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UKETS14 FAR/VR - Verification of FAR baseline data reports, annual activity level data, and validation of MMPs

April 2025

Note

This document is intended to provide guidance for operators of installations. If there is any inconsistency between the guidance and legislation, the legislation prevails.

Any enquiries regarding this publication should be sent to us at:
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Contents

1 Overview

This document aims to provide guidance on the verification of data relevant to the free allocation of allowances (i.e. baseline data and activity level data) as well as the accreditation of verifiers that conduct such verification. Information is provided on:

- What a verifier should check during the verification of relevant data
- What principles the verifiers should apply to such verification
- The steps in the verification process and the specific rules applicable when verifying data
- The accreditation of verifiers and the specific competence and impartiality requirements that apply.

Important note

- The UK ETS Authority has announced that the start of the second allocation period has been moved from 2026 to 2027 for free allocation (FA) purposes. This follows recognition of stakeholder views and concerns over the potential misalignment of industrial decarbonisation and carbon leakage policy. This change also enables us to align the implementation of the Free Allocation Review with the introduction of the UK CBAM, ensuring a holistic policy approach to carbon leakage, and providing additional time for policy development in what is a complex and challenging area. These are important decisions which will impact the future of business and industry, and we want to get them right.

- Following this announcement, any changes to FA policy following the Free Allocation Review will take effect from 2027. The Free Allocation Review consultation sought views on some changes to FA rules, such as changes to the carbon leakage list and application of the carbon leakage exposure factor, which, if implemented, could change eligibility for FA. Depending on the outcome of the Free Allocation Review, some installations' eligibility to FA could change after the baseline data collection exercise has concluded. In addition, the indicative FA values produced by the BDR template may be subject to revision following the publication of any changes to the FA rules resulting from the Free Allocation Review.

The relevant legislation in this area is:

- **The Greenhouse Gas Emissions Trading Scheme Order 2020** (**The Order**) https://www.legislation.gov.uk/uksi/2020/1265/contents as amended from time to time
- **The Free Allocation Regulation** (**FAR**) (Commission Delegated Regulation (EU) 2019/331 of 19 December 2018) as it has effect in domestic law and as amended by the Order
- **The Verification Regulation** (**VR**) (Commission Implementing Regulation (EU) 2018/2067 of 19 December 2018 on the verification of data and on the accreditation of verifiers pursuant to Directive 2003/87/EC of the European Parliament and of the Council (disregarding any amendments adopted after 11 November 2020), as given effect for the purpose of the UK ETS by Article 25 of the Order, subject to the modifications made for that purpose from time to time
- **The Activity Level Changes Regulation** (**ALCR**) (https://www.legislation.gov.uk/eur/2019/1842/contents) as it forms part of domestic law and as amended by The Order
- **The Monitoring and Reporting Regulation** (**MRR**) (Commission Implementing Regulation (EU) 2018/2066 of 19 December 2018) on the monitoring and reporting of greenhouse gas emissions pursuant to Directive 2003/87/EC of the European Parliament and of the Council (disregarding any amendments adopted after 11 November 2020) as given effect for the purpose of the UK ETS by Article 24 of the Order, subject to the modifications made for that purpose from time to time

2 Verification of UK ETS baseline data reports (BDRs) for 2026-2030

According to Article 4(1) of the FAR, an operator that is eligible for a free allocation of allowances must submit an application to the relevant regulator by 30 June 2025 for the five years beginning on 1 January 2026. The application consists of:

- the UK ETS BDR which is verified as satisfactory by an accredited verifier. This report contains the information listed in Annex IV to the FAR covering data relevant for the installation and sub-installation(s), and update of benchmarks, for each year of the baseline period.
- the methodology monitoring plan (MMP) and any associated documents supporting the BDR. The MMP states how data for the BDR are collected, monitored, and reported in accordance with the FAR. It also defines the installation's sub-installation boundaries as well as quality assurance and internal control measures. If the MMP has already been approved by the regulator and there are no changes, it is not necessary to submit it again (see box 1 below). More information can be found in 'UKETS13 FAR - Monitoring and reporting in relation to the free allocation rules'.
- a verification report providing the conclusions of verification of the BDR and, if the MMP has not yet been approved by the regulator,[1] the verifier's opinion on whether the MMP complies with the FAR.

The regulator may request additional information is submitted with the application on a case-by-case basis, if further information is required to assess the completeness and plausibility of the data.

2.1 The UK ETS BDR

Annex IV to the FAR defines the content of the BDR. The verifier checks the data in the report as well as the underlying data that was used to compile it. The BDR contains two sets of key data upon which the verifier will give their opinion as to whether the data are free from material misstatements – baseline data used for calculating the free allocation of allowances, and data required to update benchmarks e.g. activity data for each product benchmark sub-installation. This guidance document therefore includes information on how a verifier assesses benchmark update data as part of the verification of the UK ETS BDR. Box 1 below gives information upon which key data the verifier will provide a conclusive opinion, whereas Box 2 provides

[1] This may occur where a Hospital and Small Emitter (HSE) or Ultra Small Emitter (USE) believes they may exceed their emissions threshold during the second allocation period and has therefore submitted a full application for free allocation under the Baseline Data Collection, which includes the need to have an approved MMP.

information that the verifier must evaluate for the purposes of corroborating the data contained in Box 1.

Box 1: Key data on which the verifier expresses a conclusion

The activity level for each year of the baseline, for each sub-installation. This includes (as relevant to the installation):

- production levels of product benchmark sub-installations
- amounts of measurable heat eligible under heat benchmark sub-installations and the district heating sub-installation, as a result of the installation's heat balance
- amount of energy content of fuels eligible under the fuel benchmark sub-installations
- amount of emissions eligible under the process emissions sub-installations
- for product benchmarks where exchangeability of electricity applies, the relevant quantity of electricity
- where applicable to the installation, the additional data listed in section 2.6 of Annex IV of the FAR
- where applicable to the product benchmark sub-installation, the additional data listed in section 2.7 of Annex IV to the FAR.

In addition, for the update of the benchmark values the following:

- the attributed emissions arising from fuels, process inputs, measurable heat equivalent, production, import or export of waste gases or transferred CO2.

Box 2: Data for corroboration and checking

Information necessary for understanding and corroborating the data in Box 1:

- detailed annual verified emissions data at installation level and per sub-installation
- installation-wide balance of heat import, production, consumption and export
- attribution of energy to sub-installations
- installation-wide balance of electricity import, production, consumption and export
- installation-wide balance of waste gas import, production, consumption and export

2.2 Role of the monitoring methodology plan (MMP)

The MMP provides a basis for the operator to monitor and report all data required under the FAR, i.e. for calculating the free allocation, as well as for updating the benchmark values.

Like the monitoring plan under the MRR, the MMP is intended to ensure consistency of data over time; it is an internal 'rulebook' to be followed by the installation's personnel. For this purpose, the MMP must be approved by the regulator. The verifier will then take the approved MMP as a starting point to assess whether the BDR is free from material misstatement. If an MMP has not been approved by the regulator, for example when a USE or HSE submits a full BDR to apply for FA in case they need to rejoin the main scheme part way through an allocation period, then the MMP must be validated by the accredited verifier as being in accordance with the FAR. The verifier should start the verification with an assessment of the MMP against the FAR before looking in detail at the data and quality control systems. For further information, please see section 6.2.

Any non-compliance with the FAR subsequently identified during the verification process will also be evaluated. 'UKETS13 FAR - Monitoring and reporting in relation to the free allocation rules' provides more information on the contents of the MMP, its submission, and how the regulator's approval process of these plans will function.

2.3 Implications for achieving data of 'highest achievable accuracy'

Article 7 and Annex VII to the FAR require that operators use data of the 'highest achievable accuracy' in their baseline reporting. A hierarchy of most accurate data sources is defined in section 4 of Annex VII to the FAR for each element of the FAR data collection process (a summary is given in Annex 1 of this document). More detailed guidance on this hierarchy can be found in 'UKETS13 FAR - Monitoring and reporting in relation to the free allocation rules'.

Verifiers need to consider the context in which data is being compiled to assess whether the data being presented meet the definition of 'highest achievable accuracy'. The approved MMP specifies the approach the operator has used to collect data over the baseline period. The verifier will check the application of the MMP and will also perform checks against the FAR. For more information on what checks a verifier carries out, please see section 7.

3 Verification of new entrant's data

A new entrant that wishes to apply for a free allocation of allowances must submit an application to the regulator after the start of normal operation at the installation. When applying for free allocation the operator must provide:

- all relevant information (for the application for free allowances) and a new entrant's data report that contains the data required in accordance with Annex IV to the FAR for each sub-installation separately. The new entrant's report relates to the first calendar year after the start of normal operation
- an MMP that is approved by the regulator
- a verification report that states that the new entrant report is verified as satisfactory, containing conclusions on the new entrant's data report.

The application must specify the date of start of normal operation which is defined in Article 2(12) of the FAR as the first day of operation. The 'first day of operation' is defined as the first day the activity level is higher than 0. Verification of the new entrant's report follows the same procedure as the verification of a BDR. A verifier will carry out similar checks and activities to assess whether the new entrant's data report is free from material misstatements and to check the implementation of the MMP. However, there are specific elements concerning new entrants that a verifier will have to consider. This includes for example an assessment to confirm the start date of normal operation. This guidance will indicate where the verification of new entrants differs from the verification of the BDR.

4 Verification of annual activity data

Under the UK ETS, operators are required to report annual activity level data by 31st March of each year. To accurately report these data, operators must monitor and collect the annual data in accordance with the FAR and their approved MMP. The activity level report (ALR) must contain the following information as a minimum:

- the activity level of each sub-installation
- general installation data as set out in section 1 of Annex IV to the FAR (excluding section 1.3(c))
- each of the parameters listed in sections 2.3 to 2.7 of Annex IV to the FAR
- whether any sub-installation has ceased to operate

Each ALR must be verified by an accredited verifier in accordance with the VR and submitted with the corresponding verification report to the regulator. In principle, the same requirements that apply for verification of a BDR and a new entrant's report are applicable to the verification of ALRs. However, there are some differing requirements for the verification of annual activity level data which are outlined in section 8.

Verifiers conducting the verification of ALRs are required to be accredited against scope 98 and the scope of the technical sector activity referred to in Annex I to the VR for which the verifier is carrying out verification (see section 5). As the verifier needs to largely assess the same data sets for verification of annual activity level data as for verification of baseline data, similar competence requirements as described in section 5 and 7.2 apply to verifiers verifying ALRs. Verifiers will need to understand the requirements in the ALCR and the FAR and be familiar with the applicable guidance, including knowing which additional checks are needed for the verification of an ALR, how to report issues in the verification report, and how to conduct site visits.

5 Accreditation of verifiers

5.1 Accreditation

The approaches and requirements for annual emission verification also apply to the verification of free allocation data unless it is specifically stated differently in the VR. This also applies to accreditation of verifiers carrying out verification of allocation data. A verifier is a legal entity or part of another legal entity that

- carries out verification activities according to the AVR, and
- is accredited by a UKAS, pursuant to the AVR and Regulation 765/2008 of the European Parliament and of the Council. [2]

Verifiers that want to carry out verification of BDRs, new entrants reports and ALRs must be accredited by UKAS for the following scopes:

- scope 98 listed in Annex I to the VR. This scope relates to data verification relevant to free allocation of allowances. This includes verification of BDRs, new entrant data reports and ALRs, and
- the scope of the technical sector activity referred to in Annex I to the VR for which the verifier is carrying out verification. An installation can require that the verifier is accredited against multiple sector scopes, if the installation carries out more than one of the regulated activities listed in Table 3 in Schedule 2 of the UK ETS Order.

For example, if the installation is a cement factory, the verifier must be accredited for scope 6 which includes cement production and scope 98 as a minimum.

The accreditation of the verifier must be valid at the time the verification report is issued to the operator.

The same steps and procedures in the accreditation process apply to verifiers wishing to carry out verification of free allocation data as well as those wishing to verify annual emissions data. UKAS will assess whether the verifier and its personnel undertaking the verification activities

- have the competence to carry out verification and understand the requirements of the FAR
- are performing the verification in line with the VR
- meet the requirements in Chapter III of the VR which cover competence, impartiality, procedures, documentation and further requirements stated in EN ISO 17029 and 14065.

[2] https://www.legislation.gov.uk/eur/2008/765

Once accreditation is granted, UKAS monitors the performance and competence of the verifier through annual surveillance and a reassessment before the expiry of the accreditation certificate. The VR requirements on surveillance and reassessment, which are used for verifiers active in annual emissions verification, also apply to the monitoring of verifiers that are carrying out verification of free allocation data. Article 54 of the VR determines when UKAS can impose sanctions such as suspension, withdrawal of the accreditation certificate or reduction of scope. More guidance is provided in 'UKETS20 VR - Explanatory guidance for installations'.

5.2 Competence requirements for verifiers

The verifier and its personnel involved in verification activities must be competent to perform the verification. Competence denotes not only knowledge but also the skills to apply that knowledge and to carry out prescribed activities. The VR contains UK ETS specific competence requirements for the verification team, as well as for the UK ETS auditors, lead auditors and technical experts individually.

UK ETS auditors and UK ETS lead auditors carrying out verification of allocation data need to have:

- knowledge of the UK ETS Order, the FAR, the ALCR, the VR, and any relevant guidance issued by the UK ETS Authority
- knowledge and experience of data and information auditing
- the ability to perform verification activities
- knowledge and experience in the sector specific technical monitoring and reporting aspects that are relevant to the specific scope of accreditation. This not only includes the sector in which the operator is active, but also the monitoring and reporting aspects in relation to free allocation data.

The requirements for UK ETS lead auditors are included in Article 38 of the VR. In addition to the same knowledge and experience of UK ETS auditors, the lead auditor should be able to lead the team and be responsible for carrying out verification activities and reaching verification conclusions.

The requirements for the verification team (e.g. on composition and competence) are listed in Article 37 of the VR. Each team member should have a clear understanding of their individual role in the verification process. The Article also contains competence requirements for the verification team as a whole:

- at least one person in the verification team must have the technical competence and understanding required to assess the installation's activities in the sector and the monitoring and reporting process for that sector. Please see 'UKETS30 VR - Competence of verifiers' for further information.

- where the verifier carries out verification of free allocation data, at least one person in the team should also have the competence and understanding required to assess the technical aspects of collecting, monitoring and reporting allocation data.

'UKETS30 VR -Competence of verifiers' explains the specific requirements for verifiers carrying out annual emission verification. These requirements are also relevant for verifiers carrying out verification of allocation data.

The following sections of this guidance outline requirements for assessing MMPs and BDRs, new entrant data reports or ALRs. UKAS and verifiers need to be aware of any additional competence requirements necessary to complete the identified activities and make provisions for ensuring that those competence requirements are met. Examples of additional competences required for auditors and verification teams checking free allocation data can be found in section 7.2 of this document. These additional competences will depend on the circumstances of the individual installation and the applicable benchmark. For instance, a different skillset may be needed when assessing data relevant for the heat benchmark sub-installation compared to assessing data in relation to the fuel benchmark or process emission sub-installation.

For product benchmark sub-installations in particular, the focus of work (the activity level) may be an area that is not usually addressed by verifiers during the annual emissions verification process.[3] Therefore, an additional technical understanding of the details of the production process may be required to ensure that the assignment of products is made to the correct benchmark, etc.

As with annual emission verification, each BDR and ALR verification must include a review by an independent reviewer that meets the requirements laid down in Article 39 of the VR. An independent review includes every element of the verification, including the assessment and validation of the MMP where this is required. Please see 'UKETS30 VR - Competence of verifiers' for further information.

If the UK ETS auditor, lead auditor or independent reviewer needs support on a specific subject matter, a technical expert may be added to the verification team to provide detailed knowledge and expertise on that subject matter. As explained in 'UKETS30 VR - Competence of verifiers', this could concern all types of issues. In relation to the verification of free allocation data, technical experts could be useful for more technical issues at individual installations such as:

- the determination of product quantities through mass balance
- steam/heat measurement and accounting and the rules on attributing emissions of combined heat and power (CHP) units

[3] Annual emissions verification is likely to have already included checks on the quantity of fuels and materials and on NCV; these parameters also feed into the baseline activity level data for fuel and process sub-installations; similarly, elements of heat sub-installation activity level data may also have been checked, where relevant to annual emissions reporting.

- in relation to attribution to sub-installations under section 3.2(1)(b) of Annex VII to the FAR: verifying “estimates based on the ratio of free reaction enthalpies of the chemical reactions involved or based on another suitable distribution key that is corroborated by a sound scientific methodology”

- in relation to measurement instruments or procedures outside of the operator’s control under section 3.3(c) of Annex VII to the FAR: evaluation of “empirical correlations” provided by competent and independent third parties, such as equipment suppliers, engineering providers or accredited laboratories.

- in relation to indirect determination methods under section 3.4 of Annex VII to the FAR: verifying calculations based on

    - “a known chemical or physical process, using appropriate accepted literature values for the chemical and physical properties of substances involved, appropriate stoichiometric factors and thermodynamic properties such as reaction enthalpies, as appropriate”

    - “the installation’s design data such as the energy efficiencies of technical units or calculated energy consumption per unit of product”

    - “empirical tests for determining estimation values for the required data set from non-calibrated equipment or data documented in production protocols”.

The technical expert must have:

- the competence and expertise required to effectively support the UK ETS auditor, lead auditor or independent reviewer on the subject matter for which their knowledge and expertise is requested

- sufficient understanding of UK ETS specific legislation including the FAR, the ALCR and associated guidance, data and information auditing and the activities needed to carry out the assigned tasks. The technical expert does not have to possess full competence on all these issues, but they should understand them sufficiently to be able to provide the necessary support during the verification.

Article 36 of the VR requires the verifier to establish, document, implement, and maintain a competence process to ensure that all verification personnel are competent for the tasks that are allocated to them. This competence process includes establishing general and specific competence criteria for each person involved in verification, training, monitoring performance of personnel, etc. For further explanation please see the relevant chapter in, ‘UKETS20 VR - Explanatory guidance for installations’. The verifier needs to ensure that the elements of its continuous competence process are updated to encompass the FAR, the use of associated templates and the relevant guidance material. The competence process should be designed in such a way that the verifier can select a competent team covering lead auditors, auditors, and, where relevant, technical experts.

5.3 Impartiality requirements for verifiers

The VR contains specific provisions on the impartiality and independence of a verifier and its personnel undertaking verification activities. These provisions include restrictions and prohibitions for both the verifier and its personnel. The verifier must be independent from an operator and bodies that are trading emission allowances. An explanation of the applicable impartiality requirements is provided in the chapter on requirements on verifiers in UKETS20 VR - Explanatory guidance for installations'.

As with annual emissions verification, the verification of free allocation data means that the provision of technical support/consultancy to the operator in relation to its FAR accounting process is not allowed, due to conflict of interest. The verifier or any part of the same legal entity must not provide services to develop part of the monitoring and reporting process that is described in the MMP, including development of the monitoring methodology, the BDR, new entrant data report, the ALR, and the drafting of the plan itself. This includes advice on any element in the approved MMP, including consultancy on setting up control activities and procedures that are listed in the MMP. A verifier or any part of the same legal entity that provides technical assistance to develop or maintain the system implemented to collect, monitor, and report allocation data, including data management systems etc. would also have a conflict of interest.

The elements mentioned above are not exhaustive. This means that other activities can also lead to an unacceptable risk to impartiality. However, checking compliance with underlying regulations is a normal part of the verifier's work so this would not be considered a conflict of interest during verification of BDRs and ALRs. The VR also contains requirements to rotate lead auditors when carrying out the verification of BDRs, new entrant's reports, and ALRs. If the lead auditor undertakes verification of allocation data and/or emissions report verifications for a period of five consecutive years for an installation, the lead auditor must cease providing verification services to the installation for three consecutive years subsequently. Further guidance on impartiality requirements, the rotation of lead auditors and how to set up a process to ensure continuous impartiality and independence can be found in UKETS20 VR - Explanatory guidance for installations'.

5.4 Information exchange requirements

The VR contains requirements for information exchange between the National Accreditation Body (i.e. UKAS) and UK ETS regulators. These requirements also apply to issues relating to verifiers active in the verification of BDRs, new entrant reports, and ALRs. This means that:

- verifiers carrying out the verification of free allocation data must notify UKAS of the planned time and place of verification by 15th November each year, along with details of the operators they are verifying, if these data are available. If subsequent there are changes to these plans, the verifier must notify UKAS of their new plans within an agreed timeframe (Article 77 of the VR)

- UKAS must submit a work programme to the regulator by 31st December. The programme should include information on UKAS's planned activities in relation to all relevant verifiers. If planned activities are changed, then an update of the work programme is required by the 31st January (Article 71(1) of the VR)

- UKAS must submit a management report to the regulator by 1st June. The report should contain information on the UKAS activities in relation to those verifiers. This includes, for example, accreditation details, changes in the scope, and summarised results of surveillance and reassessment (Article 71(3) of the VR)

- UKAS must share information on administrative measures imposed on verifiers with the relevant regulator (Article 72 of the VR).

- Regulators must submit an information exchange report to UKAS. This information exchange report includes information on issues the regulator found during their assessment of BDRs, new entrant's reports and ALRs, together with the corresponding verification reports. It can also include information on issues found during inspection, assessment of a verifier's internal verification documentation in accordance with Article 26(3) of the VR, or information on complaints. The recommended date for submitting such a report is the 30th September.

More information on understanding information exchange requirements and the use of the UK ETS Authority templates can be found in 'UKETS20 VR - Explanatory guidance for installations' and 'UKETS31 VR - Information Exchange'.

6 The verification process

6.1 General approach

In principle, verification of FAR BDRs, new entrants reports, and ALRs follows the approach defined in Chapter II of the VR. The process will be consistent with the approach that has already been used for the verification of annual emissions data that are included as inputs into the BDR. This approach facilitates an efficient verification of the data required for free allocation of allowances (i.e. for product, heat, fuel or process emissions sub-installations).

When carrying out any activities required for the verification of BDRs, new entrant reports and ALRs, the verifier should be aware that it is not installation level emissions, but rather the historic activity levels (HALs) at a sub-installation level and other relevant data, that are subject to verification. For verification of fuel benchmark and process emissions sub-installation data this may mean repeating some work done during annual verification of fuel and process emissions data if these data are structured differently for sub-installation(s).

Furthermore, the requirements set out in the MMP must be considered, instead of those set out in the annual emissions monitoring plan. Where the verifier finds non-conformance with the MMP (or non-compliance with the FAR or ALCR) the operator is required to correct the data and update the MMP if a change to the MMP is required.

Taking into account the above, the main activities outlined in the figure below must be carried out during verification. These activities are interconnected and interdependent. This means that findings during the verification process can result in the verifier needing to reconsider one or more previous steps in the verification process and adjust as necessary.

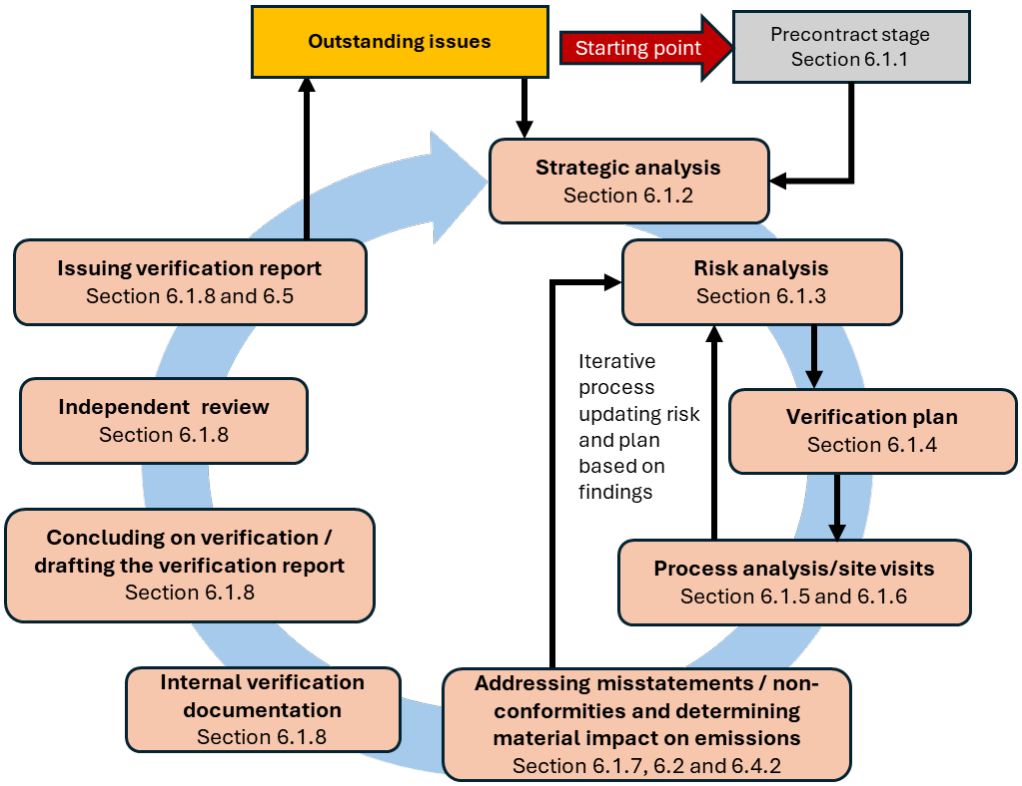

Figure 1 - The verification cycle with references in this document

6.1.1 Pre-contract obligations

According to the VR, the verifier must assess - based on documents provided by the operator of the installation - whether it is able to carry out the verification tasks for that installation. To do this, the verifier must decide whether it holds the necessary accreditation for the applicable scopes of work; and whether it has the competence, personnel, and resources to set up a verification team suitable for that installation.

Furthermore, the verifier must determine the amount of time needed for the verification tasks to be carried out. The verifier should ensure that the scope of the verification work and the time allocated in the contract is consistent with the verification risks identified. When determining the time needed for verification, the verifier must consider factors including the installation's complexity, the number and nature of the applicable benchmarks, and the complexity of individual sub-installation(s). The verifier should also assess whether the documentation provided by the operator is sufficient for making a quotation, and if the business risks involved with the verification can be mitigated sufficiently by developing a suitable verification approach.

The operator should provide the following documents as a minimum:

- the MMP (with evidence of the regulator's approval, if applicable)
- the installation's greenhouse gas emissions (GHGE) permit and associated approved monitoring plan

- a description of the installation (including a simple flow chart, where it helps to improve clarity) if this is not included in one of the documents listed above
- the verified emission reports and verification statements (where these are separate documents) for the baseline years and prior annual activity level periods and a commentary on any corrections made to the relevant data after submission of the verified report to the regulator
- the verified BDR for the previous allocation period
- the BDR
- the ALR.

Depending on the timing of establishing the contract,[4] the BDR, the latest ALR or the latest verified annual emission report may not be available in the pre-contract stage. In such situations, the verifier may use BDRs from the previous allocation cycle, annual verified emission reports and ALRs from earlier years. Once the reports for the current period are available, the verifier will need to reassess the information to ensure that the contracted time and the verification plan are still appropriate.

Article 9 of the VR (and for reference EA-6/03[5]) contain requirements on including certain conditions within the contract. One key aspect is time allocation. The time allocated cannot be fixed; if during the detailed verification the verifier finds that additional time is needed to properly carry out the necessary activities, the time allocation initially provided must be adjusted accordingly. Therefore, the contract must have a provision for this adjustment.

6.1.2 Strategic analysis

According to Article 11 of the VR, the verifier must assess - based on the information provided by the operator - the nature, scale, and complexity of the verification activities to be carried out. It must gain an understanding of how the operator has collected and determined the free allocation data (and benchmark data, if relevant) to be verified. The information will include not only the documents listed above but also other relevant information including:

- the GHGE permit and other environmental permits, where these provide relevant information for production processes
- copies of documented procedures associated with the MMP concerning, for example:
    - assigning responsibilities for monitoring and reporting
    - regular evaluation of the appropriateness of the MMP and the effectiveness of monitoring

[4] In a practical sense, contracts are likely to be negotiated well before the year-end for the relevant reporting cycles. It may therefore not be possible to review a copy of the baseline report (even in draft) when a pre-engagement evaluation is being conducted, while waiting to negotiate a contract until the draft baseline report is available means that operators may not be able to contract a verifier in time for the submission deadline.
[5] https://european-accreditation.org/wp-content/uploads/2018/10/EA-6_03.pdf

  - keeping track of NACE[6] and PRODCOM[7] codes, and products produced by each sub-installation
  - keeping track of MMP modifications
- Data flow activities and control activities to ensure the data contain no anomalies, including in relation to:
  - internal review and validation of data
  - corrections and corrective actions
  - quality assurance of IT and measurement systems
  - control of outsourced processes
  - control of documents and records
- the operator's risk assessment
- how the operator has corrected any non-conformities and addressed recommendations for improvements included in the verification report for either an ALR from the previous year or a relevant BDR
- correspondence with the regulator on how the operator has addressed non-compliance issues that were reported in prior years by the verifier, where relevant
- if the MMP was changed, a record of all changes
- any other relevant information which supports the verifier in understanding the activities carried out at the installation.

When analysing the information, the verifier will specifically consider:

- the complexity of accounting for individual sub-installations and the way aggregate data is apportioned to them
- the applicable benchmark
- details on the calculation approach etc. given in the MMP, and
- the associated data flow and internal control activities.

In addition, where the MMP specifies different internal controls for data that have been subject to control under the MP for prior annual reporting and verification, the verifier must establish why the controls are different and whether that has an impact on any data that have been verified previously.

Where the verifier has previously conducted the verification of relevant annual emissions reports or annual activity data for the same installation, the verifier should assess, as part of

[6] NACE codes mean "NACE Rev 2.0" as laid down in Regulation (EC) No 1893/2006 of the European Parliament and of the Council, as amended (codes can be found in the annex) by https://www.legislation.gov.uk/eur/2006/1893/pdfs/eur_20061893_2019-07-26_en.pdf.
[7] The applicable PRODCOM codes are those set down in Commission Regulation (EU) 2019/1933 https://www.legislation.gov.uk/eur/2019/1933/annexes.

the strategic analysis, what evidence and data it already holds for the reporting years being assessed. This should ensure that verification of the historic baseline data is conducted efficiently. Data for fuels and process sub-installations will likely have already been assessed during the annual emissions verifications (e.g. fuel/material quantities, NCV etc.); associated instrumentation will have already been inspected, and the maintenance status of instruments, etc. will have been checked during annual site visits. In such cases, the verifier should consider to what extent these earlier verifications cover the data being verified for the current baseline and whether the scope(s) of the earlier verifications coincide(s) with the current verification.

6.1.3 Risk analysis

The verifier must assess the risks of misstatements, non-compliances and non- conformities, and their material effect on the reported data. The outcome of the risk analysis determines how and to what extent the verification activities should be designed, planned, and implemented. The risk analysis centres on identifying and assessing two types of risks, i.e. inherent risks[8] and control risks.[9] Together with the detection risk, these risks form the overall verification risk, i.e. the risk that the verifier issues an inappropriate verification opinion. See 'UKETS26 VR - Verifier risk analysis' for more information.

According to the VR, the verifier must assess the likely inherent risks, control risks and detection risks based on the outcome of the strategic analysis. In addition, the verifier will assess the verification risks associated with a reliance upon evidence that was:

- obtained in previous years during site inspections, interviews, etc. (if relevant) to determine if additional visits are necessary to facilitate evidence gathering
- provided by other third-party auditors, such as financial auditors in the case of product information.

Risk analysis is an iterative process, and the assessment must be updated if detailed verification activities during the process analysis show that the risks are higher or lower than initially assessed. If should this happen, the verification plan will also need to be updated.

6.1.4 The verification plan

The risk analysis determines how the verifier sets up the verification plan, which consists of three elements:

[8] Inherent risks are linked to the operator's data flow activities assuming that there are no related control activities to mitigate these risks, and without considering the operator's control environment. Examples of inherent risk include significant manual input and data transfers; complex data management systems for collecting and quantifying product or emissions data; multiple sub installations, complexity and number of emissions sources and fuels used – especially where these relate to more than one sub-installation, malfunctions, shut-downs, or changes in the production process.

[9] Control risks are linked to the operator's internal control environment and the potential for internal controls to fail or break down. Examples of control risk include automated controls in the IT system that are missing or not functioning properly; no calibration of measurement equipment; internal data reviews, and the checking of the manual transfers of data that are not carried out or not carried out to the rigour required in view of the level of associated inherent risk.

- a verification programme[10] describing the nature and scope of verification activities, as well as the time and manner in which these activities are to be carried out. It also involves the planning of all such activities. According to Article 26 of the VR, justifications for the exclusion of activities based on the verifier's risk analysis must be fully documented in the internal verification documentation

- a test plan setting out the scope and methods of testing specific control activities and procedures for control activities

- a data sampling plan setting out the scope and methods of data sampling related to data points underlying the aggregated data, the tests to be performed on sampled data and the planning response if testing of that sample raises issues.

See 'UKETS26 VR - Verifier risk analysis' on how the risk analysis impacts the set-up of the verification plan.

6.1.5 Process analysis (detailed verification)

The objective of this stage of verification is to collect and document detailed evidence upon which the verifier can base its verification opinion. During the process analysis the verifier must implement the verification plan. The verifier will therefore:

- assess the implementation of the MMP by reviewing the data flow activities, control activities and procedures as well as checking sub-installation boundaries and the application of the methodologies

- if applicable,[11] assess the MMP against the requirements of the FAR to confirm that the MMP is compliant with requirements

- conduct substantive data testing consisting of data verification, analytical procedures and checking of the monitoring/data collection methodology.

The verifier will use different techniques and methods to carry out these checks e.g. by conducting interviews, observing how operators apply control activities, tracing data back to primary source(s), etc. More information is provided in 'UKETS20 VR - Explanatory guidance for installations' and 'UKETS27 VR - Process analysis'. Section 7 of this document contains more information on what specific checks the verifier will do on data that is relevant for free allocation. A key aspect is that where the MMP has not been approved by the regulator, the verifier will check the MMP against the FAR. This means that the verifier will specifically assess whether:

[10] The verification programme is not just an agenda for the site visit, as it should provide sufficient detail of planned tests and activities to inform team members on which activities need to be carried out.
[11] I.e. where the MMP has not been approved by the regulator prior to submission of the BDR. This also applies when the verifier identifies some anomalies between the MMP and the FAR and wishes to confirm there are no others.

- the sub-installation boundaries are determined in line with the FAR, and are consistent with the boundaries of the installation as a whole (i.e. as permitted for annual emissions reporting)
- data relevant for the applicable benchmark(s) are attributed to the correct sub-installation without double counting or omissions
- methodologies for collecting and monitoring data are applied correctly in line with the FAR
- highest achievable accuracy and the correct hierarchy of accuracy is used
- data gap methodologies are applied correctly in line with the FAR
- data flow activities and procedures are established, implemented, documented and maintained correctly in line with the FAR.

Where the MMP is approved by the regulator, the verifier will use the approved MMP as a starting point for planning its activities. For further information, please see section 6.2. Section 8.1 contains guidance on what additional checks should be carried out for the verification of annual activity level data.

In some cases, data sets may be too extensive to test all of them. If it is justified by the verifier's risk analysis, the verifier can apply sampling to the data or control activities to focus attention on the material aspects. Please see 'UKETS28 VR – Sampling' on the principles that apply.

If misstatements, non-conformities, and non-compliance are found, the verifier will adapt the strategic analysis, the risk analyses, and the verification plan accordingly.

6.1.6 Site visits

According to Articles 21 and 31 of the VR, site visits are required for the verification of BDRs. The purpose of a site visit is to gather sufficient evidence to conclude, with reasonable assurance, that the operator's data report is free from material misstatements. Activities during site visits include:

- interviewing staff, reviewing documents and assessing operator's procedures in practice.
- checking the installation and sub-installation boundaries, the data flow and assessing the completeness of source streams and emission sources.
- actual testing of the control activities and assessing the application of procedures mentioned in the approved MMP.

- obtaining physical evidence through assessment of measurement equipment, monitoring systems and processes.[12]

The verifier's risk analysis determines whether additional locations should be visited and when.

Verifiers should bear in mind that data related to the baseline period will, in some cases, have already been verified during the site visits for annual activity level verification. Where all data have been verified by the same verifier during the site visits for activity level verification, it may not be necessary to carry out further site visits if this is justified by the verifier's risk assessment. The verifier must be confident that their responsibilities under Article 21 have been met by the site visits for activity level verification. Note that this does not constitute a waiver of the site visit.

The verifier must determine whether:

- the scope(s) for verification of the activity data under annual activity level reporting cover the same scope(s) required for BDR verification
- the free allocation data (including the attribution of emissions for the benchmark update), the methodologies and installation boundaries, the data flow activities, control activities, and procedures were all assessed during the site visits for activity level verification.

If any of the above have not been verified before, additional visits for the verification of the BDR will be necessary.

A site visit will always be required if either of following circumstances apply:

- the installation does not have an approved MMP[13]
- a new sub-installation forms part of the BDR.

For information on site visits relating to verification of annual activity level data please see section 8.3.

[12] It should be noted that the type and status of control systems and measurement instruments in use at the time that the data were gathered is key. Checks on systems, instrumentation, etc., during a site visit needs to reflect the historic nature of baseline data; inspection of controls and instruments currently in place may not be relevant to the data set.

[13] This would occur for new entrants and HSEs or USEs that have submitted a full FA application under the baseline data collection.

6.1.7 Addressing misstatements, non-conformities and non-compliance

The verifier must inform the operator, on a timely basis, if it has identified misstatements, non-conformities, or non-compliance.

Misstatements	Omission, misrepresentation, or error in the operator's BDR, the new entrants report or ALR. This does not include any uncertainty permissible under the FAR.
Non-conformities	Any act or omission of an act that is contrary to the MMP. Examples of non-conformity include not applying the methodology to calculate the baseline or annual activity data correctly. If a non-conformity results in an error, misrepresentation, or omission in the reported data, it must also be regarded as a misstatement.
Non-compliance	Any act or omission of an act that is not in line with the FAR, the ALCR, or other relevant legislation. In some cases, non-conformities can also be a non-compliance with the FAR or ALCR.

The operator is required to correct all misstatements, non-conformities, and non-compliances identified by the verifier. This can, for example, be done by correcting the data in the BDR or ALR and updating the MMP (if relevant), addressing omissions in the MMP, etc.

Where the MMP has not been approved by the regulator, the verifier will assess the MMP against the FAR requirements as the starting point for planning its activities.

Where non-compliance has been identified by the verifier, the operator must notify the regulator. This also applies if the approved MMP is not in line with the FAR or the ALCR. Subject to the regulator's approval, the operator is required to correct the non-compliance, and the verifier will note any remaining non-compliance in its report.

Corrected misstatements, non-conformities and non-compliance must be documented within any internal verification documentation.

If misstatements, non-conformities, and non-compliance are not corrected, the verifier must assess the material impact of these issues on the reported data (see section 6.4.2).

The verifier will undertake additional activities if data gaps are identified (please see section 7.3).

6.1.8 Concluding the findings of verification

When completing the verification and considering all the evidence gathered during the verification, the verifier is required to carry out the activities listed in Article 24 of the VR. Verifiers must ensure that it has gathered sufficient evidence to support the verification opinion statement. For further information please see the section on 'concluding the findings of the verification' in 'UKETS20 VR - Explanatory guidance for installations'.

After evaluation of the evidence and before completion of the verification, it is good practice for the verifier to obtain a signed 'Management Declaration' from the installation's senior management in which they confirm that they have provided the information and evidence that the verifier needs to complete their work. This declaration could also confirm in writing any justification for exceptions made to applying the rules of the FAR (for example, in relation to the application of highest accuracy data requirements). An example Management Declaration is provided in Annex 2.

A Management Declaration provides support to verifiers when managing their verification risks and potential liabilities. It should be noted that such a declaration does not exempt the verifier from doing detailed checks on the data and compliance with the MMP and the FAR; nor does it exempt the verifier from further checks and sanctions (if relevant) by UKAS.

Independent review

Before issuing the verification report, the internal verification documentation and the verification report must be subject to an independent review. For further information please refer to the section on independent reviews in 'UKETS20 VR - Explanatory guidance for installations'.

Internal verification documentation

The verifier must compile internal verification documentation to provide a complete trail of evaluations and decisions that enabled the verifier to reach its verification opinion with reasonable assurance. All relevant documents and all findings of previous verification steps are included in the internal verification documentation. For further information please refer to the section on internal verification documentation in 'UKETS20 VR - Explanatory guidance for installations'.

Verification report

In accordance with Article 27 of the VR, the verifier must issue the verification report along with a final verification opinion to the operator (see section 6.5).

6.2 Scope of verification

For each individual data report submitted by an operator, the verifier is required to issue an opinion - based on reasonable assurance – that the baseline data (or annual activity level data) reported are free from material misstatement.[14] This work is conducted based on Articles 6, 7(2) and 7(3) of the VR which means the verified BDR, new entrant data report or ALR must be reliable. Verifiers must plan and deliver their work with an attitude of professional scepticism, in the public interest, and independent of other parties in the FAR process.

The scope of verification is defined by the tasks the verifier must perform to achieve the

[14] 'Material misstatement' means a misstatement that, in the opinion of the verifier, individually or when aggregated with other misstatements, exceeds the materiality level or could affect the treatment of the operator's or aircraft operator's report by the regulator.

objective of verification i.e. to ensure that the data for free allocation have been monitored in accordance with the FAR and ALCR, and that reliable and correct baseline data and allocation data are reported. According to Article 7(4) of the VR, the verifier must assess whether:

- the BDR, new entrant's report or ALR is complete and meets the requirements of Annex IV to the FAR
- the operator has acted in conformance with the requirements of the approved MMP
- data in the BDR, new entrants report or ALR is free from material misstatements. For the verifier to be able to conclude this, it must obtain clear and objective evidence from the operator to support all data reported. To obtain the evidence required for a reasonable level of assurance and make this assessment on the material correctness of the data and associated information, the verifier will use analytical procedures, carry out data verification, and assess the implementation of the monitoring methodology in accordance with Articles 15, 16 and 17 of the VR. Materiality thresholds for specific elements of the baseline and benchmark data are given in Article 23(4) of the VR, with an explanation of the application of materiality analysis for the FAR given in section 6.4.2
- information can be provided in relation to the operator's data flow activities, control system and associated procedures to improve the performance of their monitoring and reporting. This activity is linked with Articles 27(3)(p) and 30 of the VR. The verifier has the responsibility to consider and assess whether an operator can improve their monitoring and reporting process to improve the robustness and quality of reported data. This relates especially to the data flow activities, the operator's risk assessment, the control activities, evaluation of the control system and the procedures mentioned in the MMP. If there are areas for improvement, the verifier must include a recommendation for improvement in the verification report.[15]

One of the most important tasks of the operator is to develop a methodology for compiling existing available data – supplemented by (conservative) assumptions and estimations where necessary – for determining the historic baseline data and attributing that data to sub-installations. The aim is that only "data sources of highest achievable accuracy" are used. This means that where several sources for the same historic data set are available for the operator to select from, the operator is required to choose the data of the highest accuracy and attach data from other sources for corroboration purposes. The essence of this data compilation process must be documented in the MMP with justification as to why the data selected is deemed 'highest accuracy'.

The MMP assessment by the verifier is therefore a key aspect of the verification. As outlined above, the scope of the assessment differs in the situation where the MMP has been approved by the regulator compared to the situation where the MMP has not been

[15] However, whilst the verifier should identify weaknesses in control activities as part of the recommendations and inform the operator why it is considered a weakness, the verifier must not communicate how the operator should resolve the weakness, as that would place the verifier in a consultancy role and compromise its independence.

approved by the regulator. Differences related to checking of the MMP are summarised in the table below.

MMP was not subject to approval by the regulator	MMP was subject to approval by the regulator
• The verifier checked during the strategic analysis whether the MMP to be validated was the correct version.	• the verifier checks in the strategic analysis whether the MMP is the latest version approved by the regulator, whether there have been changes to the MMP in the reporting period(s), whether these changes have been significant and, if yes, whether they have been approved by the regulator. More information on which changes are significant is provided in 'UKETS13 - FAR Monitoring and Reporting in Relation to the Free Allocation Rules' • when assessing implementation of the MMP, the verifier will also check regulator correspondence on MMP approval.
• The verifier validated (checked) the MMP against the FAR to confirm that it was complete and complied with the rules. • The verifier assessed the correctness of the methodologies, and the appropriateness of the data sources, used for determining the historic baseline data (i.e. whether it demonstrably was the most accurate data available). The verifier assessed the operator's justification for selected data sources (based on the FAR) for reasonableness. • The verifier checked whether the detail in the MMP was commensurate with the complexity of the installation. • The verifier checked implementation of different elements of the MMP and assessed whether the actual situation for each sub-installation reflected what was recorded in the MMP.	• During its approval the regulator will have checked the MMP against the FAR. • The verifier uses the approved MMP as a starting point to assess the accuracy of the data. • The verifier checks implementation of different elements of the MMP and assess whether the actual situation for each sub-installation reflects what is recorded in the MMP. • To some extent the verifier will do cross checks between the MMP and the FAR: assessing the sub-installation boundaries, checking the appropriateness and implementation of control activities and procedures etc.
• When the verifier identified non-compliance, the verifier informed the operator. The operator then updated the MMP to be compliant with the FAR.	• When the verifier identifies non-compliance, the verifier informs the operator. The operator is required to notify the regulator and correct the non-compliance in agreement with the regulator (e.g. updating the MMP and obtaining approval by the regulator).
• Corrected non-compliance and action taken to correct these was documented in the internal verification documentation.	• Corrected non-compliance and action taken to correct these was documented in the internal verification documentation.

• For non-compliance that is not corrected the verifier will assess the material impact on the reported data. • Non-compliance that is not corrected, before the verification report is issued to the operator, must be included in the verification report.	• For non-compliance that is not corrected the verifier will assess the material impact on the reported data. • Non-compliance that is not corrected, before the verification report is issued to the operator, must be included in the verification report.

For both situations described in the table above the verifier will:

- assess whether the sub-installations and their boundaries are correctly defined.
- check whether the methodology presented is transparent and allows for complete audit trails from primary data sources to the final figures in the FAR BDR.
- check completeness of the MMP ensuring neither gaps nor double counting have occurred.
- check whether the control activities and procedures are appropriately established, implemented, documented and maintained and whether these are effective to mitigate the risks. How the verifier checks the control activities and procedures is done in a similar way as for annual emission verification. More information on how to check control activities and procedures is provided in 'UKETS27 VR - Process analysis'.

6.3 Data assessment

During the process analysis the verifier will do detailed data verification and check implementation of the data collection and monitoring methodology applied. This will be based on the verification plan and the results of the strategic analysis and risk analysis. In addition to checks in relation to data identified in Annex IV of the FAR and the requirements under Article 10(5) of the FAR, the verifier will specifically check the following elements that form part of the verification plan:

- check whether all data for emissions, inputs, outputs and energy flows are attributed correctly to the sub-installation(s) in line with the system boundaries. The verifier's data checks also include, for example:
    - checks that the sum of annual verified emissions attributed to individual sub-installations under Annex IV(2)(2) to the FAR matches the total verified emissions for the relevant year; If these data do not match, the verifier should check whether:
        - there are emissions associated with activities at the installation that are not eligible for free allocation. Section 2.2 of 'UKETS13 FAR - Monitoring and reporting in relation to the free allocation rules' provides further information on non-eligible activities (see also Box 3 below)

        - any corrections that are made by the operator subsequent to the relevant verified report are reasonable[16]
        - additional emissions have been attributed to sub-installations that are not reported under annual emissions reports, such as “internal source streams”[17] or emissions equivalent to imported measurable heat; and that these additional emissions are calculated correctly with no data gaps or double counting
        - relevant corrections for import and export of waste gases have been calculated correctly (see sections 2.3 and 5.3 of ‘UKETS13 FAR - Monitoring and reporting in relation to the free allocation rules’)
    - confirmation that, where the operator normally reports annual emissions using mass-based emissions factors; the NCV used for energy reporting in the baseline report is determined in accordance with the requirement to report NCV under standard conditions[18]

- check whether data are complete and whether data gaps or double counting have occurred
- check whether activity levels for product benchmarks are based on correct application of the product definitions listed in Annex I of the FAR
- check whether activity levels for heat benchmark sub-installations, district heating sub-installation, fuel benchmark sub-installations and process emissions sub-installations have been correctly attributed according to the products produced and in line with the Carbon Leakage List
    - as part of these checks, confirm that the NACE / PRODCOM codes declared in the baseline report or ALR are consistent with other evidence of such declarations by the operator; or that there is a justifiable reason for a code declared to have changed.

[16] The verifier should check that they are working with the most up to date copy of the Annual Emissions Report (AER) since it is possible that a subsequent amendment was notified to the regulator, but the AER was not required to be re-verified.
[17] See section 2.2 of ‘UKETS13 FAR - Monitoring and reporting in relation to the free allocation rules’.
[18] Article 3(52) of the MRR defines ‘standard conditions’ to mean “temperature of 273,15 K and pressure conditions of 101 325 Pa defining normal cubic metres (Nm3)”.

Box 3 – Activities not eligible for free allocation

Section 2.2.1 of 'UKETS13 FAR - Monitoring and reporting in relation to the free allocation rules' outlines those activities that are not eligible for free allocation and specifically draws attention to the following:

"*After attributing all inputs, outputs and emissions to sub-installations following the FAR, some inputs, outputs, and emissions will remain not attributed to any sub-installation (these elements are not eligible for free allocation). Examples include:*

- *fuels and/or measurable heat used for electricity production, and the related emissions*
- *measurable heat produced in nitric acid sub-installations, from electric boilers or imported from non-UK ETS entities*
- *emissions related to heat exported to UK ETS installations*
- *waste gases or fuels flared for purposes other than safety flaring outside product benchmark sub-installations, and related emissions*."

During verification, the verifier may find misstatements in the data or non-conformities between data calculations and the MMP. In such cases the verifier will request the operator to correct the identified errors, misrepresentations, omissions, or non-conformities.

The operator must update and improve the MMP where it is found by the verifier to be incomplete, erroneous, or contradicting the rules laid down in the FAR or ALCR. The operator must correct the associated baseline data and allocation data in accordance with any improvements to the MMP, and the verifier will take account of these revisions in the subsequent verification of the updated MMP (where relevant) and BDR or ALR. Please see section 6.2 for more information on how to address identified non-conformities and non-compliance with the FAR and ALCR.

Where the data required for the BDR or ALR is not available and there is a data gap, the operator must use an alternative methodology or data source for completing the data gap, provided that this methodology or data source is listed in the MMP (as required by Article 12(2) of the FAR). If the MMP does not contain such a methodology or data source, the operator must use an appropriate estimation method for determining conservative surrogate data for the period of the data gap and respective parameter. The operator must include sufficient justification for the data gap and the method used in the BDR.

In the context of baseline data or annual activity level data, "conservative" means that a set of assumptions is defined to ensure that the parameters relevant to the allocation of free allowances are assigned values so that the resulting allocation is not higher than it would be

through using the true value of that parameter.[19] To ensure surrogate activity data for the BDR or ALRs are conservative, any conservative adjustment factor (for example 2 x Standard Deviation) should be deducted rather than added (compared with AEM reporting in which conservative adjustment factors are added to surrogate data). Data gaps must be closed in a transparent way. More information on what checks a verifier does on these data gaps is provided in section 7.3.

The verifier must decide if any remaining misstatements, non-conformities, or non-compliances have material impact on the reported data (see section 6.4.2). If the issues that have a material impact on the reported data remain unresolved at the end of verification, the verifier must issue a negative verification opinion statement. Furthermore, all outstanding misstatements, non-conformities and non-compliances must be included in the verification report, including a reasoning why any of them have a material impact on the reported data.

If only misstatements, non-conformities or non-compliances remain that do not have a material impact on the reported data, the verifier can issue a positive verification opinion statement with comments. The verifier must list those issues in the verification report. This also applies to quantification errors in the data sets at a sub-installation level and non-aggregate level. i.e. if there are uncorrected mistakes at sub-installations but these do not have a material impact on the data, they must be reported. This will alert the regulator to them.

Where no misstatements or non-conformities have been found, or where all misstatements and non-conformities have been fully corrected, the verifier can issue a positive verification opinion statement declaring that the BDR or annual ALR has been verified as satisfactory.

The wording for such a verification statement is found in the verification report template provided by the UK ETS Authority.

6.4 Methodological choices

6.4.1 Level of assurance

Article 7(1) of the VR requires the verifier to carry out the verification with the aim of providing a report that concludes with reasonable assurance that the operator's report (e.g. BDR) is free from material misstatements. The degree of assurance that the verifier gives in its reported opinion statement on the accuracy of data relates to the depth and detail of verification. Please see 'UKETS20 VR - Explanatory guidance for installations' for an explanation of the application of reasonable assurance.

The FAR requires the operator to show the data flow from primary source to aggregated data; and explain how data has been collected and why it is considered data of 'highest achievable accuracy'. Operators must also provide alternative data sets for corroboration, if other data sources are available (e.g. by using correlations to other parameters).

[19] In other words, the resulting preliminary allocation will be lower rather than higher when a conservative estimate is done – this is different to what applies to annual emissions reporting.

Data submitted for the 2027-2030 allocation period is likely to be of higher quality compared with the previous baseline data, since the data collected is based on an approved MMP that uses the best available sources. This means that the operator may have installed new measurement instruments where necessary to avoid using correlations and estimations - where this is technically possible and without incurring unreasonable costs.

Furthermore, the verifier can improve data quality by providing reasonable improvement recommendations, where applicable. The operator will need to implement such recommendations for future data monitoring, either by updating its MMP or explaining why it should not take account of the verifier's recommendations (e.g. due to unreasonable costs or technical infeasibility). It is the regulator's responsibility to decide on these matters.

Consequently, the verifier should be able to follow audit trails back to the point of primary data generation, such as production protocols or fuel invoices.

6.4.2 Materiality

Materiality is a key element of verification: it is important in two respects:

- the concept itself is relevant when the verifier determines the nature, timing and extent of verification activities: the planning and design of these activities is based on the assessment of the risks of misstatement and non-conformities and any likely material effect they may have on the reported data.
- secondly, materiality is essential for concluding whether a baseline/new entrant report or ALR can be verified as satisfactory. Only reports that are free from material misstatements[20] can be regarded as satisfactory.

Materiality has both a quantitative aspect and a qualitative aspect. The quantitative aspect depends on the size and nature of the impact an error has on the overall reported data, whereas the qualitative aspect is very much determined by factors that can influence the user of the data, i.e. the regulator (e.g. particular circumstances, whether it concerns non-compliance, etc.).

For the quantitative aspect the materiality level is important.

For the purposes of verification of FAR baseline data and annual ALRs, Article 23(4) of the VR specifies the materiality level for certain elements of the data set. The materiality level is ±5% of the reported values for each of the following elements:[21]

[20] Material misstatement according to Article 3(6) VR means a misstatement that, in the opinion of the verifier, individually or when aggregated with other misstatements, exceeds the materiality level or could affect the treatment of the operator's or aircraft operator's report by the regulator.

[21] These individual elements span the following data sets – (a) data covered under annual emissions monitoring (i.e. this will cover fuel and process sub-installation data); and (b), (c), (d) the additional data sets that are specific to the free allocation and benchmark processes. For (a) to have a material error in the total emissions means that there have been errors in the underlying sub-installations which in aggregate are material when converted to CO2 and compared to the total emissions. Note that a material error during annual emissions verification for an installation with a 2% materiality level under Article 23(2) of the VR would not automatically be material under the FAR if it does not exceed the 5% materiality threshold. However, based on a qualitative assessment it can still be material regardless of whether the 5% materiality threshold under the FAR is exceeded.

a) The installation's total emissions,[22] where the data relate to emissions

b) The sum of imports and production of net measurable heat at installation level, if relevant, where the data relate to measurable heat data

c) The sum of the amounts of waste gases imported and produced within the installation, if relevant

d) The activity level of each relevant product benchmark sub-installation individually.

When an individual misstatement[23] (or misstatements when aggregated) for one of the elements above exceeds the ±5% materiality level, the misstatement is material for that element. In such cases, the entire reported data set is rejected, and the verifier must issue a negative verification opinion statement in relation to the baseline/new entrant data report or annual ALR.

The VR does not specify a materiality level in relation to elements of the data set other than the ones mentioned in Article 23(4), as outlined above. Where the verifier identifies any other element(s) of the data set as having a significant quantitative error, this must be included in the verifier's wider materiality analysis (qualitative assessment) when reaching their conclusions on the reliability of the overall reported data. The verifier needs to consider the potential impact on the user of the reported data if they find a significant error in the data set that is not one of the elements with a mandated materiality threshold.

The elements a) to c) above relate to the total reported value i.e. the total emissions, the sum of imports and production of net measurable heat, and the sum of the amounts of waste gases imported and produced within the installation. If multiple sub- installations are based on one of these data elements, the individual misstatement or misstatements, when aggregated, may covers the total value for that element. This does not mean that an error at sub-installation level cannot lead to a material error, as it depends on the qualitative assessment of materiality.

Example

An installation has a total heat value (production + import) of 100TJ across all its relevant sub- installations; an individual or aggregate error of 5TJ or above in the heat value would be material under point (b) above: 5% of the total production and import of net measurable heat is 5TJ. Any quantitative error equal to or above the materiality level is material.

[22] Note that the sum of the attributed emissions of all sub-installations is not necessarily equal to the installation's (verified) emissions. For details see Box 3 in section 6.3 of this document. More details on the determination of attributed emissions are found in sections 2.3 and 5.3 of 'UKETS13 FAR - Monitoring and reporting in relation to the free allocation rules'. Note that in some cases the installation's own emissions may be small compared to the allocation (e.g. where most of the allocation is due to imported heat). In such cases the verifier's materiality assessment will be based on qualitative criteria, including the fact (and size) of the heat imports.

[23] A non-conformity or non-compliance can also be a misstatement if it has an impact on the reported data.

The installation has two heat sub-installations (A) and (B), each importing 10TJ of heat:

- an individual error of 2TJ is found in the imported heat to sub-installation (A); on its own this would not be quantitatively material but would still represent an error of 20% of the imported heat.

- an individual error of 3.5TJ is found in the imported heat to sub-installation (B); on its own this would not be quantitatively material but would still represent an error of 35% of the imported heat.

However, the aggregate error on the total heat imports to sub-installations (A) and (B) is 5.5TJ; this is above the 5% materiality level for the sum of imports and production of net measurable heat. This would result in a material error and therefore a negative verification opinion (i.e. not verified).

Consider a case when the installation (as above) had only one heat sub-installation - (B) - with an individual error of 3.5TJ in its imported heat that is not quantitatively material; the verifier could still determine that the error overall was a material issue if, when evaluating the qualitative aspects of materiality, the verifier identifies uncorrected non-compliance and/or non-conformance that impacts the data calculation process and that the verifier considers significant enough to warrant a finding that it is material.

For product benchmarks – element d) above - any individual misstatement or misstatements that when aggregated exceed 5% of the activity level for the relevant product benchmark sub-installation individually, leads to a negative verification opinion statement.

As mentioned previously, when determining materiality of an issue, the materiality level alone is not the only factor to be considered when assessing whether a misstatement, non-compliance or non-conformity has material effect on the overall reported data. Qualitative aspects must be considered as well. Such aspects can have a material impact on the overall reported data even if a specified materiality level is not exceeded.

Verifiers should take into consideration qualitative aspects of data not listed in Article 23(4) e.g. for the quantity of exchangeable electricity, individual CWT values, etc. In such cases the verifier needs to understand how such data affect the overall reported data to determine if a non-compliance or non-conformance has a material effect. This will need to be established under two different scenarios:

- for the purposes of the free allocation application, and

- for the purposes of updating the benchmarks.

The key question for assessing qualitative aspects in either case is whether a misstatement, non-conformity, or non-compliance (individually or combined) can influence the decision of the user (e.g. the regulator for allocation data or the UK ETS Authority, in the context of benchmark updates). This will depend on the size and nature of misstatements, non-

conformities, or non-compliance, as well as the data concerned. This decision will depend on the professional judgment of the verifier.

Factors that can be relevant in determining whether a misstatement, non-conformity or non-compliance has material effect include:

- whether the misstatement, non-conformity or non-compliance can be corrected. For example, if a robust alternate estimation method can be applied to fill a large data gap – and that data gap relates to the allocation of allowances for the installation – the verifier would determine qualitatively that there was no material issue since the alternate methodology is appropriate. If, however, the alternate method was not robust, not properly supported by evidence, or had other failings, the verifier would need to make a qualitative judgement as to whether it was a material issue.

Other examples include whether estimation methods for attributing heat consumption between sectors exposed to carbon leakage and sectors not exposed are robust and supported by evidence:

- whether the operator refuses to correct the identified misstatement, non-conformity or non-compliance. If an operator refuses to correct an issue, the verifier will first request the operator's reasons for doing so. Article 22(1) of the VR requires operators to correct any identified misstatement, non-conformity or non-compliance which makes the refusal to correct an outstanding issue without sound justification an important factor that the verifier needs to consider when assessing the materiality

- the likelihood of the identified misstatement, non-conformity or non- compliance reoccurring. For example, if the control activities are not sufficient to mitigate inherent risks; calibration is not carried out on a planned and structured basis; important monitoring data are not documented properly, or there is systematic over- or under-estimation of values, even if the individual errors are lower than a specified materiality threshold. The likelihood of misstatements or non-conformities reoccurring may be high in those cases, and the situation may therefore be considered a material issue

- the duration of a misstatement, non-conformity or non-compliance. If the issue has lasted for a long period of time (from one year to another), this is usually a sign that the control system is not working properly, or operators are reluctant to correct the issue. This will inform the verifier's assessment of whether this has a material impact on the reported data

- whether misstatements, non-conformities or non-compliance are the result of an act with or without intent

- the type of non-compliance with the FAR and whether it affects the allocation or quantity of allowances such as:

    - the system boundaries for sub-installations have not been determined in accordance with the FAR and this affects the reported baseline data

- the product definition (reflected in reported NACE or PRODCOM code) does not correspond with the actual production process and/or the correct carbon leakage status
- the installation or part of the installation generates electricity which is not eligible for free allocation of allowances and the data for that installation or part of the installation has been taken into account in the calculations.

Where data contains misstatements that do not directly affect the allocation because the data is only being reported to enable the verifier and regulator to carry out plausibility checks (such as annual emissions attributable to product benchmark sub-installations), the verifier may consider this misstatement as non-material for allocation purposes. However, this does not absolve the operator from the requirement to correct the data. The verifier must include such misstatements as findings in the verification report should they not be corrected before issuing the verification report.

6.5 Verification report and opinion statement

6.5.1 Transparency and completeness

The verification report should be completed with sufficient detail so that the regulator can understand the main steps of verification carried out and obtain a clear picture of the quality of the operator's MMP (if relevant) and the data delivered. Both the regulator and the operator should be able to understand the nature of any issues identified. Article 27 (3) of the VR contains requirements for the verification report content.

The verification report must cover the basis of the verification as well as conclusions on:

- the compliance of the MMP with the FAR
- the quality and reliability of the data used for the free allocation application, and
- the quality and reliability of the data to be used for updating benchmarks.

Different verification opinions can be stated (these are applicable to any of the situations outlined above):

Table 1 - Verification opinion statements

Verification opinion statement	Clarification
The report is verified as satisfactory (positive verification opinion).	This opinion statement is given in two situations: • if there are no outstanding misstatements, non-conformities, or non-compliance issues • if there are outstanding misstatements, non-conformities, or non-compliance issues, but these are not material. This is called 'verified with comments'.

Verification opinion statement	Clarification
The report contains material misstatements that were not corrected before issuing the verification report. The report is **not** verified as satisfactory (negative verification opinion).	This opinion statement is given if there are material misstatements. This can include non-conformities and non-compliance that have a material impact on the reported data.
The scope of verification is too limited. The report is **not** verified as satisfactory (negative verification opinion).	Limitation of scope can occur if: • data or information are missing that prevents a verifier from obtaining the evidence required to reduce the verification risk to the level needed to obtain reasonable level of assurance e.g. some, or all, of the primary source data are missing, and data are only available at an aggregated level • the MMP does not provide sufficient scope or clarity to conclude on the verification (e.g. parts are not properly described, or it is unclear what methodology is applied) and it is not possible to determine this during implementation of the verification plan • the operator has failed to make sufficient information available to enable the verifier to carry out the verification • if approval is required for the MMP and that approval has not been granted. See section 2.2 for situations where the MMP does not require approval and where the verifier will do full checks against the FAR.
Non-conformities, either individually or combined with other non-conformities, provide insufficient clarity and prevent the verifier from stating, with reasonable assurance, that the report is free from material misstatements. The report is **not** verified as satisfactory (negative verification opinion).	Usually, when non-conformities are found during the verification process, it affects the risk analysis and the planned verification activities. If such non-conformities increase the risk of misstatements and create uncertainty over the accuracy of the data, the verification activities must be more detailed and further tests and checks will be required to achieve a greater level of assurance. However, further testing will not always provide the verifier with sufficient confidence in the data and a negative opinion may be issued. In certain cases, non-conformities (individually or combined with other non-conformities) provide too much uncertainty for the verifier to positively state with reasonable assurance that the operator's report is free from material misstatements. This could happen, for example, if the operator does not calibrate measurement equipment, the non-conformity is repeatedly not corrected and/or calibrated measurement results are not available, thereby causing the verifier to be uncertain whether the reported data are free from material misstatements.

Verification opinion statement	Clarification
Where the MMP is not subject to the approval of the regulator, non-compliance with the FAR individually or combined with other non-compliances provide insufficient clarity and prevent the verifier from stating with reasonable assurance that the report is free from material misstatements. The report is **not** verified as satisfactory (negative verification opinion).	For example, this is the case when some elements of the MMP are not scientifically justifiable, are not in line with the FAR (e.g. the 'highest achievable accuracy' data source is not being justifiably used), or the methodology is lacking in transparency and cannot be determined during implementation of the verification plan. If the non-compliance issues are so severe or lead to increased uncertainty over the accuracy of the data, it can prevent the verifier from concluding on the reported data with reasonable assurance.

Any identified misstatements, non-conformities, and non-compliance issues (whether these are material or not) are reported in the verification report, unless they have been corrected by the operator before the verification report is issued.

6.5.2 Possible situations with the MMP

If the verifier has reasonable doubts regarding the quality of minor elements of the methodology, e.g. regarding a particular estimation methodology for substitute data for closing data gaps, these doubts must be clearly stated in the verification report. If such non-conformities are found to have non-material impact on the reported data, the verification opinion can be positive if the derived data is found to be correct based on the MMP, and if the operator demonstrates that it cannot provide more accurate data.

If the verifier finds that the MMP indicates that the operator uses data sources which do not qualify as "data of highest achievable accuracy", the verifier will report this fact as a finding in the verification report. It can continue with further verification tasks if such non-conformities are found to be non-material. The verification opinion can be positive if the derived data is found to be correct based on the MMP, and if the operator demonstrates that it cannot provide more accurate data.

In such circumstances the verifier may add comments to the opinion statement to draw the regulator's attention to any issues they consider specifically relevant.

6.5.3 Describing the issues in the verification report

All outstanding issues must be described in a clear manner. This will allow the regulator and UKAS to assess the verifier's findings more closely. When describing the issues in the verification report, Article 27(4) of the VR requires the verifier to include the following in the description:

a) the size and nature of any misstatement, non-conformity or non-compliance with the MRR, the FAR or the ALCR

b) whether a misstatement has material effect on the reported data or not

c) to which element of the operator's report a misstatement relates, or to what element of the MP or the MMP a non-conformity relates

d) to which Article(s) of the MRR, the FAR or the ALCR a non-compliance relates.

In addition to stating findings in the verification report, the verifier may add comments to the opinion statement to draw the regulator's attention to any issues they consider specifically relevant, for example, significant quantification errors in elements of the data set to which the materiality level does not apply under Article 23(4) of the VR. Please note that for such significant errors the fact that a materiality level is not specified does not necessarily mean that the error is not material. This can still be the case based on the qualitative assessment of materiality (please see section Materiality).

6.6 Dealing with negative verification opinions

Free allocation data will only be accepted by the UK ETS Authority if it has been submitted to a regulator and verified as satisfactory by a verifier, in accordance with the VR. When data gaps are due to exceptional and/or unforeseeable circumstances that could not have been avoided even if all due care had been exercised, the regulator may decide to determine the HALs even in the event of a negative verification opinion statement (as per Article 15(2) of the FAR). Information on how to deal with negative verification opinion statements regarding annual activity level data is provided in section 8.5. If the regulator identifies any non-conformities or any errors which impact the determination of HALs, it shall require the operators to correct those issues. If needed, the regulator can request the operator to provide additional information and documentation to complement the application for free allowances in accordance with Article 4(2) of the FAR.

7 Special topics for FAR baseline data

This chapter explains some of the specific issues that are relevant in the verification of BDRs and new entrant data reports. Please note that this is not a complete list of issues.

7.1 Principles of the FAR

Verifiers should understand the underlying principles of the FAR calculations. The most important ones are listed below. More details about these concepts can be obtained from the guidance papers mentioned in Annex II.

7.1.1 Assessing the boundaries of the sub-installations

The verifier will check the boundaries of the sub-installation(s) and of the installation itself, to ensure that the calculations match with the physical processes on site, with no overlaps or omissions. Multiple sub-installations can apply to one installation.

Verifiers should therefore be aware of the sub-installation definitions for the different benchmarks (particularly product benchmarks[24]) as well as how the operator has divided the installation into sub-installations, if more than one sub-installation applies. Other key concepts include definitions of:

- an electricity generator. The export or consumption of heat used for electricity generation is not eligible for free allocation. The verifier should pay careful attention when electricity is generated on site, including electricity produced by standby generators, to ensure that no allocation is claimed for electricity production.

  As per Article 2c of the FAR, when determining electricity generator status ONLY for the 2027 – 2030 allocation period any electricity produced for sale for consumption outside the installation in the relevant period must be ignored if

  - it is relevant CHP electricity, or
  - it represents no more than 5% of the total electricity (not including relevant CHP electricity) produced at the installation in the relevant period.

  The rules surrounding whether an installation has electricity status as per Article 2c of the FAR and, if so, whether they are entitled to free allocation in respect of measurable heat (as per Article 2a of the FAR) are complex. Sheet I.III of the BDR contains a list of questions to help operators determine whether they have electricity status from 2026 and if so, whether they are entitled to free allocation for measurable heat. Verifiers must check sheet I including all supporting evidence as stated by the operator in sheet I.III of the BDR. This will include confirming whether the operator has provided valid CHPQA

[24] Verifiers should pay special attention to the boundaries of product benchmarks and use of excess heat that is already covered under the product benchmark.

certificates, and the period covered by the certificates. Verifiers should consult 'UKETS12 - Guidance on completing the 2025 Baseline Data Collection and an HSE/USE scheme status application' for further information.

- measurable heat, other non-measurable heat and district heating, and the principles for treatment of cross-boundary heat flows. Heat benchmark sub-installations can often be complex. Verifiers are advised to take note of 'UKETS15 FAR - Cross-boundary heat flows'.

- process emission sub-installations, including principles related to waste gases and the applicable correction to the allocation calculation. Corrections for waste gases are also relevant for the attributed emissions of product benchmark sub-installations in relation to the update of benchmark values. See 'UKETS17 FAR - Waste gases and process emissions sub-installation' for more details.

- Furthermore, verifiers must check the completeness of source streams and emission sources that are listed in the MMP. For this, verifiers will do similar checks as are done for annual emission verification. For more information see 'UKETS22 VR - Objective and scope of verification'.

7.1.2 Most accurate available data sources

As explained in section 2.3, the operator needs to use data sources that achieve the highest possible accuracy. If the MMP is approved by the regulator, it will include, where relevant, justifications for the applied data sources. If the regulator accepts justifications related to the technical feasibility or unreasonable costs associated with implementing new measurement systems, the approved MMP will take this into account and the verifier can accept the approved data sources as being of highest achievable accuracy. The verifier will take the decisions of the regulator on the MMP as a starting point for its work. However, it can still report non-compliance issues or recommendations for improvement if it considers that the requirements on most accurate data sources are not complied with, or it considers that the operator can improve on the selection of most accurate data sources.

7.1.3 Unreasonable costs and technical infeasibility

When other data sources are used because of technical infeasibility or unreasonable costs, the verifier will do the same checks as they would do for annual emissions verification of unreasonable costs and technical infeasibility. With respect to unreasonable costs, verifiers assess the calculation of unreasonable costs as well as the underlying evidence for the costs used in the calculation to determine if the justifications and evidence are complete and reasonable.

With respect to technical infeasibility, the verifier will gather evidence as to the equipment that was in place and available at the time the data were collected, and decide whether the evidence presented by the operator in the MMP of technical infeasibility is complete and reasonable.

7.1.4 Simplified uncertainty assessment

An operator can use other data sources provided it demonstrates to the satisfaction of the regulator that the associated level of accuracy of the data source it proposes is equivalent to, or better than, the level of accuracy of the most accurate data sources in the hierarchy given in section 4 of Annex VII to the FAR. For that purpose, the operator must compile a simplified uncertainty assessment, identifying major sources of uncertainty and estimating their associated levels of uncertainty. This uncertainty assessment does not have the same rigour[25] as that required for annual emissions reporting but should be robust and supported by logical evidence and justifications. When such a simplified uncertainty assessment is made, the verifier should check the validity of information used in the assessment. The verifier needs to check for evidence that all the major sources of uncertainty have been identified – across the entire data flow for generating, collecting, and calculating relevant data points - and the basis on which an estimation of uncertainty for each is derived.

Verifiers will cross-check that information with their own evaluation of the data flow and the operator's risk assessment. Verifiers will also ask the operator to justify the inclusion/ exclusion of sources of uncertainty within the assessment and to provide reasonable evidence for how the operator has decided the level of uncertainty.

7.1.5 Assessing the application of product benchmarks

As explained in section 6.3, the verifier will carry out checks on the correct application of product benchmarks and other benchmark update data, including:

- whether data gaps or double counting occurs.
- correct application of product definitions.
- correct attribution of activity levels for the fall-back allocation approaches (heat, district heating, fuel and process emissions sub-installations) according to the carbon leakage status of the products linked to those sub-installations and to the NACE/PRODCOM codes of these products.
- HALs (based on mean values of the baseline period and the relevant calculation methods).

The verifier will apply analytical procedures and data verification to assess these elements and should therefore be aware of how these concepts can be evaluated (see also section 6.3).

7.1.6 Product definitions and production data

A key issue when verifying FAR baseline data and annual activity level data is to check production data. These data form the basis for calculating the HALs for product benchmarks to determine the preliminary number of allowances allocated free of charge. This covers two

[25] Nor does it need to have the same approach and methodology, although if there is an existing approach applied to instruments etc. under annual reporting of emissions, operators would need to supply the verifier with a reasonable justification as to why this has not been applied to relevant FAR data collection activities.

aspects:

a) qualitative checks: has the operator chosen the correct benchmark? In other words, do the products fall under the relevant definition in Annex I to the FAR[26]?

b) annual quantity of products

Product classification

To answer point (a), the verifier will need both an understanding of the relevant product definitions in the FAR and the applicable NACE and PRODCOM classifications. Should there be any dispute about product classifications, the verifier should seek clarification from the UK ETS Authority.

For determining the quantitative production data (including heat sales data), the operator will usually be able to provide data from its financial accounting systems, such as delivery notes and invoices, and/or production accounting protocols. Often the data provided will be stored in electronic database systems and may be subject to audit by the operator's financial auditors. The verifier should consider the following issues:

- for HAL data, the amount of saleable product produced is relevant in most cases. If sales data are used, they must be corrected for annual stock changes to determine production data. Equally, if the operator's financial accounting year doesn't coincide with the calendar reporting year, appropriate adjustments must be made.

Considering results from financial or other audits:

- the verifier may consider the results of external independent audits performed for the purpose of tax or customs authorities, or in context of financial regulations. However, it is within the responsibility of the verifier to assess if relying on such audit opinions can be justified with a view to the scope and required level of assurance for FAR baseline data or annual activity level data verification. If necessary, the verifier must carry out additional verification activities.

7.1.7 Carbon leakage

Verifiers should be aware of the risk of significant exposure to carbon leakage of different sectors, and its impact on allocation rules. If a sector or sub-sector is subject to a risk of significant exposure to carbon leakage, they are listed on the arbon Leakage List (CLL).[27] Any sub-installations serving sectors or sub-sectors on the CLL are eligible for 100% free allocation. In principle, the eligibility assessment of (sub-) sectors included on the list is based on their NACE classification codes, although for several sub-sectors it is based on the more disaggregated[28] PRODCOM classification codes. Verifiers should confirm that the

[26] Definitions are further elaborated upon in 'UKETS18 FAR - Sector specific guidance'
[27] The CLL is contained in Commission Delegated Decision (EU) 2019/708 and is based on NACE revision 2, with the corresponding 2019 for PRODCOM. See Section 2.4 of 'UKETS13 FAR - Monitoring and reporting in relation to the free allocation rules' for more details.
[28] 'More disaggregated' means that more digits of the PRODCOM codes are relevant.

NACE / PRODCOM codes declared in the baseline report are consistent with other evidence of such declarations by the operator, or that there is a justifiable reason for a code declared to have changed. Verifiers need to be aware of the potential for distortion of free allocation levels by use of incorrect codes in BDRs and that some sectors have been split such that some sub-sectors (with more disaggregated codes) are on the CLL and some are not. Verifiers need to carefully check the CLL and make sure that the operators use the correct NACE / PRODCOM code in the baseline/new entrant's data report or the annual ALR. More information on the impact of carbon leakage is provided in 'UKETS11 FAR - Determining allocation at the installation level'.

7.1.8 Changes to allocation

There can be situations when changes to the installation's operations can impact the initial allocation e.g. known capacity changes that will impact production levels soon after the change. The verifier should be aware of such changes and check for any operational changes that may occur during the period the report covers. From the start of Phase 1 of the UK ETS, an installation's allocation will only change as a result of data notified in the annual ALR. See section 8 for more information.

Where the verifier observes that there is a cessation of an installation or sub-installation, or a significant change in a sub-installation as result of long term/permanent shutdown of technical units associated with that sub-installation, the verifier will follow normal verification procedures and report this in the verification report: it is a significant change in operations. In case of cessation of a sub-installation, the verifier will seek evidence to confirm that products covered by the definition of the relevant product or fall-back benchmark sub-installation have ceased production, and that there are no emissions attributable to the relevant sub-installation type. The verifier can obtain evidence for the cessation or shutdown of technical units, for example, by:

- assessing other permits such as environmental and pollution permits and publicly available information on changes at the installation
- confirming that the relevant equipment has been physically disabled and would require an engineering project to restart it (for example, if there is an 'air gap' in input fuel or material lines leading to the equipment)
- assessing formal documentation and sign-off by technical specialists and/or management to show that there has been formal decision making on the shutdown of the equipment such that the sub-installation ceases to apply
- confirming the date of cessation (or shutdown of individual technical units).

However, for some sub-installations, a cessation may happen without operation of the related technical units ceasing, e.g. where a switch from coloured glass to colourless glass takes place, or from uncoated to coated fine paper, etc. In such cases, the cessation of sub-installation cannot be confirmed.

Further guidance on determining a cessation, the requirement to surrender a permit, and the effect of a cessation on free allocation, is set out in "UKETS16A FAR – Guidance for installations ceasing operation". Please note that new legislation came into force on 6 February 2025 related to the "Final Year Rule". The effect of this rule is that the regulator must re-calculate the allocation for each sub-installation that has ceased operation (or, where the relevant permit has been surrendered or revoked, each sub-installation which makes up the installation). An exemption from the Final Year Rule is considered when the "decarbonisation condition" applies (described in section 5.3 of "UKETS16A FAR – Guidance for installations ceasing operation").

7.1.9 Mergers/splits

Article 25 of the FAR requires operators of new installations arising from a merger or a split to provide documentation about the ownership change to the regulator. The verifier must review that documentation and check whether the BDR of the installation is accurate, how the installation was merged or split, and what impact this has had on the sub-installations. This will be important information to consider in the assessment of whether the allocation data are accurate.

7.2 Special competences required

As explained in section 5.2, UK ETS auditors and lead auditors should have knowledge of the specific FAR rules, the ALCR and guidance, as well as knowledge and experience on monitoring and reporting aspects in relation to allocation data. Furthermore, the team should include at least one person that has the technical competence and understanding required to assess the specific technical aspects regarding the monitoring, reporting, and collection of data. This will allow the verifier to understand the installation and sub-installations applicable and check the application of the monitoring methodology and the implementation of the MMP. Otherwise, the verifier will not be able to assess the material correctness of the data and the correct implementation of the monitoring plan. Table 2 below provides an indication of which technical competence and understanding should apply to assess specific technical monitoring and reporting aspects.

Table 2 - Knowledge and skills related to technical competence

Element of technical expertise and competence	Examples of knowledge and skills related to technical competence
Assessing aspects of the MMP	Being able to assess and understand: • how the MMP is implemented in the installation • how to check the BDR or ALR against the MMP • how to analyse information and data to confirm whether the MMP is still appropriate and is being implemented

Element of technical expertise and competence	Examples of knowledge and skills related to technical competence
	• how to check the MMP against the FAR if the MMP is not approved and how to deal with aspects of unreasonable costs/technical infeasibility if there is no approval of these aspects by the regulator.
Specific activity and technology	• being able to identify and understand which key operations impact the installation's allocation data • having general knowledge of the technologies applicable to the industry sector in which the installation operates.
Relevant boundaries of the sub-installation and emissions sources/source streams.	Being able to understand and have knowledge of: • concepts related to process emission sub-installations, waste gases and correcting for the heat content therein; safety flaring etc. • boundaries of sub-installations • definition of product benchmarks and system boundaries • exchangeability of fuel and electricity • definition of fall-back sub-installations • attribution of data to relevant sub-installations • assessing completeness of source streams and emission sources • attribution of energy consumption to sub-installations • production inputs and outputs relevant to GHG emissions.
Quantification, monitoring and reporting including relevant technical and sector issues.	Being able to understand and have knowledge of techniques relevant to monitoring and reporting which requires skills such as: • parameters for collecting baseline data or annual activity level data • ability to understand the concept of exchangeability of electricity and heat • knowledge on special topics such as CWT factors and how to determine related activity levels, and other special benchmarks • understanding methods for determining net heat flows eligible for allocation under the fall-back sub-installations; for determining proxy data for measurable heat; and for calculating emissions related to heat in CHP installations • how to assess the most accurate data sources, and how to assess unreasonable costs and technical infeasibility • how to assess whether methods for completing data gaps are conservative and do not lead to material misstatements.

Element of technical expertise and competence	Examples of knowledge and skills related to technical competence
Knowledge related to the operator's organisation and quality assurance.	• operator's specific data flow and risk assessment • operator's specific control activities in relation to data flow • overall organisation with respect to monitoring and reporting, as well as the control environment in which the operator's accounting system functions • procedures mentioned in the MRR e.g. procedures for data flow activities and control activities; and for managing responsibilities for monitoring and reporting within an installation.
Knowledge related to verification agreements.	• understanding contracts or other agreements with the operator to manage conflicts that could impact the verification (e.g. time allocation in contracts with the operator); • understanding how to apply the concept of materiality to baseline data or annual activity level data, particularly for aspects of the data sets that have no defined materiality threshold.

7.3 Dealing with FAR-related data gaps

Data gaps can be identified by the verifier when carrying out analytical tests and detailed data verification, or by the operator itself. Figure 3 below shows what the verifier is required to check in the case of data gaps.

A data gap occurring several times over a longer period may show that the internal control activities have not been functioning correctly. The verifier will therefore assess the frequency of data gaps occurring and the control activities implemented to avoid such data gaps. The verifier assesses whether internal control activities are effective (e.g. whether IT systems automatically transferring data are secure and functioning properly, whether the operator has built in manual controls to ensure that no data gaps occur and whether regular data validation is occurring to pick up issues before they become data gaps).

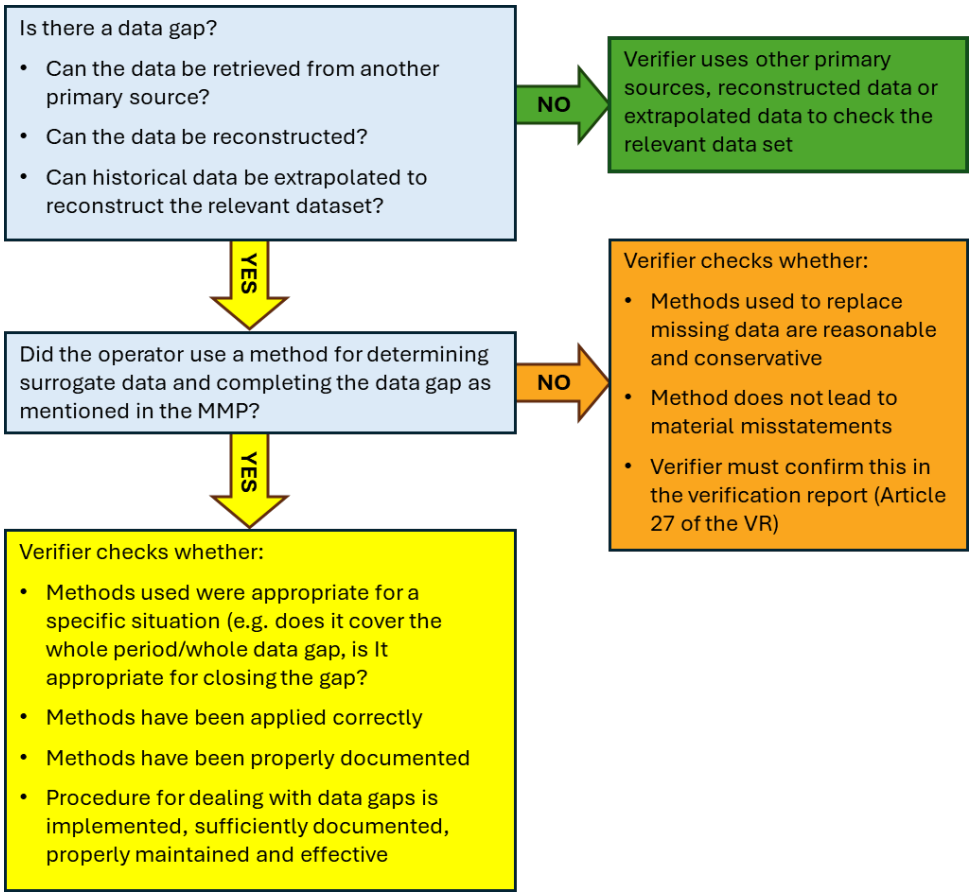

Figure 3 the process steps for dealing with data gaps

8 Specific rules for verification of annual activity level data

This section contains specific rules for the verification of annual activity level data.

8.1 Additional rules in the verification process

The same steps in the verification process are followed during the verification of ALR: from the activities in the pre-contract phase, the strategic analysis and risk analysis to independent review and verification reporting (see section 6). Verifiers must be provided with similar information by the operator as when verifying a BDR, including the provision of prior and current ALRs (see section 6.1.2). This information will be analysed in the strategic analysis and considered when verifying the relevant data. Other requirements that are similar include:

- the scope of verification (see section 6.2)
- the level of assurance (see section 6.4.1)
- the application of materiality (see section 6.4.2)
- how to deal with misstatements, non-conformities and non-compliance issues (see section 6.1.7)

During the verification of ALRs the verifier will carry out the same type of checks as when verifying BDRs (see sections 6.1.5, 6.3 and 7); but it will also do some additional checks. In particular, the verifier will check the accuracy of the parameters that can trigger a change in allocation levels, including the parameters in:

- Article 16(5) of the FAR, e.g. the amount of heat coming from nitric acid production and, from 2026, the emissions from flaring other than safety flaring
- Article 19 of the FAR, e.g. the tonnes of production of H2, ethylene and other HVC from supplemental feed, emissions from net imported heat, specified electricity consumption
- Article 20 of the FAR, e.g. hydrogen-related emissions[29], emissions from net imported heat, specified electricity consumption
- Article 21 of the FAR, e.g. amount of heat imported from an installation or other entity not included in the UK ETS

[29] Hydrogen-related emissions are calculated based on the calorific value times the heat benchmark.

- Article 22 of the FAR (electricity exchangeability), e.g. emissions from net imported heat, specified electricity consumption, direct emissions[30]
- Article 6(1), (2) and (4) of the ALCR, e.g. production levels and energy efficiency.

To check the accuracy of parameters, the verifier will perform plausibility checks on the underlying data, trace the data back to primary source data, do cross-checks between data sets, and perform analytical checks to spot outliers and anomalies. As part of the data verification the verifier will assess whether the data is obtained by correctly implementing the MMP and correctly applying methodologies in the FAR. This will allow the verifier to establish whether there have been changes to the installation's operations, heat imports, production level or energy efficiency that could lead to changes in allocation levels.

To check whether production levels, energy efficiency and energy consumption are accurate, the verifier will also assess:

- whether the energy consumption has been correctly attributed to each sub-installation
- the start of normal operations as this is relevant for defining activity levels. According to the FAR the start of normal operations is the first day of operations, i.e. as soon as the process is started (this includes the period of commissioning).

In addition, a consistency check shall be made between the previous year's data included in the report and the data that was verified for the relevant prior years to ensure there has been no change.

As with the verification of BDRs, the verifier will check whether the data in the annual ALR have been monitored and reported correctly in accordance with the MMP. This relates to both the annual activity level data and the underlying data and parameters listed in sections 2.3 to 2.7 of Annex IV to the FAR. To some extent, the verifier will also check against the FAR. Any non-compliance with the FAR and ALCR that is identified, will be reported by the verifier, even if it concerns an issue that is approved in the MMP. More information on the data required for annual activity level reporting can be found in 'UKETS13 FAR - Monitoring and reporting in relation to the free allocation rules'.

8.2 Annual emission report and ALRs

Some operators may choose to select the same verifier for the verification of both the annual emissions report (AER) and the ALR. This is acceptable provided that the verifier is accredited against the respective scopes and is entitled to do both types of verifications. If the same verifier is doing both verifications, it should be aware that these are separate verifications involving different types of risks, requiring checks on different data sets and internal controls, and subject to different rules and scope of verification. Furthermore, the sub-installation boundaries will not always correspond with the installation boundaries impacting the scope of

[30] E.g. whether a change in the fuel in the product benchmark sub-installation leads to a change in the allocation level.

verification. Even if doing the work during the same period, the verifier needs to consider that the work falls under separate verifications with specific and tailored time allocations, and separately documented strategic analyses, risk analyses, verification plans and verification reports. Where data sets and internal controls on data collection are the same for both AER and activity level change (ALC) reporting, verifiers may consider synergies in data checking and consider combining site visits, provided that the verifier accounts for the different objectives of the verifications and treats the work as separate verification activities. The verifier will also need to ensure that appropriate time is allocated to both verifications and the VR requirements on rotation are applied.

8.3 Site visits during the verification of ALRs

In principle site visits must be carried out by the verifier when verifying ALRs. The aim is to gather sufficient evidence to conclude with reasonable assurance that the operator's ALR is free from material misstatements. The activities carried out during a site visit are the same when verifying BDRs (see section 6.1.6), although the verifier will specifically look at elements that can impact annual activity levels.

8.3.1 Waiver of site visits

Article 31 and 32 of the VR allow for a waiver of site visits during the verification of ALRs when the following conditions have been met:

- the verifier has determined, based on a verification risk analysis, that a waiver of site visit will not compromise the verification work and can be justified, with all necessary evidence and data able to be remotely accessed
- the criteria for waiving a site visit in Article 32 of the VR have been met
- the operator has obtained the regulator's approval for installations emitting more than 25,000 tonnes of CO2 per year.

In preparing a site visit waiver risk assessment, the verifier will specifically consider the risks of not going to site in the planning and delivery of the verification.[31] These are different to the assessment of risks in the operator's data flow that forms part of verification planning. However, the risk assessment of the operator's controls over its data flow will potentially have impacts on the decisions made on site visit waiver risks.

As explained in 'UKETS26 VR - Verifier risk analysis', the risk analysis of the operator's controls over its data flow is an iterative process and subject to change following findings and further analysis of the risks during the verification process. If the regulator has already approved the waiving of a site visit, this does not exempt the verifier from updating its operator

[31] This is a similar process as is applicable for the waiver of site visits described in 'UKETS25 VR - Site visits' for the verification of annual emissions. The verifier should, however, be aware that the risks of waiving site visits can be different for FAR reporting: e.g. inspection of additional metering and controls required for elements not covered by the AER; evaluating boundaries of sub installations and technical units associated with each one versus the boundary of the overall installation and eligible technical units and source streams, etc.

controls risk analysis and adjusting its verification plan if it identifies higher inherent and control risks in the operator's data flow and internal controls than initially thought.

Increased risks in the operator's controls over its data flow may result in a situation where the magnitude of those risks requires the verifier to carry out the site visit after all. In such a scenario, the verifier must conduct a site visit to that installation, regardless of any earlier approval of the regulator to waive the site visit.

In the following situations, a waiver of site visit is not allowed:

- The verifier verifies the ALR for the first time
- No site visits have been carried out during the verification of ALRs or BDRs in the previous two activity level reporting periods. In general, these periods cover 1 year.
- If, during the activity level reporting period, there have been significant changes to the installation or its sub-installations which require a significant change to the MMP. This does not apply if the change relates only to a default value for a calculation factor.

Article 32 of the VR outlines the criteria for waiving site visits for ALRs:

- the same simple installations for which a waiver of a site visit is allowed for AER verification (as outlined in Table 3 below) and the following criteria are met (Article 32(3a) of VR):

    a. the installation only has one sub-installation to which a product benchmark is applicable, and

    b. the production data relevant for the product benchmark has been evaluated as part of an audit for financial accounting purposes and the operator has provided evidence to that effect.[32]

- simple installations as outlined in Table 3, and all the following criteria are met (Article 32(3b) of the VR):

    a. the installation has no more than two sub-installations

    b. the second sub-installation contributes less than 5% to the installation's total final allocation of allowances

    c. the verifier has sufficient data available to assess the split of sub-installations (if relevant), and

    d. if the sub-installation contributing 95% or more to the installation's total final allocation of allowances is a sub-installation to which a product benchmark is applicable, the production data relevant for the product benchmark must have

[32] E.g. a signed declaration from the financial auditor that the auditor has looked at the data and confirmed that it is correct.

been evaluated as part of an audit for financial accounting purposes. The operator must provide evidence to that effect.

- simple installations as outlined in Table 3, and the following criteria are met (Article 32(3c) of the VR):

  a. the installation only has heat benchmark or district heating sub-installations, and

  b. the verifier has sufficient data[33] available to assess the split of sub-installations, if relevant.

- unmanned sites (Article 32(4) of the VR). The same conditions for telemetered data, data management, and meter inspection are applicable for AER and ALR verification. There needs to be evidence to confirm that the meters have been inspected on site in accordance with Article 60 of the MRR or Article 11 of the FAR (see 'UKETS25 VR - Site Visits').

- installations located on remote or inaccessible sites, in particular offshore installations (Article 32(5) of the VR). The same conditions for centralisation of data and meter inspection are applicable for AER and ALR verification. There needs to be evidence to confirm that the meters have been inspected on site in accordance with Article 60 of the MRR or Article 11 of the FAR (see 'UKETS25 VR - Site Visits').

Table 3 - Simple installations for which site visits can be waived in AER verification

Type I Installations (Article 32(1) of the VR)	**Type II Installations (Article 32(2) of the VR)**	**Type III Installations (Article 32(3) of the VR)**
• category A or B installation • only one natural gas and/or 1 or more de minimis source streams[34] • natural gas is monitored through fiscal metering[35] • calculation factor for natural gas is a default value	• category A or B installation • only one fuel without process emissions[36] and/or 1 or more de minimis source streams[34] • activity data determined by fiscal metering or invoice data taking into account stock changes	• small installation • only one fuel without process emissions and/or 1 or more de minimis source streams • activity data determined by fiscal metering or invoice data taking into account stock changes • default values for calculation factors

[33] Where measurement instruments used for heat data are not working correctly and are not maintained properly by the operator, this may impact the verifier's risks of waiving a site visit and the verifier's decision to waive a site visit.
[34] Which in aggregate do not exceed the threshold for de minimis source streams.
[35] Which is subject to an appropriate legal regime for the control of fiscal meters and meets the required uncertainty levels related to the applicable tier.
[36] Fuel is either a solid fuel directly combusted in the installation without intermediate storage, or a liquid or gaseous fuel for which there may be intermediate storage.

	• default values for calculation factors • simplified MP according to Article 13 MRR	

Unless it concerns an installation with low emissions, the operator must submit an application to the regulator requesting approval of a site visit waiver. The application for a waiver of a site visit shall be accompanied by evidence that all conditions have been met. In addition to the elements listed in 'UKETS25 VR - Site visits', this includes evidence that the ALC-related criteria have been met e.g. evidence that the split of sub-installations can be assessed, of financial audit in the case of product benchmarks, or the number of sub-installations.

8.3.2 Virtual site visits

As described above, Article 21 of the VR requires the verifier to carry out physical visits to the installation. However, certain circumstances beyond the control of the verifier (force majeure) may prevent a physical site visit being carried out (e.g. COVID-19 plant closures). Article 34a of the VR allows verifiers to carry out virtual site visits if certain conditions are met. Article 34a of the VR can also apply to the verification of annual activity level data provided all conditions have been met. More clarification is provided in 'UKETS25 VR - Site visits'.

8.4 Verification reporting

The same requirements in Article 27 of the VR on the submission, content and detail of the verification report apply to the verification of ALRs. However, there are some additional elements that verifiers need to report:

- the total verified value of the activity level, for the years in the activity level reporting period(s), for each individual sub-installation
- where there are changes to the parameters listed in Article 16(5), 19, 20, 21 or 22, or changes in the energy efficiency parameters, a description of these parameters and related remarks must be provided
- confirmation that the date of start of normal operation has been checked, where this is applicable.

The same types of verification opinion statements apply to verification of ALRs as to BDRs (see section 6.5).

8.5 Addressing outstanding issues in the verification report

As with verification of AERs and BDRs, the verifier must state in the verification report any identified misstatements, non-conformities and non-compliance issues that have not been

corrected by the time the verification report needs to be issued to the operator. The verifier can also make recommendations for improvement if there are areas for improvement in the monitoring and reporting of annual activity level data, procedures and internal controls. Once the issues have been reported in the verification report, certain follow-up actions are necessary, as outlined in Table 4.

Table 4 - Follow-up actions in response to outstanding issues

Type of outstanding issue reported in verification report	Type of follow-up action
Non-material misstatement	The regulator assesses the misstatement and conservatively estimates the value of the parameter where possible. The regulator shall inform the operator whether and which corrections are required to the annual ALR. The operator must make the information available to the verifier (Article 3(4) of the ALCR).
Non-material non-compliance (either concerning BDR or ALR)	The operator corrects non-compliance in consultation with the regulator. An update of the MMP may be required.
Non-material non-conformity (either concerning BDR or ALR)	The operator must correct the non-conformities. During verification of the next annual ALR, verifiers must check whether these non-conformities have been corrected. If non-conformities have not been corrected, the verifier must consider the impact on the risk of misstatements and report this in the verification report. The regulator may want to pay attention to these when reviewing verified annual ALRs.
Recommendations for improvement	During verification of the next ALR, verifiers must check whether recommendations have been followed up. If recommendations have not been followed up (or not agreed with the regulator that acting on recommendations is not justified), the verifier must consider the potential impact on the risk of misstatements and non-conformities and report this in the verification report. The regulator may want to pay attention to these when reviewing verified annual ALRs.
Misstatements, non-conformities and non-compliance issues that have material impact on annual activity level data (negative verification opinion statement)	Conservative estimation by the regulator and correction by the operator of non-conformities and non-compliance issues in consultation with the regulator. This may require an update of the MMP.

Limitation of scope (negative verification opinion statement)[37]	Conservative estimation by the regulator

If the annual ALR is not in compliance with the ALCR or FAR, or if the report is not verified by an accredited verifier in accordance with the VR, the regulator may make conservative estimation of annual activity level data as per Article 3(4) of the ALCR.

[37] Information on what constitutes limitation of scope is provided in section 6.5.

Annex 1: Hierarchy of accuracy for data sources

The hierarchies for highest achievable data sources specified by Annex VII(4) to the FAR are shown in the following figures

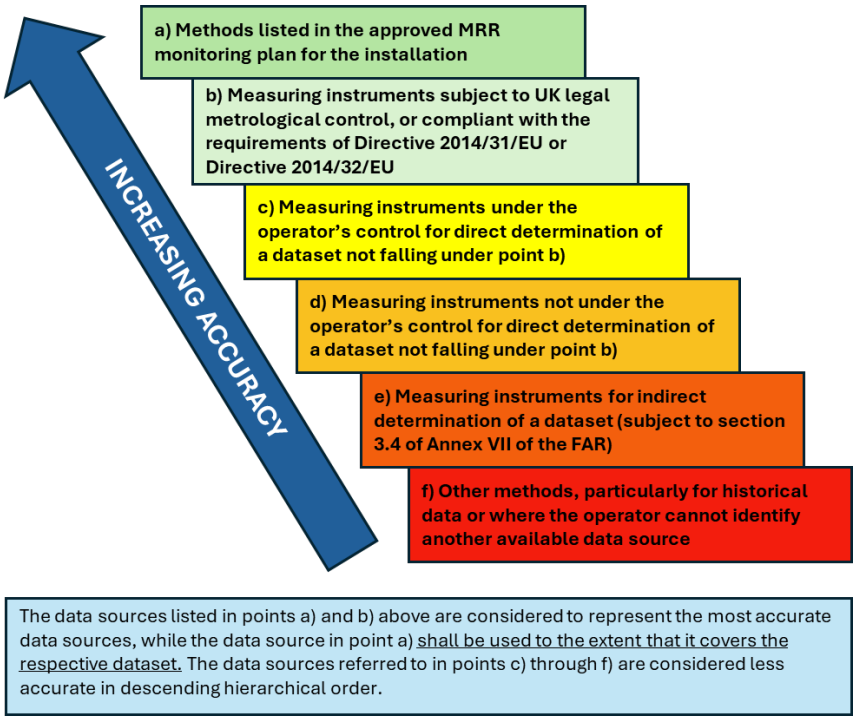

Figure 4 – Data sources for quantification of materials and fuels

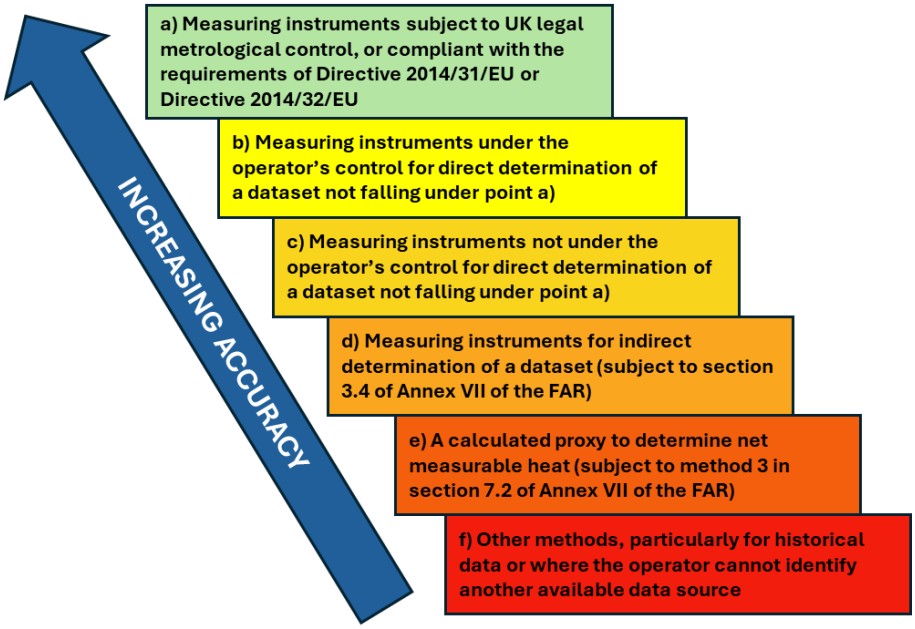

Figure 5 – Data sources for quantification of energy flows

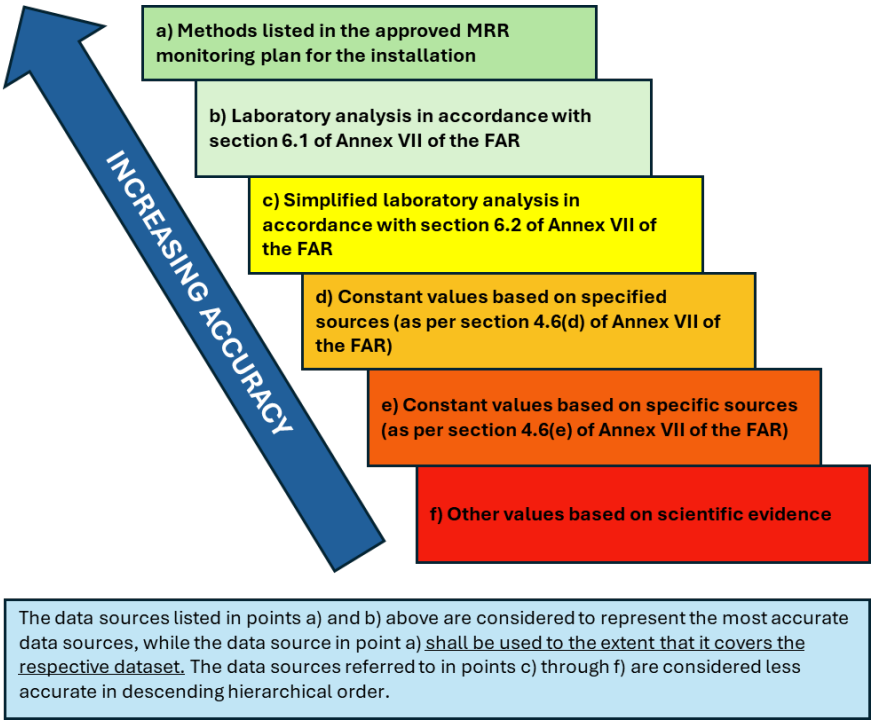

Figure 6 – Data sources for properties of materials

Annex 2: Example 'Management Declaration'

< *Name and job title of main operator contact point* >

< *Address of installation / company* >

< *Date* >

< *UK ETS Permit Number* >

To whom it may concern,

Verification of baseline data for UK ETS free allocation for 2027 – 2030

We confirm to the best of our knowledge and belief, and having made appropriate enquiries, the following representations given to [*Verification Body name*] in connection with your verification of this installation's free allocation data baseline report.

1. We confirm that all relevant sub-installations have been accounted for, and aggregate data apportioned without omissions or double counting, *with the exception of:*
   - *< insert any exceptions to the above statement (with explanation as to why the exception occurs) or delete as appropriate >*

2. We confirm that the information in the submitted Baseline Report corresponds to the related information in the monitoring methodology plan for this installation (insert date of relevant MMPs), *with the exception of:*
   - *< insert any exceptions to the above statement (with explanation as to why the exception occurs) or delete as appropriate >*

3. We confirm that we have used the available data of highest accuracy in accordance with section [*insert relevant section numbers e.g. 4.4(a), 4.5(a),4.6(a) etc.*] of Annex VII to the FAR, *with the exception of*:
   - *< insert any exceptions to the above statement (with explanation as to why the exception is allowed – supporting evidence to demonstrate this will be required) or delete as appropriate >*

4. We confirm that the NACE/PRODCOM codes declared in the baseline report are consistent with the codes that we use for other purposes, *with the exception of:*
   - *< insert any exceptions to the above statement (with justification as to why the exception is allowed – supporting evidence will be required) or delete as appropriate >*

5. We confirm that the evidence pack supplied to [*Verification Body name*] is as complete as possible for the installation by taking account of the FAR rules and guidance provided by the UK ETS Authority and the regulator, *with the exception of:*
   - *< insert any exceptions to the above statement (with explanation as to why the exception occurs) or delete as appropriate >*

6. We confirm that we are not aware of any actual or possible instances of non-compliance with the rules of the above scheme, *with the exception of:*
   - *< insert any exceptions to the above statement (with explanation as to why the exception occurs) or delete as appropriate >*

7. We acknowledge our responsibilities for the monitoring and internal control systems that are designed to prevent and detect error or misstatement of UK ETS baseline data.

8. We have disclosed to [*Verification Body name*] the results of our risk assessment that assesses whether our baseline data report is free of material misstatements that may arise due to error, omission or lack of internal control.

9. We confirm that the above representations are made on the basis of enquiries of [*insert installation/company name*] management and staff (and where appropriate, inspection of evidence) sufficient to satisfy ourselves that we can properly make each of the above representations to you.

10. We confirm that the persons listed below are authorised to make representations on behalf of the installation and the Operator.

Signed on behalf of *[insert installation/company name*]

1. Installation's UK ETS technical responsible authority

Signature:	
Name [CAPITALS]	
Position:	
Date	

2. Independent review of UK ETS data flow activities by:

Signature:	
Name [CAPITALS]	
Position:	
Date	

3. Senior management sign-off

Signature:	
Name [CAPITALS]	
Position:	
Date	

Note: This declaration must be signed by

1. The person responsible for the collation of baseline data and overall supervision of the UK ETS data and control environment

2. One person who has reviewed the data but has not been involved in the determination or recording of UK ETS baseline data, and

3. An appropriate Member of the Senior Management Team at the Installation, such as (but not limited) to the Managing Director, Site Manager, Company Secretary or Executive Director.

This publication is available from: www.gov.uk/government/publications/uk-ets-2025-baseline-data-collection-and-hseuse-scheme-status-how-to-meet-the-data-submission-requirements

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