

THE ACCREDITATION PROCEDURE: SPECIFIC PROVISIONS

THIS PROCEDURE COMPLEMENTS DOCUMENT BELAC 3-11

«THE ACCREDITATION PROCEDURE: GENERAL PROVISIONS FOR THE IMPLEMENTATION»

Whenever it is relevant to a particular conformity assessment activity, the general principles described in this procedure are supplemented with specific provisions in a document from the series BELAC 2-405.

The only valid versions of the documents of the BELAC management system are those available from the internet website (www.belac.be).

English translation for information only.

French and Dutch version remain the authoritative documents.

Date of implementation: 29.03.2021

HISTORY OF THE DOCUMENT

Revision	Reason for revision	Scope of the revision
0 CC 08.11.2002 CC 05.06.2003	Replaces documents OBE A010, BELTEST P04T/I and P12 and BELCERT BCT-P10,P12,P15,P18,P21,P23, P24,P25,P30	Full document
1 CC 25.06.2004	The document BELAC 3-11 Rev 0 is divided into 2 parts: BELAC 3-11 is limited to § 1 to 9 (general provisions) BELAC 3-12 is created and includes § 10 (field specific provisions). This document will be regularly updated with new accreditation fields. Accreditation in the aeronautical sector is	Full document § 5.4.3
	added.	
2 Secretariat 01.02.2006	Update of the scope for GMP : trade and production of additives	§§ 5.4.2 and 7.7.1
3 CC 18.05.2006	Revision following the implementation of the R.D BELAC: respective responsibilities of the Accreditation Board and of the secretariat	Full document
4 CC 10.05.2007	 Provisions for accreditation of on-site testing or calibration Witnessing of inspections in real conditions 	§ 3.2 § 4.2.1
5 Secretariat 18.06.2007	 Specific provisions with respect to QS 9000 are cancelled Modification of the certificate number and code for EMAS accreditation 	Previously § 5.4.1 § 5.4.3.3
6 CC 14.05.2009	 Update of NACE codes according to Rev 2 The maximal term of 3 years for sleeping sectors is brought to 5 years Specific provisions with respect to GMP are cancelled Specific provisions with respect to "decretale milieu-audit" are cancelled 	§ 5.1 § 5.2.4 Previously § 5.4.1 en 7.6 § 5.4.3.3
7 CC 14.10.2011 e-mail consultation	 Full revision of the structure of the document Upgrade to Regulation (EC) Nr. 1221/2009 (EMAS III) 	Full revision

		T
	- The chapter on supervision of foreign	
	environmental verifiers is transferred	
	from this document to BELAC 3-14.	
8	- Reference to the existence of the	Cover page
Secretariat	documents of the series BELAC 2-405	
29.10.2012	when specific provisions are applicable	
	for a specific conformity activity.	
	- Extension of the scope of the document	Chapter 4
	to validation and verification bodies.	Chapter 4
		D: 140
9	Provisions for the organisation of the	Point 4.2 and 4.3
CC	assessments of inspection bodies and	
22.01.2015	validation / verification bodies	
10	- Critical sectors for ISO 9001, ISO	Point 5.2
CC 27.10.2016	14001 and EMAS	Point 5.3.3
	- Provisions for environmental verifiers	
	active in other Member States	
11	- Provisions for Proficiency Testing	Point 4
CC 20.04.2017	Providers and Reference Materials	
	Producers	
12	- Implementation of IAF MD 17 for the	Point 6.1.3
CC 20.10.2017	accreditation of management systems	
	certification bodies	
	- Provisions for the performance of	Point 6.2
	witnessing of certification audits	1 01110 0.2
	(includes the provisions of IAF MD 17)	
	•	
	- Clustering of scopes in MS certification	
	(incudes the provisions of IAF MD 17)	D: 1 04 44 54
10	- Editorial updates	Points 3.1, 4.1, 5.1
13	- Adaptation IAF MD 17	Point 6.2.2.2 and
Secretariat	- Correction to table 2	6.3.2
03.12.2019		
14	Correction to table 2	Point 6.2.2.2 Table 2
Secretariat		
24.06.2020		
15	- Additions for ISO 45001 and VCA/VCU	Point 6.2 and tables
CC 04.03.2021		3 and 4
	- Lay-out optimisation	Full document
	/ F	

TABLE OF CONTENT

1	OBJECTIVES AND NORMATIVE REFERENCES	5
2	RECIPIENTS	5
3	ACCREDITATION OF LABORATORIES	7
	3.1 Provisions for evaluation of the body	7
4	ACCREDITATION OF PROFICIENCY TESTING PROVIDERS AND PRODUCERS OF REFERENCE MATERIALS	3
	4.1 Provisions for the evaluation of the body	3
5	ACCREDITATION OF INSPECTION BODIES, VALIDATION AND VERIFICATION BODIES	9
	5.1 Provisions for the evaluation of the body	7
	5.2 Follow-up of inspection, validation and verification activities	7
	5.2.1 Witnessing: selection, planification and organisation	7
	5.2.2 Evaluation of the competence of the personnel in charge of inspections, validation and verification10	C
	5.3 Assessment report10)
6	ACCREDITATION OF CERTIFICATION BODIES FOR MANAGEMENT SYSTEMS (MS), PRODUCTS, PERSONS AND ENVIRONMENTAL VERIFIERS	1
	(EMAS)1: 6.1 General provisions applicable to all types of certification bodies1:	
	6.1.1 Content of an evaluation1	
	6.1.2 Office assessment: specific attention points	
	6.1.2.1 Qualification of certification auditors	
	6.1.2.2 Compliance with the specific requirements of the certification	L
	schemes12	2
	6.1.2.3 Subcontracting of activities that are part of the certification process	2
	6.1.2.4 Review of certification files12	2
	6.1.3 Witnessing of certification audits:	2
	6.1.3.1 Objectives12	2
	6.1.3.2 General policies13	3
	6.1.3.3 General instructions for carrying out a witnessing13	3

6.2		cific provisions with respect to the accreditation of certification bodies management systems according to ISO 9001, ISO 14001, ISO 45001,	
		and VCU and for environmental verifiers EMAS	
6	.2.1	Clustering of scopes	.15
6	.2.2	General rules applicable to QMS and EMS/EMAS schemes	.15
6	.2.3	Table 1: technical clusters for ISO 9001 (QMS)	.19
6	.2.4	Table 2: technical clusters for ISO 14001 (EMS) and EMAS	.20
6	.2.5	Table 3: technical clusters for ISO45001 and VCA	.22
6	.2.6	Table 4: technical clusters for VCU	.23
6.3		reditation of environmental verifiers: provisions complementary to ts 6.1 and 6.2	
6	.3.1	Acceptance of application	.24
6	.3.2	Accreditation certificate and directory of accredited bodies	.24
6	.3.3	The prior notification	.24
6	.3.4	Transmission of the report in case of non-compliances	.24

THE ACCREDITATION PROCEDURE: SPECIFIC PROVISIONS

1 OBJECTIVES AND NORMATIVE REFERENCES

This document aims to complement the provisions of document BELAC 3-11 "The accreditation procedure: general provisions for the implementation" by providing further information related to the implementation in the different accreditation fields.

For each documented provision mentioned in this document, explicit reference is made to the relevant points of document BELAC 3-11.

This document makes reference to and complies with the relevant sections of the standard EN ISO/IEC 17011, Regulation (EC) Nr. 1221/2009 (EMAS) and the relevant EA, ILAC and IAF guidelines.

With NACE code is meant the nomenclature of economical activities as defined in Regulation (EC) Nr. 1893/2006.

2 RECIPIENTS

With follow-up of revisions:

- Members of the Coordination Commission
- Members of the Accreditation Board
- Accreditation Secretariat
- Assessors
- Accredited or applicant bodies

Without follow-up of revisions:

- Experts
- Any external request

3 ACCREDITATION OF LABORATORIES

- BELAC 3-11 / §2.1 initial assessment

- BELAC 3-11 / §3.3.1 surveillance assessment

- BELAC 3-11 / § 4.3.1 re-assessment

3.1 Provisions for evaluation of the body

The assessment of the capability of the laboratory is not expected to encompass a detailed evaluation of all activities. The assessment programme shall select the activities to be evaluated with a view to ensure a proper coverage of all concerned technologies and types of products.

The evaluation shall involve a balanced combination of:

- office assessment activities, including in particular the review of:
 - o organisational and technical policies, procedures and work instructions;
 - customers files;
 - all types of records;
 - o interviews of personnel;
- witnessing of actual calibration or testing activities.

Due to the specific nature of the calibration activities, the assessors have the possibility, as part of their preparation for the assessment, to require the laboratory to provide detailed information on the calibration methods, including the calculation of the uncertainty budgets.

In case an application for accreditation includes on-site activities (i.e. activities that are performed outside the normal premises of the laboratory, the witnessing of a simulation of the test, calibration or sampling can be envisaged. However, such a simulation cannot replace the witnessing of the activity in actual conditions where all factors that may have an influence on the final result have to be taken into account. The witnessing of an actual on-site testing or calibration activity shall take place at least during the initial assessment and 2 times per accreditation cycle.

Special attention will be paid to results of participation in intercomparisons or proficiency testing exercises or any other means to demonstrate the validity of the test and calibration results.

Should such results not be available, measurement audits may be required.

4 ACCREDITATION OF PROFICIENCY TESTING PROVIDERS AND PRODUCERS OF REFERENCE MATERIALS

- BELAC 3-11 / §2.1 initial assessment

- BELAC 3-11 / §3.3.1 surveillance assessment

- BELAC 3-11 / § 4.3.1 re-assessment

4.1 Provisions for the evaluation of the body

The assessment of the capability of Proficiency Testing Provider or of a Producer of Reference Materials is not expected to encompass a detailed evaluation of all activities. The assessment programme shall select the activities to be evaluated with a view to ensure a proper coverage of all concerned activities.

The evaluation shall involve a balanced combination of:

- office assessment activities, including in particular the review of
 - o organisational and technical policies, procedures and work instructions;
 - customers files;
 - all types of records;
 - o interviews of personnel;
- witnessing of activities specific to the organization of proficiency testing schemes or the production of reference materials, in particular:
 - the preparation, packaging, identification, transportation and whenever relevant the distribution of PT items and reference materials;
 - o the performance of tests as part of homogeneity and stability studies.

Witnessing the performance of these activities is mandatory during an initial assessment and at least once per accreditation cycle. The witnessing of a simulation of these activities can be envisaged but such a simulation cannot replace the witnessing of the activity in actual conditions where all factors that may have an influence on the final result have to be taken into account.

In case of subcontracting of these activities, the evaluation of the subcontractors' competence as well as the management and supervision of the subcontracted activities will receive specific attention during the assessment.

5 ACCREDITATION OF INSPECTION BODIES, VALIDATION AND VERIFICATION BODIES

- BELAC 3-11 / §2.1 initial assessment

- BELAC 3-11 / §3.3.1 surveillance assessment

BELAC 3-11 / § 4.3.1 re-assessment

5.1 Provisions for the evaluation of the body

The assessment of the capability of the inspection body, validation and verification body is not expected to encompass a detailed evaluation of all activities. The assessment programme shall select activities with a view to ensure a proper coverage of all concerned fields and types of products.

The evaluation shall involve a balanced combination of:

- office assessment activities, including in particular the review of:
 - o organisational and technical policies, procedures and work instructions;
 - o inspection files;
 - all types of records;
 - o interviews of personnel;
- witnessing of actual inspection, validation and verification activities.

5.2 Follow-up of inspection, validation and verification activities

5.2.1 Witnessing: selection, planification and organisation

The selection of activities to be witnessed is part of the preparation of each individual assessment within the framework of the accreditation program for the whole accreditation cycle. The selection will be such as to provide a representative sampling of activities accreditation has been applied for, including, whenever relevant, activities performed from different locations as well as the concerned inspectors, validators or verifiers.

In case of inspection, the witnessing of a simulation of the activity can be envisaged. However, such a simulation cannot replace the witnessing of the activity in actual conditions where all factors that may have an influence on the final result have to be taken into account. The witnessing of an actual inspection activity shall take place at least during the initial assessment and once per accreditation cycle.

It is the responsibility of the conformity assessment body:

- to provide the BELAC representatives with the necessary safety equipment;

- to inform its client of the presence of BELAC representatives during the performance of the conformity assessment activity and to highlight their role.

Once they are aware of the composition of the BELAC team, the customers selected may challenge the appointment of any member by presenting documented reasons for doing so to the applicant. If the request is justified but the secretariat is unable to offer a satisfactory alternative to the customer by appointing another observer, BELAC will select another customer or another activity. In case the request is not justified, the presence of the BELAC assessor during the activity will be maintained or the activity will need to be performed outside of the accreditation.

The witness part of the evaluation is normally under the responsibility of technical assessors or of an expert who will work under supervision. The witness team will not include more than 3 persons.

During witness, BELAC team members shall restrict to the role of observer; questions to the inspection personnel and request for clarifications, if needed, will take place aside from the conformity assessment activity, during private meetings and in the absence of the client representatives. Remarks and observation will be reported only to the representatives of the body.

5.2.2 <u>Evaluation of the competence of the personnel in charge of inspections, validation and verification.</u>

Witnessing conformity assessment activities may need to be complemented by interviews with other staff members in charge of inspections, validation and verification to ensure an appropriate coverage of accredited activities, both as regards the nature of activities and the competence of personnel.

The organization of interviews during the office assessment, with specifically identified individuals may require prior interaction between the body and the audit team. It is appropriate to select different persons than those witnessed / interviewed in previous assessments.

5.3 Assessment report

To facilitate programming for subsequent assessments, the assessment report of the technical assessor shall

- identify the location and nature of the witnessed activities;
- explicitly specify the names of the evaluated staff either through witnessing or during the office assessment.

10/24

6 ACCREDITATION OF CERTIFICATION BODIES FOR MANAGEMENT SYSTEMS (MS), PRODUCTS, PERSONS AND ENVIRONMENTAL VERIFIERS (EMAS)

- BELAC 3-11 / §2.1 initial assessment

- BELAC 3-11 / §3.3.1 surveillance assessment

- BELAC 3-11 / §4.3.1 re-assessment

6.1 General provisions applicable to all types of certification bodies

Note: For an easier reading of the following text, the terms "certification", "certification body", "certification auditor" etc also apply for "environmental verification", environmental verifier" ... etc when the following guidelines are used in the context of the EMAS regulation.

6.1.1 Content of an evaluation

The evaluation shall involve a balanced combination of:

- office assessment activities, including in particular the review of
 - o organisational and technical policies, procedures and work instructions;
 - o certification files;
 - all types of records;
 - interviews of personnel
- witnessing of on-site activities, provided such activities are part of the tasks of the certification body.

6.1.2 Office assessment: specific attention points

The assessment shall take into account all accreditation requirements with specific attention for the following elements:

6.1.2.1 Qualification of certification auditors

The BELAC assessors will review procedures dealing with recruitment, training and maintaining the qualification of certification assessors.

It is necessary to review the curriculum vitae and personnel data in order to establish whether certification assessors are available and allow for a proper coverage of the sectors concerned by the application for accreditation.

The technical assessors will furthermore check to which extent the procedures of the applicant for the selection of certification teams and the expertise of the auditors are technically adequate.

6.1.2.2 Compliance with the specific requirements of the certification schemes

The BELAC assessors will check the management of the documents that specify the certification requirements (i.e. regular update, archiving, integration of the specific aspects in the work instructions) as well as the respect of these specific requirements in the certification process.

6.1.2.3 Subcontracting of activities that are part of the certification process

In case of subcontracting of activities that are part of the certification process, the BELAC assessors will check the adequacy of the provisions that have been implemented in order to control the subcontracted activities.

6.1.2.4 Review of certification files

The assessment team will select one or more files on organisations that have received certification or are in the process of being certified. They will examine in depth the entire process from the submission of the application up to the issue of the certificate. They may also hold interviews with or contact the appointed auditors.

The technical assessors will review the certification records and will pay special attention to the technical aspects (e.g.: technological processes, measuring equipment, calibration, specific standards, controls during production, regulations).

6.1.3 Witnessing of certification audits:

6.1.3.1 Objectives

6.1.3.1.1 The objective of witnessing is to provide assurance of the competence of the CB across the scope of accreditation. The competence requirements related to auditing and auditing personnel are specified in the relevant accreditation standard.

6.1.3.1.2 The witnessing of CB's audits on their clients by BELAC is valuable for:

- verifying, on site, the effective implementation of the CB's certification programmes and procedures (and especially with regard to their assignment of competent audit teams and determination of audit time) and determine the correct assignment of scope by the CB for the client,
- observing the CB's auditors to evaluate if they:
 - conform with the CB's procedures;
 - o adequately address the requirements of:
 - certification requirements;
 - applicable points of the relevant accreditation standard;

- relevant IAF documents; and
- any relevant sector specific requirements, as applicable;
- obtaining a representative sample of the competence of the CB across the accreditation scope.

6.1.3.1.3 Witnessing can also be initiated upon the receipt of complaints, claims, disputes, market or regulator feedback.

6.1.3.2 General policies

The requirement for witnessing by BELAC shall be included in the contract agreements between CBs and their clients. Refusal to accept a witness assessment by BELAC, must be duly justified and accepted by the CB and BELAC, and could result in withdrawal of accreditation of the CB where reasons are not accepted.

If sanctions are imposed on a CB resulting in certificate withdrawal then other ABs and all scheme owners who may be impacted shall be notified, if their identity is known. An accredited certificate shall not be issued if, in order to avoid having its audit witnessed, the organization transfers the certificate to another CB or if the CB intends to reissue the same certificate under the coverage of another AB.

6.1.3.3 General instructions for carrying out a witnessing

When requested, the CB shall promptly provide to BELAC the complete and updated schedule of confirmed and planned audits (dates, location, audit team composition, audit type and scope, etc.), in order to allow BELAC to schedule or update the program for the coverage of the scope of accreditation.

Before the witness takes place, the CB will provide BELAC with:

- the CB's audit plan;
- previous audit reports (if applicable);
- audit team competence records;
- the justification for calculation of the audit time.

For each witnessing, BELAC shall appoint an assessment team, competent in the relevant scope of accreditation. BELAC shall inform the CB in advance of the BELAC assessment team composition. The CB and/or its client can object to the nomination of a given AB assessor on the grounds of demonstrated close or direct relationships with competitors (threats to impartiality) or a previous valid complaint against an assessor, etc.

It is the duty of the CB to inform its client, to explain the witnessing procedure, and to get the client's agreement. The CB is not expected to change its audit team, audit plan

or audit duration due to the witnessing. If such changes do take place, the CB shall provide appropriate justification to BELAC.

During witnessing, BELAC assessors' activities shall be those of an observer, without influencing the conduct of the audit by the CB's audit team. Access to the client's documentation reviewed by the CB's audit team shall be promptly provided to the BELAC assessors upon request.

Any information collected during the witnessing of an audit is confidential and shall be treated by the BELAC assessors and staff accordingly.

The direct questioning of the CB's client by BELAC is not allowed, as this can affect the outcome of the audit. BELAC assessors shall not provide any opinions to the CB, while the audit is being conducted. The BELAC assessors shall not provide any opinions to the CBs client at any time. BELAC assessors should ensure that their presence and witnessing activity is not perceived as interference by the CB's client, and is instead viewed positively.

Normally, the full on-site audit shall be witnessed, unless objectives for a particular activity can be satisfied with a partial witnessing. In case of the latter, the CB's audit report will be also evaluated by the BELAC assessor.

Feedback on the CB's performance, including any assessment findings/non-conformities, shall be given to the CB's audit team when the witnessing is completed. Where possible this feedback should be provided to the CB's management as well. This should occur after the audit, always in the absence of the CB's client.

It is the responsibility of the CB's client to inform in advance the audit team and the BELAC assessors, of all the applicable safety requirements. BELAC assessors shall conform to safety rules made known to them by the organization; however, it is expected that BELAC assessors shall take immediate action at any time to avoid injury, including leaving the area or the organization if necessary.

If at any time during the assessment of a CB audit the BELAC assessor observes a potential condition he or she considers to be an imminent risk of high severity (e.g. health and safety or the environment) the BELAC assessor shall request an immediate private meeting with the CB's audit team leader to inform him or her of the potential threat, with the expectation that the CB's audit team leader will address the threat with the organization in accordance with the CB's process and any legal obligation.

6.2 Specific provisions with respect to the accreditation of certification bodies for management systems according to ISO 9001, ISO 14001, ISO 45001, VCA and VCU and for environmental verifiers EMAS

6.2.1 Clustering of scopes

The accreditation scopes of certification bodies for management systems according to ISO 9001 are described in terms of the IAF codes (see IAF ID1). The accreditation scopes of certification bodies for environmental management systems according to ISO 14001 and for environmental verifiers EMAS are described following the nomenclature of economical activities as defined in Regulation (EC) Nr. 1893/2006 (NACE codes).

The accreditation scopes of certification bodies for management systems according to ISO 45001 and VCA/VCU use the IAF codes as described in IAF MD17.

All the codes have been merged into a series of technical clusters (taking into consideration the applicable regulations, the technicalities of the processes, and the consequent competence needed by CB's audit team) as appropriate for each type of MS certification (ISO 9001 (§6.2.3 table 1), EMS/EMAS(§6.2.4 table 2), ISO 45001 and VCA (§6.2.5 table 3) and VCU (§6.2.6 table 4)).

Critical codes have been identified for each technical cluster. A critical code is a code that from a technical point requires the CB's audit team to have a higher level of:

- competence (due to the complexity of the processes / environmental aspects involved); or
- caution (due to the risk of non-conformities and their impact, or to the high degree of regulation); or
- diligence (due to the desired personal behaviours that are important for personnel involved in certification activities as required in a specific context).

If another coding system is used, the CB shall establish a correlation between their coding system and the coding system defined in this document.

6.2.2 General rules applicable to QMS and EMS/EMAS schemes

6.2.2.1.1 The assessment program shall guarantee that competence is assessed throughout the scope in the accreditation cycle, for all IAF codes of each MS scheme, with one of the mechanisms described in §6.1.1.

If this kind of assessment is not possible in the accreditation cycle, then BELAC shall reduce the scope of accreditation.

- 6.2.2.1.2 During the first 5-year period following the initial accreditation of each MS scheme, BELAC shall perform at least one witnessing activity in each technical cluster of each MS scheme. This programme will continue until the CB has demonstrated sufficient experience and performance for an enhanced programme. When this happens, BELAC shall perform at least one witnessing activity in each technical cluster of each MS scheme, to be complemented with other assessment activities to guarantee that each technical cluster is assessed within a period of 10 years. BELAC shall be able to justify why the witnessing programme was reduced. The witnessing frequency established for the 1st period should be reinstated if significant changes occur in the CBs' auditor qualification process, auditing practices or results and audit personnel.
- 6.2.2.1.3 The following witnessing rules apply for the granting and extension of accreditation of each MS scheme to be complemented with other assessment activities to guarantee the appropriate coverage of the applicant scope:
 - if a technical cluster has only 1 critical code, BELAC shall perform a witnessing activity in this critical code to grant accreditation for all the IAF codes in that cluster;
 - o <u>Examples</u>:
 - for QMS, cluster Food, with 1 witnessing activity in IAF code 03, BELAC can grant accreditation in the other IAF codes (01 and 30) of that cluster;
 - for EMS, cluster Paper, with 1 witnessing activity in IAF code 09, BELAC can grant accreditation in the other IAF codes (7 and 8) of that cluster;
 - if a technical cluster has more than 1 critical code, BELAC shall perform at least a witnessing activity:
 - o in all the critical codes that are identified with an "and" (on the "Critical code" column):
 - Example: for EMS, cluster Goods Production, with 1 witnessing activity in IAF code 04 or 05, BELAC can grant accreditation in all the noncritical codes (06 and 23) of that cluster, but the other critical code (04 or 05) needs to be witnessed to be granted;
 - in one of the critical codes that are identified with an "or" (on the "Critical code" column);
 - <u>Example</u>: for QMS, in cluster Mechanical, with 1 witnessing activity in IAF code 20 or 22, BELAC can grant accreditation in the other IAF codes (17, 18, 19, 20 or 22) of that technical cluster;
 - BELAC can grant accreditation after successful conclusion of at least one witnessing activity in a critical code for clusters with several critical codes, while respecting the 'AND' and 'OR' logic in the formulation of the critical codes;
 - Example: ISO 45001 for the cluster Chemicals: Critical codes are formulated as: 7 and 10 and 12 and 13 and 16 or 17. This implies

that a witness activity in e.g. IAF code 10, will only allow accreditation for the critical code 10 and the non-critical codes 14 and 15, and the code 17 (the 'OR' is respected). In this example codes 7, 12, 13 and 16 cannot be granted on the bases of this witness activity ("AND" is not respected). On the other hand, when a witnessing activity would be performed in code 17, this would imply that all codes can be granted (the 'OR' is respected for the full cluster);

- if it is not possible to perform a witnessing activity in the IAF code/s identified as critical, BELAC can agree with the CB on one of these two options:
 - BELAC can grant accreditation only in the non-critical IAF code/s of the technical cluster for one of which a witnessing activity is performed (e.g. for QMS - Food cluster - with 1 witnessing activity in IAF code 30, BELAC can grant accreditation for both IAF code 30 and 01); or
 - o BELAC can grant accreditation in all the codes of the cluster, performing an office activity in the critical code/s, but on condition:
 - that the CB has demonstrated its competence on a documental basis in all the codes of the cluster; and
 - that the witnessing activity in the critical code/s takes place before any certificate in the critical code/s based on accreditation is issued;
 - However, in such cases, if the result of the witnessing activity is negative,
 BELAC shall consider reducing the scope of accreditation.

If the CB wants to be accredited only in one or more non-critical IAF codes, a minimum of one witness audit is required in each cluster with non-critical IAF codes.

For initial accreditation for each MS scheme, BELAC shall witness both stage 1 and stage 2 audits, for at least one of the CB's clients. Prior to witnessing the stage 2 of the same audit, the applicant CB shall submit the completed report and/or conclusions from the stage 1 audit to the BELAC assessment team. If the CB does not have any new clients, it is possible to witness one renewal or two surveillances which cover the key processes.

The possibility to grant accreditation in a whole IAF code is always subject to the CB demonstrating it has the competence to manage certification in all of the underlying technical areas.

For VCA and ISO 45001 we note such a partial overlap of competence for the corresponding codes, where BELAC will evaluate on a case by case base.

For VCA and VCU a partial overlap is present for IAF code 35.

- 6.2.2.1.4 In addition to the above, it is necessary to assess competence also for all noncritical codes before BELAC can grant accreditation. Therefore accreditation shall be granted only:
 - in IAF codes where the CB has already taken decisions for certification (e.g. for QMS, with 1 witnessing in IAF code 03, BELAC shall grant accreditation only for IAF codes 30 and 03 in cases where the CB has taken no decisions for certification in IAF code 01); or
 - in IAF codes where the CB has demonstrated its competence by other means (e.g. demonstrating to have competent personnel for all the specific certification functions see Annex A of ISO/IEC 17021).

Note: for existing accredited CBs, if they already hold accreditation for a critical code but not the related non-critical code they can have their accreditation extended to include the noncritical codes, in line with the above.

6.2.2.1.5 In cases of an integrated or combined management system audit, the scope of the witnessing activity shall be agreed with the CB. If a witnessing activity has been recently performed in the same code, for a different purpose (e.g.: ISO 13485, ISO 3834...), BELAC can consider removing the necessity of another witnessing activity.

6.2.3 Table 1: technical clusters for ISO 9001 (QMS)

Technical	IAF	Description of economic sector/activity,	Critical	
cluster	code	according to IAF ID1	code(s)	
	1	Agriculture, forestry and fishing		
Food	3	Food products, beverages and tobacco	3	
	30	Hotels and restaurants	1	
	17	Basic metals and fabricated metal products		
	18	Machinery and equipment	1	
Mechanical	19	Electrical and optical equipment	20 of 22	
	20	Shipbuilding	1	
	22	Other transport equipment		
	7a	Pulp, paper and paper products		
Paper	8	Publishing companies	9	
	9	Printing companies	1	
	2	Mining and quarrying		
Minerals	15	Non-metallic mineral products	2 of 15	
	16	Concrete, cement, lime, plaster		
	28	Construction	20	
Construction	34	Engineering services	28	
	4	Textile and textile products		
	5	Leather and leather products	1	
Goods production	6	Wood and wood products	5 of 14	
•	14	Rubber and plastic products	1	
	23	Manufacturing not elsewhere classified	1	
	7b	Pulp, paper and paper products		
Chemicals	10	Manufacture of coke and refined petroleum products	12	
	12	Chemical, chemical products and fibres		
	25	Electricity supply		
Supply	26	Gas supply	26	
	27	Water supply	1	
Transport and	24	Recycling		
waste	31	Transport, storage and communication	24	
management	39	Other social services	7	
	29	Wholesale and retail trade		
	32	Financial intermediation; real estate; renting	1	
Camiaaa	33	Information technology	22 - 6 27	
Services	35	Other services	- 33 of 37	
	36	Public administration	1	
	37	Education	1	
Nuclear	11	Nuclear fuel	11	
Pharmaceuticals	13	Pharmaceuticals	13	
Aerospace	21	Aerospace	21	
Health and social work	38	Health and social work	38	

6.2.4 Table 2: technical clusters for ISO 14001 (EMS) and EMAS

Technical cluster	IAF code	Description of economic sector/activity, according to IAF ID1	Critical code(s)	NACE code
Agriculture, forestry and fishing	1	Agriculture, forestry and fishing	1	01, 02, 03
Food	3	Food products, beverages and tobacco	- 3	10, 11, 12
1 000	30	Hotels and restaurants	3	55, 56
	17a	Basic metals and fabricated metal products		24 excl. 24.46, 25 excl. 25.4, 33.11
	18	Machinery and equipment		25.4, 28, 30.4, 33.12, 33.2
Mechanical	19	Electrical and optical equipment	20 of 21	26, 27, 33.13, 33.14, 95.1
	20	Shipbuilding		30.1, 33.15
	21	Aerospace		30.3, 33.16
	22	Other transport equipment		29, 30.2, 30.9, 33.17
	7a	Pulp, paper and paper products		17.2
Paper	8	Publishing companies	9	58.1, 59.2
	9	Printing companies		18
	28	Construction		41, 42, 43
Construction	34	Engineering services	28	71, 72, 74 excl. 74.2 en 74.3
	4	Textile and textile products		13, 14
Goods	5	Leather and leather products	1 an E	15
production	6	Wood and wood products	4 en 5	16
	23	Manufacturing not elsewhere classified		31, 32, 33.19
	7b	Pulp, paper and paper products		17.1
	10	Manufacture of coke and refined petroleum products		19
	12	Chemical, chemical products and fibres		20
	13	Pharmaceuticals	7 en 10	21
Chemicals	14	Rubber and plastic products	en 12 en	22
Chemicais	15	Non-metallic mineral products	13	23, excl. 23.5 en 23.6
	16	Concrete, cement, lime, plaster		23.5, 23.6
	17b	Basic metals and fabricated metal products		24 excl. 24.46, 25 excl 25.4, 33.11
Mining and quarrying	2	Mining and quarrying 2		05, 06, 07, 08, 09
	25	Electricity supply		35.1
Supply	26	Gas supply	25 of 26	35.2
	27	Water supply		35.3, 36

Technical cluster	IAF code	Description of economic sector/activity, according to IAF ID1	Critical code(s)	NACE code
	24	Recycling		38.3
Transport & Waste	31	Transport, storage and communication	24 en 39	49, 50, 51, 52, 53, 61
management	39a	Other social services	1	37, 38.1, 38.2, 39,
	29	Wholesale and retail trade	29 of 35 of 36	45, 46, 47, 95.2
	32	Financial intermediation; real estate; renting		64, 65, 66, 68, 77
	33	Information technology		58.2, 62, 63.1
Services	35	Other services		69, 70, 73, 74.2, 74.3, 78, 80, 81, 82
	36	Public administration		84
	37	Education		85
	39b Other social ser	Other social services		59.1, 60, 63.9, 79, 90, 91, 92, 93, 94, 96
Nuclear	11	Nuclear fuel	11	24.46
Health and social work	38	Health and social work	38	75, 86, 87, 88
Other	-	-	-	97, 98, 99

6.2.5 Table 3: technical clusters for ISO45001 and VCA

Technical Cluster	IAF code	Description	Critical code
Agriculture, forestry and fishing	1	Agriculture, forestry and fishing	1
Food	3	Food products, beverages and tobacco	3
Food	30	Hotels and restaurants	3
	17	Limited to "fabricated metal products"	
	18	Machinery and equipment	
	19	Electrical and optical equipment	
Mechanical	20	Shipbuilding	20 and 21
	21	Aerospace	
	22	Other transport equipment	
	7	Limited to "Paper products"	
Paper	8	Publishing companies	9
	9	Printing companies	
Cara kana aki ara	28	Construction	00
Construction	34	Engineering services	
	4	Textiles and textile products	
	5	Leather and leather products	4 (with tanning)
Goods production	6	Wood and wood products	and 5 or 6
	23	Manufacturing not elsewhere classified	
	7	Limited to "Pulp and paper"	
	10	Manufacture of coke and refined petroleum products	
	12	Chemicals, chemical products and fibres	7 and 10 and 12
Chemicals	13	Pharmaceuticals	and 13 and 16 or
	14	Rubber and plastic products	17
	15	Non-metallic mineral products	
	16	Concrete, cement, lime, plaster etc	
	17	Limited to "Basic metals"	
Mining and quarrying	2	Mining and quarrying	2
	25	Electricity supply	
Supply	26	Gas supply	25 or 26
,	27	Water supply	
	24	Recycling	31 (limited to dangerous
Transport & Waste management	31	Transport, storage and communication	goods), and 24 or 39 (limited to
	39	Other social services	NACE 37, 38.1, 38.2, 39)

Technical Cluster	IAF code	Description	Critical code
		Wholesale and retrail trade, repair of motor vehicles, motorcycles and personal and household goods	
Comitons	32	Financial intermediation; real estate; renting	29 or 35
Services	33	Information technology	or 36
	35	Other services	
	36	Public administration	
	37	Education	
Nuclear	11	Nuclear fuel	11
Health	38	Health and social work	38

6.2.6 <u>Table 4: technical clusters for VCU</u>

Technical Cluster	IAF code	Description	Critical code
Services	35	Other services	35

6.3 Accreditation of environmental verifiers: provisions complementary to points 6.1 and 6.2

6.3.1 Acceptance of application

- BELAC 3-11 / § 2.3.2

BELAC does not accredit individuals as environmental verifier.

6.3.2 Accreditation certificate and directory of accredited bodies

- BELAC 3-11 / § 2.11

As soon as the accreditation is effective, the organization is registered in the lists of organizations accredited by BELAC and the data are made public on the BELAC website.

BELAC shall notify the modifications made to the scope of accredited environmental verifiers to the European Commission.

6.3.3 The prior notification

At least 4 weeks in advance of each verification in Belgium, the environmental verifier notifies the time and the place of the verification to BELAC, by using the form BELAC 6-211.

Environmental verifiers accredited by BELAC shall follow the procedure for notification defined in Article 24(1) of Regulation (EC) No 1221/2009 before taking up verification or validation activities in a Member State other than Belgium. BELAC will verify that the notification requirements have been met when the environmental verifier has been active in a different Member State.

6.3.4 <u>Transmission of the report in case of non-compliances</u>

If the BELAC Board is of the opinion that the quality of the work of the environmental verifier does not meet the requirements of the EMAS Regulation (EC) N° 1221/2009, a written supervision or renewal report shall be transmitted to the environmental verifier concerned and to the Competent Body to which the organisation concerned intends to apply for registration or which registered the organisation concerned. In case of further dispute, the supervision/renewal report shall be transmitted to the Forum of Accreditation and Licensing Bodies (FALB) referred to in article 30 of the EMAS.