



# **QSI.TL.14**

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# **INSTRUCTION ON THE CALCULATION OF VERIFICATION PERIOD AND THE PRICING**

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**CONTENTS**

<b>1. PURPOSE .....</b>	<b>3</b>
<b>2. SCOPE.....</b>	<b>3</b>
<b>3. DEFINITIONS .....</b>	<b>3</b>
<b>4. REFERENCE DOCUMENTS .....</b>	<b>3</b>
<b>4.1. Forms .....</b>	<b>3</b>
<b>4.2. Other documents .....</b>	<b>3</b>
<b>5. IMPLEMENTATION .....</b>	<b>4</b>
<b>5.1. CSB MRV Standard Verification Periods .....</b>	<b>4</b>
<b>5.1.1. Extending Verification Periods .....</b>	<b>4</b>
<b>5.1.2. Calculation of Verification Period .....</b>	<b>7</b>
<b>5.1.3. Calculation of CSB MRV Verification Fee .....</b>	<b>8</b>
<b>          CORSIA Verification</b>	
<b>5.2. Periods .....</b>	<b>8</b>
<b>5.2.1. Extending Verification Periods .....</b>	<b>8</b>
<b>6. REVISION TRACKING PAGE.....</b>	<b>9</b>

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<b>Page No/Total Pages</b>	<b>2/9</b>		

## 1. PURPOSE

The purpose of this instruction is to determine the method for the duration and fee of the activities to be carried out within the scope of the Verification procedures.

## 2. SCOPE

This instruction covers all verification activities.

## 3. DEFINITIONS

## 4. REFERENCE DOCUMENTS

### 4.1. Forms

### 4.2. Other Documents

- EUROPEAN COMMISSION DIRECTORATE-GENERAL CLIMATE ACTION Directorate A - International and Climate Strategy CLIMA.A.3 - Monitoring, Reporting, Verification Man-day Guidance for NABs and NCAs
- EA-6/03 - EA Document for Recognition of Verifiers under the EU ETS Directive Annex D – Factors to consider for time allocation and data sampling (normative)
- SHY-16-4 Regulation on Monitoring of Greenhouse Gas Emissions Resulting from Aviation Activities
- SHT-CORSIA Application Instruction for Carbon Offsetting and Reduction Scheme for International Aviation
- ICAO Annex 16 – Environmental Protection – Volume IV, Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA)
- ICAO Doc 9501 - Environmental Technical Manual - Environmental Technical Manual

<b>Doc. No</b>	<b>QSI-TL.07</b>	<b>Prepared By</b>	<b>Approved By</b>
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<b>Revision Date</b>	<b>17.02.2021</b>		
<b>Revision No</b>	<b>04</b>		
<b>Page No/Total Pages</b>	<b>3/9</b>		

**5. IMPLEMENTATION**

**5.1. CSB MRV Standard Verification Periods**

Verification periods are determined in accordance with the table below.

Category of Facility	Minimum Verification Period	Minimum Site Visit Duration (Within minimum verification period)	Minimum Strategic Analysis Site Visit Duration (If applicable, in addition to minimum verification period)	Minimum Technical Expert Period (In addition to verification period, if used in verification team)
	(1) (man-day)	(2) (man-day)	(3) (man-day)	(4) (man-day)
Low emission facilities	3	1	0.5	0.5
Category A facilities	4	2	0.5	0.5
Category B facilities	8	4	1	1
Category C facilities	16	6	1	1
Category B and C facilities in activity group 2, 3 (performing all sub-activities simultaneously) or 8.3	20	8	2	2

**Table 1**

\* The times to be spent for the site visit to be carried out before the contract are not included in the periods in the table. The periods in columns (1), (2) and (3) of the table cover only the activities of the chief verifiers and verifiers after the verification contract. Column (4) covers only the activities of technical experts after the verification contract.

**5.1.1. Extending Verification Periods**

It may be decided to extend the verification periods by the decision of the Planning Officer during the proposal/contract phase of the verification, and by the decision of the Chief Verifier in other stages.

The extension amount for verification periods is calculated in accordance with the following methodology. The number of days after the calculation is compared with the minimum periods in the table above. After comparison, the higher value is taken into account.

**i] Number of Emission Sources**

The fact that the emission sources are excessive during the verification process shall be effective in the measurement method or in the formation of the activity data. Therefore, considering this parameter, the verification period is determined according to the complexity of the business. The increase in the table within the scope of the evaluation is applied as follows.

<b>Doc. No</b>	<b>QSI-TL.07</b>	<b>Prepared By</b>	<b>Approved By</b>
<b>First Issue Date</b>	<b>01.05.2016</b>		
<b>Revision Date</b>	<b>17.02.2021</b>		
<b>Revision No</b>	<b>04</b>		
<b>Page No/Total Pages</b>	<b>4/9</b>		

## INSTRUCTION ON THE CALCULATION OF VERIFICATION PERIOD AND THE PRICING

Number of Emission Sources	Points to Be Awarded
1 – 3	1
3 – 6	2
More than 6	3

### ii] Number of Source Flows

The size and nature of data contained in the verification report will affect the verification period. For example, when the emission value that will occur from small and insignificant source flows is compared with the emission value that will occur from large source flows, the large source flow will take more time in the process. Therefore, the number of source flows plays an important role in determining the verification process. Small and insignificant source flows will not be taken into account when evaluating the table below.

Number of Large Source Flows	Points to Be Awarded
1 – 3	1
3 – 6	2
6 – 9	5
More than 9	10

### iii] Type of Source Flows

The increase in the number of fuels (especially non-standard fuels) or materials and addition of biomass fuels will mean more evaluation and testing by the verifier and therefore more time. For this reason, types of source flows are also decisive when determining the verification period.

Type of Source Flow	Points to Be Awarded
If only commercial standard fuels are use	1
If only liquid fuels / natural gas are used	4
Any combination of fuels (liquid, solid and/or gaseous fuels and materials, mixed biomass)	8

### iv] Total Emission Amount

The final emission value of the report to be verified is specified as the main data. When the emission values of Category A and Category B enterprises are compared, it can be determined that a Category B enterprise at the limits can be separated from Category A. In this regard, emission values can be decisive when determining the verification periods.

<b>Doc. No</b>	<b>QSI-TL.07</b>	<b>Prepared By</b>	<b>Approved By</b>
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<b>Revision Date</b>	<b>17.02.2021</b>		
<b>Revision No</b>	<b>04</b>		
<b>Page No/Total Pages</b>	<b>5/9</b>		

## INSTRUCTION ON THE CALCULATION OF VERIFICATION PERIOD AND THE PRICING

Number of Large Source Flows	Points to Be Awarded
DE Facilities	0
Category A Facilities	1
Category B Facilities	8
Category C Facilities	15

### v] Complexity of Data Flow Activities and Control Systems

The number of days to be spent for verification depends on the complexity of the accounting system, and soundness and adequacy of the operator's data management systems and the control system. (The complexity of the accounting system has more impact on the number of days than the complexity of site operations).

When data of the enterprises are evaluated, it is certain that it will affect the result specified in the emission report. In this regard, the data flow diagram and control activities are examined in detail within the scope of the enterprise. Verification periods may vary depending on these situations. The verification period of a business that uses automation in the data recording method and has less risk for the inclusion of erroneous data in the system compared to a manually recording enterprise will be less. Likewise, the verification period will increase as the tests to be applied will increase or the understanding of the system will take longer as the control activities in the data become more complex.

Complexity and Control	Points to Be Awarded
Low Complexity and good control	2
Moderate Complexity and good control	8
High Complexity and good control	16
Moderate/High Complexity and poor control	30

Whether the verifier's confidence level is high, medium, low, or very low depends on the specific conditions, the verifier's professional judgment, and the outcome of the individual risk analysis. During verification, confidence in the soundness of control activities, procedures and other elements of the control system may change, for example, as non-compliances are detected or the risk of false statements increases. This will have an impact on time allocation, which may need to be adjusted.

The following should be considered by the verifier during verification:

- The level of confidence is closely related to the outcome of the risk analysis. High control risk means that the verifier has a low level of confidence on the soundness of control system and procedures. While moderate control risk implies a moderate level of confidence, low control risk will likely result in a high level of confidence in the adequacy of the control system and the procedures performed.
- If a facility has a certified management system accredited to requirements such as ISO 9001, ISO 14001 or EMAS, this can increase confidence in the controller's control system – but these systems must include relevant data accounting and reporting processes. However, this does not exempt the operator from performing control activities and procedures that are inherent and commensurate with the control risks. Note that small facilities may not have ISO 9001,

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<b>Revision Date</b>	<b>17.02.2021</b>		
<b>Revision No</b>	<b>04</b>		
<b>Page No/Total Pages</b>	<b>6/9</b>		

ISO 14001 or EMAS systems. This does not mean that the control system is not sound. The determining factor is whether the verifier has sufficient assurance that the control activities and procedures implemented will reduce inherent and control risks on an ongoing basis.

- The difference between low and very low confidence in the effectiveness of the control system depends on particular conditions. Low confidence may mean that a control system and procedures are available; however, they are not commensurate with the identified inherent and control risks or are not properly documented and implemented. There may be very low confidence in the installation where there is no suitable system for data collection or processing, or if appropriate procedures are in place because the control risks are too high.

**Additional Note** - During strategic and risk analysis these systems should be more thoroughly evaluated by the verifier as an indication of the true complexity and associated inherent and control risks. At this stage, time allocation should be reviewed by the lead verifier. It should be ensured that the verifier is adequate for the level of confidence it has gained from the risk analysis after completing the strategic analysis.

### vi] Additional Factors

According to the additional factors stated below, the time to be spent on site for the facility will be extended by at least 1 day as a result of the evaluation of the Verification Manager and this time will be reduced from office work.

1. Types and number of emission sources to which continuous measurement methods (CMM) are applied,
2. If the EU ETS emissions are applied, the method determined by continuous emission measurement, the standards used, the measurement principle used and the parameters;
3. Implementation of EN 14181 and other calibration requirements in CMM.

### 5.1.2. Calculation of Verification Period

The items listed above may affect the verification period. The total score is obtained by summing the scores given in the above items in the periods to be determined for the verification activity. The score obtained is evaluated according to the table below.

The number of days found according to the table includes Strategic Analysis but excludes Technical expert period.

Total Score	0 – 7 points	8 – 23 points	24 – 35 points	36 – 50 points	>50
Min man/day	1.5	2-3	4-5	6-7	8-9

Whether it is more appropriate for the time allocation to be above or below the specified range will depend on the specific conditions of the verification. The range should serve as an indicator for comparison in the verifier's real time allocation. In practice, the verifier has to consider other factors that may affect time allocation.

Doc. No	QSI-TL.07	Prepared By	Approved By
First Issue Date	01.05.2016		
Revision Date	17.02.2021		
Revision No	04		
Page No/Total Pages	7/9		

### 5.1.3. Calculation of CSB MRV Verification Fee

While calculating the verification fee, the gross minimum wage announced in January of the verified year is taken into account. This fee is multiplied by the total verification time (including strategic analysis and technical experts) to determine the total verification fee (excluding VAT).

### 5.2. CORSIA Verification Periods

Verification periods are determined in accordance with the table below.

Aircraft Operator Category	Domestic & International Total Emissions Amount (CO <sub>2</sub> e)	Strategic Analysis Site (Man/Day)	Process Analysis Site (Man/Day)	Process Analysis Office (Man/Day)
Category A	0-25,000	1	2	2
Category B	25,001-100,000	2	4	4
Category C	100,001-.....	2	6	6

**Table 1**

\* The times to be spent for the site visit to be carried out before the contract are not included in the periods in the table.

\* Technical Experts must be on site together with the verification team throughout the Site visit.

#### 5.2.1. Extending Verification Periods

In the following cases, verification periods can be extended.

- Verifications that require an interpreter +10%
- The need for site visits to more than one location +20%
- Complexity of datasets (so much manual data...) +20%

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<b>Revision No</b>	<b>04</b>		
<b>Page No/Total Pages</b>	<b>8/9</b>		



