SLOVENSKÁ NÁRODNÁ AKREDITAČNÁ SLUŽBA

Policy

PL - 66

SNAS POLICY ON ACCREDITATION OF ENVIRONMENTAL VERIFIERS ON THE TRANSITION TO THE CLASSIFICATION ACCORDING TO NACE, REV. 2.1

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PURPOSE: This document determines SNAS policy on accreditation of environmental verifiers regarding the transition to classification according to NACE, Rev. 2.1.

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1. SNAS POLICY ON ACCREDITATION OF ENVIRONMENTAL VERIFIERS THE TRANSITION TO THE CLASSIFICATION ACCORDING TO NACE, REV. 2.1

This document provides information on the transition from of the classification of economic activities from Regulation (EC) No 1893/2006 of the European Parliament and of the Council to Commission Delegated Regulation (EU) 2023/137. This document is mandatory for all accredited CABs in the field of environmental verification.

2. TRANSITION REQUIREMENTS

Normative Document:	**Commission Delegated Regulation (EU) 2023/137, as amended by Commission Delegated Regulation (EU) 2025/471 (hereinafter referred to as 'Commission Delegated Regulation (EU) 2023/137)**
Replacing:	**Annex I to Regulation (EC) No 1893/2006 of the European Parliament and of the Council**
Current Status:	**published on 20 January 2023**
Valid:	**01 January 2025**

3. SUMMARY OF KEY CHANGES

3.1 KEY CHANGES INCLUDE BUT ARE NOT LIMITED TO:

One new section has been created (bringing the total to 22 sections, up from the original 21).

Splitting of Section J: The original Section J ("Information and Communication") has been divided into two separate parts:

- Section J: Publishing, broadcasting and content production and distribution activities

- Section K: Telecommunications, computer programming, consulting computing, infrastructure and other information services, activities.

All subsequent sections, starting from the original letter K, have shifted forward by one letter in the alphabetical sequence.

36 new classes have been added, and the total number of categories at lower levels (divisions, groups, and classes) has been adjusted.

Division 45 has been abolished; the wholesale and retail trade of motor vehicles has been moved to Divisions 46 and 47, while the maintenance and repair of motor vehicles have been reclassified into other categories.

3.2 THE IMPACT OF CHANGES:

The overall changes to the document are minimal; therefore, it is expected that organisations will find changes to requirements of the standard to be largely intuitive, practicable, and depending on the organisation's context and objectives, attainable with reasonable effort. The impact and risk may differ by organisation; it is the verified organisation's responsibility to determine the changes to its context and management system.

4. KEY TIMESCALE

Activity	Due Date
SNAS will be ready to assess Commission Delegated Regulation (EU) No 2023/137 and announce the transition process	*As soon as possible, no later than 15 November 2026*
CABs to submit transition declaration (Annex A, or AB established equivalent) and supporting documents, to the accreditation body for the purposes of the transition to NACE	*30 November 2026*
SNAS transition decisions of CABs completed	*31 December 2026*
Accredited verification by a CAB is permitted under Commission Delegated Regulation (EU) No 2023/137, in accordance with:	*Transition of the CAB's accreditation by SNAS*
Verification carried out by the CAB after this date will relate exclusively to Commission Delegated Regulation (EU) No 2023/137	*Entry into force of the CAB Accreditation Certificate*

5. TRANSITION PROCESS

5.1 ACCREDITATION BODY ACTIONS AND PROCESS

Activity	Yes/No	Notes:
SNAS Actions / Arrangements	Yes	SNAS shall: a. Carry out analyses of the scope of each environmental verifier's accreditation

Activity	Yes/No	Notes:
		certificate. b. Update the certificate in the event of a change to the name of a NACE code. In the event of a change in the number of NACE codes within the relevant, already accredited EA codes, offer the CAB a change to the scope without increasing the price. c. In the event of a change to the EA code within a NACE code for which the CAB was already accredited under NACE, Rev. 2.0, offer the CAB the option to extend its accreditation to include the specific NACE code. d. If the CAB requests the full scope of the relevant NACE code or the entire EA code, it must submit an application for the extension of accreditation. e. Carry out the necessary training and competence assessment of assessors and other staff.
CAB Document Review	Yes	This is necessary for this transition.
CAB's Head Office Assessment	No.	Not required for this transition. The CAB's head office assessment following the transition decision shall focus on the verification of the implementation of the transition arrangement and declaration, including progress of the transition for verified clients.
CAB Witnessed Assessment(s)	No	Not required for this transition. Following the transition decision all witnessed assessments must be carried out in accordance with the NACE Rev. 2.1 classification of economic activities
SNAS Transition Decision	Yes	a. ABs are required to make a transition decision, based on the declaration (Annex A) and supporting documents provided by the CAB. b. Transition decisions, including issuance of the accreditation documents (e.g. certificate), are

Activity	Yes/No	Notes:
		required to be completed to the 31. December 2026 c. If required, additional follow-up may take place during normal scheduled assessment activity. d. In cases of extenuating circumstances or based on risk, at the discretion of the AB, the AB may require additional transition activity prior to the transition decision. For example, if a CAB's accreditation is suspended, the decision may not be able to be made through a declaration, and further follow-up (e.g. assessment) may be required prior to a transition decision.
Is extra time likely to be needed for the transition?	Yes	At least one day of assessment to confirm the CAB transition.
Impact to Accreditations	Yes	a. Accreditations for the previous version of the document are no longer valid after the date of the decision regarding the new accreditation. b. All new accreditation activities must meet the requirements set out in Commission Delegated Regulation (EU) No 2023/137.

5.2 Conformity Assessment Body Actions and Process

Activity	Yes/No	Notes
CAB's Actions / Arrangements	Yes	CAB shall: a. Establish their transition arrangement for the classification of economic activities according to NACE, Rev. 2.1, taking into account the requirements of this document and the transition arrangements established by SNAS. b. Develop transition plan to address the following: - Identify the changes between Commission Delegated Regulation (EU) No 2023/137 and Regulation (EC) No 1893/2006 of the European Parliament and of the Council which are taken into account when implementing changes may involve sales/offers, the verification process, competence

Activity	Yes/No	Notes
		management, and communication with existing clients undergoing verification. - Actively communicate, throughout the transition process, with existing verified clients on the transition process, expected actions and timelines. - Analyse impact of changes on relevant activities / processes and identify required actions to ensure conformance (e.g. management system/documents, IT tools). - Implement required actions. - Ensure that relevant personnel affected by the changes are trained and competent and qualified in accordance with Commission Delegated Regulation (EU) 2023/137. Relevant personnel may include sales personnel, auditors, technical reviewers, decision makers and contract/application reviewers. c. Declare, to SNAS, their readiness for the transition, using the attached declaration template (Annex A) by 31 November 2026 d. In addition to the declaration, provide SNAS required supporting documents. As a minimum, evidence to support the declaration (Annex A) including a transition plan, updated CAB documentation to support the revised verification program for competence, the verification duration changes, Note: It is the CAB's responsibility to demonstrate, to their AB, it is adequately addressing requirements and competence needs for the revised version.
Is extra time likely to be needed for the transition?	Possibly	a. The CAB shall consider if additional time is needed including justification for the calculation b. In determining if additional audit time is needed, the CAB shall consider, at a minimum, the degree of change to the client's management system Note: Additional time may not be needed for a full system verification.

Activity	Yes/No	Notes
Accredited verificaton Impact	Yes	a. Following the AB's transition of the CAB's accreditation, the CAB shall verification decision based on the results of the transition audit, and any other applicable information. b. Accredited Environmental verifiers declaration on verification and validation activities for the previous version of the document shall cease to be valid from the next scheduled verification date, and no later than 31 December 2027 Note: It is not necessary to modify current / existing Environmental verifiers declaration on verification and validation activities under Commission Delegated Regulation (EU) No 2023/137 to reflect expiry before the end of the verification cycle on the basis of this requirement.

6. OTHER

6.1 If an accredited CAB does not intend to transition to Commission Delegated Regulation (EU) No 2023/137, the CAB shall notify SNAS as early as possible. At a minimum, the CAB shall notify SNAS in writing prior to the CAB Transition Deadline defined in this document. The CAB's accreditation shall be withdrawn at the end of the transition for the applicable document.

6.2 A CAB that decides not to transition to Commission Delegated Regulation (EU) No 2023/137 shall inform all affected clients of this decision in writing (e.g. by email) by 31 December 2026. This shall include, as a minimum, further information on certificate validity period and information on the consequences of not transferring or transitioning.

6.3 If an organization undergoing verification decides not to transition its EMAS environmental statement to Commission Delegated Regulation (EU) 2023/137, the CAB cannot perform verification in accordance with Regulation (EC) No 1893/2006 from the date the new accreditation decision enters into force.

7. ANNEX A

Declaration by Accredited Conformity Assessment Body for Environmental Verification

I (name below) declare that from the date of this declaration, CAB (CAB name below):

- has implemented changes required under this transition,
- conforms with the requirements necessary for transition, and
- can demonstrate evidence of implementation.

I further acknowledge that:

- SNAS will review the implementation of transition against this declaration during assessment(s).

- A declaration that is false or cannot be substantiated is a breach of the Conditions of Accreditation and is grounds for required corrections and corrective actions. If not properly resolved within set timelines this will be grounds for suspension or withdrawal.

- The following activity has been completed:
  - Transition Plan,
  - Documentation revised to support transition and/or revised requirements,
  - Necessary competence has been determined for the revised document and CAB has sufficient number of verifiers and other personnel (e.g. application reviewer, verification decision maker) deemed competent to support the revised certification program,
  - CAB has a process to determine verification duration that supports the revised certification program (if applicable), and
  - The CAB has a process for managing the control of verifications in accordance with a revised document, that includes (a) issuing environmental verifier´s declaration on verification and validation activities following the SNAS decision on the transition.

Signature:	
Name:	
Title:	
CAB Name:	
Date:	