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HKCAS Supplementary Criteria No. 17

HKAS Policy on Validation and Verification Programme for Environmental Information

1. INTRODUCTION

1.1 This document details HKAS policy on validation and verification^{Note 1} programmes (V/V programmes) for environmental information that HKAS Executive grants accreditation under Hong Kong Certification Body Accreditation Scheme (HKCAS). HKAS may consider to accept application and grant accreditation to a validation and verification body^{Note 2} (V/VB) that undertakes a third-party validation and verification of environmental information statements in respect of a specific V/V programme that satisfies the criteria set out in this document.

Notes:

1. In this document, 'validation and verification' (V/V) refers to 'validation', 'verification' or 'validation and verification'.

2. In this document, 'validation and verification body' (V/VB) refers to 'validation body', 'verification body' or 'validation and verification body'.

1.2 HKAS will define from time to time specific types of environmental information for which accreditation programmes of validation and verification under HKCAS are available. Details of available accreditation programmes and additional criteria for V/V programmes, if any, are documented in relevant HKCAS Supplementary Criteria document.

1.3 'Agreed-upon procedures' (AUP) is a type of engagement used when the intended user(s) do not require assurance on the environmental information statement. HKAS Executive will not accept any V/V programmes which specify AUP rather than assurance.

1.4 Before submitting an application for accreditation, the applicant V/VB shall provide

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details of the V/V programme and all relevant supporting information to HKAS Executive. Where it considers appropriate, HKAS Executive will approach the programme owner or operator for more information. HKAS Executive will then review the information to determine the suitability of the V/V programme for accreditation. The review normally will be conducted off-site. However, an on-site review may be arranged at HKAS discretion. HKAS Executive may consider to accept the accreditation application only if the relevant accreditation programme is available (refer to clause 1.2 of this document) and the V/V programme satisfies the criteria set out in this document.

- 1.5 An accredited V/VB shall ensure that the V/V programme it is accredited for providing validation and verification continues to satisfy the criteria set out in this document. The accredited V/VB shall inform HKAS Executive in writing immediately of any proposed changes of the V/V programme that may affect its continuing conformity with the criteria set out in this document. The accredited V/VB shall discuss with the parties concerned and come up with an action plan proposing measures to resolve any nonconformity or anticipated nonconformity. The changes made in the V/V programme have to be evaluated by HKAS before the changed programme is published. Accreditation of the V/VB may be suspended or terminated when the V/V programme no longer satisfies the criteria set out in this document.
- 1.6 This document does not apply to V/V programmes which are included or invoked by legislation/regulation, and/or developed by national, regional or international standardisation bodies.

2. TERMS AND DEFINITIONS

- 2.1 For the purposes of this document, the terms and definitions given in ISO/IEC 17000: 2020, ISO/IEC 17029: 2019, ISO 14065: 2020 and IAF MD 25: 2022 apply. The term 'programme' used in this document refers to the term 'scheme' used in IAF MD 25: 2022.
- 2.2 The term 'should' is used in this document to indicate recognised means of meeting the requirements. A V/V programme can meet these in an equivalent way. The term 'shall' is used in this document to indicate requirements which are mandatory.

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3. CRITERIA FOR PROGRAMME OWNERS

- 3.1 A programme owner (PO) shall maintain sufficient evidence and justification that the V/V activity and the standard selected for the accreditation of V/VBs is appropriate.
- 3.2 The PO shall make a general description of the V/V programme publicly available without request. The programme documents, including the criteria and process to be used in assessing conformity shall be publicly available. In addition, the PO shall make the V/V programme publicly available for application without restriction by number of membership or other limitations.
- 3.3 The PO should demonstrate that the V/V programme has been validated^{Note 3}. The validation^{Note 3} should be documented and include the following aspects:
- 3.3.1 a description of the purpose of the V/V programme;
 - 3.3.2 a description of the requirements of the V/V programme;
 - 3.3.3 an analysis of the appropriateness of the established requirements for fulfilling the defined purpose of the V/V programme;
 - 3.3.4 a description of the methods to be used for determining fulfilment of the requirements;
 - 3.3.5 an analysis showing that the described methods to be used for determining fulfilment of the requirements are appropriate;
 - 3.3.6 the decision on the V/V activity to be used (including identification of the applicable V/V standard); and
 - 3.3.7 an analysis showing that the selected V/V activity is appropriate.

Note:

3. The terms 'validated' and 'validation' used in Clause 3.3 of this document refer to the confirmation of the fulfilment of specific intended uses or purposes. The 'validation' can be in terms of pilot programme or by demonstrating that the programme is based on available international or national standards.

- 3.4 In case the PO provides any clarification on the V/V programme to any interested party, this information shall also be available to HKAS and V/VBs within the V/V

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programme.

- 3.5 The PO shall have a legally enforceable agreement with V/VBs it authorizes which, as a minimum, shall ensure that the V/VBs use the V/V programme as published by the PO, without any additions or reductions, and comply with PO rules for applying the symbol/statement/mark, as applicable.
- 3.6 The PO shall have a procedure for dealing with complaints relating to the V/V programme, ensuring that complaints processes of V/VBs' clients, V/VBs and HKAS are not affected. Investigation and decision on complaints shall not result in any discriminatory actions.
- 3.7 An arrangement describing the relationship and the terms of cooperation between the PO and accreditation bodies should be established. Any requirements for accreditation bodies shall be part of the V/V programme and not individual arrangements. HKAS may, at its discretion, not accept some or all these requirements or terms of cooperation.
- 3.8 If the PO monitors the V/VBs, it should consider cooperation with HKAS and have a feedback mechanism to provide information on the performance of the V/VBs to HKAS.
- 3.9 The PO shall develop the V/V programme with the participation of technically competent representatives of interested parties. The PO shall demonstrate that the V/V programme has credibility with relevant industry, appropriate regulatory authorities or relevant professional groups.
- 3.10 The PO should have a process for a periodic review of the V/V programme taking into account the experience gained and the feedback received from parties interested in the V/V programme.
- 3.11 The PO should monitor the development and review of the standards and other normative documents, whether its own or external, which define the specified requirements used in the programme. Where changes in the normative documents of the V/V programme occur, the PO should have a process for making the necessary changes in the V/V programme, and for managing the implementation of the changes (e.g. transition period) by the V/VBs' clients and, where necessary, other parties

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interested in the V/V programme.

- 3.12 Changes to the V/V programme that affect the output of the V/V programme, should be validated according to clause 3.3 of this document.

4. CRITERIA FOR VALIDATION AND VERIFICATION PROGRAMMES

4.1 A V/V programme for environmental information is a set of rules, procedures and management for carrying out V/V activities in a specific sector. These rules, procedures and management shall not contradict or exclude any of the requirements of ISO/IEC 17029: 2019 and ISO 14065: 2020. The V/V programme should cover the following elements:

- 4.1.1 Selection of the object(s) of validation and verification, including selecting specified requirements to be assessed and planning information collection and sampling activities;
- 4.1.2 Determination, including the use of one or more determination methods to develop complete information regarding fulfilment of the specified requirements by the object of validation and verification;
- 4.1.3 Review, decision and attestation, including the review of evidence from the determination stage. Conclusion based on the results of the review as to whether fulfilment of specified requirements has been demonstrated and a subsequent attestation that the object of validation and verification has been reliably demonstrated to fulfil the specified requirements, and any subsequent marking or licensing and their related controls, where applicable.

4.2 The V/V programme shall include the following:

- 4.2.1 the objectives of the programme for the specific industry or intended user group;
- 4.2.2 the scope of validation and verification (including the type of environmental information and its associated information where applicable, e.g. boundaries, facilities, processes, time period, etc.)
- 4.2.3 the validation and verification criteria (e.g. validation and verification standards);
- 4.2.4 specific competence criteria for the validation and verification team and V/VB;

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- 4.2.5 process for validation and verification;
 - 4.2.6 evidence gathering activities of validation and verification;
 - 4.2.7 reporting of validation and verification;
 - 4.2.8 any specific applications or explanations of ISO/IEC 17011: 2017, if applicable;
and
 - 4.2.9 any specific application or explanation of ISO/IEC 17029: 2019 and ISO 14065: 2020, if applicable.
- 4.3 Where applicable, the requirements in the V/V programme should be written in terms of results or outcomes, together with limiting values and tolerances.
- 4.4 The requirements in the V/V programme should be stated unambiguously using wording that is objective, logical, valid and specific and enable consistent application by organisations as well as evaluation across V/VBs.
- 4.5 Where the V/V programme includes legal requirements, these shall be formulated in such a way that compliance is a condition for outcome of conformity assessment.
- 4.6 The V/V programme should describe the method used to monitor that the validation and verification statement holder continues to comply with the requirements, if applicable.
- 4.7 Where the PO authorisation is given before accreditation, which implies that the V/VB can perform validation and verification activities covered by the V/V programme and may have the right to use the PO's mark, the V/V programme shall require the V/VBs to be accredited in a defined period of time.
- 4.8 The V/V programme shall specify the decision made about the environmental information statement in the V/V documents.
- 4.9 Where the V/V programme provides the use of validation and verification marks and/or allows marking any reference, there should be a license and/or rules or another form of enforceable agreement to control such use and/or reference.
- 4.10 The V/V programme may specify a manner by which the PO monitors V/VBs, beyond requiring that the V/VBs are accredited to the V/V programme requirements.

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4.11 If any V/V programme specific requirements are placed on HKAS, they shall not contradict or exclude any of the requirements of ISO/IEC 17011: 2017, relevant IAF guidelines, policies and other requirements.