

Att.: To all applicant and accredited certification bodies concerning EMAS environmental verifiers

Your email

Our ref.: DC2014SSV136

Milano, 15/10/2014

**Re: ACCREDIA Department of Certification and Inspection – Circular N° 16/2014
Informative, regarding accreditation for the EMAS scheme**

Introduction

ACCREDIA only accredits environmental verifiers who are defined as legal persons, whilst individual verifiers (physical persons) remain under the management competence of the Committee for the Ecolabel and for the Ecoaudit.

Accreditation standard and regulations

Accreditation standard	UNI CEI EN ISO/IEC 17021:2011 and Reg. (CE) N°1221/2009 (hereinafter referred to as the EMAS regulation).
Requirements for environmental verifiers	The general requirements for the accreditation of environmental verifiers laid down in article 20 of the EMAS regulation
Certificate	The certificate of accreditation shall carry, as scope of accreditation, the list of NACE codes issued (see attached the equivalence table between EMAS sector clusters – NACE – IAF codes). As well as the standards of the verifier, the certificate of accreditation shall carry an accreditation number which will follow the following format: IT-V-xxx in continuity with what has already been issued by the Committee for the Ecolabel and for the Ecoaudit.

Accreditation process

Various case possibilities may be presented depending upon ACCREDIA accreditations already held by the environmental verifier presenting the application for accreditation or extension.

The requirements for accreditation and extension contained in ACCREDIA regulation RG-01 do not vary; preliminary conditions for the application are as follows:

- If a NACE code is being applied for, to have a client already for that code;
- If the application is for an entire sector cluster, to have at least one client for each critical NACE code in the sector cluster.

For the granting of accreditation and/or extension it is not necessary to have previously issued certificates (i.e. to have validated environmental declarations) due to the fact that this is not possible without the availability of accreditation. The sector cluster may be requested also after the performance of audits, in subsequent periods, on NACE critical codes.

The table below sets out the conditions for the granting of accreditation and extension.

<p>1) First accreditation for accredited CB against ISO/IEC 17021 for the EMS scheme</p>	<p>Documental exam lasting 1 day. Audit at the location of the environmental verifier lasting 2 days. Witness audit: if a sector cluster is requested a witness audit will be performed in a NACE critical code, considering it representative for the issue of the sector cluster. For example: if sector cluster I is requested, considering that there is a client in NACE critical codes 1.1, 1.2, 1.3 and 2, a witness audit performed in one of these NACE codes makes accreditation possible for the entire sector cluster. If critical and non-critical NACE codes are requested in the same sector cluster, a witness will be conducted in a critical NACE code for the issue of all the NACE codes requested. For example: NACE codes 1.1, 1.2 and 1.3 of the sector cluster I are requested and there are clients for these NACE codes, a witness carried out in one of the critical NACE codes makes accreditation possible for all the requested NACE codes. If a number of non-critical NACE codes are requested, a witness will be conducted in a non-critical NACE code within the sector cluster for the issue of all the non-critical NACE codes requested. For example: request is made for non-critical NACE codes 1.5, 1.6 and 81.3 of sector cluster I, having clients for these non-critical NACE codes, a witness carried out in one of the non-critical NACE codes makes accreditation possible for all the requested NACE codes.</p>
<p>2) First accreditation for accredited CB against ISO/IEC 17021 but not for the EMS scheme</p>	<p>Documental exam lasting 1 day. Audit at the location of the environmental verifier lasting 3 days. Witness audit as in the first case.</p>
<p>3) First accreditation for CB not accredited in any scheme</p>	<p>Documental exam lasting 1 day. Audit at the location of the environmental verifier lasting 4 days. Witness audit as in the first case.</p>
<p>4) Extension of accreditation in other NACE codes for CBs already accredited in the EMAS scheme</p>	<p>Documental exam lasting 0.5 day (1 day if a large number of NACE codes is requested) 5) No on-site audit. Witness audit as in the first case.</p>

Note 1: in the case of new clients within one sector cluster where a NACE critical code has already been accredited it is not necessary to carry out a witness: a documental exam is sufficient for extension. For example: if, in sector cluster I, the NACE critical code 1.1 has already been accredited, if NACE code 1.2 is requested for extension, it is sufficient to perform a documental exam.

Note 2: if extension is requested to the NACE codes belonging to sector clusters XVI, XVII, XXII, ACCREDIA may decide not to perform a witness and to deem it sufficient to perform a documental exam for extension if the environmental verifier already has EMS accreditation from ACCREDIA for the corresponding IAF sectors. For example: if NACE code 62 is requested and the environmental verifier has ACCREDIA accreditation for EMS in IAF sector 33, the extension may be issued following a documental exam.

The documents to be given to ACCREDIA (apart from those required by the modules for the application for accreditation or for extension) for the documental exam are as follows:

- an organization chart which defines the responsibilities and the personnel structure of the organization and a declaration regarding the legal status, ownership and finance sources;

- documentation enabling the identification of the tasks, responsibilities and relations, shown by means of a scheme of organization, among the staff of the organization and – in particular – the connections between the staff performing audits and those issuing conformity declarations of the system and the validation of environmental declarations in line with the EMAS requirements;
- evidence of the presence of environmental competence in decision-taking personnel regarding the validation processes together with the CV;
- documentation regarding the audit system and validation of environmental declarations used, including the regulations and procedures applied for the granting of validation.

Maintenance of accreditation

For the maintenance of accreditation throughout the accreditation cycle, apart from special situations such as the handling of complaints and remarks, modifications to the certification scheme or the structural organization of the Body, as well as an annual head office audit, the following assessments will take place:

- o if the environmental verifier has issued fewer than 25 validations of environmental declarations, ACCREDIA performs 1 witness;
- o if the environmental verifier has issued from 26 to 100 validations of environmental declarations, ACCREDIA performs 2 witnesses;
- o if the environmental verifier has issued from 101 to 200 validations of environmental declarations, ACCREDIA performs 3 witnesses;
- o if the environmental verifier has issued more than 201 validations of environmental declarations, ACCREDIA performs 4 witnesses;

Requirements for accreditation in third countries

Accredited environmental verifiers may apply for accreditation to operate in third countries in the same way as for normal extension of accreditation (see above).

To do this, the application for extension to operate within EMAS in third countries shall contain the names of the countries and the NACE codes in question. If the applicant is not already accredited for these codes, the application will be treated as a double extension – for operating in third countries and also for the new codes.

The supplementary requirements for environmental verifiers operating in third countries are set out in article 22 of the EMAS regulation and they are:

1. knowledge and comprehension of the legal, regulatory and administrative rules regarding the environmental situation in the country in question;
2. knowledge and comprehension of the language of the country in question.

The environmental verifier, when conducting audits in third countries, shall ensure with the competent local authorities that there are no legal complications which might block the registration of the organization, and shall investigate any complaints from interested parties concerning the organization. It is the responsibility of the environmental verifier to provide adequate documental evidence regarding the planned actions for the appraisal and also the results obtained, which shall be analyzed for any risks regarding the credibility of the validation issued.

Furthermore, in accordance with article 27 of the EMAS regulation, the environmental verifier shall notify ACCREDIA at least 6 months in advance regarding each verification and validation in a third country, the information concerning the place and time of the verification and validation and also any new contracts signed for the fulfillment of points a) and b) in case those previously sent are no longer valid.

For accredited environmental verifiers to operate in third countries, the list of such countries shall be given in the attachment to the certificate of accreditation.

With regard to surveillance activities, ACCREDIA will usually carry out one witness assessment in the third country in each accreditation cycle.

Requirements for operating in Italy with accreditation obtained in another EU member state

The EMAS regulation states in article 28 that accreditation bodies designated by member states in accordance with articles 4 and 5, paragraph 2 of Reg. (CE) n. 765/2008 have the task of accrediting and issuing authorizations to environmental verifiers and to oversee their activities.

Article 25, paragraph 10 of the EMAS regulation states that environmental verifiers accredited or authorized by a member state may carry out verification and validation activities in any other member state, and that such activities are subject to surveillance by the accreditation body of the state where they take place as set out in article 23, paragraph 2 of the same regulation. Environmental verifiers wishing to undertake verification and validation activities in Italy shall notify ACCREDIA at least 4 weeks in advance and they shall give ACCREDIA the following information:

- details regarding the accreditation or authorization (certificate of accreditation or authorization, date of accreditation or authorization and range of accreditation or authorization);
- NACE code for the requested activity;
- details regarding the members of the audit team (competence, sector-specific training and experience as well as field of environmental verification);
- measures adopted for acquiring knowledge of the applicable Italian standards and language;
- details of the date and place (with address of the organization and contact details) of the verification;
- draft of the environmental declaration to be verified;
- verification plan.

If the accredited environmental verifier in another member state seeks to operate in Italy for the first time the witness assessment is performed on the verifier making the application.

For the subsequent witness assessments ACCREDIA may carry it out taking into consideration:

- the knowledge that has been acquired by the verifier;
- the NACE code of the request (e.g. if it concerns the subsequent assessments of the verifier of the same organization it is possible to choose not to perform the witness);
- the result of the previous witnesses.

If a witness is not conducted, ACCREDIA asks the environmental verifier to send the final audit report and, if necessary, also at a later date, all other information or documentation regarding the audit for a future documental assessment.

The costs of accreditation assessment activities are invoiced to and met by the environmental verifier as per the ACCREDIA pricelist, available on our website.

Equivalence table between EMAS sector clusters – NACE – IAF codes
(ref. IAF Informative Document ID 1:2014 issue 2 2014 06 10)

EMAS sector clusters	NACE		IAF SECTORS	SECTOR CLUSTERS ACCREDIA RT-09
	NACE CODES	CRITICAL NACE CODES		
I	1.1- 1.2 - 1.3 - 1.5 - 1.6 – 2	1.1- 1.2 - 1.3 - 2	1	I
II	1.4 - 1.7 - 3	1.4 - 3	1	I
III	5 – 6 – 7 – 8 - 9	5 - 6	2	IV
IV	10 – 11 - 12	10 - 11	3	I
V	17	17	7	III
VI	13 – 14	13	4	VI
VII	15	15	5	VI
VIII	16 – 31	16	6, 23e	V
IX	19 – 20 - 21 - 22	19 -20 -21	10, 12, 13, 14	VII
X	24.46	24.46	11	X
XI	23 – 24 (excluding 24.46)	24 (excluding 24.46)	15, 16, 17a	IV
XII	25 – 26 – 27 – 28 – 29 – 30 -32 – 33 – 45.2 – 95	25 – 26 – 27 – 28	17b, 18, 19, 20, 21, 22, 23a, 23b, 23c, 23d, 23f 29b 29c	II
XIII	37 – 38 -39	37 – 38	24, 39a	XI
XIV	35 -36	35 -36	25, 26, 27	VIII
XV	41 – 42 - 43	41.2 – 42	28	IV
XVI	77	77	32	IX
XVII	45 (excluding 45.2) – 46 (excluding 46.12) – 47 (excluding 47.3)	45 (excluding 45.2) – 46 (excluding 46.12)	29a	IX
XVIII	47.3 – 46.12	47.3	29a	IX
XIX	55 - 56	55 -56	30	I
XX	75 – 86 - 87 - 88	86	38	XIV
XXI	49 - 50 – 51 -52 -53 -61	49 - 50 – 51	31a, 31b	II
XXII	58.2 – 62 – 63.1 – 64 – 65 – 66 – 68 – 69 -70 -73 –74.2 e 74.3 - 78 – 80 – 81 - 82	62 – 64 -65 -68	32, 33, 35	IX
XXIII	18 – 58.1 – 59.2	18 – 58.1	8, 9	III
XXIV	84 - 85	84 - 85	36, 37	XIII
XXV	59.1 – 60 – 63.9 -79 -90 – 91 -92 – 93 – 94 – 96 – 97 – 98 - 99	59.1 – 60 – 90 – 91 -93 -96	39b	IX
XXVI	71 – 72 - 74 (excluding 74.2 - 74.3)	72	34	XII

We are available for any clarifications.

Kind regards,

Emanuele Riva

Director of the Dept. of Certification and Inspection

