

Att.: all certification bodies, accredited and applicant, as EMAS environmental verifiers

Our ref.: DC2017SPM147

Milano, 25-05-2017

Subject: ACCREDIA Department of Certification and Inspection – Circular N° 11/2017
Informative, regarding accreditation for the EMAS scheme

This communication replaces the previous DC2014SSV136 dated 15/10/2014.

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 17021-1:2015 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 set out 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 on the basis of 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 have not been changed; 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 required 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.

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

Note 1: in the case of new clients within one sector cluster where a critical NACE code has already been accredited it is not necessary to carry out a witnessing: a document review 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 required for extension, it is sufficient to perform a document review.

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

The documents to be given to ACCREDIA (apart from those required by the modules for the application for accreditation or for extension) for the document review 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 verifications 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 assessment, the following assessments will take place:

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

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 NACE codes required.

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 official language of the third party country for which accreditation is sought.

The environmental verifier, when conducting verifications 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 document evidence regarding the planned actions for the verification 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 usually carries 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, in accordance with Decision (EU) 2016/1621 of the Commission dated 07.09.2016, at least 4 weeks in advance and they shall give ACCREDIA the following information:

- a) details regarding the accreditation or authorization with evidence that the accreditation or authorization are still valid, have not been suspended or withdrawn and are suitable for the specific activities of the organization which undergoes the verification or validation;
- b) composition and competences of the verification team, with special information regarding knowledge of the normative environmental obligations and the Italian language;
- c) if necessary, documentation concerning the personnel regarding qualifications, training and specific economic experience of the sector submitted to verification;
- d) place and times of the verification and the validation, including the visit of the environmental verifiers at the organization and all the previous and subsequent phases to the visit in compliance with article 25 of Regulation (CE) n. 1221/2009;
- e) address and other information for contacting the verified or validated organization, including all locations and activities coming within the scope of the verification or validation and the number of dependent staff.

If the notification does not comply with article 24, paragraph 1 of the EMAS regulation, the consequences of non-fulfillment of the notification procedures as set out in paragraph 3 of the Decision (EU) 2016/1621 of the Commission dated 07.09.2016 become applicable.

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 environmental verifier making the application.

In compliance with paragraphs 4 and 5 of article 23 of the EMAS regulation, ACCREDIA performs the subsequent surveillance activities at intervals of not more than 24 months by means of a witnessing or a document review usually lasting 1 day (which includes the verification of the environmental declaration and/or the updated environmental declaration and an analysis of the verification report including any findings raised), taking the following factors into consideration:

- the knowledge that has been acquired of the environmental verifier;
- the NACE code concerning the witnessing (e.g. if they are the subsequent verifications of the verifier on the same organization it is possible to choose not to perform the witnessing);
- the result of the previous witness visits.

The verification of accreditation activities shall be paid for and invoiced to the environmental verifier as per the ACCREDIA pricelist, available on our website.

We are available for any clarifications.

Kind regards,

Emanuele Riva
Director of the Department of
Certification and Inspection



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

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