

To all accredited and applicant Verificaton/Validation certification bodies  
To the Associations of conformity assessment bodies

**SUBJECT**                    **Certification and Inspection Department**  
**Information Circular DC N° 41/2023 - UNI/TS 11820:2022**  
**Measurement of circularity - Methods and indicators for**  
**measuring circular processes in organizations**

### **Introduction**

The circular economy is an economic model that has a key role in the implementation of the ecological transition and the objectives of the National Recovery and Resilience Plan. Through a systemic and comprehensive approach, the circular model aims to keep the flow of resources circular, conserving, regenerating or increasing their value and, at the same time, contributing to sustainable development.

For several years, national and international technical standards have started work to produce various standards on the circular economy.

At the Italian level, on 30 November 2022, UNI/TS 11820:2022 was published, developed under the competence of the UNI Technical Commission "Circular Economy".

As reported in its introduction, the technical specification provides indications on how to measure and evaluate the circularity performance of an organization and use them to verify the effectiveness of circularity strategies through a set of circular economy indicators. The technical specification also provides the methodology for collecting the information necessary to enable the measurement of circularity.

UNI/TS 11820:2022 is based on a broad circularity perspective, including, among others, complementary approaches such as life cycle thinking, material flow analysis, resource value maintenance and value recovery.

The measurement system does not provide a minimum circularity threshold value, but allows the level achieved by an organization to be evaluated, compared to the maximum achievable level. The technical specification provides opportunities for improving the level of circularity over time.

The technical specification, providing the requirements regarding the methodological approach, the criteria for measuring and evaluating circularity, the acquisition and quality of data, defines 71 indicators applicable for calculating the level of circularity of both production and service organizations.

The technical-normative contents relating to Appendix A of UNI/TS 11820:2022, reported in point 1 "Standard and verification and validation rules", have been shared by the UNI/CT 057 "Circular Economy".

To ensure a homogeneous approach to conformity assessment, Appendix A of UNI/TS 11820 contains the verification program which includes the requirements to be considered for third party conformity assessment. The CAB must prepare a program that incorporates the requirements of Appendix A of UNI/TS 11820.

### **1) Standard and rules for verification and validation**

Please refer to Appendix A "Requirements for third party conformity assessment to the requirements defined by this technical specification" of UNI/TS 11820:2022 considering that the only accreditation standard is UNI CEI EN ISO/IEC 17029:2020.

In preparing the program, the Body must also take into consideration the following indications:

- In the pre-engagement phase (point 9.2 of UNI CEI EN ISO/IEC 17029), the following information shall (at a minimum) be collated:
  1. master data of the organization;
  2. circularity assertion to be verified and the perimeter of the evaluation being measured;
  3. data and information supporting the circularity assertion and their materiality and level of assurance;
  4. elements of the process of establishing the circularity assertion, including reports, data and any other relevant information;
  5. context of the declared assertion;
  6. any first, second or third party audits.

Following the review of the information received, the Body ensures that the objectives and scope of the verification are agreed with the customer, that the materiality and level of assurance are agreed, and the Body defines the type of service, timelines and the resources to be allocated. Following the analysis of the information, the Body must decide whether or not to proceed with the verification.

- Referring to § A.2.2 Level of assurance of the assertion

The Body must define the conditions to achieve a level of verification assurance that is limited or reasonable, considering as a minimum:

1. the extent of the perimeter of the evaluation being measured;

2. the extent of the supply chain;
3. the risk level evaluated by the Body in the planning phase;
4. objective difficulties in evaluating data which reduce the verifier's trust;
5. inadequate management of documented information by the organization and difficulty in finding the requested information.

- Referring to § A.2.3 Pre-engagement and planning phase

The Body must apply points 9.3 and 9.4 of ISO/IEC 17029. In particular, for the development of the evidence collection plan, the Body must take into consideration the risk of material inaccuracy and the level of assurance agreed with the customer.

- A.2.4 Conduct of the verification

The Body must apply point 9.5 of ISO/IEC 17029. In particular, for the evidence collection activity, the Body must ensure traceability by means of the data management process and any other additional analysis or calculation; it must identify the inaccuracies, considering the relative materiality, evaluating compliance with the requirements specified by UNI/TS 11820.

## 2) Accreditation process

Accreditation is granted for:

- UNI CEI EN ISO/IEC 17029:2020;
- UNI/TS 11820:2022.

Different situations may occur, based on the ACCREDIA accreditations already held by the Certification Body making the application for accreditation or extension.

The requirements of RG-01 and RG-01-03 for the granting of accreditation and extension remain unchanged.

If the CB already holds accreditations issued by other Accreditation Bodies, a case-by-case evaluation must be carried out, based on the applicable EA/IAF MLA agreements.

A	<p>Conformity assessment body already accredited for the V/V of assertions in accordance with:</p> <p><b><u>UNI CEI EN ISO/IEC 17029:2020</u></b></p>	<ul style="list-style-type: none"> <li>• Document review of 1 day (to be done, at least in part, remotely) in which the program prepared by the Body in accordance with Appendix A of UNI/TS 11820 will also be evaluated.</li> <li>• 1 witnessed assessment.</li> </ul>
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<b>B</b>	Conformity assessment body not yet accredited for V/V of assertions but accredited for other accreditation schemes	<ul style="list-style-type: none"> <li>• Document review of 1 day (to be done, at least in part, remotely) in which the program prepared by the Body in accordance with Appendix A of UNI/TS 11820 will also be evaluated.</li> <li>• Assessment of 2 days at the Body's head office;</li> <li>• 1 witnessed assessment.</li> </ul>
<b>C</b>	Conformity assessment body not yet accredited for any schemes	<ul style="list-style-type: none"> <li>• Document review of 1 day (to be done, at least in part, remotely) in which the program prepared by the Body in accordance with Appendix A of UNI/TS 11820 will also be evaluated.</li> <li>• Assessment of 4 days at the Body's head office;</li> <li>• 1 witnessed assessment.</li> </ul>

For the accreditation/extension application and the related document review, in addition to what is provided in the modules for the application for accreditation, it is necessary to send to ACCREDIA the following:

- a) Programme (ref. point 8 and Appendix A of UNI CEI EN ISO/IEC 17029) prepared in accordance with Appendix A of UNI/TS 11820;
- b) Qualification criteria for the personnel appointed for all phases included in the verification process;
- c) Curricula and evidence of assignment of qualifications of the personnel appointed for all phases of the verification process;
- d) Documents/checklists/reports prepared by the Body for recording the phases of the verification process;
- e) Instructions/procedures/regulations prepared by the Body for specific description of the phases of the verification process;
- f) Sample contractual documents with the organization preparing the assertion;
- g) Sample of the verification statement issued by the Body;
- h) List of the statements and verifications already issued, and of the upcoming verification activities (data necessary to plan the witnessed assessment).

For witnessed assessments, ACCREDIA reserves the right to evaluate on a case-by-case basis the suitability of the organizations and audit groups proposed for accreditation and subsequent surveillance activities.

### **3) Maintenance of accreditation**

An annual assessment is scheduled at the Body's head office. The duration of this assessment will be established on the basis of the number of assertions verified/validated during the previous year.

A witnessed assessment will be carried out during the accreditation cycle.

If, due to the type of verified/validated assertions, it is not possible to plan the witnessed assessments, sampling will be carried out only at the Body's head office.

With kind regards.

**Dott. Emanuele Riva**

Director Department  
Certification and Inspection