

Joint Accreditation System of Australia and New Zealand



*JAS-ANZ submission to the
Department of Climate Change*

*National Greenhouse and Energy
Reporting System*

Regulations Policy Paper

27 February 2008

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1. References

ISO 14064.1	Part 1: Specification with guidance at the organization level for quantification and reporting of greenhouse gas emissions and removals
ISO 14064.2	Part 2: Specification with guidance at the project level for quantification and reporting of greenhouse gas emission reductions and removal enhancements
ISO 14064.3	Part 3: Specification with guidance for the validation and verification of greenhouse gas assertions
ISO 14065	Greenhouse gases – Requirements for greenhouse gas validation and verification bodies for use in accreditation or other forms of recognition
Draft IAF MD	Draft IAF Mandatory Document on the application of ISO 14065:2007 (also incorporating requirements for the application of ISO 14064.3)
ISO/IEC 17000	Conformity assessment – Vocabulary and general principles
ISO/IEC 17011	Conformity assessment – General requirements for accreditation bodies accrediting conformity assessment bodies,

2. Definitions

The International Organization for Standardization publishes standard definitions to enable mutual understanding of reference documents. This submission uses terms as defined by ISO/IEC 17000.

Accreditation Body (AB) An authoritative body that performs **accreditation**. The authority of an accreditation body is generally derived from government.

Accreditation Attestation of the competence of a **conformity assessment body** to carry out specified conformity assessments.

Conformity Assessment Body (CAB) A CAB is a body that provides conformity assessments.
Note – CABs include certification bodies (including management systems, personnel, product, validation and verification bodies) inspection bodies and laboratories

Additionally:

International Accreditation Forum (IAF) The IAF is the world's peak accreditation forum for bodies offering accreditation of certification and inspection bodies. The IAF membership develops mandatory and informative documents to harmonise interpretation of the international conformity assessment standards to facilitate mutual recognition of conformity assessment s by its signatories. The IAF signatories include the peak accreditation bodies from all developed economies.

Note – Signatory status is only awarded to IAF members who have successfully completed an IAF peer evaluation to ISO/IEC 17011 and other relevant normative references. JAS-ANZ is the only IAF signatory in Australia and New Zealand.

3. Overview

This submission to the Australian Government Department of Climate Change (DCC) on the national Greenhouse and Energy Reporting System (NGERS), Regulations Policy Paper (RPP), follows on from our previous submission to the Australian Greenhouse Office on the NGERS – Regulations Discussion Paper. The comments we make in this submission should be understood to be entirely consistent with the comments we made in our previous submission on the NGERS Regulations Discussion Paper.

As previously advised, JAS-ANZ continues to be deeply involved in the completion of the Draft IAF Mandatory Document (IAF MD) for the application of ISO 14065, incorporating the requirements of ISO 14064.3 with reference to ISO 14064.1 and ISO 14064.2. We will be attending the next round of IAF meetings in early March 2008 and anticipate that these meetings will provide the near final draft of the IAF Mandatory Document.

We expect to be in a position to commence offering accreditation of GHG verification and validation bodies soon after the IAF MD approaches its near final draft form.

The economies of the IAF members will soon be in a position to commence recognising the international standards and IAF member accredited GHG verifications and validations as the basis for harmonising GHG verifications and validations. This will place member economies in a stronger position to appropriately address any potential Technical Barriers to Trade issues around emissions trading arising from World Trade Organisation agreements.

Key points

3.1 JAS-ANZ has formed the view that the referenced international standards, combined with the Draft IAF MD, should be recognised as meeting and exceeding the majority of the proposed NGERS scheme requirements as described in the NGERS RPP.

3.2 JAS-ANZ proposes that a gap analysis be performed to capture the additional uniquely NGERS scheme requirements, and that the international standards combined with these additional uniquely NGERS scheme requirements be used as the basis of a DCC recognised JAS-ANZ accredited NGERS scheme.

3.3 For the purposes of a proposed DCC recognised JAS-ANZ accredited NGERS scheme, JAS-ANZ would ask the DCC to ensure that the NGERS regulations allow

recognition of international standards and other JAS-ANZ accreditation requirements that meet or exceed the minimum requirements of the NGERS RPP, and not seek to over-ride or diminish them in any way.

4. Specific issues arising from the Regulations Policy Paper

As mentioned at 3.1 above, the referenced international standards, combined with the Draft IAF MD, generally meet or exceed the majority of the proposed NGERS scheme requirements as described in the NGERS RPP.

There are also a number of key areas where the relevant international standards and IAF requirements go beyond what is described in the NGERS RPP.

Key points

4.1 The NGERS RPP is consistent with the NGER Act in defining the responsibilities and requirements for an external auditor in the context of an individual. By contrast, ISO 14065 describes validation and verification bodies in the context of an organisation.

4.2 Accreditation of an organisation incorporates a far more stringent set of requirements than recognition of an individual. For example, verification and validation bodies are required to demonstrate that they have effective procedures for:

1. managing impartiality. Impartiality must be demonstrated in the validation or verification body's policies, personnel and independent review and sign-off of reports (i.e. the final decision on the endorsement of a report).
2. ensuring that all personnel are competent for the functions they perform.
3. Internal monitoring of the performance of the verification or validation body against the accreditation requirements.

END