

EESTI AKREDITEERIMISKESKUS
ESTONIAN ACCREDITATION CENTRE



**THE CONDUCT OF AN
ENVIRONMENTAL VERIFIER
ASSESSMENT**

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Authorship and basic principles

This guidance document is a revised and updated version of EAK J18-2007 and replaces it with aim to implement a new EMAS III Regulation.

Observance of this document is obligatory for the EAK staff and assessors participating in accreditation.

The text may not be copied for resale.

Official language

The text may be translated into other languages as required. The Estonian language version remains the definitive version.

Further information

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Approval

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1 INTRODUCTION

The aim of this procedure is to give principles for initial assessment of EMAS environmental verifiers according to the requirements of Regulation (EC) No 1221/2009 of the European Parliament and the Council, Chapter V.

1.1 Estonian Accreditation Centre (further in text **EAK**) does not accredit individual environmental verifiers performing verifications of their own.

1.2 In the process of assessment of an environmental verifier EAK uses beside this procedure the EAK guidance documents J8, J9, J12, J17 and other normative documents as follows:

national legislation concerning EMAS

EVS-EN ISO/IEC 17021

IAF GD 6

1.3 An applicant body provides EAK with a controlled copy of its Quality Manual (QM) together with a precise description of its desired scope of accreditation and an application (recommendable form aa_aq21) filled in. In addition the applicant shall make available (if not included in the QM) an organisation chart detailing structures and responsibilities within the organisation and a statement of legal status, ownership and funding sources.

1.4 Assessment of environmental verifiers is identical with the assessment of EMS (environmental management system) certification bodies (EAK J17) except the first phase of it. According to the Regulation customers of an environmental verifier can not obtain registration before the verifier is accredited in the area concerned (NACE *rev 2* code). So the accreditation will be performed in parallel with the first verification of an environmental verifier and the decision on granting the accreditation will be made after witnessing the verification (when whole work is done including validation of an environmental statement of the organization).

1.5 The assessment of an applicant seeking accreditation as an environmental verifier could be combined with the assessment of an EMS certification body. Witnessing the applicant`s operations will be performed at least once prior to the decision on granting accreditation to it.

1.6 An applicant for accreditation of environmental verifier shall comply with all the requirements of Regulation (EC) No 1221/2009 of the European Parliament and the Council (*hereafter EMAS Regulation*). In addition during an assessment the standard EVS-EN ISO/IEC 17021 and the IAF GD 6 will be used as guidelines.

1.7 Scope of accreditation of an environmental verifier is defined according to the classification of economic activities (NACE *rev 2* codes) as established by the Regulation (EC) No 1893/2006 of the European Parliament and the Council. The scope is limited by the competence of an environmental verifier and takes into account the size and complexity of the activity, where appropriate.

When determining the scope of an environmental verifier EAK takes into account the permanent personnel and auditors who are in contract relationship with the applicant/environmental verifier.

1.8 The assessment of environmental verifiers will focus on the following:

a) impartiality;

b) competence;

c) knowledge of the individual auditors, who will perform EMAS verifications, of the Regulation, supporting guidance, established practices, technical knowledge of the sectors in which they will work, European and national Environmental Law;

- d) system to ensure consistent implementation;
- e) legal status of an organization;
- f) guidance to environmental verifier to be applied when a certificate of conformity to ISO 14001 is already granted.

1.9 For the purposes of assessment of an environmental verifier EAK will conduct interviews with the individual auditors and technical experts who will participate as a part of the environmental verifier's audit teams.

1.10 The environmental verifier should have enough competent auditors and/or technical experts to perform verifications in specific area. The competence of an auditor or technical expert is not expected to cover more than one area of activity unless there is objective evidence of work experience.

1.11 EAK witnesses the performance of minimum one Lead Auditor at least once. EAK verifies whether the evaluation of competence of auditors and Lead Auditors by the verifier is based on the requirements of EVS-EN ISO/IEC 17021-2 (in transition period ISO 19011).

1.12 EAK uses a number of standard forms (see Forms Register, EAK J12 and Annexes 2 and 3) to reduce the administrative work involved in setting up and carrying out of assessments. They are intended to be self-explanatory and reflect objectively the sequence of actions during the preparation for, and execution of, an assessment, including all the findings.

2 DESK STUDY OF THE DOCUMENTATION

2.1 Within 21 days from receipt of the documentation the assessors complete their desk study and the Lead Assessor prepares a report (form AR02-2004, see EAK J12) with a detailed description of all deficiencies and forwards it to the applicant.

3 HEADQUARTERS ASSESSMENT

3.1 During the headquarters assessment the EAK team checks whether the applicant's structure, personnel, etc. meet the requirements of EMAS Regulation and determines whether the quality system is fully implemented and is operational.

3.2 Headquarters assessment including reporting on nonconformities is conducted according to the EAK J17 Chapters 5 to 13.

3.3 Headquarters assessment includes some sample interviews with auditors and technical experts of the environmental verifier, who will carry out verification/validation audits for getting the evidences whether the qualification process is implemented effectively.

The interviews will focus on:

- knowledge on the Regulation, supporting Guidance, established practice, technical knowledge of the sectors in which they will work, European and Estonian Environmental Law;
- differences between ISO 14001 and EMAS Guidance to verifiers to be implemented where a certificate of conformity to ISO 14001 is already granted;
- knowledge and understanding of environmental issues, of technical aspects relevant to environmental issues which are the subject to verification;
- understanding of the general functioning of the activity subject to verification in order to assess appropriateness of the management system;

- knowledge and understanding of environmental auditing requirements and methodology;
- knowledge on information audit (Environmental Statement).

4 WITNESSED AUDITS

4.1 EAK witnesses a number of verification audits before making the decision on granting the accreditation to the applicant.

4.1.1 The number of witnessed verification audits is dependent on the breadth and complexity of the accreditation scope requested compared with the breadth and complexity of the currently accredited scope. The following minimum guidelines apply:

- a) if the certification body is not accredited for EMS certification (ISO 14001), a minimum 1 (one) witnessing of EMAS verification/validation of an organization which does not have a certified ISO 14001 management system and 1 (one) witnessing of EMAS verification/validation of an organization which has a certified ISO 14001 management system or EMAS surveillance validation or revalidation, is carried out;
- b) if the certification body is accredited for EMS certification (ISO 14001), a minimum of 1 (one) witnessing of EMAS verification/validation of an organization which does have or does not have a certified ISO 14001 management system, is carried out.

4.1.2 A witness of a verification is normally scheduled in one of the more environmentally complex sectors of the scope requested. If the requested scope includes any of the following sectors, a witness is normally obligatory:

- agriculture,
- mining and quarrying,
- pulp and paper,
- manufacture of coke and refined petroleum products,
- nuclear fuel,
- chemicals, chemical products and fibres, pharmaceuticals,
- basic metals,
- electronic valves, tubes and other (micro-) electronic components,
- shipbuilding,
- aerospace,
- other transport equipment,
- electricity supply,
- construction,
- sewage and refuse disposal and sanitation.

4.2 As soon as possible, but at least 2 weeks before the witnessed audit, the verifier is required to send the following documentation to EAK:

- the auditee's environmental manual;
- the auditee's environmental statement;
- the report of the auditee's documented system;
- the verification plan (or at least a specification of the verification details);
- resumé and qualification records of the verifiers and other team members involved in the verification.

4.3 After completion of each witnessed audit of an applicant the verifier sends the following documentation to EAK as soon as possible:

- 1) copy of an approved text of the version of the EMAS Statement which it is expected to publish;
- 2) copy of a verifier's report to management of the organization applying for EMAS registration (EMAS Regulation, Article 25 clause 6).

4.4 The Lead Assessor reviews the above documents and verifies whether the reporting documentation is an appropriate reflection of the verification witnessed.

4.5 After witnessing of the verifier assessors make a conclusion whether the audit team followed the rules of EMAS Regulation and verifier's procedures and obtained enough evidences to make a decision whether the audited organization meets the requirements or not. The report will be presented to the verifier.

5 ASSESSMENT OF EMAS STATEMENT

5.1 The minimum requirements for Environmental Statement are (EMAS Regulation, Annex IV):

- a) a clear and unambiguous description of the organization registering under EMAS and summary of activities, products and services and its relationship to any parent organizations as appropriate;
- b) the environmental policy and brief description of the environmental management system of the organization;
- c) a description of all the significant direct and indirect environmental aspects which result in significant environmental impacts of the organization and an explanation of the nature of the impacts as related to these aspects;
- d) a description of environmental objectives and targets in relation to the significant environmental aspects and impacts;
- e) a summary of the data available on the performance of the organization against its environmental objectives and targets with respect to its significant environmental impacts;
- f) other factors regarding environmental performance including performance against legal provisions with respect to their significant environmental impacts;
- g) the name and accreditation number of the environmental verifier and the date of validation.

5.2 The data mentioned above should use the indicators which are chosen based on following:

- a) provide an accurate appraisal of the organizations performance;
- b) are understandable and unambiguous;
- c) allow a year by year comparison to assess the development of the environmental performance of the organization;
- d) allow for comparison with sector, national or regional benchmarks as appropriate;
- e) allow for comparison with regulatory requirements as appropriate.

5.3 The results of assessment of a review of an Environmental Statement are recorded on the form AsER-2010 (see Annex 3).

6 SUPERVISION OF ENVIRONMENTAL VERIFIERS ACCREDITED BY EAK

6.1 EAK performs annual surveillance assessments to ensure that the environmental verifier continually comply with the accreditation requirements and to monitor the quality of the verifications undertaken. For more details see EAK J8.

6.2 The status of accreditation is reviewed by the Director of EAK at an interval of 12 (twelve) months.

6.3 The verifier shall inform EAK immediately if it has not performed any EMAS verifications (nor an EMS certification) within the previous 1 (one) year in any area for which the accreditation has been granted by EAK.

6.4 If EAK is not satisfied with the work done by a verifier (for example severe deficiencies in audit practices), the supervision report will be transmitted to the verifier concerned and to the Estonian Competent Body within 1 (one) week. In case of any other dispute also to the Forum of Accreditation Bodies (FAB) may be addressed.

7 REDUCTION OR EXTENSION OF THE ACCREDITATION SCOPE

7.1 For details see EAK J17 Chapter 15.

7.2 The decision on reduction of the accreditation scope of a verifier is made by the Director of EAK. Prior to the decision the verifier will be given a possibility of a hearing. The verifier will be informed of the decision and it will be published at the EAK website. Verifier has a right to appeal against the restriction decision according to the EAK's appeal procedure.

7.3 Decision on the restriction or extension of the accreditation scope will also be notified to EMAS Helpdesk and to the Estonian Competent Body.

8 SUSPENSION OF ACCREDITED STATUS

8.1 A verifier's accredited status may be suspended if any of following events occurs and adequate corrective measures have not been taken in time:

- findings of the supervision process and review justify suspension;
- there is a complaint which is found to be justified after investigation by EAK concerning the accredited activity of a verifier but its significance does not justify withdrawal of the accreditation. In this case the accreditation is suspended until corrective actions have been implemented to the satisfaction of EAK;
- a verifier does not meet the deadlines for the implementation of corrective actions acceptable to EAK as set by EAK J17 clause 10.5 or proposed by the verifier and accepted by EAK during the supervision process.

8.2 The extension of any deadline can be sought by applying to EAK in writing at least 5 (five) days before its expiry date. EAK will normally not refuse any reasonable request for an extension for which adequate justification is made.

8.3 The decision on suspension of accreditation of a verifier is made by the Director of EAK. Prior to the decision the verifier will be given a possibility of a hearing. The verifier will be informed of the decision and it will be published at the EAK website. Verifier has a right to appeal against the suspension decision according to EAK's appeal procedure.

8.4 The decision of suspension will be published at the EAK website. The suspension decision will also be notified to EMAS Helpdesk and to the Estonian Competent Body.

9 WITHDRAWAL OF ACCREDITED STATUS

9.1 Withdrawal of an accredited status may be initiated if any of the following events occur and appropriate and timely corrective actions have not been taken:

- a verifier does not facilitate EAK in carrying out the supervision process;
- a verifier has been suspended and it still does not comply with the requirements;
- the basic requirements for on-going maintenance of the accredited status are not being met by a verifier;
- major nonconformities have been found and not corrected in time;
- a significant complaint is made to EAK, which is found to be justified in investigation, concerning the accredited activity of a verifier;
- a verifier ceases activity or closes down.

9.2 The decision on withdrawal of accreditation is made by the Director of EAK. Prior to the decision the verifier will be given a possibility of a hearing. The verifier will be informed of the decision and it will be published at the EAK website. Verifier has a right to appeal against the suspension decision according to EAK appeal procedure. The withdrawal decision will also be notified to EMAS Helpdesk and to the Estonian Competent Body.

10 SUPERVISION OF ENVIRONMENTAL VERIFIERS ACCREDITED IN OTHER MEMBER STATES

10.1 EAK supervises operations of environmental verifiers accredited in Member States other than Estonia according to the requirements of the EMAS Regulation Article 23. The supervision consists of office audit, witnessing in organisations, questionnaires, review of environmental statements validated by the verifiers and review of verification report.

10.2 The verifier intending to perform verification activities in Estonia should provide EAK at least 4 (four) weeks in advance with the following information prior to a new verification:

1. its accreditation details and the team`s composition;
2. team members competence (preferably CV`s);
3. when and where the verification will occur;
4. address and contact details of the organization being verified;
5. measures taken to deal with legal and language issues.

10.3 EAK may request further clarification on the necessary legal and language knowledge.

10.4 EAK will not require other conditions which would prejudice the right of the verifier to provide services in a Member State other than the one where accreditation was granted. Organisations may not refuse the right of EAK to supervise the environmental verifier through witnessed assessments during the verification process.

10.5 EAK witnesses activities of every verifier accredited in an other Member State during its first operation in Estonia. After witnessing and successful verification the same verifier may not be witnessed under the normal circumstances (no appeals, complaints; positive feedback from competent body etc.) in the next 2 (two) years

period of time if the verifier is working in the same area under the same NACE rev 2 code as during the first operation in Estonia.

10.6 If EAK is not satisfied with the work done by the verifier (severe deficiencies), the supervision report will be transmitted to the verifier concerned, the AB which granted the accreditation and to the Estonian Competent Body within 1 (one) week. In case of any further dispute also to the Forum of Accreditation Bodies (FAB).

10.7 The operations of a verifier which work didn't satisfy EAK during the witnessing will be witnessed again during the next verification performed by the verifier concerned.

10.8 If EAK decides not to witness operations performed by a verifier accredited in an other Member State, the verification records, final reports, auditee's EMAS statement or other relevant information (incl. the competence of the verification team members) can be asked to be delivered to EAK.

10.9 EAK may decide not to witness operations of a verifier accredited in an other Member State based on the following:

- verifier has already been witnessed by EAK and the area (industrial sector, NACE code) in question is environmentally not completely different of the area previously witnessed by EAK. EAK evaluates the reliability of the verifier considering the possible opinions of different interested parties and makes a decision on need for witnessing;
- if the timing of verification is within the above limit, but is unsuitable for EAK it may request adaptation of the scheduling. If it is not possible to schedule a witnessed assessment, other forms of supervision will be exercised.

10.10 EAK prepares a report (form AR1221-2010, see Annex 2) and deliver's it to the Competent Body after the supervision activities (incl. witnessing if relevant) are completed and verified EMAS statement of the auditee is presented to EAK by the EMAS-verifier. A report is to be completed and sent to the Competent Body within 5 days.

EAK ACCREDITATION REQUIREMENTS 1(1)

ENVIRONMENTAL VERIFIERS:

1. The environmental verifiers shall comply with requirements of the Regulation (EC) No 1221/2009 of the European Parliament and of the Council of 25 November 2009 on the voluntary participation by organisation in a Community eco-management and audit scheme (EMAS).
2. EVS-EN ISO/IEC 17021:2006 „Conformity assessment. Requirements for bodies providing audit and certification of management systems“ and IAF GD 6:2006 “Guidance on the Application of ISO/IEC Guide 66:1999“ provide guidelines for implementation of the above requirements.
3. When making reference to accreditation an EMAS environmental verifier shall follow the requirements of the guidance document EAK J9 "Conditions for the use of accreditation symbol and reference to accreditation and MLA signatory status by the EAK accredited laboratories and bodies".

Note:

1. Accreditation will be carried out according to the guidance document EAK J18 „The conduct of an environmental verifier assessment“.
2. The EAK guidances are available from the EAK website at the address www.eak.ee, the translated EC Regulation from the website of Ministry of Environment at the address www.envir.ee/keskkonnakorraldus/juhtimissysteemid. The EC documents are available at the address europa.eu.int/comm/environment/emas/documents and IAF documents at the address www.iaf.nu. Copies of the EAK guidance are available also from EAK.



Report on supervision of activities of an environmental (EMAS-) verifier accredited in another Member State *(to be transmitted to the Competent Body)*

		Comments/remarks
1	EMAS – verifier <i>(name, address)</i>	
2	Accreditation of EMAS – verifier <i>(Member State, accreditation body, No of accreditation certificate)</i>	
3	Organisation under evaluation <i>(name, address, description of activity, NACE rev 2 code)</i>	
4	Dates of supervision	
5	Documents submitted to EAK	
6	Composition and competence of the assessment team	
7	Procedures and activities of supervision	
8	Conclusion	

Additional remarks:

Assessor:



Assessment of an EMAS statement

Part A. Background information

1. Name of organisation, which issued the environmental statement:
2. Does this organisation have an EMAS registration?
3. Does the organisation apply for its first EMAS registration?
4. Address of the organisation:
5. Brief description of the activity(ies) of the organisation:
6. NACE *rev 2* code as specified in the environmental statement:
7. Does the NACE *rev 2* code specified in the environmental statement correspond to the activity described in it?
8. Number of staff:
9. Name, address and contact data of accredited EMAS-verifier, which validated the environmental statement:
10. No of accreditation:
11. Does the verifier's scope of accreditation (*inter alia* any limitation, including those on size and complexity) cover the activities of the organisation applying for EMAS registration?
12. Date of validation of the environmental statement:
13. The term for issuing the next environmental statement:
14. The time period embraced by the environmental statement:
15. Brief description of the environmental management system:
16. Date of presentation of the environmental statement to EAK:



17. Is the object (location) identifiable by presented instructions or on the map?
18. Is the information presented sufficient for completing this form?
19. Conclusion of an EAK officer on to what extent the requirements of part A are satisfied:

Part B. Compliance of the environmental statement to the appropriate requirements of EMAS Regulation

Structure and content of the statement

Is the environmental information presented clearly and unambiguously?

Is the information available as a printout for those unable to receive the information from other sources?

Has the organisation considered the information needs of interested parties when drafting the environmental statement?

Does the statement contain sufficient amount of information needed to comply with the minimum requirements of Annex 4 part B to the EMAS Regulation?