1 INTRODUCTION

1.1 Certification Process Overview

Applications for Environmental Management System Auditor (EMSA(A)), Environmental Management System Lead Auditor (EMS(LA)), Certified Environmental Auditor (CEA) and Certified Environmental Auditor – Sustainable Forest Management (CEA(SFM)) are received in electronic format by the Canadian Environmental Certification Approvals Board (CECAB).

Applications are examined against the competence requirements that CECAB has developed, using ISO 19011:2002, Clause 7, ‘Competence and evaluation of auditors’ as a guidance document. Audit experience requirements for all auditing designations are listed in the T002 ‘Eligibility Requirements’.

All applications undergo an initial review by CECAB Staff to ensure that the application is complete, and that, in general, the requirements of T002 ‘Eligibility Requirements’ are met. The initial review verifies that the education, work experience, formal training and reference information submitted by the applicant meets the minimum requirements. Additionally, the review assesses the number and length of the audit experience submitted to confirm the minimum numbers required for the designation. The review performed by staff does not attempt to fully evaluate that the audit experience fulfills the requirements for certification. The initial review identifies and resolves any deficiencies in the other sections of the certification requirements.

If the review performed by CECAB staff indicates the application meets the minimum requirements, the application proceeds to the Panel Review stage where it is evaluated by two certified and qualified volunteers. This evaluation assesses whether the applicant has demonstrated that the audit experience requirements of the applicable certification scheme have been fulfilled.

1.2 Eligibility Requirements for Panel Reviewers

Panel Reviewers are volunteers and are not employed or contracted by CECAB in exchange for any remuneration. Panel Reviewers may use the time taken to complete the activity of panel review towards the annual professional development requirements of their environmental auditing designation(s) with CECAB. Panel Reviewers must meet the criteria outlined in M008 ‘Requirements, Training and Management of Evaluation Volunteers’.

1.3 Qualification Requirements for Applicants

CECAB has developed a series of documents that detail the qualification requirements for each of the auditing designations:

- T002 ‘Eligibility Requirements’ states the qualification requirements for each of the auditing designations – EMS(A), EMS(LA), CEA and CEA(SFM)
- T012 ‘Body of Skills and Knowledge – EMS(A) and EMS(LA)
- T013 ‘Body of Skills and Knowledge – CEA
2 PANEL REVIEW PROCESS

Each application is reviewed by two trained volunteers who comprise the Panel Review for each auditor application under evaluation by CECAB. The Coordinator, Certification Programs, will enlist the participation of 2 trained Panel Reviewers. The potential Panel Reviewers will be contacted via e-mail and given instructions on how to login to their CECAB Members account and accept or decline the invitation.

If the Panel Reviewer has a conflict of interest with the applicant, or is currently unavailable to perform the review, they can indicate so once they sign into their CECAB Members account and view for whom the review has been requested. Declining a review will send an automatic e-mail to CECAB staff, which will allow staff to quickly identify an alternate Panel Reviewer.

Once the invitation is accepted the Panel Reviewer can proceed with the evaluation. They will only be allowed to see that individual applicant’s file and will not have access to any others. CECAB staff will inform the Panel Reviewer where to locate F024 ‘Panel Review Checklist’ to help them with the review as well as pass along the contact information of the other reviewer.

Each Panel Reviewer must adhere to the principles of confidentiality. Panel Reviewers may confer with each after they’ve independently reviewed the application; however, they should not contact applicants directly as they are to remain unknown to the applicants. If there is a need for additional information, the request should be made through the Coordinator, Certification Programs. It is acceptable for the Panel Reviewer to contact verification contacts listed to verify audit details; however, such requests can also be made via the Coordinator, Certification Programs.

2.1 Audit Log Format

The audit log allows the applicant to input detailed information on a per audit basis. Applicants must choose a type of audit to enter – EMS or Compliance. Common to both audit types is:

- Start Date
- End Date
- Days On Site
- Days Off Site
- Team Size
- Role of the Applicant
- Auditee – contact information for the auditee as well as the Industry sector and the Type of Facility
- Client – if different from the auditee, client contact information is also entered
- Verifier – contact information for the verifier of the audit, who can be the Audit Program Manager, the Audit Team Leader, the Auditee or another Auditor on the team.
For EMS audits, the applicant must also enter:

- The EMS Audit type – 1st, 2nd or 3rd party
- Information (via checkbox) on exactly which clauses from ISO 14001 were covered in this audit
- Information (via checkbox) on exactly which clauses of ISO 19011 the applicant personally participated
- A detailed description of the audit scope, including the aspects of the audit process in which the applicant was personally involved.

For Compliance audits, the applicant must also enter:

- The audit criteria
- The process used for the audit. Note that some choices from the drop down box result in additional checkboxes for the applicant to indicate exactly which clauses of the standard in which he/she was personally involved.
- A detailed description of the audit scope, including the aspects of the audit process in which the applicant was personally involved.

2.2 Initial Assessment of the Audit Experience

The Panel Reviewers should begin their review of the application by first scanning through the audit logs to obtain an impression of the audit experience submitted. The Panel Reviewer should note the type of audits undertaken by the applicant. At this point, it is again possible for a Panel Reviewer to observe if there is a conflict of interest with the applicant. In such a case, the Panel Reviewer would contact the Coordinator, Certification Programs allowing another Panel Reviewer to be recruited to complete the Panel Review.

2.3 Panel Reviewer Checklist

Panel Reviewers are required to review F024 ‘Panel Reviewer Checklist’ for each application assessed. This checklist is designed to assist in the assessment of the audit experience.

The checklist itself has been subdivided into several sections – common elements for All auditing designations, general requirements for both CEA and CEA(SFM), specific requirements for CEA, specific requirements for CEA(SFM), general requirements for both EMS(A) and EMS(LA), specific requirements for EMS(A) and specific requirements for EMS(LA). The panel reviewer may then choose the sections that are relevant to the designation that the applicant is seeking. For instance, if the applicant has requested consideration for an EMS(A) designation, the panel reviewer would hold them accountable to all of the sections that apply to the EMS(A) designation – the ‘All’ section, the ‘EMS General’ section, and the ‘+EMS(A) Specific’ section. All other sections on the checklist would be irrelevant for an EMS(A) applicant.

2.3.1 All Designations (applicable to CEA, CEA(SFM), EMS(A) and EMS(LA) applicants)

- All audits performed within the previous three (3) consecutive years.
  The Initial Review will have established that all the audits were performed in the three consecutive years immediately prior to the date of application.
Audits that were not performed within this time frame cannot be considered in support of meeting the audit experience requirements for Auditors. In the event that there has been a leave of absence for maternity/paternity or for disability, then this will have been noted during the Initial Review and the dates for which the audit experience is acceptable will have been adjusted.

2.3.2 **CEA General (applicable for both CEA and CEA(SFM))**

- **Minimum of 40 equivalent audit work days**

  The CECAB on-line system requires applicants to enter the number of days that they spent on an audit (both on site and off site). The input fields for days accept decimals, although most applicants will round audit experience off to the nearest half day. If the applicant does input a decimal that is not an increment of half a day, both the Initial Review and the Panel Review should round it to the nearest half day. An equivalent workday of environmental auditing is a minimum of 6 hours, although most applicants will consider it 8 hours. Each audit should be at least one day in length. The number of on-site days and off-site days is also requested of the applicant. The Panel Reviewer should take note of any audit where the number of off-site days far exceeds the number of on-site days, as in general, the number of on-site days should be greater than, or equal to, the number of off-site days for each audit. Auditing on-site includes the opening and closing meetings and the conformance/compliance auditing phase, but excludes document review, planning, and preparation of the audit report, even if these functions are performed on the premises of the auditee. This is in accordance with ISO 19011, Clause 6, and CSA Z773, Clauses 6 and 8.

- **Environmental audits are defined by ISO 19011 or CSA Z773 and include not just EMS audits but also multi-issue compliance audits, single issue audits, and pre-acquisition and divestment audits that meet the definitions**

  In ISO 19011, the definition of an environmental audit is “a systematic, independent and documented process for obtaining audit evidence (records, statements of fact or other information, which are relevant to the audit criteria and verifiable) and evaluating it objectively to determine the extent to which the audit criteria (set of policies, procedures or requirements) are fulfilled.” CSA Z773 defines an Environmental Compliance Audit (ECA) as “a systematic and documented verification process that involves objectively obtaining and evaluating evidence to determine whether an organization’s activities conform to applicable statutes, regulations, and local laws.” The definition from ISO 19011 is somewhat more applicable to management systems than that in CSA Z773, which is designed to describe a compliance audit. However, both definitions are acceptable as descriptions of an audit process and are the basis of determining whether the activity that has taken place is an audit. CECAB views an audit as a two component process. The first component is that a suitable, or appropriate, audit process has been undertaken. In ISO 19011, the process can further be described by Clause 6 with reference to the principles in Clause 4. Additionally, the principles in Section 4 and the activities as described in Sections 6, 7 and 8 of CSA Z773 also provide a
foundation for a description of an audit program and the conditions in which it is conducted.

Where an audit process that is not ISO 19011 or CSA Z773 has been employed by an applicant, the applicant is requested to indicate the alternate process used. In most cases, CECAB staff will determine if the audit experience is consistent with the standards listed above. It is permissible to have other standards, as many company audit programs are based on the material in ISO 19011 or CSA Z773 but are not the standard verbatim.

Where the audit process is derived from one of the standards, or incorporates the standard but is not described as the standard, the decision is generally that the standard has been met and that the experience is satisfactory. The intent is to ensure that an audit, as opposed to another type of investigation, has been conducted and that the main components of either of the definitions given above had been performed.

The second component of the audit experience is the audit criteria to which the audit has been conducted. This is also specified in the audit definition in that there must be audit criteria to which the audit evidence is compared. This can include both conformance and compliance audits. From this, the determination that the audit was an environmental audit is made. That is, it is the audit criteria that determine if an audit is an environmental audit. The underlying principle is that the audit criteria must be related, or be applicable to, environmental matters, then the audit can be considered to be an environmental audit. For example, compliance audits where the audit standard describes an Environmental Management System (EMS) such as ISO 14001, are environment related audit criteria. Industry standards that govern environmental performance or management or describe compliance for environmental matters are also environment related audit criteria.

It is at this point that the experience of the Panel Reviewer becomes important. The reviewer must be satisfied that an audit, as opposed to another type of investigation has occurred and that the audit criteria are related to environmental matters.

Thus an audit submitted by an applicant which was conducted to an acceptable audit process and where the audit standard was one that describes an EMS is an environmental audit which is acceptable for the purpose of certification. For conformance audits, the audit process must be an acceptable audit process and the audit criteria may be federal, provincial, municipal regulations or statutes, or even company or industry policies that relate to environmental matters.

The audit type, which includes not just EMS audits but also multi-issue compliance audits, single issue audits and pre-acquisition and divestment audits are audits, that if they employ an appropriate audit process and the audit criteria employed related to environmental matters are all acceptable for the purpose of certification.

Providing legal, financing, business or consulting advice based on review of completed audit reports does not represent environmental auditing. (i.e. a review of a previously conducted audit by the applicant is not acceptable.) Also, as the intent is to establish that the applicant has the audit experience sufficient to be granted a designation as an environmental auditor,
experience in other types of auditing and in environmental investigations and assessments that do not meet the environmental audit definition will not be recognized for the purposes of certification. Acceptable audit experience for the CEA(SFM) designation differs from that for the CEA designation. This is discussed in the CEA(SFM) Specific section below. However, it should be noted that an application for CEA(SFM) is essentially a special case of the CEA application.

2.3.3 CEA Specific

- **Minimum of 8 separate complete environmental audits**
  
  Once the Panel Reviewer is satisfied that the audit experience submitted are environmental audits as defined for the purpose of certification, then it is also necessary to further establish that there are eight separate, complete audits. The Initial Review should have established that there are eight audits submitted. An audit is considered the entire process as described in ISO 19011, 6.2 to 6.6, although some sections of 6.2 such as appointing the audit team leader may be performed by an audit program manager and not the applicant auditor. It is the judgment of the Panel Reviewer that the audit was a complete and distinct audit. However, it should be noted that there is a distinction between the audit and the applicants’ participation in the audit. While each audit must be a complete audit, the applicant auditor may not have completed each and every step in the audit process for each audit. Overall, the applicant auditor should have performed each step in the audit process at least once in the audit experience submitted. Again, it is the judgment of the Panel Reviewer that the applicant has gained the required experience to be able to act in the capacity of an audit team leader following certification. Additionally, those steps that may be performed by an audit manager, or other persons, in ISO 19011 Clause 6 should at least be familiar to the applicant although the steps may not have been directly performed. The Panel Reviewer will have to rely on their judgment that such is the case.

  In some instances, there is an allowable conversion for long audits (those over 20 days). For long audits, each 20 days, or fraction thereof, is considered equivalent to a single audit. For example, an audit of 50 days would be equivalent to two audits of twenty days each, and a third audit of ten days. When using the long audit conversion there must be at least two audits and by the conversion process, the number of equivalent audits must be a minimum of eight. If a conversion is required, this will have been performed and noted by CECAB staff.

- **Auditing experience involves all aspects of environmental auditing as described by ISO 19011, Clauses 6.2 to 6.6 or CSA Z773, Sections 6,7,8 or an acceptable audit process**

  Where the experience has been gained to an audit process that is not one of the predefined choices (the applicant has chosen 'Other' from the Audit Process drop down list) in the on-line audit log, the applicant is required to specify what process has been used. This may be followed up by CECAB staff to ensure that a process consistent with Clause 6 of ISO 19011 and Sections 6 thorough 9 of CSA Z773 has been employed. It is not necessary
for the steps in the alternate audit process to match each step in ISO 19011, however, the intent and requirements of ISO 19011 must be met in the alternate audit process for the audit experience to be considered consistent and acceptable.

2.3.4 CEA(SFM) Specific

- Minimum of eight separate forestry-related environmental audits, of which at least two are Sustainable Forest Management (SFM) Audits. SFM audits are those for which the audit criteria describe an SFM such as CSA Z809, SFI2002:2004, or the FSC Principles and Criteria (and related Regional standards)

As with the CEA audit experience, applicants are required to meet a minimum number of separate and distinct audits. Also, as with the CEA audit experience, there is a process to allow a conversion of long audits (those over 20 days) to audits for the purpose of certification. The requirement for the CEA(SFM) differs from the CEA in that the audits submitted must be forestry-related audits with the additional requirement that at least two of the audits submitted are Sustainable Forestry Management (SFM) audits.

Forestry-related audits may be conducted to the same audit processes (ISO 19011, etc.) as CEA audits. The intent is that an audit process has been used as opposed to some other type of investigation. Forestry-related environmental audits are environmental audits, as defined same manner as for CEA audits above, conducted at forest industry manufacturing facilities (sawmills, pulp mills, OSB plants, etc.) or of forest industry operational infrastructure.

An SFM audit is distinguished by the audit criteria employed in the audit. If the audit criteria describe an SFM, then the audit is an SFM audit. CECAB currently recognizes CSA Z809, the American Forest and Paper Association (AFPA) Sustainable Forestry Initiative (SFI) and the Forest Stewardship Council (FSC) Principles and Criteria (P&C) as audit standards that describe an SFM. The FSC P&C do not in and of themselves provide the requirement for an SFM for the purpose of certification. However, the FSC Regional Standards or the FSC P&C within a specified audit program do constitute an SFM. CECAB maintains a list of acceptable audit standards for SFM and audits submitted which are considered to be SFM audits will have been assessed against the list by the Initial Review.

In summary, a Sustainable Forest Management (SFM) audit means a forest management audit conducted on-site at a woodlands operation that addresses policies, practices, forest conditions, operational procedures and other policy requirements such as those covered by CSA Z809, AFPA SFI or FSC.

- Auditing experience involves all aspects of environmental auditing as described by ISO 19011, 6.2 to 6.6, CSA Z773 Section 6.7,8, or CSA Plus 1133 or an acceptable audit process

The audit processes as described in the CEA section above are also relevant here. CSA Plus 1133 was specifically designed to be used in conjunction with CSA Z809 as the audit standard. Again, the intent is that an audit
process was followed by the applicant and that the audit process is consistent with ISO 19011.

Where the applicant has indicated ‘Other’ under the audit process, this will have been assessed by CECAB staff to ensure that it is consistent. For example, ISO 14011 and CSA Z773 would also be consistent audit processes that would be acceptable.

2.3.5 EMS General (applicable for both EMS(A) and EMS(LA))

- **Minimum of 3 operating organizations or business units audited**
  Each applicant must have auditing experience from at least three different organizations or business units. A separate business unit within the same corporate structure would be established by both the scope of the audit and the management group for whom the audit report is prepared. If the audit scope includes only a single operating or business unit, this would be acceptable. If the audit report was delivered to the management group of the business unit, this would also establish that the audit was for a separate business unit. Applicants are requested to clearly indicate in the audit log if the audit was conducted at an operating or business unit of a larger organization. This requirement will also have been verified during the initial review by CECAB staff.

- **Auditing experience shall include each of the major elements of a complete EMS standard (e.g. ISO 14001 or an acceptable alternative EMS standard)**
  The applicant’s audit experience must demonstrate that they have fulfilled the requirement that each element of an audit standard has been audited by the applicant or the audit team the applicant was a part of at least once within the audit experience submitted for consideration. The applicant will be required to clearly state in their audit log if the individually audited an element of the audit standard or if they participated with their audit team to audit an element of the audit standard.

The audit logs in the EMS Auditor Application have been designed to look for a specific combination of audit criteria and audit activities. That section of the audit log contains two sets of checkboxes, one to indicate which Elements of the Standard were audited by the applicant, and another to indicate in which steps of the audit the applicant personally participated. The two sections, taken together, are used to evaluate whether the applicant has met the requirement.

The Standard Audited must either be ISO 14001 or an acceptable alternative. CECAB defines an EMS audit as an audit for which the audit criteria indicate an Environmental Management System. CECAB considers ISO 14001 to be the de facto standard to which all other audit criteria are evaluated for equivalency. If the applicant submits audit experience to an alternative standard, then this standard will have been subjected to the CECAB Equivalency process completed by CECAB staff, prior to the Panel Review. Over the entire audit experience, each of the checkboxes must have been checked at least once by the applicant in order to meet the audit experience requirements. It is possible that an applicant has submitted audit experience where a number of different audit standards were used, e.g. ISO 14001 and one other acceptable audit criteria. In such a case, it is still the
requirement that all elements of an entire EMS audit criteria have been audited at least once, that is, it is not possible to mix elements of one audit standard with elements of another to meet the requirement. If there are any questions regarding whether or not all elements have been audited, it is acceptable to request additional information, through CECAB staff. It should be noted that it may not be feasible for auditors to have audited every element of the ISO 14001 standard, and instead may have played more of an observing role. This will be noted by the applicant in their audit experience if that is the case.

- **Auditing experience shall involve all aspects of environmental auditing as defined by ISO19011** (refer to references or contact audit leader if logs do not provide enough information)

CECAB considers that an EMS audit consists of two separate components:
1. The audit criteria, which as discussed above, must be an acceptable EMS standard
2. The audit must follow audit activities to be considered an audit. CECAB considers the de facto standard to be ISO 19011. CECAB will also consider audit activities that are an acceptable alternative consistent with ISO 19011. The alternatives are evaluated prior to panel review by CECAB staff to determine acceptability.

The audit log contains a section of checkboxes for the applicant to indicate which audit activities they were involved with. The applicant is also requested to provide, in the box provided, a narrative describing which portions of the audit activities were participated in. Over the entire audit experience submitted, the applicant must have been involved in all audit activities for this grade. If there is not enough information in the audit logs to establish the required audit experience, then a request for additional information will need to be made.

Where the applicant has used audit activities that are consistent with ISO 19011 as determined by the CECAB Equivalency process, this will be noted by CECAB staff and forwarded to the Panel Reviewers

- EMS(A): Auditing Experience shall involve all activities of environmental auditing as described by ISO 19011 6.3 to 6.7
- EMS(LA): Auditing Experience shall involve all activities of environmental auditing as defined by ISO 19011 6.2 to 6.7

### 2.3.6 EMS(A) Specific

- **Minimum of 20 equivalent audit workdays**

The CECAB on-line system requires applicants to enter the number of days that they spent on an audit (both on site and off site). The input fields for days accept decimals, although most applicants will round audit experience off to the nearest half day. If the applicant does input a decimal that is not an increment of half a day, both the Initial Review and the Panel Review should round it to the nearest half day. An equivalent workday of environmental auditing is a minimum of 6 hours, although most applicants will consider it 8 hours. Each audit should be at least one day in length.

The number of on-site days and off-site days is also requested of the applicant. The Panel Reviewer should take note of any audit where the...
number of off-site days far exceeds the number of on-site days, as in
general, the number of on-site days should be greater than, or equal to, the
number of off-site days for each audit. Auditing on-site includes the opening
and closing meetings and the conformance/compliance auditing phase, but
excludes document review, planning, and preparation of the audit report,
even if these functions are performed on the premises of the auditee. This is
in accordance with ISO 19011, Clause 6, and CSA Z773, Clauses 6 and 8.

- Minimum of 4 separate, complete EMS Audits
  For the grade of EMS(A), the applicant must have performed in at least four
  separate and distinct audits. In most cases this is quite clear from the dates
  of the site visit and the number of days on the audit and the verification
  contact information.
  However, in some cases this may not be as clear. CECAB considers an
  audit for which the entire audit activities were followed. In some cases, a
  number of facilities are audited as part of a single audit. Having audited a
  number of facilities does not constitute separate audits.

2.3.7 EMS(LA) Specific

- Minimum of 35 equivalent audit workdays
  As per the directives given in the EMS(A) Specific section above, but with a
  minimum of 35 equivalent audit workdays.

- Minimum of 7 complete EMS Audits, of which a minimum of 3 complete EMS
  audits are as Audit Team Leader/Lead Auditor
  For the grade of EMS(LA), the applicant must have performed in at least
  seven separate and distinct audits. The same provisions as to what
  constitutes an audit as for EMS(A) apply.
  In order to meet the audit experience requirement, an applicant for EMS(LA)
  must have performed at least three EMS audits acting in the role of lead
  auditor. The term is applicable for all situations where the applicant has
  been in the role of Lead Auditor, even if the applicant was the sole auditor on
  the team.
  The applicant indicates their role in the audit in the appropriate
  field on the application.

2.4 Completion of the Checklist

The Panel Reviewer should indicate in the memo field which criteria have not been met.

In addition, the Panel Reviewer should indicate whether the overall audit experience of the
applicant is considered Passed, Failed or Inconclusive (more information is required). By
selecting 'Passed' from the drop-down menu the panel reviewer is indicating that they have
determined that this applicant meets CECAB’s CEA, CEA(SFM), EMS(A) or EMS(LA)
qualification criteria and that this applicant is eligible to move forward in the certification
process. CECAB staff perceives this to be the final decision of the panel reviewer. Any
additional comments that may be made regarding the applicant’s audit experience will not
be addressed by CECAB staff.

By selecting 'Failed' from the drop-down menu, the panel reviewer is indicating that they
have determined that this applicant does not meet CECAB’s CEA, CEA(SFM), EMS(LA) or
EMS(A) qualification criteria. CECAB staff perceives this to be the final decision of the panel reviewer. Any additional comments that may be made regarding the applicant’s audit experience will be given to the Certification Audit Specialist and kept on file.

If the Panel Reviewer feels that additional information solicited from the applicant would provide sufficient information for the requirement to be met, the panel reviewer should select ‘Inconclusive’ from the drop-down menu and in the memo field the panel reviewer should clearly state what supplemental information they would like to request from the applicant or any comments they would like CECAB staff to address before making their final decision. The Panel Reviewer should be explicit in the additional information requested.

If the Panel Reviewer is considering an EMS application, it should be noted that even if after additional information has been obtained, if the audit experience requirements for the grade of EMS(LA) cannot be met, the applicant should be considered for EMS(A). In such cases, the panel reviewer will review the application using the EMS(A) requirements. If such an applicant cannot then meet the audit experience requirements for EMS(A), the applicant fails to obtain either grade and the application should be marked as such by the Panel Reviewer. The Panel Reviewer should also clearly indicate that the application was considered for both EMS(LA) and EMS(A).

Panel Reviewers should review the applications independently, and once a decision has been made of either “Passed” or “Failed”, the two Panel Reviewers should confer before submitting their final evaluation. If a Panel Reviewer has indicated that more Information is needed, this will be addressed by CECAB staff and the Applicant. In turn this information will be provided back to the Panel Reviewers for them to make their final decision of “Passed” or “Failed”. If there is a discrepancy between the two Reviewers which cannot be resolved by the two Reviewers, CECAB staff will identify a third and final Panel Reviewer.