

To all certification bodies, accredited and applicant, as EMAS environmental verifiers
 To all assessors and experts of the Dept. of Certification and Inspection
 To the associations of conformity assessment bodies

SUBJECT **Certification and Inspection Department**
Informative Circular DC n° 05/2023 – Informative circular concerning accreditation for the EMAS scheme

This communication replaces the previous DC2017SPM147 dated 25/05/2017.

Introduction

ACCREDIA accredits only the environmental verifiers defined as legal persons, while the individual verifiers (natural persons) remain under the management competence of the Ecolabel and Ecoaudit Committee.

Accreditation rules and standard

Accreditation standard	UNI CEI EN ISO/IEC 17021-1:2015 and Reg. (CE) N°1221/2009 (EMAS Regulation).
Requirements for environmental verifiers	The general requirements for the accreditation of environmental verifiers are established in art. 20 of the EMAS Regulation.
Certificate	The accreditation certificate will report the list of granted NACE Divisions as the scope of accreditation (see the attached table of equivalence between EMAS sector clusters - NACE - IAF Codes). In the accreditation certificate, in addition to the name of the environmental verifier, an accreditation number will be entered which will respect the following format: IT-V-xxx in continuity with what has already been issued by the Ecolabel and Ecoaudit Committee.

Process of accreditation

Various cases may be presented, based on ACCREDIA accreditations already held by the environmental verifier who applies for accreditation or extension.

The following table defines the conditions for issuing accreditation and for granting extensions.

<p>1) First accreditation for a CB already ISO/IEC 17021 accredited for the EMS scheme</p>	<p>Doc review of 1 day.</p> <p>Assessment at the head office of the environmental verifier of 2 days.</p> <p>Witness assessment: if a sector cluster with qualifying codes "or" is requested, a witness assessment will be done in a qualifying NACE code, considering it representative for the issuance of the sector cluster, after having conducted a document review attesting the competence for all the NACE codes present in the cluster sector.</p> <p>Witness assessment: if a sector cluster with qualifying codes "and" is requested, a witness assessment must be carried out in each NACE code qualifying for the issuance of the sector cluster, after having carried out a document review which certifies the competence for all the NACE codes present in the sector cluster.</p> <p>Witness assessment: if some qualifying and non-qualifying NACE codes are requested in a sector cluster with the wording "and", carrying out the check in a qualifying NACE code will allow obtaining the NACE code with the wording "and" and all the non-qualifying NACE codes requested, subject to have carried out a documentary review that certifies the competence for all the NACE codes subject to application in the sector cluster.</p> <p>Witness assessment: if some non-qualifying NACE codes are requested in a sector cluster regardless of the wording "and" or "or", performing the assessment will allow obtaining all the required NACE codes, after having carried out a document review certifying competence for all the NACE codes requested in the sector cluster.</p>
<p>2) First accreditation for a CB already ISO/IEC 17021 accredited, but not for the EMS scheme</p>	<p>Doc review of 1 day.</p> <p>Assessment at the head office of the environmental verifier of 3 days.</p> <p>Witness assessment: as in the first case</p>
<p>3) First accreditation for a CB not yet accredited in any scheme</p>	<p>Doc review of 1 day.</p> <p>Assessment at the head office of the Environmental Verifier of 4 days.</p> <p>Witness assessment: as in the first case</p>
<p>4) Extension of accreditation in other NACE codes for CB already accredited in the EMAS scheme</p>	<p>Document review of 0.5 days (1 in the case of a large number of NACE codes requested).</p> <p>5) No on-site assessment.</p> <p>Witness assessment: as in the first case</p>

- Note1: If the extension to NACE codes belonging to sectors 16, 17, 18 is requested, ACCREDIA may decide not to carry out the relative witnessing and consider it sufficient for the extension to do a document review if the environmental verifier is EMS accredited by ACCREDIA for the corresponding IAF sectors. For example, if NACE 62 is requested and the environmental verifier is accredited for EMS by ACCREDIA in the IAF sector 33, the extension can take place following a document review.

Maintenance of accreditation

For the maintenance of accreditation, throughout the accreditation cycle, except for special situations (e.g. management of complaints and feedbacks, changes to the certification scheme, changes in the organizational structure of the Body), as well as an annual audit at the head office, the following assessments will be done:

- if the environmental assessor has issued less than 25 validations of environmental declarations, ACCREDIA will carry out 1 witness assessment;
- if the environmental assessor has issued between 26 and 100 validations of environmental declarations, ACCREDIA will carry out 2 witness assessments;
- If the environmental assessor has issued between 101 and 175 validations of environmental declarations, ACCREDIA will carry out 3 witness assessments;
- If the environmental assessor has issued more than 176 validations of environmental declarations, ACCREDIA will carry out 4 witness assessments.

Requirements for accreditation in third countries

Accredited environmental verifiers can apply for accreditation to operate in third countries, as an extension of the conventional accreditation (referred to in the previous points).

For this purpose, the application for an extension to operate under EMAS in third countries must contain an indication of the country/ies in which it intends to operate and the NACE divisions for which the applicant is presented. If the applicant is not already accredited for the NACE codes indicated, the application will be treated as a double extension: to operate in third countries and for new NACE codes requested.

The additional requirements for environmental verifiers operating in third countries are set out in art.22 of the EMAS Regulation and concern the following aspects:

1. knowledge and understanding of the laws, regulations and administrative provisions concerning the environment in force in the third country for which accreditation is requested;
2. knowledge and understanding of the official language of the third country for which accreditation is requested.

The environmental verifier, when performing verifications in a third country, should ascertain with the competent National Environmental Authority that there are no legislative "vetoes/problems" that could block the registration of the organization and the environmental verifier must investigate any complaints from the interested parties in the organization. It is the environmental verifier's responsibility to provide adequate documented evidence of the actions

taken for this assessment and of the results obtained, which must be adequately analysed for any risks regarding the credibility of the validation issued.

Pursuant to art. 27 of the EMAS Reg. the environmental verifier is required to inform ACCREDIA, at least 6 weeks in advance of each verification and validation to be carried out in third countries, with regard to the information relating to the place and timing of the verification and validation, as well as any new contracts signed for the purpose of fulfilling points a) and b), in cases where those previously sent are no longer valid.

For environmental verifiers accredited to operate in third countries, the list of countries subject to accreditation shall be reported in the Annex to the accreditation certificate.

For the surveillance activities, ACCREDIA will normally carry out at least one witness assessment in third countries during each accreditation cycle.

Requirements for parties wanting to operate in Italy with accreditation obtained in an EU Member State

The EMAS Regulation establishes in article 28 that the accreditation and authorisation bodies designated by each Member State on the basis of article 4 and article 5 paragraph 2 of Regulation (EC) n. 765/2008 have the task, respectively, of accrediting and issuing the qualification to environmental verifiers and of supervising their activities.

Considering that the EMAS Regulation, in article 25 paragraph 10, establishes that accredited or authorized verifiers in a Member State can carry out verification and validation activities in any other Member State and that these activities are subject to the surveillance of the accreditation body or authorisation of the State in which they take place, according to the provisions of article 23 paragraph 2 and article 24 of the same Reg., the Environmental Verifiers who intend to perform the verification and validation activities in Italy must notify ACCREDIA as required by the Commission Decision (EU) 2016/1621 of 7 September 2016, at least four weeks in advance, providing the following information:

- a) detailed information of the accreditation or authorisation with evidence that the accreditation or authorisation is still valid, has not been suspended or withdrawn and is suitable for the specific activities of the organization being verified or validated;
- b) composition and competences of the verification team, with particular information regarding the knowledge of the regulatory obligations on the environment and of the Italian language;
- c) if necessary, documents regarding personnel, such as relevant information on qualifications, training and experience specific to the economic sector being audited;
- d) place and times of the verification and validation, including the visit of the environmental verifiers at the organization and all stages before and after this visit in accordance with Article 25 of Regulation (EC) n. 1221/2009;
- e) address and other contact information for the organization being verified or validated, including all sites and activities covered by the verification or validation and number of employees.

If the notification does not fulfil the obligations set out in Article 24, paragraph 1, of the EMAS Regulation, the consequences of failure to comply with the notification procedure set out in paragraph 3 of Commission Decision (EU) 2016/1621 of 7 September 2016 will apply.

If the environmental verifier accredited in another Member State requests to operate in Italy for the first time, a witness assessment is always done on the environmental verifier who made the request.

In compliance with paragraphs 4 and 5 of article 23 of the EMAS Regulation, ACCREDIA performs the subsequent surveillance activities, at intervals not exceeding 24 months, by means of a witness assessment or a document review usually lasting 1 day (which provides for the verification of the environmental declaration and/or the updated environmental declaration and in an analysis of the verification report including any findings issued), in consideration of the following factors:

- the knowledge acquired on the environmental verifier;
- the NACE code subject to the witness activities (e.g. if they are the subsequent audits by the environmental verifier on the same organization, it is possible choose not to carry out the witness activities);
- the outcome of the previous witness assessments.

The verification of accreditation activities will be paid for and invoiced to the environmental verifier according to the current ACCREDIA pricelist available on our website.

**Equivalence Table between EMAS sector clusters – NACE –IAF codes
(ref. IAF Informative Document ID 1:2020 issue 3 - 2020 08 06)**

EMAS SECTOR CLUSTERS	NACE Division		IAF SECTORS
	NACE CODES	NACE QUALIFICATION CODES	
I	1.1- 1.2 - 1.3 - 1.5 - 1.6 - 2	1.1 or 1.2 or 1.3 or 2	1
II	1.4 - 1.7 - 3	1.4 or 3	1
III	5 - 6 - 7 - 8 - 9	5 or 6	2
IV	10 - 11 - 12	10 or 11	3
V	17	17	7

VI	13 - 14	13	4
VII	15	15	5
VIII	16 - 31	16	6, 23
IX	19 - 20 - 21 - 22	19 and 20 and 21	10, 12, 13, 14
X	24.46	24.46	11
XI	23 - 24 (excluding 24.46)	24 (excluding 24.46)	15, 16, 17
XII	25 - 26 - 27 - 28 - 29 - 30 -32 - 33 - 45.2 - 95	25 or 26 or 27 or 28	17, 18, 19, 20, 21, 22, 23, 29
XIII	37 - 38 -39	37 and 38	24, 39
XIV	35 -36	35 or 36	25, 26, 27
XV	41 - 42 - 43	41.2 and 42	28
XVI	77	77	32
XVII	45 (excluding 45.2) - 46 (excluding 46.12) - 47 (excluding 47.3)	45 (excluding 45.2) or 46 (excluding 46.12)	29
XVIII	47.3 - 46.12	47.3	29
XIX	55 - 56	55 or 56	30
XX	75 - 86 - 87 - 88	86	38
XXI	49 - 50 - 51 -52 -53 -61	49 or 50 or 51	31
XXII	58.2 - 62 - 63.1 - 64 - 65 - 66 - 68 - 69 -70 -73 -74.2 e 74.3 - 78 - 80 - 81 - 82	62 or 64 or 65 or 68	32, 33, 35
XXIII	18 - 58.1 - 59.2	18 or 58.1	8, 9
XXIV	84 - 85	84 or 85	36, 37

XXV	59.1 - 60 - 63.9 -79 -90 - 91 - 92 - 93 - 94 - 96 - 97 - 98 - 99	59.1 or 60 or 90 or 91 or 93 or 96	39
XXVI	71 - 72 - 74 (excluding 74.2 e 74.3)	72	34

Kind regards,

Dott. Emanuele Riva

Director Department
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