the body must justify the inability to quantify the uncertainty or the case where it is not economically advantageous and conducts a qualitative assessment.

The organisation could apply its principles and methodologies of ISO/IEC Guide 98-3 to complete the uncertainty assessment.

For the purpose of detailed verification and analysis of the process, the team Verification Completes Form: QFo.QPr.HSE.401.007- Sheet "Plan sampling & Data control", the section on control Data. At this stage, it verifies in practice that the data activity follow the principles of relevance, completeness, consistency, accuracy and transparency.

ON-SITE VISIT

The above-described detailed verification shall be accompanied by one or more visits to the premises of the organisation, for the purpose of verifying, for example, the location and correct operation of the measuring devices, the adequacy of the control activities and the completeness of the emission sources and the source streams.

Upon arrival of the verifiers at the operation for the on-the-spot verification, a kick-off meeting shall be held where the lead verifier presents the verification team to the organisation's emission manager, the responsibilities of each verifier shall be clarified and shall briefly explain the verification process, based on the verification programme.

The lead verifier shall specify during the on-site visit, the conditions for inspection in a clear and transparent manner. This lead verifier shall make all necessary arrangements to carry out the verification and on-site assessment, including the provision of access to all relevant areas, records and staff to review documentation and access for the purposes of verification and resolution of non-conformities and inaccuracies.

At the end of the on-site visit, a concluding meeting is held, where the lead verifier presents to the organisation's emissions manager, the findings of the verification, including any non-compliances, inaccuracies and suggestions for improvement. Finally, it stresses to the organisation's emissions manager that the emission report, or the verification report, or any part thereof, should not be used in a misleading manner.

IDENTIFICATION, CATEGORISATION AND REPORTING OF INACCURACIES AND NON-CONFORMITIES

The lead verifier shall communicate to the organisation's emission manager the findings of the verification (both those obtained during the on-site visit and at an earlier stage of the verification) by completing the Recriminations/Non-Compliances | Recommendation Improvement Report Form, this form shall be handed over to the organisation's emissions manager either at the final meeting or ex-post, if this is not possible. the essential nonconformities and inaccuracies must be withdrawn before the final preparation and approval of the verification report and all proof of removal shall be sent to the lead verifier within the agreed time.

The categorization of verification findings is as follows:

- Material non-compliance: Any act or omission by the organisation which is contrary to the requirements of the monitoring methodology and the ISO14064-1 standard, and which, considered individually or in combination with other non-conformities, in the opinion of the lead verifier may lead to an exceeding of the degree of importance.
- Material inaccuracy: an inaccuracy which, considered individually or in combination with other inaccuracies, in the opinion of the lead verifier, exceeds the degree of significance.

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- Minor non-compliance: Any act or omission by the organisation which is contrary to the requirements of the monitoring methodology and the ISO14064-1 standard, but which, considered alone or in combination with other nonconformities, in the opinion of the lead verifier, cannot lead to an exceeding of the degree of importance EPO material inaccuracy: an inaccuracy which, considered in isolation or in combination with other inaccuracies, in the opinion of the lead verifier, does not exceed the degree of significance.
 - Recommendation for improvement: Points for improving the agency's performance in terms of:
 - the risk assessment,
 - the development, documentation, implementation and maintenance of data flow and control activities and evaluation of the control system,
 - the development, documentation, implementation and maintenance of procedures for data flow activities and emission control and monitoring activities and reporting.

INTERNAL VERIFICATION DOCUMENTATION

General

The internal documentation includes all the files that arise during the implementation of the verification process (completed forms of ICDQ Verification Body, collected documents from the organization, etc.), in which the verification team records all the proofs and supporting documents of the activities of which) are carried out to verify the emissions report of the organization.

Review of documentation - Conclusion

Upon completion of the verification activities, the verification team shall study and review all evidence and findings from the verification activities carried out and shall meet to assess them and draw the conclusion of the verification. A key point of investigation at this step is to determine whether sufficient evidence has been collected to support the decision to validate the emissions report.

The lead verifier advises that the Emissions Report can be verified as 'satisfactory' or 'unsatisfactory', to this end the opinion shall be accompanied by the following cases of justification:

- Identification of material inaccuracies and/or material deficiencies in compliance.
- Identification of minor inaccuracies and/or minor non-conformities which do not lead to unsatisfactory exposure of emissions.

DESIGN AND ISSUANCE OF A VERIFICATION REPORT

Designing a Verification Report

Upon completion of the Internal Documentation stage, the lead verifier shall arrange to contact the organisation's emissions manager to arrange for the removal of any outstanding non-conformities and inaccuracies, by sending the necessary evidence. These are reflected in the Verification Report. Proof of non-compliance or inaccuracies has been removed shall form part of the internal document.

The lead verifier then draws up the original draft of the Emissions Verification Report. The Emissions Report can be verified as 'satisfactory' or 'unsatisfactory'. To this end, the opinion of the verification team shall be accompanied by the following cases of justification for the assessment of the Agency's Emissions Report:

- 'Satisfactory' report
 - The emissions report shall not contain any inaccuracies, non-compliances or recommendations for improvement.
 - The emissions report contains minor inaccuracies that do not lead to an unsatisfactory emissions report
 - The emissions report contains minor non-compliance deficiencies that do not lead to an unsatisfactory emissions report
 - Recommendations have been made for improvement (e.g. in relation to data flows, control activities, procedures, possibilities of achieving a higher level, or using more accurate coefficients, calibration and sampling methods, etc.).
- 'Unsatisfactory' report
 - The emissions report contains material misstatements leading to an unsatisfactory emissions report
 - The emissions report shall contain individual or combined material non-material non-compliance deficiencies preventing the verifier from stating with reasonable assurance that the emissions report does not contain material misstatements
 - The scope of the verification is very limited (e.g. missing or incomplete data, lack of monitoring methodology, insufficient data provided by the organization, etc.)

INDEPENDENT REVIEW

Prior to the final issuance of the Verification Report, both the Verification Report and the Internal Verification Documentation shall be subject to an independent review. For this purpose, the Technical Review Manager fills in an appropriate form. After studying all the relevant verification documentation, the Technical Review Manager:

- Conducts a quality check to identify any technical errors or omissions
- Conducts a final audit to confirm that the verification process was carried out with professionalism and good judgment
- Checks whether the verification process was implemented in accordance with the requirements of the ISO14064-1 standard
- Assesses whether sufficient evidence has been collected to justify the decision stated in the verification report.

In the event that the Technical Review Officer identifies deficiencies, errors or ambiguities, he/she shall contact the lead verifier for further clarifications and/or collection of additional evidence.

ISSUANCE OF A REPORT AND A DECLARATION OF VERIFICATION

After the completion of the independent review, the final version of the Emissions Verification Report follows, which is signed by the lead verifier who carried out the verification and by the Director General of ICDQ Verification Body and the issuance of the "Verification Statement", which is signed by the latter. Both the emission verification

report and the emissions report shall be stamped with the seal of ICDQ Verification Body and initialed by the co-master verifier on each page.

5.4 OTHER ISSUES

It is the policy of ICDQ Verification Body that the organization is not allowed to use the Report and the Verification Statement of the Verification Body or part of it, in a misleading way.

6. FORMS

"Application for the Verification of greenhouse gas emissions report"

"Contract"

"Solemn Declaration"

Other internal documentation of ICDQ Verification Body