

**INFORMATIVE CIRCULAR** Ref. DC2024SPM112

**DATE** Milan, 25-07-2024

To all Certification Bodies accredited or seeking accreditation as EMAS environmental verifiers

To Associations of Conformity Assessment Bodies

To all Inspectors and Technical Officer of the DC Department

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**SUBJECT**                    **Certification and Inspection Department**  
**Informative Circular N° 27/2024 regarding accreditation for the EMAS scheme**

This communication replaces the previous DC2023SPM028 dated 03/02/2023. For greater clarity, you will find the updates highlighted in green.

**Introduction**

ACCREDIA exclusively accredits Environmental Verifiers defined as legal entities, while individual Verifiers (natural persons) remain under the management of the Committee for Ecolabel and Ecoaudit. For greater clarity, you will find the updates highlighted in green.

**Standard and Accreditation rules**

Accreditation Standard	UNI CEI EN ISO/IEC 17021-1:2015 and Regulation (CE) N°1221/2009 (hereinafter referred to as EMAS Regulation).
Requirements for Environmental Verifiers	<p>The general requirements for the accreditation of environmental verifiers are established in Art. 20 of the EMAS Regulation.</p> <p>It is specified that it is not possible to automatically grant the qualification to an entire macro-sector if the verifier only holds the most critical NACE code within the macro-sector.</p> <p>Qualifications for a macro-sector can be accepted based on similar environmental characterizations (type of aspects, environmental impacts, knowledge of particular included processes, knowledge of relevant environmental legislation, etc. – see Article 20, paragraph</p>

	2 of the EMAS Regulation) for which the Environmental Verifier must provide appropriate records and documented evidence.
Certificate	<p>The Accreditation Certificate will list the NACE Divisions granted as the scope of accreditation (see the attached table for the equivalence between EMAS Macro-sectors, NACE, and IAF Codes).</p> <p>In the accreditation certificate, alongside the name of the environmental verifier, there will be an accreditation number following the format: IT-V-xxx, consistent with what has already been issued by the Committee for Ecolabel and Ecoaudit.</p>

**Accreditation process**

Various scenarios may arise based on any ACCREDIA accreditations already held by the Environmental Verifier submitting the accreditation or extension application.

The following table defines the conditions for accreditation issuance and extension grants.

<p>1) First accreditation for Certification Body already accredited to UNI CEI EN ISO/IEC 17021-1:2015 for the EMS scheme</p>	<p>Document review of 1 man-day.</p> <p>Assessment at the Environmental Verifier's site lasting 2 man-days. If the audit is conducted in combination with other management systems, the duration can be reduced to 1 man-day.</p> <p>Witness assessment: In case a macro-sector with qualifying codes "or" is requested, a witness assessment will be conducted in a qualifying NACE code considered representative for the issuance of the macro-sector, provided that a document review has been carried out to certify competence for all NACE codes present in the macro-sector.</p> <p>Witness assessment: In case a macro-sector with qualifying codes "and" is requested, a witness assessment will be conducted in a qualifying NACE code considered representative for the issuance of the macro-sector, provided that a document review has been carried out to certify competence for all NACE codes present in the macro-sector.</p> <p>Witness assessment: In case some qualifying and non-qualifying NACE codes are requested in a macro-sector with the term "and", conducting the verification in a qualifying NACE code will allow obtaining the NACE code with the term "and" and all the requested non-qualifying NACE codes, provided that a document review has been carried out to certify competence for all NACE codes requested in the macro-sector.</p> <p>Witness assessment: If certain non-qualifying NACE codes are requested within a macro-sector, regardless of whether the request uses the terms "and" or "or," conducting the assessment will enable obtaining all requested NACE codes, following a document review that</p>
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	confirms competence for all NACE codes included in the application for the macro-sector.
2) First accreditation for Certification Body accredited to UNI CEI EN ISO/IEC 17021-1:2015, but not for the EMS scheme.	Document review: 1 man-day. Assessment at the Environmental Verifier's site of 3 man-days. Witness assessment: as in the first case.
3) First accreditation for Certification Body not yet accredited in any management system.	Document review of 1 man-day. Assessment at the Environmental Verifier's site of 4 man-days. Witness assessment: as in the first case.
4) Extension of accreditation to additional NACE codes for Certification Body already accredited in the EMAS scheme	Document review of 0.5 man-days (1 in case of a high number of requested NACE codes). 5) No on-site assessment. Witness assessment: as in the first case.

Note 1: If an extension to NACE codes belonging to macro sectors XVI, XVII, XXII is requested, ACCREDIA may decide not to perform the witnessing and consider a document review sufficient for the extension, provided that the Environmental Verifier is accredited for EMS 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 IAF sector 33, the extension can be granted following a document review.

### Maintenance of Accreditation

For the maintenance of accreditation, during the entire accreditation cycle, except in special situations (e.g., handling complaints and reports, changes to the certification scheme, changes in the organizational structure of the Body...), in addition to an annual on-site assessment, the following verifications will be conducted:

- If the Environmental Verifier has issued fewer than 25 Environmental Statement validations, ACCREDIA will conduct 1 witness assessment.

- If the Environmental Verifier has issued between 26 and 100 Environmental Statement validations, ACCREDIA will conduct 2 witness assessments.
- If the Environmental Verifier has issued between 101 and 175 Environmental Statement validations, ACCREDIA will conduct 3 witness assessments.
- If the Environmental Verifier has issued more than 176 Environmental Statement validations, ACCREDIA will conduct 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 their conventional accreditation (as outlined in the previous points).

To this end, the application for extension to operate under EMAS in third countries must include the indication of the country/countries where the applicant intends to operate, as well as the NACE divisions for which accreditation is sought. If the applicant is not already accredited for the indicated NACE divisions, the application will be treated as a dual extension: one for operating in third countries and another for the newly requested NACE codes.

The additional requirements for environmental verifiers operating in third countries are established in Article 22 of the EMAS Regulation and concern the following aspects:

1. knowledge and understanding of the legislative, regulatory, and administrative provisions regarding 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.

Additionally, when conducting assessments in a third country, the environmental verifier should ensure with the competent National Environmental Authority that there are no legislative "vetoes/problems" that could block the organization's registration. They must also investigate any complaints from stakeholders against the organization. It is the responsibility of the environmental verifier to provide adequate documented evidence of the actions taken for such check and the results obtained. These should be thoroughly analysed for any risks to the credibility of the issued validation.

Furthermore, under Article 27 of the EMAS Regulation, the environmental verifier is required to notify ACCREDIA at least 6 weeks in advance of each verification and validation to be conducted in third countries. This notification should include information about the location and timing of the verification and validation, as well as any new contracts entered for the purpose of meeting points (a) and (b), in case the previously submitted ones are no longer valid.

For environmental verifiers accredited to operate in third countries, the list of countries covered by the accreditation will be included in the Annex to the Accreditation Certificate.

For surveillance activities, ACCREDIA will typically conduct at least one witness assessment in third countries during each accreditation cycle.

## **Requirements for those wishing to operate in Italy with accreditation obtained in another EU member state**

The EMAS Regulation establishes in Article 28 that the accreditation and licensing bodies designated by each Member State under Articles 4 and 5(2) of Regulation (EC) No 765/2008 are responsible, respectively, for accrediting and issuing licensing to environmental verifiers, as well as monitoring their activities.

Considering that Regulation EMAS, Article 25(10), establishes that accredited or authorized verifiers in one Member State may conduct verification and validation activities in any other Member State, and that such activities are subject to the surveillance of the accreditation or licensing body of the State where they are carried out, as provided for in Article 23(2) and Article 24 of the Regulation itself, Environmental Verifiers intending to carry out verification and validation activities in Italy shall notify ACCREDIA as required by Commission Decision (EU) 2016/1621 of 7 September 2016, at least four weeks in advance, providing the following information:

- a) Detailed information on accreditation or licensing, including proof that the accreditation or licensing is still valid, has not been suspended or revoked, and is suitable for the specific activities of the organization undergoing verification or validation.
- b) Composition and competencies of the verification team, including specific information regarding their knowledge of environmental regulatory obligations and the Italian language.
- c) If necessary, documentation regarding personnel, such as relevant information on qualifications, training, and specific experience related to the economic sector undergoing verification.
- d) Location and timing of the verification and validation, including the environmental verifiers' assessment to the organization and all phases before and after this assessment, in accordance with Article 25 of Regulation (EC) No 1221/2009;
- e) Address and other contact information for the organization undergoing verification or validation, including all sites and activities within the scope of the verification or validation, and the number of employees.

If the notification fails to fulfil the obligations specified in Article 24(1) of the EMAS Regulation, the consequences of non-compliance with the notification procedure as outlined in paragraph 3 of Commission Decision (EU) 2016/1621 of 7 September 2016 apply.

If an Environmental Verifier accredited in another Member State requests to operate in Italy for the first time, a witness assessment on the requesting Environmental Verifier is always conducted.

In compliance with paragraphs 4 and 5 of Article 23 of the EMAS Regulation, ACCREDIA carries out subsequent surveillance activities at intervals not exceeding 24 months, typically through a witness assessment or document review lasting 1 man-day. This includes verification of the environmental statement and/or updated environmental statement, and an analysis of the verification report including any findings issued, considering the following factors:

- the knowledge acquired about the Environmental Verifier;
- the NACE code subject to witnessing (e.g., if subsequent verifications by the environmental verifier on the same organization, ACCREDIA may choose not to conduct witnessing);
- the outcome of previous witness assessments.

ACCREDIA, based on the results of a specific risk analysis, which, analogous to what is carried out for national environmental verifiers, considers various factors such as:

- the number of high-complexity macro sectors;
- the number of notifications submitted by the environmental verifier;
- the number of NACE codes listed on the certificate.

Reserves the possibility of increasing the number of witness assessments on foreign environmental verifiers too.

Annually, ACCREDIA will request the accreditation certificate of the foreign Environmental Verifier who submits the notification, and if necessary, will ask the accrediting body for information regarding any Business Partners/ local sites covered by the accreditation certificate issued, as well as supporting checks conducted.

The accreditation verification activities will be charged and invoiced to the environmental verifier based on the current ACCREDIA price list available on our website.

**Table of equivalence between EMAS Macro Sectors – NACE – IAF Codes  
(ref. IAF Informative Document ID 1:2020 issue 3 2020 08 06)**

EMAS MACRO SECTORS	NACE Division		IAF SECTORS
	NACE CODES	QUALIFYING NACE 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
<b>III</b>	<b>5 - 6 - 7 - 8 - 9</b>	<b>5 or 6</b>	<b>2</b>
IV	10 - 11 - 12	10 or 11	3
<b>V</b>	<b>17</b>	<b>17</b>	<b>7</b>
VI	13 - 14	13	4
<b>VII</b>	<b>15</b>	<b>15</b>	<b>5</b>

VIII	16 - 31	16	6, 23
<b>IX</b>	<b>19 - 20 - 21 - 22</b>	<b>19 and 20 and 21</b>	<b>10, 12, 13, 14</b>
<b>X</b>	<b>24.46</b>	<b>24.46</b>	<b>11</b>
<b>XI</b>	<b>23 - 24 (except 24.46)</b>	<b>24 (except 24.46)</b>	<b>15, 16, 17</b>
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 22 ,23 ,29
<b>XIII</b>	<b>37 - 38 -39</b>	<b>37 and 38</b>	<b>24, 39</b>
XIV	35 -36	35 or 36	25, 26, 27
<b>XV</b>	<b>41 - 42 - 43</b>	<b>41.2 and 42</b>	<b>28</b>
XVI	77	77	32
XVII	45 (except 45.2) - 46 (except 46.12) - 47 (except 47.3)	45 (except 45.2) or 46 (except 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 (except 74.2 and 74.3)	72	34

**Note 1:** High-complexity macro sectors are indicated in bold, and these are the ones that must be verified during the MS - Management Systems accreditation cycle through on-site and witness assessments. The accreditation scope coverage will occur in combination with the EMS scheme, considering that all Environmental Verifiers are verified under this scheme for the entire accreditation scope through on-site assessments, witness assessments, and competence maintenance verifications.

Finally, as stated in the previous § 6, it is clarified that the scope coverage, according to the requirements mentioned above, may not be guaranteed where an accreditation cycle has been interrupted (resulting in its temporary reduction) due to the entry into force of the single accreditation certificate, MS scheme, effective January 2023.

**Note 2:** For the scope coverage achieved through sampling practices or witness assessments during the accreditation cycle, it is specified that verifying at least one code within the relevant macro sector suffices for its coverage. For example, for macro sector III, verifying NACE code 08 would be sufficient.

L'occasione è gradita per porgere cordiali saluti.

**Dott. Emanuele Riva**

Director Department  
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