



D05-02d5

## ASSESSMENT OF ENVIRONMENTAL VERIFIERS

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## 1 PURPOSE

The purpose of this annex to D05-02 is to determine the scope and the method of assessment that is specific for the assessment of an environmental verifier and the method of supervision of accredited environmental verifiers from the EU Member States who perform the verification and attestation activities in Slovenia.

General guidance on carrying out environmental verifier's assessment and on supervision of a foreign environmental verifier when performing verification and attestation in Slovenia is included.

## 2 GENERAL

The assessment relates to the scope of accreditation assigned to the environmental verifier to carry out auditing activities in the NACE fields (Regulation (EC) No. 1893/2006).

The assessment shall comprise assessment of compliance with the requirements defined in document S03, Chapter 4.6; in the applicable sector reference documents; in Forum of Accreditation and Licensing Bodies' (FALB) guides issued in accordance with Article 30 of the Regulation (EC) No. 1221/2009; as well as in other SA requirements for accreditation.

## 3 ASSESSMENT FOCUSES

The assessment of an environmental verifier, who already holds accreditation as a certification body for environmental management systems in accordance with SIST EN ISO/IEC 17021-1, shall be adapted *mutatis mutandis*. The assessor team assessing in accordance with the Regulation (EC) No. 1221/2009 (hereinafter called "the Regulation") with amendments shall, wherever possible in order to avoid repetition (in the course of CB accreditation surveillance procedure), take into account the results obtained by assessment of the environmental verifier as an accredited certification body for environmental management systems.

### 3.1 The environmental verifier's head office or dislocated sites

Compliance with the requirements from SIST EN ISO/IEC 17021-1 and the Regulation, Chapter V shall be assessed. The assessor shall, when assessing to SIST EN ISO/IEC 17021-1, comply with the document D05-02d4 in that part which refers to the assessment of a certification body for environmental management systems. Taking the above-mentioned into account, the assessor carrying out assessments at the environmental verifier's head office shall also focus on:

- knowing and correct understanding of the Regulation and its amendments, the relevant standards, guides and other documents issued by the Commission, and of the general functioning of environmental management systems in the relevant field;
- knowing the differences between ISO 14001 and the Regulation, Annex II;
- knowing of comparable certified environmental management systems;
- knowing and understanding of the legislative and other requirements relevant to the field of activity of verification, European environmental legislation and sustainable development principles;
- knowing and understanding of environmental issues, including the environmental dimension of sustainable development;
- knowing and understanding of the technical aspects related to the environmental regulations for the field of activity of verification;

- knowing and understanding of the general functioning of the activity subject to verification aimed at assessing the appropriateness of its management system;
- knowing and understanding of the environmental auditing requirements and methodology as well as other requirements for managing and auditing of information;
- the criteria for environmental verifier's personnel (in addition to those laid down in SIST EN ISO/IEC 17021-1) (Regulation, Chapter V), taking into account the necessary specific expertise in the fields stated in Annex 1 and other information that is verified and validated (Commission Regulation (EU) 2018/2026);
- performance of internal audits in accordance with the Regulation (Annex III);
- validation of environmental review in a technical sense, definition of organizational context (Regulation, Article 18);
- identification and documentation of risks and opportunities;
- identification and validation of the environmental aspects in relation with possible impacts of service, process and product on the environment, also from the lifecycle point of view;
- evaluation of the appropriateness of internal environmental audits;
- evaluation of credibility and correctness of the data used in drawing up the environmental statement and environmental information;
- updating procedure of the environmental statement, environmental information (Regulation, Article 18, Annex IV (Commission Regulation (EU) 2018/2026)), frequency of verifications (Regulation, Article 19) and applicability of reference documents and FALB guides;
- adequate preparation of environmental statement/environmental information in accordance with Commission Regulation (EU) 2018/2026 (the content, other environmental information included (greenhouse gas emissions));
- control of possible deviations for small organisations (Regulation, Article 7);
- performance of environmental verification and attestation by areas from the scope of accreditation, and relation with maintenance of competence in the areas when there are no clients; and
- procedure for official notification to the local accreditation and licensing body who performs verification in another EU member state.

Taking the above-mentioned into account, it should be checked during the assessment how the environmental verifier verifies the competence of auditors for carrying out environmental reviews. To this end, the assessor team shall review the already validated environmental statements to make sure that all the environmental aspects and impacts for the field in question have been considered, and shall conduct interviews with individual auditors of the environmental verifier, if necessary. The assessors shall document their review of the environmental statement on the form Review of organisation's environmental statement (OB05-49).

### **3.2 Witnessing the performance of environmental verifier**

The aim of witnessing the auditors in carrying out environmental verification is to check the efficiency of the verification and attestation procedure (appropriateness of the auditors, correct timing of the audit), appropriate defining of the scope of verification, determine the competence of the auditors (their knowing and understanding of the verification and attestation criteria, presence of corresponding auditor skills and capability to audit fulfilment of the relevant criteria), and provide a representative sample for the assessment of competence of the environmental verifier.

The assessors shall only witness the audit, they shall not interfere with its course by their actions, they shall not ask questions to the auditee, and they shall not express their opinions.

Before the witnessing of an audit starts, the environmental verifier shall provide for the audit to be witnessed the report of previous audit; the audit programme including information on the auditors and sites, type and scope of audit; information on the competence of auditors involved in the audit to be witnessed; calculation of duration of the audit; description of the client's organisation; activities; preliminary statement of the environmental verifier as to the activities of verification and attestation for the environmental audit to be witnessed and, when necessary, the appropriate additional literature (standards, regulations). The assessors shall assess the documents provided and adapt their assessment accordingly.

Prior to witnessing, the assessors shall receive, in addition to other documents, also a draft environmental statement/environmental information of the company in which the witnessing of environmental audit will take place. The assessor shall review them and report of the review on the form Review of organisation's environmental statement (OB05-49). The environmental statement shall be re-assessed when the final version is formulated, and changed findings shall be added to the form Review of organisation's environmental statement, OB05-49.

When witnessing/assessing an environmental verifier, the assessors shall carefully monitor (SIST EN ISO/IEC 17021-1:2015, 9.4):

- the performance/cooperation between the members of the auditor team, team management;
- the communication/cooperation with the auditee organisation (introductory meeting, closing meeting);
- understanding and knowing of the Regulation requirements, its amendments, SRD and the recommendations;
- the ability to acquire/collect factual evidence (appropriateness of questions asked, focusing on relevant requirements);
- verifiers' competence to analyse credibility of the data on which the environmental statement is based. The verifier needs to have experience in the field of environmental audit and/or environmental protection, experience and knowledge (training) in assessing the information. It should be assessed whether the environmental verifier also puts stress on those requirements that are more detailed in comparison with the ISO 14001 equivalents;
- that all the details and information given in the environmental statement are complete (description of registration scope, statement and reporting of main indicators) and authentic, and that the statement covers adequately all significant environmental aspects relevant for the site witnessed and that details and information are distinctly separated if they are part of another report (Commission Regulation (EU) 2018/2026);
- reporting on findings (correct definition of the finding, nonconformities shall not be reported in terms of areas for improvement, the finding related to the criterion and evidence);
- coordinating diverging opinions on findings, disagreements written down; and
- the duration, suitability of the audit programme (relevance of sites, coverage of scope).

During their witnessing of an audit, the assessors shall assess the environmental verifier's entire auditor team.

The assessors shall inform the auditors of the results of witnessing the verification and attestation immediately after the completion of the audit in the organisation, if possible, but not in the presence of the auditee organisation.

After the completion of an audit witnessed by the SA assessors, the environmental verifier shall submit to SA the following documentation within two weeks:

- a copy of the approved environmental statement with the contents intended to be published;
- a copy of the report with detailed information on the preliminary review of the documentation; the audit carried out, the personnel interviewed, and the corrective action proposals;
- a copy of the environmental verifier's report to the management of the auditee organisation.

The assessor team shall draw up their report on the witnessing of the EMAS audit of environmental verification (OB05-50), which should include information on assessment of the contents of any subsequently provided documents and the report on the assessment of validated environmental statement (OB05-49), or amend the report on the review of environmental statement prepared during preparation for the assessment. Particular attention shall be paid to that the validated environmental statement is supplemented by environmental verifier's Statement of environmental verification and certification activities. When the environmental statement has been checked in the course of assessment for obtaining/extending the scope of accreditation, attention should be paid to the information as to when the environmental verifier approved this statement.

Note: The environmental verifier's client shall provide for the safety of assessors and shall inform all the participants of the measures taken. Should SA's assessors sense potential risk of damage during the audit, they shall take immediate action and request a meeting with the lead auditor.

## **4 SCOPE OF THE ASSESSMENT (IN RELATION TO THE OVERALL SCOPE OF THE ENVIRONMENTAL VERIFIER'S ACCREDITATION)**

### **4.1 Vertical audits**

In initial assessment, of an environmental verifier, the procedure carried out till then shall be assessed through vertical audit, whereas in re-assessments, the performance of at least four certification procedures should be assessed through vertical audit with the fields/economic activities from Annex 1 as a matter of priority.

The selection shall also take into account cases of multi-site organisations, cases of certification procedures carried out abroad as well as initial audits, surveillance audits and integrated audits. These can include review of the validated environmental statement.

At regular surveillance visits, at least one vertical audit should be performed, so that all the fields, or all those NACE fields from accreditation scope in which the environmental verifier has clients, are reviewed in one assessment period. In this the fields already witnessed shall be taken into account.

In vertical audit, attention should also be drawn to the following:

- how the findings and conclusions are formulated (nonconformities should not be reported as possibilities for improvement, finding shall be connected with the criterion and evidence) (SIST EN ISO/IEC 17021-1:2015, 9.4.);
- documentation of checking the efficiency of corrections and corrective actions (SIST EN ISO/IEC 17021-1:2015, 9.4.10).

### **4.2 Witnessing of environmental verifications and attestations**

Normally, the performance of environmental verifications and assessments within the scope of initial assessment/extension shall be witnessed in a quarter of the fields/economic activities of the applied for

scope, when the clients exist, all by taking into account that witnessing of the performance of environmental verifications in the NACE field indicated in bold print in Annex 1 is mandatory prior to granting/extending accreditation. Should a verifier request accreditation for the NACE fields which are not indicated in bold print in Annex 1, priority shall be given in selecting the sample to witnessing in the fields in portrait print in Annex 1. Normally, at least one initial environmental verification should be witnessed (if possible). This includes review of the validated environmental statement.

The witnessing of verifications during surveillance shall follow a schedule drawn up after the initial assessment by the Sector Manager in cooperation with the lead assessor. The schedule shall take into account the rule that all fields of accreditation shall be reviewed within one accreditation cycle, where there are clients.

In addition to the general principles, the following criteria shall be taken into account when estimating or determining the time necessary to carry out an assessment:

- the size and complexity of the NACE field/s of verification; and
- the number of auditors engaged by the environmental verifier to perform environmental audits.

## **5 MAINTENANCE OF GRANTED ACCREDITATION**

The supervision of an accredited environmental verifier may include: office audit, assessing the performance of environmental audit at an environmental verifier's client, assessment of completed questionnaires, review of validated environmental statements/information, and review of verification report (Regulation, Article 23(5)).

Whenever possible, witnessing/assessment of the performance of environmental verification should be undertaken for each NACE field covered by the scope of accreditation of the environmental verifier, at least once between two re-assessments.

The scope and method of assessment during a surveillance visit should also depend on the extent of environmental verification activity undertaken by the environmental verifier.

In the case that the accredited environmental verifier has not extended its activity between two surveillance visits, the surveillance should consist in reviewing the environmental statements for any changes, or reviewing the environmental statements and environmental information. When no changes of the type have occurred, the scope of surveillance should be adapted accordingly.

Prior to each announced witnessing/assessing of an audit, the environmental verifier shall provide to SA the documents indicated under 3.2 hereof. Within a week after each witnessing/assessing of the activity of environmental verification, the environmental verifier shall provide to SA a copy of its audit report and a validated environmental statement/information.

SA assessors must review each validated environmental statement against all the elements listed in clause 1.1 of the form OB05-49. They shall pay particular attention to the validation status (who validated it; reference to the environmental verifier's accreditation and when it was validated). The report on the review of validated environmental statement/information can be given on the form OB05-49 (for new statements or in the case of major changes in already reviewed statements/information) or on the form Assessment report, OB05-14 (in the case of minor changes in an environmental statement/information). Any record on the review of environmental statements/information shall contain a precise identification of the statement/information.

## **6 SUPERVISION OF ACCREDITED/LICENSED ENVIRONMENTAL VERIFIERS FROM EU MEMBER STATES PERFORMING VERIFICATION AND ATTESTATION ACTIVITIES IN SLOVENIA (REGULATION (EC) NO. 1221/2009, ARTICLES 23, 24)**

Environmental verifiers from other EU Member States, wishing to perform environmental verification and attestation activities in Slovenia, shall announce their intention to Slovenian Accreditation at least four weeks in advance of each verification.

They shall provide to SA, together with a completed form OB05-52, Announcement of environmental verifier from EU Member States to perform audit in Slovenia, at least the information (Commission Decision (EU) 2016/1621) and documents stated in S03, Chapter 8.

The announcement and the required information should be sent before each intended performance of the activity of environmental audit in Slovenia.

Upon receiving the announcement with all the required information, Certification Bodies Sector Manager shall examine the data and record the examination on the form OB05-51, Preparing for supervision of foreign verifier, and shall check the availability of assessors in order to organise the supervision. SA shall inform the environmental verifier from the EU Member State of the way of its supervision within two weeks of receiving its announcement and all the relevant documents.

The definition of the extent and method of supervision shall depend on the complexity of the information received and on the results of the previous supervision of the same environmental verifier. The supervision may include:

- witnessing of the foreign environmental verifier's performance of environmental audit;
- talking to the auditors;
- reviewing the audit reports.

The first supervision of the foreign environmental verifier shall always include witnessing of the foreign verifier when performing verification activity in Slovenia. SA will try to accommodate to an already planned environmental verification of the environmental verifier.

During witnessing of a foreign environmental verifier, the SA assessor shall follow the instructions under 3.2 hereof, *Witnessing the performance of environmental verifier*, or they shall focus on the correctness of performance of the verification activity, and on the knowledge of the national environmental legislation.

After witnessing an environmental verification and attestation, the SA assessor shall draw up a report in the same way as when supervising an SA-accredited environmental verifier (OB05-50 – Report on witnessing EMAS audit). The report should additionally include information about:

- any possible reservations as to (not) knowing the language, the Slovenian environmental legislation or the technical field;
- independence and impartiality of the environmental verifier;
- any doubts/dilemmas/information important to NAB, the competent body or FALB.

In the case of any nonconformity, SA shall inform the accreditation service who granted the accreditation to the respective environmental verifier, the competent authority, and – in the case of any further dispute – also FALB.

Should SA not receive information essential to the satisfactory surveillance of verification and attestation (e.g. time and place of verification and attestation, address and contact details of the organisation, environmental verifier's accreditation or licence data, composition of the team or their

technical competencies, in particular their knowledge of legal requirements and of the Slovene language), SA will inform the environmental verifier that they consider the notification to be unsatisfactory and therefore, that satisfactory surveillance is not possible, and that they will, should the verification or attestation take place before provision of the missing information, they will recommend to the competent authority not to register the organisation.

When SA decides to recommend to the competent authority not to register the organisation, SA shall inform to that effect the environmental verifier, the accreditation or licensing body who granted the accreditation or licence, the organisation (when possible), and the competent authority.

## **7 CHANGES SINCE THE PREVIOUS REVISION**

In Chapters 3.1 and 3.2 elements from Commission Regulation (EU) 2018/2026 have been added and some non-relevant elements deleted.

In Chapter 4.1 the subject of vertical audit has been more clearly defined.

In Chapter 6 the text describing necessary documents provided to SA has been replaced by reference to requirements in document S03.

The information in Annex 1 has been revised in line with the rules of IAF MD 17 (two notes added).

Some other minor text changes have been introduced.

## **8 TRANSITIONAL PROVISIONS**

N/A

## **9 CONTROL OF THE DOCUMENT**

A valid document shall be retained in the SA information system i4. A clean copy shall be published on SA's website. Printouts shall be accessible at the SA registered office.

Individual copies may be controlled in physical form. The recipients or places of storage shall be shown in records on issuance of the document.

Printouts and other copies of the document shall have an informative character and are not controlled copies. The validity of these documents shall be checked in i4 or on SA's website.



**ANNEX 1: Scope of accreditation in EMAS verifiers – specific environmental knowledge and mandatory witnessing of audits required**

<b>Scope (NACE 2 codes)</b>	<b>Economic activity</b>	<b>Scope (IAF MD 1 codes)</b>
01, 02, 03	<b>Agriculture, forestry and fishing</b>	<b>01</b>
05, 06, 07, 08, 09	<b>Mining and quarrying</b>	<b>02</b>
10, 11, 12	<b>Food products, beverages and tobacco</b>	<b>03</b>
13, 14	<b>Textiles and textile products</b>	<b>04<sup>3)</sup></b>
15	<b>Leather and leather products</b>	<b>05<sup>3)</sup></b>
17	<b>Pulp, paper and paper products</b>	<b>07</b>
18	<b>Printing companies</b>	<b>09</b>
19	<b>Manufacture of coke and refined petroleum products</b>	<b>10</b>
20.46	<b>Nuclear fuel</b>	<b>11</b>
20	<b>Chemicals, chemical products and fibres</b>	<b>12</b>
21	<b>Pharmaceuticals</b>	<b>13</b>
22	Rubber and plastic products	14
23 (without 23.5 and 23.6)	Non-metallic mineral products	15
23.5 and 23.6	Concrete, cement, lime, plaster etc	16
24 except 24.46, 25 except 25.4, 33.11	Basic metals and fabricated metal products	17
30.1, 33.15	<b>Shipbuilding</b>	<b>20<sup>1)</sup></b>
30.3, 33.16	<b>Aerospace</b>	<b>21<sup>1)</sup></b>
29, 30.2, 30.9, 33.17	Other transport equipment	22
35.1	<b>Electricity supply</b>	<b>25<sup>4)</sup></b>
35.2	<b>Gas supply</b>	<b>26<sup>4)</sup></b>
35.3, 36	Water supply	27
38.3	<b>Recycling</b>	<b>24</b>
41, 42, 43	<b>Construction</b>	<b>28</b>
45, 46, 47, 95.2	<b>Wholesale and retail trade; Repair of motor vehicles, motorcycles and personal and household goods</b>	<b>29<sup>2)</sup></b>
69, 70, 73, 74.2, 74.3, 78, 80, 81, 82	<b>Other services</b>	<b>35<sup>2)</sup></b>
84	<b>Public administration</b>	<b>36<sup>2)</sup></b>

Scope (NACE 2 codes)	Economic activity	Scope (IAF MD 1 codes)
49, 50, 51, 52, 53, 61	Transport, storage and communication	31
<b>75, 86, 87, 88</b>	<b>Health and social work</b>	<b>38</b>
<b>limited to 37, 38.1, 38.2, 39</b>	<b>Other social services</b>	<b>39</b>

<sup>1)</sup> In case the client has in the scope both activities with codes 20 in 21 according to IAF MD 1, only one is selected for witnessing, otherwise the activity that is in the scope is selected for witnessing.

<sup>2)</sup> In case the client has in the scope two all or three activities with codes 29, 35 and 36 according to IAF MD 1, only one is selected for witnessing, otherwise the activity that is in the scope is selected for witnessing.

<sup>3)</sup> In case the client has in the scope both activities with codes 4 in 5 according to IAF MD 1, only one is selected for witnessing, otherwise the activity that is in the scope is selected for witnessing.

<sup>4)</sup> In case the client has in the scope both activities with codes 25 in 26 according to IAF MD 1, only one is selected for witnessing, otherwise the activity that is in the scope is selected for witnessing.

For the activities indicated in **bold text**, the witnessing of audit is required prior to grant of accreditation, except for cases defined under Notes <sup>1), 2), 3)</sup> and <sup>4)</sup>.