SCCM
stichting
coördinatie certificatie
milieu- en arbomanagementsystemen

Certification scheme for Environmental Management systems according to ISO 14001

We at SCCM are convinced – and our experience has proven – that any organization, large or small, will achieve better environmental performance by using the 'plan-do-check-act' approach outlined in the ISO 14001 standard.

Certification scheme for Environmental Management systems according to ISO 14001*

Translation of N110707 (Dutch), 7 February 2013, rev. 1
Replaces (Dutch) version of 12 April 2012

*This certification scheme is a translation of the Dutch-language certification scheme based on the NEN-EN-ISO 14001:2004, the Dutch version of the European standard EN ISO 14001: 2004. This European standard is identical to the international standard ISO 14001:2004. For the sake of convenience, this certification scheme will use the term ISO 14001 instead of NEN-EN-ISO 14001:2004.

Contents

CHAPTER I

Introduction

By entering into an agreement with SCCM (the Association for the Coordination of Certification of Environmental and Occupational Health and Safety Management Systems in the Netherlands), accredited certification bodies can use this certification scheme, which is based on the worldwide standard ISO 14001:2004 (ISO: International Standardization Organization in Geneva). The certification scheme was developed by a Central Committee of Experts (CCE) operating within SCCM and approved by the board of SCCM. SCCM qualifies as scheme supervisor in conformance with the requirements set by the Dutch Council for Accreditation (RvA). Certification bodies (CBs) associated with SCCM are obliged to follow the scheme drawn up by the CCE for certification based on the ISO 14001 standard.

The Dutch Council for Accreditation (RvA) is a body designated by the government to supervise the functioning of the certification and inspection bodies. Certification bodies complying with the requirements set by the RvA can be accredited by the RvA. If a CB develops a certification scheme, it must involve the relevant interested parties. Using a central scheme manager obviates the need for each CB to develop its own separate scheme. This also promotes a uniform interpretation of the standard at the basis of the scheme, and a single scheme has added value as an information provider to both CB auditors and organizations wishing certification.

SCCM concludes agreements solely with RvA-accredited certification bodies. In addition to the ISO 14001 standard, there are specific requirements from the following documents that are of importance for environmental management systems and accrediting CBs:

- → NEN-EN-ISO/IEC ISO 17021:2011, the standard a certification body must meet to certify management systems.
- → IAF MD 1: 2007 (Certification of multiple sites based on sampling).
- → IAF MD 2: 2007 (Transfer of Accredited Certification of Management Systems).
- → IAF MD 5: 2009 (IAF Mandatory document for duration of QMS and EMS audits), Guideline for determining CB for auditor time by the International Accreditation Forum (IAF).
- → EA-7/04, a clarification of the European co-operation for Accreditation on legal compliance within the ISO 14001 standard.
- → EA-7/05 (EA Guidance on the Application of ISO/EC 17021:2006 for Combined Audits). The EA-7/05 describes procedures for combined audits, as to both content and determining time schedules (and ways to reduce time spent).
- → SAP-C005 (the RvA's Accreditation Protocol specifically for ISO 14001).

The IAF MD 5, EA-7/04 and EA-7/05 can be downloaded from the SCCM website.

SCCM's aim is to prepare a high-quality certificate with a broad support base that adds particular value to the relationship between the certified organization and those around it (the government, customers, suppliers and its neighbours). To achieve this broad base, SCCM's Central Committee of Experts (CCE) includes representatives of trade and industry (including trade organizations), the various authorities and other concerned parties.

The certification scheme consists of the following three elements:
→ The interpretation of the ISO 14001 standard.
→ The organization of the certification body.
→ The procedures used by the certification body.

A number of passages in this document state that SCCM 'expects' that something will be done. This means that SCCM urgently recommends the action but will waive the requirement if there is good reason to do so.

Chapter 2 is the interpretation of the ISO 14001 standard.

Chapter 3 describes the requirements set by the CCE for the organization of the certification body.
Finally, Chapter 4 outlines further requirements and interpretations concerning the working methods of the certification bodies. The requirements in both chapters 3 and 4 are based on the NEN-EN-ISO/IEC 17021:2011, IAF MD 5, EA-7/04 and EA-7/05.

The following text of the certification scheme of April 12th 2012 has been changed:
→ SCCM expects the internal audit cyclus to be completed within a period of three years. This is not a requirement from the ISO 14001 standard (paragraph 2.5.3).
→ An addition concerning recognizable certificates of branches/offices that belong to a concern certificate (paragraph 3.4.1).
→ Adjustment of table 1 annex 3 concerning the combining sectors in technical areas. Missing sector codes were added and some were moved.

CHAPTER 2

Interpretation of the ISO 14001 standard

This certification scheme is based on the Dutch version of EN-ISO 14001: 2004 `Environmental management systems - Specification with guidelines for use' by the International Organization for Standardization (ISO). This standard was accepted by the European Committee for Standardization (CEN) as a European standard. The text of this European standard, EN ISO 14001: 2004, is identical to ISO 14001: 2004. (The title of the Dutch translation is NEN-EN-ISO 14001:2004 'Environmental managementsystemen – Eisen met richtlijnen voor gebruik').

The guidelines of the Dutch Council for Accreditation (RvA) state that certification bodies must comply with the EA-7/04 'Legal Compliance as a part of Accredited ISO 14001: 2004 certification' (see SCCM website). The EA 7/04 describes in what way the CB must assess parts of the ISO 14001 standard concerning legal compliance. Insofar as the content of EA-7/04 relates to the interpretation of the ISO 14001, it has been incorporated in this chapter.

This chapter gives an interpretation of sections of the ISO 14001 standard, both sections of the standard which are essential for the development of a high-quality environmental management system, and sections which in practice give rise to questions about their interpretation. In some cases the explanatory notes refer to a situation specific to the Netherlands. The order in which situations are discussed corresponds with the order in which subjects are discussed in the standard. Each section indicates the section in the ISO 14001 standard to which the interpretation refers.

The text of the standard remains the basis for certification. The interpretations drawn up by the CCE are binding for a CB. The organization can follow the explanatory notes in this certification scheme or choose for an interpretation which as a minimum provides a comparable result.

ISO 14001 contains an Annex A, which provides guidance for the use of the standard in order to prevent misinterpretations. The CCE considers this Annex A as a correct interpretation, to be applied as such.

SCCM wishes to draw attention to the ISO 14004, `Environmental management systems - General guidelines on principles, systems and supporting techniques' (and its Dutch version NEN-ISO 14004 'Environmental managementsystemen – Algemene richtlijnen voor de principes, systemen en ondersteunende technieken'). These documents provide useful background information for the implementation of an environmental management system.

2.1 General

ISO 14001 is a standard for a management system with the cycle `plan-do-check-act' at its core. In addition to this cycle, ISO 14001 imposes requirements on the results of the management system:

→ The organization commits itself to at least comply with applicable legal and other requirements to which the organization subscribes (sub-section 4.2 c).

→ The organization commits itself to continual improvement, and to preventing pollution (sub-section 4.2 b).

The first requirement, in particular, makes the `plan-do-check-act' cycle go much farther than the control of operational matters which are related to licences, for example. The organization itself is responsible for analyzing all relevant environmental aspects, and drawing up and executing plans to reduce the environmental impacts of these environmental aspects. It is important when identifying an organization's environmental aspects to review products and services as well as the activities themselves. This also applies to environmental aspects elsewhere in the production chain and those which the organization can reasonably influence.

2.1.1 General requirements (section 4.1)

The organization must define and document the scope of its environmental management system (EMS). The scope indicates which organizational unit the EMS involves. This means that the organization must define and document:
→ the name and address of the organizational unit to be certified;
→ the name and address of any branches, offices or plants;
→ a short description of the organizational unit's activities, products and/or services.

All activities, products and services of the organizational unit defined must be taken into consideration when identifying environmental aspects. An organizational unit can be a part of an organization and/or site. If only parts of an organization are chosen, this choice must be credible from the point of view of the environmental aspects, and explained. Annex A.1 of the standard explains how the scope can be delineated. Section 4.3 of this certification scheme discusses the procedures of the CB in evaluating this part of the standard.

2.2 Environmental policy (section 4.2)

2.2.1 Continual improvement and prevention of pollution (section 4.2 b)

SCCM considers compliance with the commitment to the prevention of pollution to be part of the continual improvement process.
According to the definition, continual improvement is a recurring process which generally improves environmental performance in accordance with the organization's environmental policy. The organization must formulate its objectives on the basis of the environmental policy, in which the top management has committed itself to continual improvement and to the prevention of pollution. In order to be able to comply with its environmental policy, the organization's objectives must therefore express its ambition.

Improvements in environmental performance are achieved when the environmental objectives have actually been met. Periodically during the management review (sec. 4.6) it will be decided if the objectives are still ambitious enough for the organization to be complying with its formulated environmental policy.

The process of continual improvement will be discussed in more detail in the sections on interpreting the objectives and targets (2.3.3) and the management review (2.6).

2.2.2 Compliance with applicable legislation and regulations (section 4.2 c)

The standard requires that the environmental management system shall at least comply with applicable legislative and regulatory requirements and other agreements. This does not mean that non-compliance with legal requirements may never occur. The environmental management system must be able to detect non-compliances, take the right corrective and preventive action (sections 4.5.1, 4.5.2 and 4.5.3) and if necessary notify the competent authority. If non-compliance occurs, and these corrective and reporting mechanisms fail to work, this is indicative of an environmental management system which is not functioning correctly, and which is not eligible for certification. The EA-7/04 guidance provides more detail on this element of the standard.

Various sections in the ISO 14001 standard are related to compliance with legislation and regulations. In summary, SCCM finds that the EMS must include procedures for:

→ the procedures, as general administrative measures, for arranging the necessary licences or notifying competent authorities.
→ reporting changes, insofar as this is required based on legislation and regulations.
→ reporting incidents and/or nonconformities, if applicable to the competent authorities (see 2.4.4).
→ documenting correspondence and agreements with competent authorities.

Besides environmental legislation and regulations, there may be other legislation and regulations which must be kept in mind since they are related to the environmental aspects. For example, there may be legislation and regulations regarding the use of certain materials or raw materials, packaging and disposal methods. Also, there may be legislation, such as the Works Councils Act in the Netherlands, which exerts influence on the interpretation of the 'implementation and operation' section (section 4.4) within the environmental management system.

2.2.3 Other requirements (section 4.2 c)

Other requirements the organization must comply with may be derived from such programmes as:

→ Long-term agreements with the Netherlands Ministry of Economic Affairs concerning energy savings
→ Other covenants
→ Responsible care programme
→ ICC (International Chamber of Commerce) business charter for sustainable development

2.3 Planning (section 4.3)

2.3.1 Environmental aspects (section 4.3.1)

The standard makes a distinction between environmental aspects and environmental impacts. Environmental aspects are the elements of the organization's activities, products and services which cause an environmental impact. The SCCM information sheet 'Identifying and evaluating environmental aspects' (available soon in English) gives examples of this distinction.

A further distinction is made between direct and indirect environmental aspects. Indirect environmental aspects are those that can be influenced. The direct environmental aspects are mainly those which occur mainly at the site of the organization itself; since environmental aspects occurring at other points in the chain (for example, among suppliers and customers) are often less easy to influence, they are included among the indirect environmental aspects. The degree to which the influence on the environment can be exercised may differ from product to product between the organization and other points in the chain.
The organization must have some understanding of both the relevant environmental aspects which arise directly from the its activities and those which occur in other places on the chain, and which can be reasonably influenced. Annex A.3.1 of the ISO 14001 standard provides an overview of environmental aspects to be considered. SCCM interprets this overview as follows:

→ Water (and its consumption) is counted as a natural resource.
→ The noise produced by an organization is counted as an energy emission.
→ Various environmental aspects may be involved in the transport of raw materials, waste materials and finished products (energy consumption, noise and environmental incidents).

An organization must determine which of the environmental aspects that it has identified are important. There are instruments available that many organizations use to, for example, help them rate and weigh their environmental aspects (see information sheet). An organization is not obliged to use these instruments.

Points of attention when selecting important environmental aspects are:
→ reproducibility of the selection process;
→ the nature of the criteria used for selection (legislation alone is often not enough);
→ the acceptance of the criteria within the sector concerned;
→ the objectivity and consistency of the selection;
→ consistency with the organization's policy and objectives.
An organization may choose to qualify all of its environmental aspects as important, and thereby will not have to make a selection.

The procedure must make it clear how the identification and selection of important environmental aspects are kept up to date. SCCM expects that a decision whether to update the list is made at least once a year.

Although the standard does not explicitly required it, it is assumed that the company has at its disposal a description of its relevant production processes with a schematic representation of the process flows, and a drawing of the site on which the production processes relevant to the environmental management system are shown together with other elements relevant for the environment. Often this information is already available because it is necessary for the application for an environmental licence.

The information sheet about identifying environmental aspects discusses a number of questions about the practical implementation of this element of the standard:
→ When does an environmental aspect have a significant environmental impact?
→ How does one handle environmental aspects of the organization that take place outside the site to be certified?
→ What environmental aspects play a role in service companies?
→ Must an organization perform its own identification of the environmental impacts, or can it refer to a branch study?
→ Is it necessary to identify environmental aspects for all of the suppliers and contractors?
→ What is required from the suppliers and contractors?
→ How far back in the chain of suppliers, contractors and customers should the environmental aspects be identified?
→ To what depth should the environmental aspects of the products be analyzed?

2.3.2 Legal and other requirements (section 4.3.2)

According to the standard, the organization must determine how legal requirements and other requirements apply to its environmental aspects. This means, according to SCCM, that an organization must have an overview of the concrete requirements applying to their environmental aspects. This overview is important for performing the evaluation of compliance (section 4.5.2).

The organisation should periodically review if there are new applicable legal requirements or if existing requirements have been changed. (EA 7/04 section 3.2.2).

2.3.3 Objectives, targets and programme(s) (section 4.3.3)

A distinction can be made between objectives and targets for:
→ controlling the level of environmental performance;
→ improving environmental performance.
As regards controlling environmental performance, it is assumed that the identified objectives and targets (for example, maximum emissions or concentrations) in the 'control of operations' element (section 4.4.6) are translated into procedures and criteria for work instructions. There must be a programme (or programmes) for achieving objectives and targets aimed at improving environmental performance, in which concrete activities are worked out.

In order to formulate objectives in line with its policy of pursuing continual improvement and the prevention of pollution, the organization must be able to prove that it has an idea of the possible ways it can reduce pollution. Within this context it is important that organizations, as far as this is applicable, have insight into and stay abreast of developments such as:

→ the technology available on the market;
→ the state of technology in accordance with, for example, BREF documents from the EU, and NeR (air emissions) and CIW (water) guidelines in the Netherlands;
→ the solutions applied by similar organizations for reduction of pollution, for example, on the basis of studies carried out on a branch level.

A distinction can be made between short-term and long-term objectives. Long-term objectives can be especially important if the possibilities for reducing pollution require investments and will only show reduction in the long term. The programme formulates activities required for the realization of the long-term and short-term objectives.. There must be a periodic evaluation as to whether the programme should be amended, in view of the formulated objectives. An annual review of the environmental programme would be an obvious choice.

For organizations to which European-level BREFs (Best Available Techniques reference documents) apply, these documents contain, in theory, the frame of reference for the objectives aimed at the direct environmental aspects. The official reaction of the competent authorities to these BREFs must also be included in the frame of reference for the objectives.
UP to now, the BREFs have focused on environmental impacts directly related to the production process. If applicable, separate attention must be given to the objectives for the improvement of the indirect environmental impacts in the chain of purchasing, production, use and disposal phases of the product (insofar as the organization can influence them).

It should be realized that environmental pollution cannot be reduced only by applying new technology, but also by - for example - using other materials, introducing organizational measures or new practices, or making agreements with partner organizations in the chain. Even for non-industrial organizations, a process of continual improvement can be brought about through organizational measures or new practices.

As stated in the introduction to ISO 14001, the environmental management system plays an important part in the relationship between the organization and other interested parties (stakeholders). This is also shown in section 4.3.3: '...when establishing and reviewing its objectives and targets, [an organization] shall take into account the legal requirements and other requirements to which the organization subscribes...'. The requirements and wishes of interested parties may be among these 'other requirements'. To flesh out these requirements, the organization is expected to pursue an active policy of including and involving the opinions of third parties with an interest in its environmental policy.

In relation to the frame of reference for objectives and targets, SCCM wishes to state that for non-industrial organizations, there are often no legislation or regulations applicable to them that can direct these objectives and targets. Consequently, these non-industrial organizations in particular should familiarize themselves with the views of interested parties concerning the environmental policy they should pursue. Apart from the `technological options' referred to in the standard, they should consider other options which may lead to a reduction of pollution.

2.4 Implementation and operation (section 4.4)

2.4.1 Competence, training and awareness (section 4.4.2)

Identifying training needs is based on the competence of personnel. It must be determined what competence is necessary for the various relevant positions and/or whether individual staff members have it, based on education, training and/or experience.

2.4.2 Communication (section 4.4.3)

The decision whether or not to communicate externally must be documented. With regard to this documentation, the CCE expects that the organization will consider:

→ the target groups related to the important environmental aspects, objectives and any complaints which may arise.
→ the subjects and/or environmental aspects which may be of relevance to these target groups.

When an organization is falls within the scope of one of the environmental laws SCCM expects that it will communicate with the competent authorities responsible for that law. SCCM expects contact to be made with the competent authority at the following times:

→ Before certification of the environmental management system. The opportunity to indicate points for attention must be offered. The letter in Annex 1 can be used.
→ When preparing to make decisions with potentially significant consequences for the objectives and targets, and about which the relevant competent authority may be expected to have an opinion.
→ When drawing up and/or amending procedures in which there is communication with the competent authority and about which the relevant competent authority may be expected to have an opinion.
→ When there are amendments, incidents or nonconformities which must be reported (see 2.4.4).

SCCM's information sheet about communication indicates possible ways to communicate.

The standard states that the method of communication must be worked out for each of the selected target groups. According to SCCM each method must include at least the following elements worked out:

→ the aim of the communication.
→ the means of communication used and their frequency.
→ who is responsible for implementation.

The category of relevant target groups can include other organizations in the chain (suppliers and customers).

The information which the organization communicates about its environmental aspects must be traceable in documentation of registers kept within the EMS.

2.4.3 Documentation (section 4.4.4)

Although it is not explicitly required by the ISO 14001 standard, SCCM expects that the organization to be certified generally documents the procedures necessary to comply with the standard. Documenting procedures (in hard copy and/or electronic form) enhances the quality of the EMS. In addition, a lack of documented procedures can mean that the CB will need more time to determine if procedures actually exist and if they are used in practice.

2.4.4 Operational control (section 4.4.6)

Where necessary, the procedures and criteria required for operation shall be recorded in the operational instructions.

When the inventory of environmental aspects has identified significant environmental aspects with suppliers or contractors, these must be taken into account in purchasing.

The procedures requested for organizations falling under the scope of one of the environmental laws (in the Netherlands, the 'Wm' or Environmental Management Act, and 'Wvo' or Pollution of Surface Waters Act) include those for reporting changes in business activities, nonconformities regarding the licence, incidents and/or special circumstances relevant to the competent authority. These procedures must set criteria on the basis of which the organization can determine what changes, nonconformities and/or special circumstances must be reported, who has responsibility for reporting and the procedure and speed of reporting.

2.4.5 Emergency preparedness and response (section 4.4.7)

As indicated in Annex A.4.3 of the standard, as part of their communication procedures, the organization must consider involving the authorities in drawing up emergency plans.

2.5 Checking (section 4.5)

2.5.1 Monitoring and measuring (section 4.5.1)

It is assumed that adequate and relevant environmental information will be generated for all the environmental aspects for which objectives and targets have been formulated.
Requirements laid down in environmental licences that relate to the generation of information related to the environment will be considered a minimum. If such requirements do not result in adequate and relevant information about the environmental objectives they will be regarded as altogether inadequate.

'Adequate' is taken as meaning that the monitoring method (for instance, the measuring method used and the frequency of measuring and/or of using estimates and calculations) is such that the data produced result in environmental information suitable for developing, executing and, where necessary, adapting a good environmental policy. For example, although the notion of a `measuring week' is something that occurs in licences, the principle of a measuring week will, however, seldom produce a representative picture and will not be deemed adequate in such cases.

'Relevant' is taken as meaning that the environmental information is compatible with the way in which information is used while the costs and benefits of the measurement are in proportion.

The monitoring and the measurements must be compatible with the level of the formulated objectives and targets. If, for instance, objectives are formulated in the form of annual obligations for the organization as a whole then the monitoring and measurements should also be designed so that developments in annual obligations can be tracked.

The origins of environmental information must be traceable after the fact. It must also be possible for such information on the environment to be reproduced in the future in such a way that the various results can be compared. Traceability and reproducibility apply to both the measurements made and the processing of measurement results into environmental information.

The standard does not set requirements for the way in which the organization ensures its environmental information is traceable and reproducible. One way to do this is to set up an administrative organization and determine algorithms which can be used.

When the organization discovers a non-compliance with legal requirements, it is required to take immediate corrective and preventive action (including root cause analyses), which may include immediately informing the competent authority, depending on specific legal requirements and severity of non-compliance (EA-7/04 art. 3.6.2).

2.5.2 Compliance audit (section 4.5.2)

Periodically, an organization must evaluate its compliance with each and every applicable legal requirement (legislation and regulations) and that it is aware of its compliance status. An EMS helps the organization to identify its compliance status (EA-7/04 sec. 3.7.2). SCCM considers this evaluation to have a different purpose than the internal audit or management review. The performance of this evaluation must be verifiable. A 'compliance audit' can be used as an instrument to carry out the evaluation of compliance. The internal audit must evaluate the functioning of the procedure for evaluating compliance. The results are incorporated in the management review.

The frequency with which a compliance audit is conducted will depend on the chances of a non-conformity with a legal requirement occurring and its potential environmental impact. This will differ for every requirement. The higher the risks associated with a given requirement, the more frequent the evaluation must be, and the more rigorous the method. The organization must determine this for the different legal requirements. Certain requirements may not have to be evaluated every year, for example, in the case of facilities not subject to change and for non-conformities not having direct environmental impacts. Ultimately, the organization must be able to make a substantiated statement about its own compliance during the annual management review.

2.5.3 Internal audits (section 4.5.5)

The ISO 19011 standard must be followed when performing the internal audits of the environmental management system. This set of guidelines concerns the performance of internal audits within a management system. The guideline covers the principles of auditing in general, the audit programme, the elements (activities) of an audit and the competence and evaluation of the auditors.

As also indicated in the introduction to the ISO 19011 standard, the information from the standard should be flexibly interpreted. How the guideline is applied will depend on such factors as the scope, nature and complexity of the organization to be audited and the objective of the audit.

Regarding the impartiality of an auditor, it is assumed that an auditor does not evaluate his or her own work (also see Annex A of the standard).

The ISO 14001 standard does not provide a quantitative guideline for the frequency of the internal audits. The organization shall determine the frequency of the audits. This frequency depends on many factors including:
→ the nature and scope of the environmental aspects and the resulting environmental impacts.
→ the modifications in the environmental impacts which occur or may occur.
→ the functioning of the environmental management system in the past.

According to the ISO 17021 (section 9.1.1), a certificate is valid for a period not exceeding three years. Therefore SCCM expects the internal audit cycle to be completed within a period of three years. All of the elements contained in the standard must be audited within this period. However, it may be necessary to audit specific sections of the standard or certain environmental aspects more frequently.

The following subjects deserve special attention in internal environmental management audits:
→ The effectiveness of the environmental management system in achieving its objectives;
→ The efficacy of the working methods and responsibilities contained in the environmental management system for the application for the necessary licences, or of the reporting of changes to them;
→ The implementation of the environmental management system on the shop floor;
→ The operation of the monitoring and measurement procedures;
→ The operation of corrective and preventative action in the case of non-compliance with specified regulations or failure to achieve objectives or satisfy criteria;
→ The procedures for evaluating compliance;
→ The procedures for reporting changes, non-compliance and incidents.

As a rule, if the internal audits are carried out correctly, it will enable the certification body to carry out the certification audits more efficiently.

2.6 Management review (section 4.6)

The review of the effectiveness of the environmental management system (achieving the objectives) is considered a permanent component of the management review.

The management shall also review if the objectives are still appropriate for the formulated environmental policy, in particular the commitment to continual improvement and the prevention of pollution. It is assumed when formulating these objectives that organizations will make concrete use of the opportunities available to reduce pollution. They must explain why any possible measures will not be implemented or will only be implemented in the long term, e.g. because environmental policy gives other priorities.

A distinction can be made between short-term and long-term objectives. Changes and investments cannot be realized immediately; the organization will therefore have demonstrable objectives for the long term and an idea about the way in which they can be realized. It is the organization's task to determine if these long-term objectives are included in its other strategic plans. However, once the long-term environmental objectives have been integrated in other plans, they must be traceable within those plans. The more generalized long-term objectives will gradually be converted into more concrete short-term objectives.

The essence of the management review is that the organization must be able to prove that it is taking all technically and economically feasible measures to prevent pollution. For organizations which are already very active in the application of environment-friendly technologies, this may mean that there are years in which no improvement of environmental performance is achieved. The organization must demonstrate that this could not have been expected from a technical or economic perspective.

In order to ensure that the environmental management system remains adequate, the management must keep informed of possible future changes, such as:
→ changes in legislation and regulations;
→ changes in production;
→ market developments;
→ changes in the attitude of interested third parties;
→ developments in town and country planning.

The standard states: 'The organization's top management shall, at intervals that it determines, review the environmental management system, to ensure its continuing suitability, adequacy and effectiveness'. A frequency of once every year would seem reasonable in view of the rapid pace of developments in knowledge, the market, regulations and technology. This frequency is also compatible with the usual frequency for reporting and planning.

CHAPTER 3

Organization of the certification body

To be accredited to perform certification work, a certification body (CB) must meet the NEN-EN-ISO/IEC ISO 17021:2011 standard 'Conformity Assessment - requirements for bodies providing audit and certification of management systems'. The ISO 17021 contains both structural and procedural requirements. SCCM can interpret these requirements where necessary and can set additional requirements.

Chapters 1 through 8 and 10 of the ISO 17021 contain organizational requirements. The most important requirements from these chapters are summarized in this chapter of the certification scheme. Any interpretations or additions by SCCM are in text boxes.

In the event of evaluation by the Council for Accreditation (CA) the text of the NEN-EN-ISO/IEC ISO 17021:2011 (and not its translation into this certification scheme), along with the text in boxes in this document, is binding.

3.1 Principles and general requirements (ISO 17021 chapters 4 and 5)

The aim of ISO 14001 certification is to give all interested parties the confidence that the environmental management system meets all the requirements. The value of certification is determined by the confidence of parties in, among other things, the impartiality and competence of the certification body.

The following aspects play an important part with regard to confidence in the certification body.

3.1.1 Impartiality (ISO 17021 sections 4.2, 5.2 and 5.3)

A CB's impartiality can be at issue in several ways, for example if it has an interest in the organization or people within it, or too-close contact with them from an earlier assignment. The ISO 17021 recognizes the potential threat to impartiality posed by the fact that a CB is paid by the organization to be certified.

It is therefore essential that a CB can use objective evidence to make its decisions as to whether or not requirements are being met. The decisions made on the basis of this evidence must not be influenced by other interests or parties.

The requirements for a CB include the following:

- → It must have a publicly accessible statement in which the CB's management assures its commitment to impartiality and objectivity.
- → The CB must identify, analyze and document all potential threats to its impartiality. These threats can relate to both the organization and people within it. Action must be taken to eliminate or minimize potential threats. All information must be submitted to a committee created by the CB in which all interested parties are represented (see ISO 17021 section 6.2).
- → The CB must regularly evaluate its financing and income sources to demonstrate to this committee that there is no commercial, financial or other pressure influencing its impartiality.
- → The CB, or a division within the same legal entity, may not offer or provide consultancy services in the area of management systems.

→ The CB or a division within the same legal entity may not offer or perform internal audits for clients being certified. Clients for whom the CB has performed internal audit services shall not be certified by this CB for two years afterwards.
→ The CB shall not contract certification work to consultancy firms working with management systems. This requirement does not apply to individuals who are hired as auditors.
→ It may not use personnel who have been involved as consultants with regard to management systems for the company to be certified during the 2 years prior to certification work.

Personnel may not have been involved as consultants for the organization to be certified about either its environmental management system or any other management systems.

If an employee has worked for the CB for less than two years, or works part-time for the CB, the CB must make sure that this person is not, and has not been, involved with the organization to be certified (for example as a consultant or internal auditor).

Performing a 'pre-audit' is not considered consultancy as long as it only involves an evaluation of the implemented system, and no advice is given about rectifying eventual violations or non-compliance.

→ The CB must require both in-house and external personnel to inform the CB of situations that may possibly constitute a conflict of interest with them or the CB.

3.1.2 Competence (ISO 17021 section 4.3)

Competence is the demonstrated capacity to apply knowledge and skills. It is a basic requirement for personnel entrusted with performing certification work. Section 3.3 has more information on the required competence.

3.1.3 Responsibility (ISO 17021 section 4.4)

The client organization, not the certification body, has the responsibility for meeting the requirements for certification in the 14001 standard. The certification body has the responsibility to assess sufficient objective evidence upon which to base a certification decision.

Since every audit is based on sampling, a CB cannot guarantee 100% conformity.

3.1.4 Openness (ISO 17021 section 4.5)

A CB must provide public access to information about the audit and certification process and the status of issued certificates (including suspensions, withdrawal and changes of scope). The requirements are elaborated in section 3.4.

3.1.5 Confidentiality (ISO 17021 section 4.6)

To gain the privileged access to information that is needed for the certification body to assess conformity to requirements for certification adequately, it is essential that a certification body keep confidential any proprietary information about a client.

3.1.6 Response to complaints (ISO 17021 sections 4.7 and 9.8)

Effective responsiveness to complaints is important for creating confidence in certification, as well as for the protection of both certified organizations and other users of certification.

The requirements for a CB include the following:
→ It must have a publicly accessible complaint procedure.
→ The complaint procedure contains at least the following: a description of the process of receiving, evaluating and investigating the complaint; the tracking and documenting of the complaint, and the action taken in response; and ensuring that corrective action will be taken.

→ The decision in response to the complaint must be taken by a person (or persons) not previously involved with the subject of the complaint.
→ If possible, persons submitting complaints must be kept informed about the receipt of the complaint, handling process and the outcome.
→ The CB must determine if, and to what degree the complaint and resolution are made public, in consultation with the client and the complainant.

To provide confidence in certification, a CB must provide information about the conclusions of certain audits (such as those done in response to complaints) to interested parties, as far as confidentiality permits.

The CB must inform SCCM as soon as possible, but in any case within two weeks, of complaints submitted by third parties (i.e. not objections from organizations certified by the CB) about a certificate it has issued. SCCM will report the number and nature of the complaints in its annual report.

3.1.7 Legal aspects (ISO 17021 sections 5.1 and 5.3)

A CB must meet the following legal requirements:
→ The CB must be an independent legal entity or a clearly defined part of a legal entity, so that it can be legally responsible for its activities.
→ The CB must have a contract with its clients on the basis of which the agreements about performing certification work are also legally enforceable, also in the case the CB has multiple offices or the client organization has multiple certified sites covered by the same contract.
→ The CB must evaluate the risks associated with performing certification work and take measures (such as insurance or financial reserves) to cover any liabilities.

3.2 Organizational structure of the CB (ISO 17021 chapter 6)

3.2.1 Organizational structure and top management (ISO 17021 section 6.1)

The certification body shall document its organizational structure, showing duties, responsibilities and authorities (of personnel, management and committees). If the certification body is a part of a legal entity the structure shall include the line of authority and the relationship to other parts within the same legal entity.
The ISO 17021 section 6.1.2 lists nine areas for which top management is responsible.

3.2.2 Committee for safeguarding impartiality (ISO 17021 section 6.2)

→ The structure of the CB must be such that it safeguards the impartiality of the various certification activities. A committee must be appointed for this purpose, and the various stakeholders must be invited to take psec.
→ The committee assists and advises in developing the policies relating to impartiality of and creating confidence in its certification activities. The committee shall prevent any commercial or other considerations from standing in the way of its working impartially.
→ At least once a year, the committee performs an assessment of the CB's impartiality in its performing audits, certification and its internal decision-making processes.
→ The CB must document the composition, tasks and responsibilities, competence, authorities and competence of the committee members. The committee must have the right to undertake independent action, for example, by informing authorities, accreditation bodies and stakeholders, if management does not respect the committee's recommendations. In doing so, however, the committee shall take into consideration the confidentiality requirements in 8.5.

Every CB must have its own committee. The committee's work is independent of the work of SCCM.

3.3 Personnel within the CB (ISO 17021 section 7)

3.3.1 Competence of management and personnel (ISO 17021 section 7.1)

→ The CB must have a process for ensuring that personnel have relevant knowledge for the various kinds of management systems in the geographic areas where it operates.
→ The CB shall determine the competence necessary for all relevant technical areas, and for each function in the certification activity.
→ The CB shall determine the means for demonstrating competence to perform particular functions.

Annex 3 shows a system for determining the necessary competence for the relevant positions in the organization. A CB can use the system in annex 3 or its own system if it provides comparable results.

A CB must have a written analysis of the necessary competence at the various levels of the organization for the technical areas in which it wishes to be active.

A CB must have available the expertise to carry out a contract review and must be able to demonstrate it is capable of performing the following:
→ Defining the operations and processes of the organization wanting certification.
→ Defining the environmental aspects and impacts connected with the processes of the organization to be certified.
→ Define to what degree the necessary expertise is actually available.

The ISO 17021 makes an explicit distinction between the following positions:
→ Top management
→ Audit team leader
→ Auditors
→ Reviewer of audit report and decision maker(s)
→ Competence evaluator (for evaluating the competence of auditors and other personnel)

Annex A lists the personnel charged with the contract review and scheduling. A CB must determine which competence these personnel must have. Personnel making this determination must in any case have sufficient knowledge and experience to determine the qualifications necessary for the audit team and set a schedule, based on the information from the organization about, among other things, the environmental aspects and the history of the management system. This is discussed in more detail in Annex 3.

3.3.2 Personnel involved in the certification activities (ISO 17021 sections 7.2 and 7.4)

The requirements in ISO 17021 include the following:
→ The CB must have personnel within its own organization with sufficient competence to organize the certification of environmental management systems.
→ The CB must have enough available auditors (internal or external), including technical experts and audit team leaders, to perform the range of audit activities and all of the certification work.
→ The CB must have a defined process for selecting, training and formally authorizing auditors and technical experts used in certification activities.
→ The CB must have a demonstrably effective auditing process, including the use of auditors and audit team leaders with general auditing skills and knowledge as well as skills and knowledge for auditing in specific technical areas.
→ The CB must ensure that auditors are kept up to date about all certification requirements, audit standards and other relevant requirements. The CB must identify its training needs and offer training opportunities.

→ Auditors and technical experts may only be used in areas for which they have demonstrated competence.
→ The group or individual that takes the certification decision must understand the ISO 14001-standard and its certification requirements and shall have demonstrated competence to evaluate the audit processes and conclusions of the audit team.
→ The CB must have documented procedures for monitoring and measuring the performance of both individual auditors and other personnel. The methods for doing so include evaluating audits, periodically observing audits in practice and asking clients for feedback.
→ The CB must maintain records for auditors, management and administrative personnel with information about, among other things, relevant qualifications, training, experience, competence and all relevant consulting activities.

3.3.3 Use of external auditors and outsourcing (ISO 17021 sections 7.3 and 7.5)

→ The CB shall have external auditors and technical experts sign a written agreement committing themselves to the CB's policy and procedures. The agreement shall address the aspects of confidentiality and independence from commercial and other interests. The statement shall require external auditors and experts to inform the CB of existing or former contacts with an organization they are assigned to audit.
→ The CB has a process describing the conditions under which services may be outsourced. Outsourcing may be understood to mean subcontracting to another organization to provide part of the certification activities on behalf of the certification body. The CB will draw up a legally enforceable contract for each body that provides outsourced services, which includes the agreements on such matters as confidentiality and possible conflicts of interest. This does not apply to external auditors and experts who are under contract.
→ Decisions about awarding, maintaining, renewing, suspending or withdrawing a certificate cannot be outsourced.
→ The CB remains responsible for all activities outsourced and must ensure that both the body that provides outsourced services and the individuals working for it meet the requirements of the CB and of ISO 17021, also with regard to competence, impartiality and confidentiality.
→ The CB has documented procedures for qualification and monitoring of all bodies that provide outsourced services which it uses for certification activities. The CB shall ensure that information about the competence of auditors and technical experts is kept up to date.

3.4 Information exchange between CB and third parties (ISO 17021 chapter 8)

3.4.1 Publicly accessible information (ISO 17021 sections 8.1, 8.2, 8.3 and 8.4)

→ The CB shall make information publicly available (or provide it on request) about the certification process, certification activities and geographic locations where certification activities are being provided.
→ The certificate inlcludes the name of the certified organization and location of its head office, dates of granting and expiration, unique identification code, scope of the certificate, name and address of the CB, the standard used as the basis for the certificate and the name of the accreditation body.
→ The CB must ensure that information about certificates that have been granted, suspended or withdrawn is publicly accessible.
→ The CB shall make maintain and make publicly accessible (or provide upon request) a directory of valid certificates. As a minimum, the list shall show the name, standard, scope, geographical location (such as city and country) for each certified client.
→ If requested, the CB shall provide information to demonstrate the validity of a certificate it has issued.

The CBs must include on the certificate the fact that the certificate was issued on the basis of the SCCM certification scheme. A copy of the certificate or a modified certificate must be provided to SCCM immediately. SCCM publishes the certificates on the Internet.

The following apply to suspension or withdrawal of a certificate:

- → SCCM shall be informed immediately if a certificate has been suspended, and will indicate the suspension on its Internet database.
- → If the CB suspends a certificate, it will inform SCCM of the suspension as soon as possible, but in any case within 1 week. SCCM will remove the certificate from its directory of certified organizations.

The information on the certificate must make it clear to potential users which organization is certified for what activities, and must not be misleading. In particular:

- → The name of the organization as it appears on the certificate must correspond with the level of hierarchy at which the management review is performed (such as Organization x, business unit y). The name of the organization on the certificate may have a lower hierarchical level but not a higher one.
- → The scope contains a concise description of the operations of the organization covered by the certificate. This description may not contain value judgements. It is recommended that it be made clear whether all or some of the organization's operations are covered by the certificate.
- → Branches of the organization at other addresses and/or cities will be included on the certificate in such a way that they are traceable.
- → A branch certificate issued for a branch or office which is part of a concern certificate, states the concern certificate which it is part of (by stating the name of the concern and if necessary the certificate number(s) of the concern certificate). For all readers it must be clear that the branch certificate is part of the concern certificate and not an individual certificate.
- → If there is a need to indicate in more detail what the ISO 14001 certificate relates to (such as addresses of branch offices or names of products or services) there can be a reference on the certificate to an annex, certified by the CB, with this information.

3.4.2 Confidentiality (ISO 17021 section 8.5)

- → The CB shall have a policy, arrangements and legally enforceable contracts to safeguard the confidentiality of the information it has acquired at all levels of the organization.
- → The CB shall inform the client in advance about information it will make public. All other information will be treated as confidential.
- → Unless required by the international standard, information about a particular client or individual may not be given to third parties without written permission from the client or individual concerned. If the CB is legally required to pass confidential information on to third parties, it will inform the client or individual in advance, unless this violates the law.
- → Information about the client from sources other than the client (for example, complaining parties, enforcement authorities) shall be treated as confidential information, in accordance with the CB's policy.

3.4.3 Information exchange between a CB and its clients (ISO 17021 section 8.6)

The CB must provide clients with the following information:

- → a detailed description (including normative requirements) of the various steps in the certification process (application, initial audits, surveillance audits, decision-making process, changes of scope, suspension and withdrawal of certificates; complaint procedures and recertification) including the costs of the activities.
- → changes in the requirements for certification. The CB shall monitor compliance with the new requirements by all certificate holders.

The CB must arrange with certificate holders that they immediately provide all information that could influence the functioning of their environmental management system or their compliance with the ISO 14001 standard. These include the following changes:

→ legal, commercial or organizational status or ownership;
→ organization and management (for example, key management positions or technical staff);
→ contact address and sites;
→ scope of operations under the certified management system;
→ major changes in the management system or processes.

The organization with a certified environmental management system is responsible for continuing to comply with all requirements. If this is no longer the case, the organization itself must report this to the CB.

This is not a question of nonconformities identified in internal audits, for example, and which can be solved quickly, but of structural nonconformities which have or can have consequences for the environment or those in the vicinity such that complaints or action from the authorities can be expected. See also section 4.6, which discusses nonconformities for which a CB must perform an additional interim audit.

3.5 Management system within the CB (ISO 17021 chapter 10)

The CB must have a management system meeting the ISO 9001 standard or the requirements as they appear in section 10.3 of the ISO 17021. The management system must aim to meet the requirements of sections 5-9 of ISO 17021 and demonstrate their application.

CHAPTER 4

Procedures used by the certification body

A CB wanting to be accredited for performing certification must meet the ISO 17021 standard ('NEN-EN-ISO/IEC ISO 17021:2011 Conformity Assessment - requirements for bodies providing audit and certification of management systems'). The ISO 17021 standard contains requirements for both organizational structure and the CB's procedures. SCCM can provide an interpretation of these requirements, where necessary.
Chapter 9 of ISO 17021 contains requirements related to the procedures used during the certification process.
The most important requirements from these chapters are summarized in this chapter of the certification scheme. Any interpretations or additions by SCCM are in text boxes.
In any assessment by the Council for Accreditation (CA), the text of the NEN-EN-ISO/IEC ISO 17021, in connection with the text in boxes in this document, is binding.

Certification bodies must satisfy the EA-7/04 'Legal Compliance as a part of Accredited ISO 14001: 2004 certification'. The EA-7/04 lays down the way in which the CB must evaluate elements of the ISO 14001 standard related to compliance with legislation and regulations.

4.1 General requirements (ISO 17021 section 9.1)

The certification process consists of an initial audit (which has two phases), surveillance audits in the first and second years and a re-assessment in the third year before the certificate expires. The three-year cycle begins with the decision to certify (or re-certify).
The details of the audit programme and the adjustments to the programme will vary depending on the size of the client's organization, the scope and complexity of the management system, products and processes, as well as on the basis of the demonstrated level of effectiveness of the management system and the results of previous audits. These audits may also be audits done by the certification body for other areas.

4.1.1 Audit plan and audit team (ISO 17021 sections 9.1.2, 9.1.3, 9.1.6, 9.1.7, 9.1.8 and 9.1.9)

The following apply with regard to the audit plan:

- → The CB will ensure that an audit plan is drawn up for each audit to provide the basis for the planning and carrying out of the audit activities. This involves all the audits mentioned in 4.2, 4.3, 4.4 and 4.5. The audit plan is based on documented requirements of the CB. As a minimum, the audit plan will contain the objectives, criteria and scope of the audit, the amount of time to be spent, and the dates and locations to be inspected.
- → The CB will inform the client of the names (and backgrounds, if it so desires) of the members of the audit team. The client must be given sufficient time to respond so that the CB has sufficient time to change the members of the team, if there is a good argument for doing so.
- → The audit plan and the dates agreed for the audit will be communicated to the client in advance.

> The CB must submit an audit plan in writing (by post, fax or e-mail) to the organization to be certified at least one week before an audit is held.

The CB has a process for selecting and appointing the audit team, including the audit team leader, which takes into account the competence necessary to achieve the objectives of the audit. In addition to the audit plan, factors must be considered such as whether audits are being combined, and the language and culture and involvement of auditors in previous audits.

In selecting the members of the audit team, the CB must use the qualifications based on the competence analysis performed for the client concerned, using the system in Annex 3.

The tasks to be given to the audit team shall be defined and made known to the client, and shall require that the audit team:

- examine and verify the structure, policy, processes, procedures, records and related documents of the client's organization that are relevant for the management system;
- determine that these elements meet all requirements relevant for the scope agreed for certification;
- determine that the processes and procedures have been established, implemented and maintained effectively, to provide a basis for confidence in the client's management system; and
- communicate with the client about the activities performed, as well as any inconsistencies found between the client's policy, objectives and targets and the results of the audit.

The CB shall have a documented description of the procedure for performing on-site audits for the client in accordance with the guidelines from ISO 17021. In addition to on-site visits, electronic files may be read from off-site; this may also be considered 'on-site'.

According to IAF MD 5: 2009, 80% of the time must be spent 'on site'. Modern means of communication make it possible to use methods of investigation in which specific parts of the audit can be done off-site. When more than 20% of the time is spent off-site, the CB must be able to substantiate which parts are involved and that the audit method in the situation concerned is justified (for example because the CB has a good knowledge of the environmental management system and the situation is stable).

If the CB identifies one or more nonconformities, the CB must demand that the client analyzes the cause of the nonconformity and describes the correction and corrective action that has been or will be taken.

4.1.2 Audit time (ISO 17021 sections 9.1.4 and 9.1.5)

The CB has a documented procedure for determining the time spent on an audit. For each client, the CB shall determine how much time is needed to perform a complete effective audit of the environmental management system. The audit time as determined by the CB and the justification for the determination shall be documented.

SCCM uses the IAF MD [Mandatory Document] 5: 2009 (Duration of QMS and EMS Audits) to determine time schedules. The complexity of the organization will play a part in determining how much time is to be spent. Annex B of the IAF MD 5: 2009 distinguishes between 5 levels of complexity:

- high
- medium
- low
- limited
- special cases

A sector's level is determined on the basis of the number and nature as well as the severity of its environmental aspects. Although the times indicated in this guidance are not prescriptive, the CB must be able to justify deviations from the reference. The complexity of the organization (such as its relevant environmental aspects) will play a part in determining how much time is spent. The CB must have a method for systematically determining complexity. SCCM has developed an overview of the severity of environmental aspects by sector, which can be helpful; it can be found on www.sccm.nl.

The time schedule is determined by the risk category and the number of employees, using the IAF MD 5. This document is available on the SCCM website.
Chapter 8 of the IAF MD 5 describes the criteria for increase or decrease of audit time.

During stage 1 there is a test to see if the estimates are correct and if any modifications to the time schedules and/or composition of the audit team are necessary.

If audits of different management systems are combined, it can be a reason for reducing the allocated time. The EA-7/05 (Guidance for combined audits) is the basis for the reduction of audit time. In determining the reduction, the basis is annex 3, in which the reduction is determined on the basis of the degree of integration of the various management systems and the possibilities of the audit team performing a combined audit. The maximum possible reduction of time is 20%.

If the client's environmental management system involves the same activities at several sites, the CB may use multi-site sampling. The CB must develop a spot-check plan that ensures a proper audit of the management system. The rationale for the plan must be documented separately for each client.

According to IAF MD 1:2007 the term 'multisite' refers to organizations with multiple sites where highly similar activities take place. Sampling is not permitted when auditing organizations with sites where different activities take place. The sampling must be partly selective and partly random. The IAF MD 1 provides criteria for selective sampling. SCCM would like to point out that the sites with nonconformities are the precisely the ones to select, for example because the environmental burden is greater or internal audits indicate implementation problems, etc.

If sampling, the number of sites to visit must be calculated as follows:

- → The IAF MD5: 2009 is used to calculate the number of days. Time allocation for multi-site audits must meet the requirements of the IAF MD1: 2007 (Certification of multiple sites based on sampling). This document also has conditions for the use of the rules below.
- → In an initial audit, the number of offices/plants (sites) to visit is the square root of the number of sites (not including the head office). If there are four sites, at least 2 sites must be sampled in the spot check. Numbers are to be rounded up to the nearest whole number.
- → In a surveillance audit, the number of sites is calculated as 0.6 times the square root of the number of sites. Numbers are to be rounded up to the nearest whole number.
- → In a reassessment, the number of sites is calculated as 0.8 times the square root of the number of sites. Numbers are to be rounded up to the nearest whole number.
- → If the hazards and risks of the activities at the sites are in the 'high' category, a more extensive check than indicated must be considered.

4.1.3 Audit reports (ISO 17021 section 9.1.10)

The CB shall provide a written report of every audit, based on the requirements in ISO 17021. The audit team may indicate opportunities for improvement but may not suggest particular solutions. The audit report remains the property of the CB.

A CB must account for the results of the certification audit to the organization to be certified, and in doing so must formulate opportunities for improvement. This is not considered a recommendation to be paid for separately. The CB is not permitted to make recommendations for altering the environmental management system and/or to make suggestions for concrete solutions based on the results of this report.

According to SCCM, the report must include sufficient information after the fact to account for its procedures, for example if there are any objections/appeals. The CB must maintain records with information about the audits performed (see ISO 17021 section 9.9).

In summary, the audit team's internal report must contain the following information, according to SCCM:
- → information about the certified organization.
- → an account of the investigation (such as approach, subjects investigated, time spent, audit team, etc.).
- → the degree of compliance with the requirements in the ISO 14001 standard are met. Nonconformities must be explained.
- → a summary of the most important findings, both positive and negative, with respect to the implementation and effectiveness of the environmental management system.
- → the degree to which the internal audits can be relied upon.
- → a summary of the document audit from the preliminary audit.
- → the final evaluation by the audit team.

Besides the points above, the report about surveillance audits must pay special attention to the rectifying of previously identified nonconformities.

In the event of combined systems, the assessment of the environmental management system based on the ISO 14001 standard must be readable on its own in the report, according to SCCM. The result of the application for a certificate for one management system must not affect the result for any other psec.

4.1.4 Decision making (ISO 17021 sections 9.1.14 and 9.1.15)

Before the CB takes the decision to certify, it must establish that:
- → the audit team has supplied sufficient information in the light of the requirements set and the scope of the certification;
- → the effectiveness of correction and corrective actions has been reviewed and accepted.

The CB must ensure that the committee or person responsible for the certification decision has not been involved in performing the audit.

4.1.5 Government involvement

The certification body must inform the organization to be certified, in a timely manner, that it is important to give government bodies responsible for granting and renewing environmental licences advance written notice that a certification audit will be taking place. SCCM has provided a sample letter for use in these cases (see Annex 1). In order to ensure sufficient response time, the letter must be sent at least three weeks before the preliminary audit is to be performed. The function of the letter is to offer the relevant government organization the opportunity to indicate in writing points for attention for the certification audit, by stating data and numbers of relevant correspondence. The certification body must be able to demonstrate that it has encouraged the organization to be certified to inform the authorities concerned in writing previous to the certification audit. SCCM expects that this will result in the sending of the letter of announcement, certainly in the case of organizations which intend to use the certificate in their relations with the authorities. Sending a letter of announcement is only necessary in the case of an initial certification audit. If a certificate has been awarded, government authorities wishing to object can use the complaint procedure. SCCM will follow events to ascertain how frequently letters of announcement were actually sent to government organizations regarding initial certification audits.

4.2 Procedure with regard to assessment of compliance with legislation and regulations and continual improvement

4.2.1 Compliance with legislation and regulations

The EA-7/04 sets the CB's procedures for evaluating compliance with legal requirements. Compliance can be understood to mean that the government is not taking, or expected to take, action against the organization (EA-7/04 section 1.4). In brief, the EA-7/04 requires the CB to perform the following during certification audits:

- → Assess whether commitment to compliance is enshrined in the organization's policy (EA-7/04 3.1.1).
- → Assess whether all applicable environmental legal requirements have been identified, are publicly available and are kept up to date (EA-7/04 3.2).
- → Review if the organization has determined to what degree the legal requirements apply to the significant environmental aspects and if compliance of those legal requirements has been taken into account in the EMS and its control measures (EA-7/04 3.3).
- → Assess whether operational control is such that compliance can be proved, and that procedures and operating instructions are in place where they are needed (3.5.2).
- → Assess whether corrective and preventive action (including informing the competent authority if necessary) are undertaken immediately and properly carried out (EA-7/04 3.6).
- → Assess whether the organization's procedures for evaluating its own compliance have been implemented and/or if all legal requirements are periodically evaluated (including through taking spot checks and evaluating procedures) (EA-7/04 3.7).

> According to SCCM, an organization must realize that many of its environmental legal requirements are fairly clear. It must also have the intention to familiarize itself with, and comply with, the less obvious legislation and regulations. In its evaluation, however, the CB must consider the degree to which an organization can also reasonably be expected to be familiar with applicable legislation and regulations (e.g. in professional publications/journals).

- → Assess whether the competent authority is notified at the point corrective action does not result in compliance, and if there is agreement as to what action to take to return to compliance and mitigate any damage. Written proof of approval from the competent authority is acceptable as conforming to the commitment to compliance. (EA-7/04 3.8).
- → Assess whether the commitment and procedures for evaluating compliance with legal requirements are evaluated during the organization's internal audits (EA-7/04 3.9).
- → Assess whether the results of the evaluation of compliance and any changes in legal requirements are included in the management review (EA-7/04 3.10).

It is important to distinguish between a CB's task and the government's task of enforcement:

- → The CB evaluates whether the EMS is capable of complying with legal requirements. To evaluate the effective functioning of the EMS, the CB will also carry out spot checks of compliance with legislation and regulation. This spot check is meant to evaluate the effectiveness of the EMS, and not to report the actual compliance. This is the difference between the task of a CB and that of the government as enforcement authority.
- → If the environmental management system operates properly, the degree of compliance with legislation can be correlated to the results of the system. This is then documented within the EMS.
- → The functioning of the environmental management system must be the basis for the CB's justified confidence that the organization is indeed in compliance with legislation and regulations.
- → Since the evaluation is based on a spot check and on a limited period of time, having well-grounded confidence does not necessarily mean that compliance with legislation and regulations can be guaranteed.

The certification body does not assess the quality of environmental requirements contained in the permit, e.g. whether maximum permitted emission limits meet the best available control technologies. Evaluating the quality of environmental requirements is the task of the licensing authority.

An organization lacking a necessary license can still be certified as long as the lack of licence is not due to deliberate neglect on its psec. The organization's lack of culpability must be obvious from its correspondence with the authorities.

If there are sufficient grounds to do so, the certification body may consult public sources in order to verify whether the information supplied by the organization is correct. Under the Open Government Act (Wet Openbaarheid Bestuur), the competent authority's public information sources may be consulted in order to evaluate whether:

- → the organization's records of communication with the government are complete.
- → all sites and facilities of the organization to be certified are also covered by the current licence.
- → there are new developments regarding differences of opinion between the organization and the authorities.
- → the organization cannot be reproached for the fact that permits are lacking.

This opportunity may be taken when it contributes to acquiring justifiable confidence. In principle, the certification body makes use of information supplied by the organization, or available within the organization.

If the CB wishes information from the competent authority other than that already in publicly available sources, then in principle the organization itself shall request this information, unless other agreements have been made between the organization and the CB.

The CB must in any case decide against certification, or withdraw the certificate[1] if one or more of the following situations occurs:

- → The procedure and responsibilities for applying for permits laid down in the environmental management system, or the way in which the continuation of the application or notification of changes is dealt with, do not function[2].
- → The certification body has serious doubts about whether the organization can achieve its intention to comply with legal requirements using its EMS.
- → Procedures for corrective and preventive action are not effective. This is certainly the case if, for example, environmental requirements for significant environmental aspects have been systematically violated and written agreements with authorities regarding this matter are not available.
- → Procedures for reporting incidents and/or violations of legal requirements to the competent authority do not work properly.

1 Before a certificate is withdrawn, the certification body shall allow the organization concerned a period during which it can repair the nonconformity. The duration of this period depends on the nature of the nonconformity. This period can be considered a suspension if the certification body determines that the certificate must not be used and/or that the certified organization must notify its clients of the major nonconformities. If the non-compliances have been repaired within the stated period, the suspension is terminated. If not, the certificate is withdrawn.

2 This is only the case when the organization's written procedure within the EMS for the application of an environmental permit or the notification of changes does not function. The CB determines if procedures are functioning based on the description of activities of the organization, the environmental impact analysis and an inspection of the location.

4.2.2 Review of continual improvement

The organization shall be investigated as to whether it:
- → has an understanding of its important environmental aspects;
- → has an understanding of the options available for reducing pollution;
- → has a plan in which the application or non-application of the identified options in the future is explained;
- → carries out the plans it has made.

The certification body does not evaluate the quality of environmental requirements contained in permits or the organization's environmental programmes. The certification body only evaluates whether the organization has incorporated the requirements, regulations and other agreements in its objectives.

One or more of the following situations can be grounds for a refusal to grant or withdraw a certificate (see footnote 2):
- → The organization has not gained insight into its significant environmental effects and how to reduce them.
- → There is no programme, or the programme is not well founded with respect to content[3].
- → The plans are repeatedly not carried out and no convincing explanations are provided. This refers to the environmental management programmes which include concrete plans for activities as part of the continual improvement process.

4.2.3 Procedures for dealing with incomplete or incorrect environmental information

SCCM considers it an undesirable situation if an organization creates an incorrect image of the environmental aspects of its products, operations and/or services by not providing complete information in its external communications. Failure to fully inform the public damages the value of the ISO 14001 certificate. If a CB determines that, whether deliberately or not, an organization is creating a better image of itself with respect to the environment than is the case SCCM expects that:
- → the CB shall determine whether the incomplete providing of information conflicts with the organization's formulated environmental policy. A conflict with policy constitutes a nonconformity.
- → if the organization's own environmental policy is not grounds for a nonconformity, the CB will bring incomplete provision of information to the attention of the organization's top management.
- → if the CB finds that the organization has not made improvements during a subsequent audit, it can conclude that the organization has deliberately presented a better image than is the case, with the knowledge of its top management. The CB must then consider whether it wishes its name connected to the ISO 14001 certificate.

3 The evaluation of this part is subjective. Considerations are:
- → The improvement of environmental performance is best evaluated over a number of years.
- → When an organization has significantly improved its environmental performance in the recent past, the CB should take this into consideration.
- → If an organization has planned and/or undertaken very little action to improve its energy performance, while there have been improvements in technology that many of its competitors have used, the plan is probably not well grounded.
- → The exchange of experiences between CBs will be encouraged, as it is important they arrive at similar opinions.

4.2.4 Procedures for significant environmental violations and dangerous situations

In the Netherlands, article 1.1a of the Environment Act and sec. 2.1 of the Activities decree are relevant as they establish 'duty of care'. This implies that an entity will do all that can reasonably be expected.

The CB / environmental auditor may be expected to:
→ report violations of legislation and regulations to the top management.
→ suspend or withdraw certification if the environmental management system does not result in violations being prevented or exceedances being resolved. This action should be considered reasonable.

If there is immediate danger to individuals, for example, because of the violation or dangerous situation, then the procedure above will not be adequate. An auditor could be prosecuted for a punishable offence if people are put in danger as a result of the auditor's failure to take action.

In the context of liability of the CB, it is in the first place important that the CB can demonstrate that it has done what reasonably can be expected of it to prevent any potential danger.
The degree to which the company must report the violation or dangerous situation to government authorities must be decided on a case-by-case basis.

4.3 Initial certification audit (ISO 17021 section 9.2)

The initial certification audit is performed in two phases: stage 1 audit (preliminary audit) and stage 2 audit (certification audit). An application from the client must be processed before the audit process can be started.

4.3.1 Application process and review (ISO 17021 sections 9.2.1 and 9.2.2)

The CB must require the following information from the applicant:
→ the desired scope of the certificate;
→ the most important characteristics of the organization: name, address(es), significant aspects of process and operations and legal obligations;
→ general information relevant to the field about the organization's activities, personnel, technical resources, positions, and any relation to a larger corporation to which it may belong;
→ the use of consultants in relation to the management system.

Before the audit process can begin, the CB must review the application to ensure that:
→ the information available about the client and its environmental management system is sufficient to conduct an audit;
→ the CB has the competence and the ability to perform the certification activity;
→ the scope of certification sought, the client's sites, the time required for performing the audits and other matters which can have an influence on certification activities (language, safety conditions, threats to impartiality) have been taken into account.

Based on the review of the application, the CB must determine the competence that must be included in the audit team and decision makers. The audit team must be composed of members (and technical experts if necessary) who between them have the necessary competence.

SCCM has further specified the procedures for determining the scope for a number of special situations:

The certification of an activity within a large organization with multiple activities
If there is presently a situation within an organization in which more than one division, business unit, subsidiary, etc. carry out activities, then a separate activity can be certified if it:
→ has its own management.
→ has its own production facilities separately responsible for the observance of environmental permits, or sections thereof.

Certification of a large site
Principles pertaining to the certification of a large site with various plants can be summarized as follows:
→ Random sampling of production units within the site is not allowed unless several more of the same type of unit are on the site.
→ Each plant shall be checked to verify that its environmental management system is operational and if the internal audits at this plant have been carried out in such a manner that confidence in the adequate functioning of the environmental management system is justified.

However, within the framework of the certification audit it is, in such situations, possible to vary the intensity and the distribution of the spot-checks by production unit. The extent to which this is possible shall be decided by the certification body. The following conditions can be formulated:
→ An extensive preliminary audit is necessary to determine if and to what extent the intensity of spot-checks can be varied. Factors include whether or not a similar system is used for the environmental management system, whether or not use is made of the same audit team on the site; or the way in which contacts with the authorities are co-ordinated.
→ During the preliminary audit the environmental impacts and the environmental risks and the quality of the internal audits shall be reviewed by production unit. If the method based on differences in the intensity of spot-checks is chosen, the grounds for this choice must be demonstrated.
→ If such a research design is proposed in the tendering phase, it is important that conditions are stipulated to the organization regarding the quality of the implementation of the environmental management system and the internal audits. The results of the preliminary audit could be a resolutive condition for further investigation.

Site of an organization with a distinct matrix structure
If responsibility for matters such as purchasing, design, waste removal, energy and water facilities lies with a staff or other organization and not the site to be certified, there are two possible courses of action:
→ The organization having total responsibility is certified. The activities/sites covered by the certificate are stated on the certificate.
→ The staff organizations are considered as the contractors. In that case the organization shall have procedures ensuring that these contractors apply the agreed-upon criteria.

4.3.2 Stage 1 (preliminary) audit (ISO 17021 section 9.2.3.1)

The preliminary audit (stage 1 audit) shall be performed to:
→ audit the client's management system documentation;
→ evaluate the site and site-specific conditions and, through discussions with personnel, to determine whether the organization is ready for stage 2;
→ to determine whether the client has understood the requirements of the standard and has implemented it, particularly with regard to identification of the significant environmental aspects, processes, objectives and operation of the management system;

- → collect the necessary information with regard to the scope of the management system, processes and site(s) of the client and related legislation and regulations and compliance with them (for example, environmental or legal aspects of the client's activities, potential risks, etc.);
- → assess whether the audit time allowed and the composition of the audit team are appropriate, and determine the details for stage 2 with the client;
- → build a foundation for planning stage 2 of the audit by gaining a sufficient understanding of the client's management system and the activities at the site in relation to potential significant aspects;
- → evaluate whether the internal audits and the management system assessment are being planned and performed, and that the degree of implementation of the management system indicates that the client is ready for certification.

Audit findings from stage 1 (in conformance with ISO 17021 sections 9.1.15 b and c) shall be documented and communicated to the client in writing, including areas in which a nonconformity may be found in stage 2. The findings in stage 1 can be grounds for the CB to modify its agreements for stage 2. Any changes will be communicated to the client. The CB's conclusions and measures from stage 1 for planning and implementation of stage 2 will be identified in the CB's file on this client. The CB is free to report in any way it likes as long as the requirements of 17021 (9.1.10.2.i) are satisfied. The findings, audit evidence, nonconformities (and resolutions) from stage 1 must be in the full report of stages 1 and 2, so that it can be demonstrated that stage 1 was carried out in accordance with the requirements (in section 9.2.3.1).

According to SCCM, the CB must determine whether the area of application chosen by the organization corresponds with the factual situation.

It is recommended that at least one part of the stage 1 audit be performed on the premises of the client.

The initial audit consists of a preliminary audit and the certification audit performed on the premises of the organization, unless an alternative can be defended. This can be done in some cases when certifying very small organizations.

One element of the preliminary audit is a document audit (see ISO 17021 section 9.2.3.1.1). The place where the preliminary audit is to be performed can be determined in consultation with the organization. Annex 2 has a list of documents important for the preliminary audit.

According to SCCM in exceptional cases an alternative setup may be considered. In certain cases (for example, very small organizations with medium/low/limited complexity) it may not be necessary to perform the on-site visit in stage 1 (preliminary audit). The various elements of the preliminary audit must still be performed under any alternative setup of the preliminary audit.

If the total certification process will take two to three person-days, the time for an on-site audit is out of proportion with the total time required, and an alternative plan may be considered for organisations with medium/low/limited complexity.

The preliminary audit must determine whether the environmental management system has been implemented long enough to ascertain that it operates properly. The internal audits are one way to measure this. The organization must demonstrate that it has procedures for performing internal audits and that they work properly, i.e. that it is clear how internal audits are implemented (for example in planning, programme and composing the audit team). In any case an internal audit must have been performed for all important environmental aspects and organizational elements for which the implementation of all the elements in the

standards was assessed. It must be visible from the results of the internal audits that a process of improvement has been started and that the results are included in the management review.
The preliminary audit may be combined with audits of other management systems. If parts of the preliminary audit are combined, it must not jeopardize the quality and depth of the audit. In a combined audit as well, the report must clearly indicate all the aspects relevant to the environmental management system.

4.3.3 Stage 2 (initial certification audit) (ISO 17021 section 9.2.3.2)

The goal of the stage 2 audit is to evaluate the implementation of the client's management system, including its effectiveness. The stage 2 audit is performed at the site of the client. The stage 2 audit includes at least the following:

- → information and evidence related to conformity to all requirements in the applicable management system standard;
- → monitoring, measuring, assessment and reporting against key objectives and targets (consistent with the expectations in the applicable management system standard);
- → the client's management system and performance with regard to legal compliance;
- → operational control of the client's processes;
- → internal audit and management review;
- → management responsibility for the client's policies;
- → links between the standard's requirements, policy, performance objectives and targets (consistent with the requirements in the management system standard), applicable legislation and regulations, responsibilities, competence of personnel, operations, procedures, data about performance and internal audit findings and conclusions.

Obligations to report are usually incorporated in legislation and regulations. More and more, environmental information is being requested in aggregate form, for example in a legally required environmental annual report or emissions-trading report in electronic form. The certification audit must focus on the monitoring and measuring procedures necessary to trace compliance with the environmental objectives and targets (ISO 14001 section 4.5.1). Although this does not mean that figures must be evaluated separately, it does mean that:

- → during the certification audit random checks will be performed for a number of important emissions to determine how and under what circumstances the measuring and registrations are performed.
- → the procedures for processing the measuring and registration data and, if appropriate, adapting them into environmental information will be evaluated.
- → evaluation will be made of how reports made in the framework of agreements with the authorities are created, for example, if the systems allow for the report to be reproducible and if the environmental information can be compared to previous and future periods. Thus the information-processing system is being evaluated, and not primarily the individual numbers.

An ISO 14001 certificate means that various elements have been evaluated which are important for generating reliable environmental information and in this sense lend a positive value to the information generated using the environmental management system. An ISO 14001 certificate is however not a value judgement about the reliability of individual measurements, since these have only been evaluated on a random basis. If a certified organization wishes to have a statement about the quality of the environmental information provided, they can use the EMAS verification system.

SCCM expects that apart from the points mentioned in the ISO 17021 the certification audit also will include:
- → an interview with the management responsible for the environmental policy;
- → a review of the comprehensiveness and reliability of the measurement and recording system;
- → an inspection of the site, including an investigation of the implementation of the environmental management system on the work floor (among other things by conducting interviews);
- → evaluation, done randomly, of requirements in legislation and regulations within the elements of the environmental management system which are being evaluated.

4.3.4 Initial certification audit conclusions and initial certification (ISO 17021 sections 9.2.4 and 9.2.5)

The audit team shall analyze all information and evidence gathered during the stage 1 and 2 audits, to assess the audit findings and establish conclusions of the audit.

In making a decision on certification, the audit team must provide the CB with at least the following information:
→ the audit reports including the findings, audit evidence, nonconformities (and resolutions) of stages 1 and 2;
→ comments on nonconformities and, where applicable, the corrections and corrective actions taken by the client;
→ confirmation of the information provided by the client in the application;
→ a recommendation about whether or not to grant the certificate, together with any conditions and observations.

The CB bases its certification decision on the basis of an evaluation of the audit findings and conclusions and all other relevant information (such as public information and the client's response to the audit report).

4.4 Surveillance activities (ISO 17021 section 9.3)

4.4.1 General (ISO 17021 section 9.3.1)

The CB shall develop its surveillance activities so that all representative activities and functions within the scope of the management system are assessed on a regular basis. Changes to the client and its management system will be taken into account.

Surveillance activities in any case consist of on-site audits in which the client's management system is assessed as to compliance with specific requirements from the ISO 14001 standard.

Other surveillance activities can be:
→ auditing by the CB of the certified client for aspects of certification;
→ assessment of the client's communications regarding its activities (for example, promotional materials, website);
→ requesting the client for documents and records (paper or electronic); and
→ all other means of monitoring the client's performance.

4.4.2 Surveillance audit (ISO 17021 section 9.3.2)

Surveillance audits are performed on the site of the client, but are not necessarily full system audits and shall be planned along with other surveillance activities so that the CB maintains confidence that the certified system remains continually in compliance with the requirements. The programme for the surveillance audits will include at least the following subjects:
→ the internal audit and management review;
→ check of activities related to nonconformities from the previous audit;
→ complaint handling;
→ effectiveness of the management system in relation to the client's objectives;
→ progress of the activities planned focused on continual improvement;

→ continuing operational control;
→ assessment of changes;
→ use of identifying marks or other references to the certificate.

Surveillance audits are performed at least once a year. The date of the first surveillance audit after initial certification shall not be performed later than 12 months from the last day of the stage 2 audit.

SCCM expects the following points to be given attention in a surveillance audit:
→ the consequences of changes to the area of application of the environmental management system;
→ an interview with the person(s) responsible for the site's management system;
→ the functioning of procedures related to the communications with interested third parties;
→ the functioning of procedures for periodically evaluating and assessing compliance with legislation and regulations (including correspondence with government authorities).

Surveillance audits can be combined with audits of other management systems. However, this must not jeopardize the quality and depth of the audit. In a combined audit, the report must clearly indicate all the aspects relevant to the environmental management system.

4.4.3 Maintaining certification (ISO 17021 section 9.3.3)

The CB shall maintain certification if the client has proved continual compliance with the requirements in the standard. The decision can be based on a positive conclusion by the audit team leader, without an additional independent decision-making procedure, provided that:
→ the CB has a system in which the audit team leader shall report to the CB about the necessity to begin an independent decision-making procedure for every nonconformity or other situation that could lead to suspension or withdrawal of the certificate;
→ competent personnel of the CB monitor the surveillance activities, including monitoring of the auditors' reports, to confirm that the certification activity is operating effectively.

4.5 Recertification (ISO 17021 section 9.4)

4.5.1 Recertification audit planning (ISO 17021 section 9.4.1)

The purpose of the recertification audit is to confirm that the requirements of the standard are continually being met, the management system is effective and is applicable to the scope of the certificate.

The recertification audit assesses the performance of the management system during the entire period of certification, and includes the review of the reports of previous surveillance audits.

In situations where significant changes have been made in the management system, the client or the context in which the management system is operating (such as changes in legislation), a stage 1 audit (preliminary audit) may be necessary for recertification audit activities.

In the case of multiple sites or certification of a management system for multiple standards by the same CB, care should be taken in planning the audit for an adequate coverage of audits over the sites, to ensure confidence in the certificate.

4.5.2 Recertification audit (ISO 17021 section 9.4.2)

The recertification audit includes an on-site audit addressing at least the following:

→ The effectiveness of the management system as a whole, in the light of internal and external changes and the continued relevance and applicability within the scope of the certificate.
→ Demonstrated commitment to maintaining and improving the effectiveness of the management system in order to enhance the performance of the whole.
→ The contribution of the certified management system to the achievement of the organization's policy and objectives.

If nonconformities or a lack of evidence for conformity are identified during a recertification audit, the CB shall set a time limit for modification or taking corrective measures. These measures must have been implemented before the certificate expires.

4.5.3 Information for renewing the certificate (ISO 17021 section 9.4.3)

The CB shall base decisions about renewing the certificate on the results of the recertification audit, as well as on the results of the review of the system during the certification period and on complaints from users of the certificate.

4.6 Special audits (ISO 17021 section 9.5)

The following interim audits can be distinguished:

→ Audits resulting from an application for expansion of the scope by an organization with an existing certificate. Based on the application, the CB must determine what audit activities are necessary, using the application as a basis. These activities can be combined with a surveillance audit.
→ Short-notice audits can be planned in connection with the handling of complaints, investigating changes and as the result of suspensions. The conditions for these audits will be explained to the client beforehand.

A CB must perform an additional interim audit if:

→ it has been informed of a renewal decision taken by the competent authority (formulated in an official or administrative letter) in which the authorities have identified exceedances or violations of important environmental requirements.
→ there are other signals which give the CB reason to doubt the proper functioning of the environmental management system.

An interim audit does not always have to be performed at the site of the certified organization. The CB can sometimes make a judgement by requesting the relevant information.

4.7 Suspension, withdrawal or reducing the scope of certification (ISO 17021 section 9.6)

The CB must have a policy and documented procedures for suspending, withdrawing or reducing the scope of certification, in which the CB's sequence of actions is specified.

The CB must suspend a certificate if, for example:

→ the client's management system persistently or essentially does not meet the requirements, including the requirements for effectiveness of the management system;
→ the client does not allow surveillance audits and re-audits to be conducted at the required frequencies;
→ the client voluntarily requests a suspension.

In a suspension, the certificate for the client's management system is temporarily invalid. The CB must have enforceable agreements with the client that the client will not use the certificate for promotional purposes during the period of suspension and after withdrawal. The CB will make an overview of suspended certificates accessible to the public.
The CB must set the period of time in which the cause of the suspension must be remedied. In most cases this period will not be longer than six months. Failure to remedy the cause must result in withdrawal of the certificate.

The CB must inform every party requesting information about the status of a certificate, and/or if there has been a suspension, withdrawal or reduction of the scope.

According to SCCM the internal audit system must have been implemented in such a way that the degree of implementation of the environmental management system can be assessed based on the internal audit reports. The results of the internal audits must also be available for the management review.
The aspects of the environmental management system related to compliance with legislation and regulations and the continual improvement of environmental performance are essential. SCCM has worked out the way in which these aspects must be dealt with in the assessment in more detail.

4.8 Appeals (ISO 17021 section 9.7)

The CB shall have a documented process for receiving, evaluating and making decisions about appeals. The description of this process shall be made accessible to the public.

The following apply with regard to the process for handling appeals:
→ The persons involved with handling appeals must not have been involved in the audit or the decision making.
→ Submitting an appeal must not have negative consequences for the party as to its further handling.
→ The CB shall acknowledge receipt of the appeal and keep the submitting party informed of the progress and outcome.
→ The decision about the appeal must be taken or approved by a person or group not involved with the handling.

4.9 Records of applicants and certificate holders (ISO 17021 section 9.9)

The CB shall maintain records about the audits and other certification activities of all its certified clients and clients for whom certificates have been suspended or withdrawn. The records of certified clients must consist of at least:
→ application by the client and reports of the initial, surveillance and recertification audits;
→ certification agreement;
→ justification of the methods used for sampling;
→ justification for determining time schedules;
→ verification of correction and corrective actions;
→ information about complaints and appeals and subsequent correction/corrective actions;
→ committee deliberations and decisions, insofar as applicable;
→ documentation of the certification decisions;
→ certification documents including the scope of certification;
→ related documents necessary to support confidence in the certificate such as the competence of auditors and technical experts.

The CB must keep the records in such a way that confidentiality is maintained. The records will be kept for the duration of the current audit cycle plus one complete audit cycle.

ANNEX I

Letter of notification to government authorities announcing certification audit

from: company wishing to obtain ISO 14001 certificate and subject to licences (not applicable for Activities degree category A and B companies)
to: the competent authorities for the Wm (Environmental Management Act; often a provincial or local authority) and Water Act (often Public Works Department or district water board).

→ to be sent 3 weeks before initial audit commencement date

regarding: Functioning of environmental management system with regard to certification according to ISO 14001

We hereby issue notice of the fact that very shortly the certification body <name> will assess whether our environmental management system complies with the requirements in the ISO 14001 standard. Communication with interested outside parties is a requirement of this standard. We thus wish to offer our competent authorities the opportunity to indicate points for improvement, particularly with regard to the guarantee of compliance with legislation and regulations by means of our environmental management system.

We request that you fill in and return the enclosed questionnaire. Your response will be used to improve our environmental management system. It will also be given to the certification body (of course, you may send a copy directly to the CB if you wish).
The CB will incorporate any comments in its audit. The CB will then come to an impartial assessment based on the ISO 14001 standard and SCCM certification scheme.

This certification body has received accreditation from the Dutch Council for Accreditation (RvA) for the purpose of these duties and works with the certification scheme of Stichting Coördinatie Certificatie Environmental - en arbomanagementsystemen (SCCM). The various authorities are represented in SCCM and have taken the initiative to improve communication around the functioning of the environmental management system. Even if you have no comments, your response would be greatly appreciated.

If you have any further queries, please contact the undersigned. Details on the ISO 14001 certification scheme, additional background information relating to the certification process, and the significance of certification are also available from SCCM (www.sccm.nl or tel: +31 70 3623981). If you have comments or questions at a later date about the course of our certification, you may contact SCCM, as well as ourselves or the certification body.

We would request you send in the questionnaire within three weeks, so that it arrives on time for our certification audit. If we have not received a reply from you we will assume that you do not have any comments relating to the functioning of our environmental management system.

Best regards,

Questionnaire with letter of notification to government authorities of certification audit (please return by fax or post; if you wish, with a copy to the certification body)

A certification audit will be conducted at <company name, address, contact person, tel/fax/e-mail > by <name of CB, address, contact person, tel/fax/e-mail>

Please indicate any comments/points for improvement with regard to the company named above

☐ We currently have no information that gives cause for comment

☐ We have comments / points for improvement:
(please state dates and reference numbers of relevant correspondence with your organization about this point or points)

→ comments regarding compliance with the environmental licence and/or legislation and regulations

_____

_____

_____

→ comments regarding guarantee of compliance by means of the environmental management system.

_____

_____

_____

Name of government authority: _____

Name of person completing questionnaire: _____

Date: _____

ANNEX 2

Documents for the preliminary audit (stage 1 audit)

It is expected that the organization to be certified has the following documents available for the preliminary audit:

- The document describing the environmental management system with the current procedures. An index showing which parts of the documentation refer to specific requirements of the ISO 14001 standard is appreciated.
- A description of the company's processes on the site, and an analysis of the environmental effects for its production process, waste, and products.
- The evaluation of the environmental aspects and their respective environmental effects.
- A plan in which the concept of continual improvement is made tangible.
- A list of the relevant legislative and regulatory requirements, and other agreements with the authorities.
- The most important regulations in the licence.
- A record of the emissions, on the basis of which an assessment can be made of the extent to which the regulations in the licence are being complied with.
- A survey of the non-compliance with regard to the legislative and regulatory requirements.
- A summary of the correspondence with the competent authorities.
- The reports of the internal audits.
- The reports of the management review.

ANNEX 3

Determining competence for ISO 14001 certification

Definition of technical area

The ISO 17021 uses the term 'technical area'. This is defined as 'an area characterized by commonalities of processes relevant to a specific type of management system'. Thus, a 'technical area' can consist of one or more sectors according to the EA or NACE codes, for which similar competence is necessary (with regard to the environmental aspects of these sectors). A technical area can also consist of a part of a sector. Next, the subjects for a technical area are specified with which officials must be familiar. The classification according to technical areas is separate from the classification according to complexity used to determine time schedules according to IAF MD5:2009. Criteria in determining the technical areas are the similarity in activities, products and services, as well as the related environmental aspects.

In table 1 SCCM has indicated to what extent sectors can be combined to make up a technical area. SCCM does not allow sectors to be combined more than indicated in table 1. A CB can, however, choose to work out parts of a technical area separately.

ANNEX 3, TABLE 1: COMBINING SECTORS IN TECHNICAL AREAS

EA CODE	NACE CODE REV. 2**	SECTOR
1	01, 02	Agriculture and Forestry
1	03	Fishing and Aquaculture
2*	05, 06, 07, 08, 09	Mining and quarrying
3	10, 11, 12	Food Products, beverages and tobacco
4, 5	13.30 and 15.11	Tanning and dying of textiles, fur and leather
		Assemblage oriented industry
4	13 (min 13.30) and 14	Textiles and textile products/washing and (dry) cleaning
5	15 (min 15.11)	Leather and leather products / repair
6	16	Wood and wood products
7	17.2	Paper products
18	25, 28, 30.4, 33.11, 33.12, 33.2	Fabricated metal products, machinery and equipment
19	26 (min 26.11, 26.12), 27 (min 27.9), 33.14, 95	Electrical and optical equipment
23	31, 32, 33.19	Manufacturing not elsewhere specified
24	38.3	Recycling
7*	17.1	Manufacture of pulp, paper and paperboard
9	18	Printing companies
11*	20.13, 21.20, 24.46, 38.12, 38.22	Processing of nuclear fuel (including processing of radioactive materials and handling radio-active waste)
10*	19.10 and 19.20	Manufacture of coke, refined petroleum products
12*	20.x (min 20.13)	Manufacture of chemicals and chemical products
13*	21.x (min 21.20)	Manufacture of basic pharmaceutical products and pharmaceutical preparations
14	22	Manufacture of rubber and plastic products

15	23.x (min 23.50 and 23.60)	Manufacture of other non-metallic mineral products (exclusive concrete, cement, lime, plaster etc.)
16	23.50, 23,60	Manufacture of cement, lime and plaster and products of these materials
17*	24.x (min 24.46)	Manufacture of basic metals (except processing of nuclear fuel)
19*	26.11, 26.12, 27.9, 33.13	Electrical and optical equipment: electronic valves, tubes and other (micro-) electronic components
20	30.1, 33.15	Shipbuilding / Repair and maintenance
21	30.3, 33.16	Aerospace / Repair and maintenance of air and spacecraft and related machinery
22	29, 30.2, 30.9, 33.17	Other transport equipment
25*	35.11	Production of electricity
25, 26	35 (min 35.11)	Electricity, gas, steam and air conditioning supply
27	36	Water collection, treatment and supply
28	41, 42, 43	Construction
		Specific wholesale and retail trade
29, 31	45	Wholesale and retail trade and repair of motor vehicles and motorcycles
	46.71	Wholesale of solid, liquid and gaseous fuels and related products
	46.75	Wholesale of chemical products
	46.77	Wholesale of waste and scrap
	47.30	Retail sale of automotive fuel in specialised stores
	49, 50, 51, 52	Transport
		Trade and Services
8	58.1, 59.2	Publishing of books and music
29, 30,	46 (min 46.71, 46.75, 46.77)	Wholesale trade
	47 (min 47.30)	Retail trade
30	55, 56	Accommodation and food service activities
31	53, 61	Post and telecommunication
32	64, 65, 66	Financial intermediation
32	68	Real estate
32	77	Renting
33	58.2, 62, 63.1	Information technology
35	69, 70, 73, 74.2, 74.3, 78, 80, 81 (min 81.29), 82	Other professional services
36	84	Public administration
37	85	Education
38	75, 86 (minus 86.1), 87, 88	Health and social work
39	91 (min 91.01, 91.02), 93	Recreational, cultural and sporting activities
39	59.1, 60, 63.9, 79, 90, 91.01, 91.02, 92, 94, 96	Other social services
38	86.1	Hospital activities
39*	37, 38 (min 38.12, 38.22, 38.3), 39, 81.29	Other social services: sewage and refuse disposal and sanitation (except "recycling" and "hazardous waste containing radioactive components")
		Services environmental related
34	71, 72, 74 (min 74.2 and 74.3)	Engineering services, research and development

* Sectors considered 'complex' in connection with necessary knowledge of legislation and regulations (see table 4) – basic knowledge is sufficient for the other sectors.

** Eurostat: NACE Ref. 2 Statistical classification of economic activities in the European Community 2008, ISBN 978-92-79-04741-1 / ISSN 1977-0375

For every organization to be certified, a CB must evaluate if the activities and processes and the necessary competence corresponds with the competence identified for the technical area covering the organization and for which the CB is accredited. It may also be the case that an organization's activities are such that more than one technical area apply.

Competence of personnel

The requirements from ISO 17021 with regard to specifying competence are worked out in several tables. An overview of the various tables and the relationship between them is shown in figure 1.

FIGURE 1: RELATIONSHIP OF TABLES IN ANNEX 3

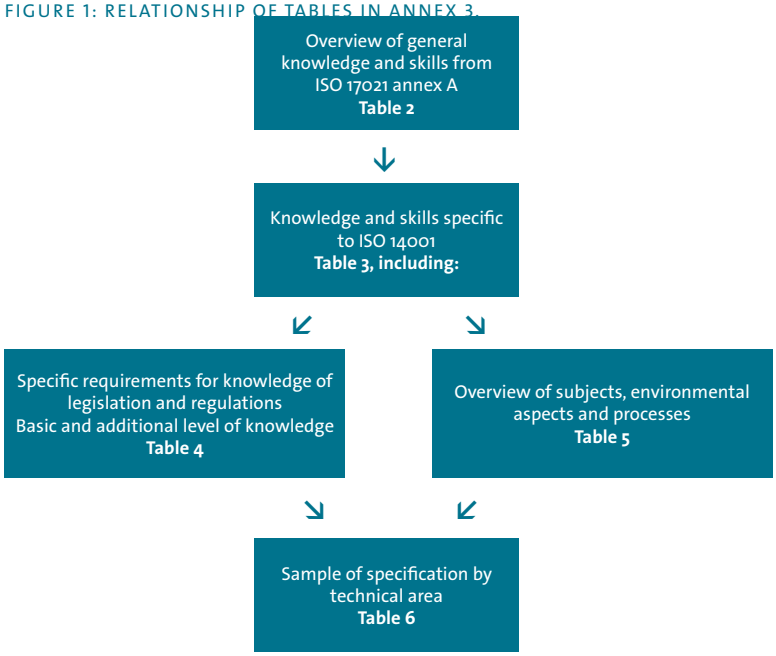

Table 2 indicates the areas of what knowledge and skills must be available for the functions involved in certification.

ANNEX 3, TABLE 2: OVERVIEW OF KNOWLEDGE AND SKILLS BY POSITION (ISO 17021 ANNEX A)
+ AND ++ INDICATE WHETHER KNOWLEDGE MUST BE LIMITED OR EXTENSIVE

		APPLICATION REVIEWER/ PLANNER	REVIEWER AND DECISION MAKER	AUDITOR	AUDIT-TEAM LEADER
1	Knowledge of business management practices			+	++
2	Knowledge of audit principles, practices and techniques		+	++	++
3	Knowledge of specific management system standards/ normative documents	+	+	++	++
4	Knowledge of certification body's processes	+	+	+	+
5	Knowledge of client's business sector	+	+	++	++
6	Knowledge of client's products, processes and organization	+		+	+
7	Language skills appropriate to all levels within the client organization			+	+
8	Note-taking and report-writing skills			+	+
9	Presentation skills			+	++
10	Interviewing skills			+	+
11	Audit-management skills			+	++

Elements 1, 2, 4, 7, 8, 9, 10 and 11 are related to knowledge and skills not specific to certifying environmental management systems. For these points, the CB uses the criteria that apply to certifying on the basis of ISO 17021 and/or EN 45011 (product certification).

In table 3 the areas from table 2 have been worked out as they relate to ISO 14001 certification. A distinction is made between auditors/audit team leaders and the contract review/reviewer.

ANNEX 3, TABLE 3: SPECIFICATION OF KNOWLEDGE AND SKILLS SPECIFIC TO ISO 14001 CERTIFICATION (X= EXTENSIVE x = LIMITED TO ESSENTIALS L = ONLY AUDIT TEAM LEADER)

SUBJECT	SPECIFICATION	CONTRACT REVIEW/ REVIEWER	AUDITOR/ AUDIT TEAM LEADER
3 Knowledge of specific management system standards and management practices			
Standards	ISO 14001	X	X
	ISO 14004		X
	EA-7/04 (Legal Compliance as part of Accredited ISO 14001: 2004 certification)		X
	EA-7/05 (Application of ISO/IEC 17021:2006 for Combined Audits)	X	
	IAF MD 1: 2007 (Certification of multiple sites based on sampling)	X	L
	IAF MD 5: 2009 (Duration of QMS and EMS Audits)	X	L
5 Knowledge of the client's sector*			
General theoretical background with regard to environmental policy and implementation	Basic knowledge of purpose of environmental regulations and implementation (competent authorities).	X	X
	Environmental management in relation to sustainable business / socially responsible business / sustainable purchasing.	X	X
	Embedding environmental awareness in an organization.	X	X
	Knowledge of business economics with regard to pay-back periods, etc.	X	X
	Principles of prevention of environmental pollution / 'Lansink's ladder'	X	X
Legal and other environmental requirements	Basic level from table 4 (every auditor must have basic knowledge).	x	X
	Supplementary level: only for auditors/audit team leaders qualified for organizations in this category (see table 1). Table 1 indicates the technical areas that are legally complex with a "*".		X
Environmental aspects and processes	All auditors must have knowledge of subjects from table 5, unless specific knowledge of a particular branch is necessary.	X	X
6 Knowledge of clients' products, processes and organization**			X
Knowledge of important processes in the sector and the Best Available Technology from an environmental perspective.			X
Knowledge of which important environmental aspects are in the sector.			X
Knowledge of what characterizes good and poor environmental performance in the sector (both process and product/service).			X

* General knowledge relevant to all sectors

** Knowledge of products, processes from an environmental perspective, by technical area (NACE codes specified in table 1)

Table 4 shows the legislation and regulations that can apply to organizations with offices in the Netherlands. A summary of all the legislation and regulations in the list can be found on www.sccm.nl. These summaries give an indication of the depth of knowledge auditors must have. It is assumed that knowledge is at the level where the essence of the legislation and regulations is known (purpose, for whom, what criteria apply, main implications/ consequences). If a limited summary is enough, this is indicated with '(-)' after the item.

ANNEX 3, TABLE 4: ENVIRONMENTAL LEGISLATION AND REGULATIONS IN THE NETHERLANDS

SUBJECT	**BASIC KNOWLEDGE** (for all auditors to some degree)	**SUPPLEMENTARY** (for complex organizations in terms of legal requirements)
General	→ Wabo (Gen. Provisions Act) → BARIM (Activities Decree) → Wm (Environmental Mgmt Act) → IVB → IPPC/BREFS (-) → Nature Conservation Act	→ IPPC / BREFS → MER → E-PRTR
Soil	→ NRB/Soil Protection Guidelines and Soil Protection Act Wet → BBK/Soil Quality Decree (-)	
Air	→ NER (emissions guideline) → BEES (emissions decree) → BVA (Waste incineration directive) → BEMS (combustion emissions) → CO_2-/ NOx-Emissions trading (-)	→ CO_2-/ NOx Emissions trading → Waste incineration (BVA)
Water	→ Water Act	
Nuisance/ nature	→ Noise Abatement Act /Environmental noise regulation (2)	→ Birds guideline → Habitat guideline → Noise Abatement Act /Environmental noise regulation
Safety	→ Bevi/ Revi (external safety) → PGS (Hazardous substance publication series) 15 → Fire safety → Carriage of Dangerous Goods Act/ADR/ GHS → PGS general → ATEX (-) → Nuclear Energy Act (-)	→ BRZO/ RRZO/ WRZO → PGS 12 → PGS 3-4 → PGS 6 → ATEX → PGS 13 → PGS-29 → Nuclear Energy Act
Waste	→ Regulation on reporting waste and hazardous substances → Regulation on hazardous substance list → LAP2 National Waste Management Plan (-)	→ EVOA (EU rules for waste transport) → Recording reports of waste substances → EVOA → LAP2 → AO/IC (acceptance and processing policy)
Raw materials/ energy	→ Energy efficiency in buildings → MJA-3 (long-term energy efficiency agreements)	
Product	→ REACH (-) chemical safety → ROHS (-) hazardous substances	→ REACH → ROHS
Other	→ STEK (cooling technologies) / SCIOS (heating)	

Table 4 contains the main legislation and regulations relevant to ISO 14001 certification in the Netherlands. However, this is only a portion of the body of environmental legislation and regulations. It is the responsibility of the CB to evaluate whether, in addition to the legislation and regulations in table 4, there are other legislation or regulations which could affect companies working in the technical areas for which accreditation is being requested. Table 6 contains a sample overview.

Table 5 lists subjects which can be of importance for the various environmental themes. This is a combination of processes that can result in environmental impacts, technologies for reducing environmental impacts and methods for monitoring.

It is the CB's responsibility to determine which subjects apply to the technical areas for which accreditation is applied. This will have to be worked out for each technical area at the level of the examples in table 6.

ANNEX 3, TABLE 5: SPECIFICATION OF NECESSARY KNOWLEDGE OF ENVIRONMENTAL ASPECTS AND PROCESSES

ENVIRONMENTAL THEMES	SUBJECTS REQUIRING KNOWLEDGE OF APPLIED METHODS AND TECHNOLOGIES FOR REDUCING ENVIRONMENTAL IMPACTS.
Air	→ Combustion engines (cars, on-site machines, transport) → Air emissions from standard manufacturing equipment (metal- and woodworking, welding, painting/coating) → Dust emissions → Calculating emissions using indicators, material balance sheets → Methods for measuring air emissions and interpreting research reports
Water	→ Drainage/sewerage / grease traps → Large water consumers (washing/rinsing processes) → Water purification technologies and facilities → Sampling and analysing water quality (determining biological and chemical oxygen use, heavy metals, phosphorus, nitrogen)
Soil	→ Procedures for existing soil contamination → Means for preventing soil contamination (sealed floors, leak-proof basins, etc.)
Waste	→ Waste separation (large and small-scale) → Hazardous waste (substances, storage methods, treatment) → Packaging waste
Resources	→ Building-related energy consumption (heating, lighting, ventilation) → Energy consumption of machines, compressed air, transport of materials and personnel → Heat → Energy purchasing → Compressed air
Hazardous substances	→ Cooling equipment → Asbestos treatment/removal
Ecosystems	→ Biodiversity evaluation methodology
Nuisance	→ Processing of materials (sharpening, driving piles, wood processing etc.) → Transport media / machines → Noise and measurements → Vibrations and dust
Safety	→ Hazardous substances and labelling/storage facilities → Large-scale storage of hazardous substances → Fire safety

ANNEX 3, TABLE 6: SAMPLE WORKED OUT FOR SPECIFICATION BY TECHNICAL AREA (SEE TABLE 3, ELEMENT 5)

TECHNICAL AREA: CONSTRUCTION **EA: 28** **NACE: 41, 42, 43**	
SUBJECT	**SUBJECTS FOR WHICH THERE MUST BE COMPETENCE**
General knowledge of sector	
General nature of technical area	Relationships and responsibilities regarding environmental aspects between the various parties involved in construction activities//work (client, architect/engineering firm, government, supervision of operations, sub-contractors)
Environmental aspects and processes	
Air	→ Combustion engines (on-site machines, transport of material and personnel) → Process emissions (material processing of substances//, painting/coating, welding)
Water	→ Water consumption (in concrete, cement, plaster production, etc.) → Water discharge (e.g. source drainage) → Influence on groundwater (level, pollution)
Soil	→ Procedures for existing soil contamination (preparing building sites) → Incidents potentially involving contamination (oil/fuel spills, leaching of materials) → Quality of dirt supplied
Waste	→ Separation of waste construction materials → Packaging waste
Energy/resources	→ Energy consumption of machines, transport of materials and personnel → Energy purchasing → Materials purchasing (concrete, wood, asphalt)
Hazardous substances	Asbestos treatment/removal
Biodiversity	Biodiversity in preparing land for construction
Nuisance	→ Materials processing (sharpening, driving piles, wood processing etc.) → Transport to/from construction site → Machines on site/work floor → Subsidence (from drilling etc.)
Safety	Fire safety (placing roofs, electricity, welding, sharpening, on-site heating)
Environmental aspects and products/services	
Product/service	
Purchasing/chain	CO_2 performance scale
Legislation and regulations	
Level	Basic knowledge covers legislation and regulations (see table 4)
Any additional legislation and regulations	Not applicable

TECHNICAL AREA: SALES AND SERVICE EA: 29, 31 NACE: 46 (min 46.71, 46.75, 46.77), 47 (min 47.30), 55, 56, 53, 58.2, 59.1, 60, 61, 62, 63.1, 63.9, 64, 65, 66, 68, 69, 70, 73, 74.2, 74.3, 75, 77, 78, 79, 80, 81 (min 81.29), 82, 84, 85, 86 (min 86.10), 87, 88, 90, 91, 92, 93, 94, 96	
ELEMENT	**SUBJECTS FOR WHICH COMPETENCE IS NEEDED**
General sector knowledge	
General nature of technical area	n/a
Environmental aspects and processes	
Air	Combustion installations (heating)
Water	→ Water consumption (toilet, canteen/restaurant) → Water discharge (household and canteen/restaurant)
Soil	n/a
Waste	→ Separating waste in office environment → Packaging waste
Energy /resources	→ Energy consumption (building-related) → Energy consumption (office machines) → Transport-related
Hazardous substances	Cooling equipment
Biodiversity	n/a
Nuisance	n/a
Safety	n/a
Environmental aspects and products/services	
Product/service	→ Financial services: environmental aspects of investment → Product information / labelling
Purchasing/chain	→ Environmental aspects of cleaning → Catering/food
Legislation and regulations	
Level	Basic knowledge covers legislation and regulations (see table 4)
Any additional legislation and regulations	n/a

Competence of audit team

In tables 3, 4, 5 and 6 subjects are specified about which there must be competence within the audit team.

The following principles apply:

→ All ISO 14001 auditors must have the general knowledge specified in table 3, the 'basic' knowledge of legislation and regulations in table 4 and the specific knowledge of the environment in table 5, insofar as it is relevant to the technical area.

→ External experts may be brought in to provide the audit team with specific knowledge. These may be experts familiar with the processes, facilities, equipment, systems and processes of the organization to be certified. They are not authorized to perform an audit independently.

→ The audit team may consist of one person.

A CB must have a written analysis of the necessary additional competence needed in the audit team for the sectors in table 1.

Evaluating competence

Annex B of the ISO 17021 describes a number of possible ways to evaluate competence:

→ Assessing documents (diplomas, work experience, audit reports).
→ Feedback from third parties (customers, colleagues, references).
→ Interviews.
→ Observations.
→ Tests (written, oral, practical case studies).

Use of documents

SCCM expects that the education and experience of ISO 14001 auditors gives them an intellectual and professional level at least equivalent to having completed Dutch 'higher professional education'.

According to SCCM, an auditor cannot build up competence without having relevant work experience. SCCM expects that an ISO 14001 auditor (with or without experience as a management system auditor) needs a minimum of two years of work experience in positions where they have gained experience relevant to evaluating environmental management systems. ISO 14001 auditors not yet qualified as auditors of management systems need five years' work experience to qualify. The number of years necessary can be reduced by a maximum of one year if a relevant post-secondary continuing-education course has been taken. The number of years is a guideline; it can be deviated from if an auditor is demonstrably qualified. This is considered a basic condition for eligibility for an audit qualification path.

Observations on qualification

To determine the competence of an ISO 14001 auditor, the auditor must be observed during at least four ISO 14001 audits with a total duration of at least ten work days. During these audits the auditor must be supervised by an experienced and qualified auditor. The observations must take place within a period of three years. These audits do not necessarily have to be done as part of a certification procedure.
A prospective ISO 14001 auditor who is already qualified as a management system auditor must be observed for at least three ISO 14001 audits with a total duration of at least seven work days. During these audits the auditor must be supervised by an experienced and qualified auditor. Supervision does not mean continuous supervision. The audit team leader determines to what degree the auditor performs elements of the audit independently, with the final responsibility with the audit team leader.

To determine competence of an audit team leader, in addition to the requirements for an ISO 14001 auditor, every audit team leader must have worked as an audit team leader at least three times under supervision from a qualified audit team leader for at least ten days, or have demonstrated sufficient knowledge and skills in another manner, such as acquiring experience as an audit team leader performing certifications of other management system.

An observation report must clearly state which qualification criteria were evaluated, and the findings of the evaluation (not only the conclusions) must be documented.

Continuing qualification

A CB must have a system allowing information to be gathered about the functioning of a qualified auditor. SCCM expects that client evaluations are being used.

ANNEX 4

Use of the ISO 14001 certification scheme abroad

In theory, the substance of the ISO 14001 certification scheme is the same regardless of an organization's place of business. Thus, the interpretation of the ISO 14001 standard, as well as the organization of the CB and the procedures it uses, are the same worldwide. Exceptions to this are:

→ interpretations and procedures designed for specifically Dutch situations;
→ points for attention in the organization and procedures having to do with their familiarity with and conditions in the other country/countries.

The following points may be modified.

Interpretation of ISO 14001

→ If local translations of the ISO 14001 are used, the English version of the ISO 14001 text shall be binding.
→ 2.2.2: The certification scheme assumes that environmental permits are required. If there is no permit system, the organization must comply with applicable national legislative and regulatory requirements.
→ 2.2.2: Insofar as procedures for notifying government authorities of non-compliance are necessary, the certification body (CB) must make its evaluation in the light of prevailing local conditions. It is essential that the organization be able to demonstrate that sufficient corrective action has been taken to repair and prevent further non-compliance.
→ 2.2.3: The 1st and 2nd bullet points concern specific Dutch instruments and are not applicable elsewhere. The environmental policy of the foreign head organization may be added if necessary.
→ 2.3.3: If adequate legislation and regulations are lacking in the country in question, the organization will have to base objectives and targets on, among other things, the technological options available. These can be derived from any available international guidelines for current technologies. Another possible frame of reference is the usual standard for comparable organizations in the country concerned and, if the organization belongs to an international concern, the usual practice within that concern.

Organization of the certification body

→ 3.1.2: In determining the CB's competency, the specific requirements for certification abroad with regard to language, knowledge of local legislation/regulations and the country's environmental policy must be kept in mind.
→ 3.1.2: The documentation of the contract review must show which specific requirements the performance of a certification audit abroad sets for the audit team.
→ 3.3.1: Members of the audit team must have excellent written and spoken command of the primary language used in the organization. In addition, one member of the audit team must have excellent written and spoken command of the language used on the work floor. If necessary, interpreters may be used.
→ 3.3.1: At least one member of the audit team must be thoroughly acquainted with the relevant local legislation and regulations for the sector concerned and the national environmental policy related to it.

Procedures used by the certification body

→ 4.2: The CB is not obliged to inform the organization to be certified of the importance of giving written notice to government authorities of the certification audit.

→ 4.7.1: Although the audit of compliance with legislative and regulatory requirements and consulting of public sources of information will depend on local conditions, the basic principles and procedures shall still apply.

→ 4.7.1: The CB's task is to evaluate the functioning of the mechanisms for improvement within the environmental management system. The level of environmental performance and/or objectives is the responsibility of the organization itself. In many countries, this level is safeguarded by legislation and regulations and their enforcement. In countries lacking adequate legislation and regulations the organization itself will have a greater responsibility. In this situation, the issuing of an ISO 14001 certificate can carry extra risks for a CB. There are situations conceivable in which a company's environmental performance is such that a CB will not want its name connected with the company. A CB may set a minimum level for itself, regarding an organization's level of environmental performances and/or objectives.

ANNEX 5

Table of Contents of the NEN-EN-ISO/ IEC 17021

Conformity assessment - Requirements for bodies providing audit and certification of management systems

ANNEX 6

Additional information

Information from SCCM

The SCCM website (www.sccm.nl) has more information including documents (downloadable), some in English, about various subjects including:

→ Background information about certification.
→ Benefits and added value of ISO 14001 certification.
→ Information leaflets (with explanation of implementation of elements of the ISO 14001 standard).
→ List of certified companies (can be searched for in a database).
→ List of affiliated certification bodies.
→ Case studies with questions and answers used at the auditor 'harmonization' meetings.
→ Background of the foundation and a list of names of the organizations and persons involved.
→ Brochures from SCCM.

Information from third parties

Information about some subjects mentioned in the ISO 14001 certification scheme is available from the parties below.

→ Best available technologies	Infomil (www.infomil.nl)
	Helpdesk Water (0800-6592837 / www.helpdeskwater.nl)
→ Accreditation	Dutch Council for Accreditation (www.rva.nl)
	European co-operation for Accreditation (www.european-accreditation.org)

The standards mentioned in this certification scheme can be ordered from NEN (Dutch Normalisation Institute) in Delft, +31 15-2690391 or www.nen.nl. The mentioned EA/IAF guidelines can be downloaded via the website of SCCM or the European co-operation for Accreditation.

Contact

Please do not hesitate to contact us if you have any questions. We will gladly help companies, organizations, consultants, supervisory bodies, certification bodies and other stakeholders.

SCCM

P.O. Box 13507
2501 EM The Hague

T +31 (0)70 362 39 81
E info@sccm.nl
I www.sccm.nl

Publication SCCM, The Hague, February 2013