

MCERTS: performance standard for laboratories testing samples from stack emissions monitoring

Environment Agency

RPC rating: validated

Description of proposal

The Environment Agency has set out a quality assurance scheme (MCERTS) for monitoring of emissions; operators of facilities that produce emissions must comply with MCERTS as a condition of licensing. The regulator has extended the scope of the additional accreditation standards applied to laboratories accredited under MCERTS, to cover analysis of samples taken from chimney stacks. Under the existing regime, samples must be analysed, but laboratories undertaking this analysis need not have any accreditation beyond general ISO standards for laboratories.

Impacts of proposal

The EA estimates that up to 20 laboratories will be able to provide the service, but only 16 are likely to apply to undertake MCERTS work. Each laboratory may choose to seek accreditation for up to 18 tests. These laboratories will incur costs of accreditation, which they may choose to pass through to the businesses that use their services. These costs fall into three main categories:

- Familiarisation with the relevant standards;
- Fees paid to the UK Accreditation Service (UKAS) for initial accreditation and annual inspection visits;
- Collection of validation data on those tests that the laboratory chooses to accredit.

Based on data gathered from UKAS and testing laboratories, the EA estimates that the unit costs imposed by accreditation fees will be around £2,425 for initial assessment and around £2,000 per annum for annual inspection. The one-off unit costs imposed by collection of validation data will be around £3,667 per test, and the total number of tests validated will be around 110. The regulator has estimated initial and ongoing familiarisation costs (based on standard reading speeds and ASHE data for professional occupations) at £1,318 for initial familiarisation and £753 per annum for refreshing understanding at the time of accreditation. Overall, this gives one-off costs due to familiarisation, initial accreditation and test validation of £482,595 and ongoing costs due to annual inspection and refreshing understanding of £32,750 per annum.

Quality of submission

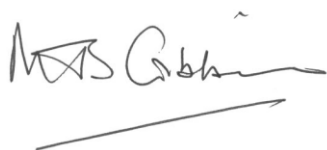
The submission is concise and provides proportionate evidence in support of the EA's cost estimates. The EA explains why it has used data from a single laboratory to underpin its unit cost estimates for validation sampling, and the approach seems proportionate under the circumstances. There is a minor error in the EANDCB calculator provided alongside the assessment, but this does not affect the rounded EANDCB. The RPC is able to validate the EANDCB of £0.1 million.

Departmental assessment

Classification	Qualifying regulatory provision (IN)
Equivalent annual net cost to business (EANCB)	£0.1 million
Business net present value	£-0.76 million

RPC assessment

Classification	Qualifying regulatory provision (IN)
EANCB – RPC validated ¹	£0.1 million
Business Impact Target (BIT) Score ¹	£0.5 million



Michael Gibbons CBE, Chairman

¹ For reporting purposes, the RPC validates EANCB and BIT score figures to the nearest £100,000.