



Netherlands Commission for
Environmental Assessment

EIA Accreditation: what and how?

Environmental assessment building block series
by the NCEA



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Table of contents

1. Introduction into EIA accreditation	2
1.1 Accreditation versus certification versus registration	2
1.2 Overview of EIA accreditation worldwide	3
2. Considerations before designing an accreditation approach.....	4
3. Guidance for designing an accreditation mechanism	5
3.1 Voluntary versus obligatory accreditation.....	5
3.2 Individual versus organisational accreditation	6
3.3 What to accredit?	7
3.4 Where to house the accreditation?.....	7
3.5 How to manage the accreditation arrangements?.....	7
4. Summary of options for accreditation	10
5. References.....	12

Box 1. EIA accreditation in the UK.....	5
Box 2. Accreditation of SEA experts in Macedonia.....	6
Box 3. Expert acknowledgement in Flanders.....	9

This document has been prepared by the staff of the Netherlands Commission for Environmental Assessment (NCEA), in support of EIA system discussions within the Netherlands, and to support NCEAs international capacity development work. The information has been compiled on the basis of interviews with relevant experts in our network, combined with websearches, and document analysis. This document forms part of a series of environmental assessment building block publications that is currently under development. Note that the current version is still a draft.

1. Introduction into EIA accreditation

In all of the countries where the NCEA has been involved there are concerns about the quality of the environmental impact assessments (EIAs) that are produced. This complaint can be heard in countries where EIA is a relatively young instrument, but also in countries where EIA has been operational for many, many years. Regardless of the maturity of an EIA system, it seems necessary that countries invest in mechanisms that ensure a minimum level of quality of EIA practice. Ideally, such mechanisms stimulate performance beyond the minimum, and drive practitioners towards good practice EIA.

If EIA quality is a problem, then an investment in EIA review seems worthwhile. However, there are additional means by which EIA quality can be managed. One such means is the accreditation or certification of the individuals or organisations that undertake key tasks within EIA. Usually EIA accreditation will aim to manage the quality of EIA makers, but there are also examples available where it is the EIA reviewers who are certified. Note that accreditation has not proven to be an “easy fix” for low EIA quality. Certification and accreditation systems require a significant up-front investment and ongoing management costs.

This building block publication gives some examples of accreditation mechanisms for EIA, and sets out a range of considerations that will help a discussion on introducing or improving an accreditation system. Also, this document presents some guidance on how to design and manage an accreditation system. References to more detailed resources on this topic are given. Note that this document will not be covering environmental management and compliance certification schemes, such as the International Standards Organisation (ISO) 14000 series, which are not EIA specific.

1.1 Accreditation versus certification versus registration

The topic of this publication is the professional recognition of individuals or organisations for the quality of their work in EIA. Such professional recognition comes under different terms, with subtle difference in practical application. Accreditation generally refers to some form of formal recognition that an organisation or individual meets a series of set requirements. Certification is based on the same formal recognition, but involves the provision of a written assurance (certificate) by a third party. The distinction is not very meaningful in this publication, since some countries use certification and others accreditation, for what is essentially the same thing. In some country a list or register of recognised EIA experts or consultancies is maintained, by a ministry for Environment, for example. Compared to accreditation or certification, these tend to be more relaxed mechanisms, where requirements for registration are not always elaborated in detail.

1.2 Overview of EIA accreditation worldwide

As far as we are aware, there is no publication that gives an overview of EIA accreditation arrangements worldwide. Neither have we been able to find research that investigates the effectiveness of accreditation in improving EIA quality. This paper is predominantly based on practical experience within the NCEA team, information from our professional networks, as well as interviews with staff involved in accreditation in the UK and Flanders.

In November of 2013, Miguel Coutinho, the president elect of the International Association of Impact Assessment (IAIA) started an online discussion on EIA accreditation on the IAIA connect Forum. This generated a multitude of reactions, from which he compiled the following overview of EIA accreditation systems. The table below lists countries that have a system in place, notes if accreditation is compulsory or voluntary, and whether individuals or companies are accredited.

Country/Jurisdiction	How?	Who?	Observations
Australia	Voluntary		
Belgium (Brussels)	Compulsory	Companies	
Belgium (Flanders)	Compulsory	Individuals	
Belgium (Wallonia)	Compulsory	Companies	
Botswana	Compulsory		
Canada	Voluntary		
Czech Republic	Compulsory		
FYROMacedonia	Compulsory	Individuals	
India	Compulsory		Various development projects
Mozambique	Compulsory		Major projects only
Namibia	Voluntary		
New Zealand	Voluntary		
Nigeria	Compulsory		Major development projects only
South Africa	Voluntary		It will become compulsory after identification of a suitable certification body
UK	Voluntary	Individuals	
USA	Voluntary		
Zambia	Compulsory		Mining projects only

This list is not complete. Professional accreditation also exists in Indonesia and China, for example. However, the table gives an indication of the spread and variation in EIA accreditation worldwide.

2. Considerations before designing an accreditation approach

There are several key considerations to explore thoroughly before moving forward with an EIA accreditation system.

- Investment vs. potential contribution to EIA quality: Invariably, the resources available for EIA are limited. Before considering investment into an accreditation system, it is important to balance the potential contribution that accreditation can make to EIA quality against the investment and management costs of such a system. And, equally important, to compare this investment against investment in other quality control mechanisms, specifically EIA review. Robust review should secure a minimum level of quality. It should secure that substandard EIAs do not proceed through the EIA procedure. The effect of EIA accreditation on EIA quality, on the other hand, is more variable and uncertain. An accredited consultant or consultancy may still deliver a poor quality EIA under unfavourable conditions.
- Accreditation is sensitive to corruption: If accreditation is to have any effect on the quality of EIA practice in a country, it needs to be securely merit-based. If there is a risk that accreditation will be awarded based on financial reward or patronage, then investment in arrangements that ensure transparency and accountability becomes even more important. If corruption is a decisive factor in EIA and project permitting practice in a country, then accreditation may not be opportune.
- Tailor-made EIA requires tailor-made accreditation: Within the environmental sector there are well known accreditation mechanisms such as the ISO 14000 series or environmental auditor certification. Such accreditation relies on standardisation of working processes and/or standardisation of expert knowledge and skills. For accreditation of EIA expertise, the same level of standardisation is not likely to work, since EIAs always need to be tailored to the type of project and location. EIA expertise accreditation should somehow reflect this necessary variety in output. This requires a more qualitative assessment of expertise.
- Accreditation and professional development: Accreditation helps to demarcate a community of EIA professionals. In some countries the accreditation system is also used to encourage exchange of EIA experiences amongst professionals, and to ensure that experts stay up to date on EIA developments. See for example the refresher workshops in Flanders in Box 3, and the IEMA case study publications in Box 1. For this reason, it will be important to involve any national professional association for impact assessment in the development of accreditation, as well as educational institutes that teach EIA.

Box 1. EIA accreditation in the UK

The UK Institute of Environmental Management and Assessment (IEMA) offers two types of accreditation schemes in the field of EIA: accreditation for individual impact assessment professionals, and a quality mark for consultancies that undertake EIAs.

The “EIA Quality Mark” (IEMA, 2014a) is based around a set of EIA Commitments, which organisations registered to the scheme agree to comply with. IEMA operates the EIA Quality Mark and undertakes an independent review of an organisations compliance with its EIA commitments both during the application process and, once it is registered, through an annual review process. The assessment process consist of interviews with the consultancies management and staff as well as reviews of a sample of the EIA reports that they produce. IEMA has dedicated staff working on the Quality Mark, but also brings in independent experts from the field for the assessments. As part of the EIA Quality Mark, registrants commit to work with IEMA to enhance the profile of good quality EIA. This commitment is met through the delivery of presentations, publication of articles and production of relevant case studies¹.

At the individual level, impact assessment professionals can apply for registration in the EIA Practitioner Register (IEMA, 2014b), which has existed since 2002. The register works with 3 levels: associate, registered and principal level. Applications are evaluated on the basis of an individual's practical experience and personal attributes and skills by an panel of experts. EIA Practitioners are required to sign and agree to abide by the Code of Practice. Complaints against registrants are dealt with by a disciplinary committee and instances of malpractice or breaches of the Code of Practice result in the removal of individuals from the register.

Acknowledgement: Special thanks to Josh Fothergill of IEMA for providing access to information on the Quality Mark and Practitioner Registration. However, any misrepresentation of information is the responsibility of the NCEA.

3. Guidance for designing an accreditation mechanism

In this section a number of key design options are set out for a system of accreditation of EIA experts or organisations.

3.1 Voluntary versus obligatory accreditation

Voluntary accreditation is independent of any regulatory requirement. Individuals or organisations choose to acquire accreditation voluntarily. For voluntary accreditation to take off, there must be some sort of market or reputational incentive associated. For example: accredited consultancies are more likely to get contracts. Box 1 describes the voluntary accreditations that the UK Institute for Environmental Management offers. The EIA quality mark, seems

to have market value, since it may be included in tender conditions. Consequently the number of consultancies that have gone through this accreditation is on the rise.

Accreditation can also be embedded in a country's EIA regulation. Often that means that the EIAs submitted to an environmental authority have to be conducted by an accredited party in order to be accepted for processing. EIA reports by experts or consultancies which are not accredited are not submissible.

When accreditation is obligatory, the incentive for accreditation is clear, and many parties are likely to be interested to participate. Government will then have a responsibility to ensure that the accreditation system works (see Box 3 Macedonia). Whereas voluntary accreditation can be initiated and run by the sector (professional associations) without claiming government authority capacities.

There is also an in-between option: which is to make accreditation obligatory for major EIAs only, while EIAs for projects of lesser significance do not require involvement of accredited parties. Also, a country can choose to start with a voluntary system that can evolve into obligatory accreditation over time.

Box 2. Accreditation of SEA experts in Macedonia

In 2009, the Macedonian Ministry for Environment and Physical Planning completed the regulatory framework for strategic environmental assessment (SEA). From then on, SEA was a requirement in planning processes. Similar to its EIA regulation, the Macedonian SEA regulation included the requirement that all SEAs submitted to the Ministry be signed off by a certified SEA expert. The certification system was set out in a separate decree, and required both an oral and a written exam. The decree also instituted an exam committee, and specified fees, etc.

However, in the first years of SEA implementation the certification system was not working as intended. The key problem was that the pool of certified experts was far too small. In the first year, only five certified experts had passed the exams, and some were spreading themselves very thinly across assignments yet still charging a hefty fee. It took several years before the number of experts available could meet demand. By 2012, the number of certified experts was heading towards 30, which meant that there was enough competition to keep everyone on their toes (NCEA, 2012).

3.2 Individual versus organisational accreditation

Some countries accredit individual EIA experts whereas others accredit consultancies (see the table on page 2). In some countries, both types of accreditation exist side-by-side. Accreditation of an organisation for EIA will depend, at least in part, on the expertise of individuals within the organisation. Because individuals can change employers, a consultancy may lose the expertise that warranted their accreditation. This can be counteracted by specifying that the organisation needs to have a certain minimal number of EIA experts in-house. Note that such requirements tend to favour larger consultancies.

Individual EIA expert recognition is often more diversified, with specific level of expertise, or separation into disciplines. See for example the three levels of impact assessment practitioners that the International Association for Impact Assessment has defined (IAIA, 2010), or the EIA expert domains defined in Flanders in Box 3. Because EIAs, especially those concerning bigger projects, are rarely undertaken by a single expert, a diversified individual accreditation system will have to specify specifically what kind of expert involvement is required for what kind of EIA.

3.3 What to accredit?

There is some variation in the basis for accreditation across the EIA accreditation mechanisms we have looked at. The selection of accreditation criteria will depend on the specific nature of EIA practice in the country concerned, but also on what is feasible to assess and monitor. The boxes in the text give some illustration. Individual accreditation criteria may include:

- Education (general level, as well as coverage of specified topics);
- Knowledge of relevant regulation;
- Track record in EIA (often with specifications of the type of experience, and years of experience needed);
- Quality of work (often based on an actual review of EIA work undertaken, but also as can be understood from candidate presentations or interviews).

The organisations accreditation criteria may include:

- EIA -related expertise available within the organisation;
- Facilities available to the organisation (such as laboratory access or equipment);
- Organisations track record in EIA (the organisation may be asked to present a portfolio);
- Quality of work (usually based on actual review of EIA work undertaken).

3.4 Where to house the accreditation?

Key considerations here will be credibility of the body that allocates the accreditation, and the capacity of this body to manage the accreditation system. There are examples of government agencies taking on this responsibility, such as in Macedonia and Flanders. Note that in these cases dedicated staff was organised into an appropriate team and time and resources freed up to undertake the associated tasks.

It may also be an option to house EIA accreditation within an organisation that is experienced in professional recognition. The accreditation of EIA consultancies in India, for example, is managed by the Quality Council of India. This council is an autonomous, non-profit organisation established jointly by the Government of India and industry sector representatives, such as the Associated Chamber of Commerce (QCI - Nabet, 2011). Such an organisation has ample experience in the field of accreditation, and the institutional infrastructure in place to run such a system.

3.5 How to manage the accreditation arrangements?

There are a few point of attention for the setting up, and day-to-day operations of an accreditation mechanisms:

- **Costs of the accreditation:** there will be costs associated with the set-up of an accreditation system, related to the time spent on setting the system up, on consultation, on documenting the arrangements, and resources needed for publication and awareness raising. Then there are ongoing costs, to do with administration, assessments, information provision, etc. It is usual for experts or organisations that want to be accredited to pay a fee for examination or assessment, as well as an annual fee or a fee upon renewal of the accreditation. However, it is not likely that these fees will cover the total costs of the start-up of and accreditation, certainly not at the outset. It is likely that investments will be needed before the accreditation mechanism starts to generate revenue. A detailed analysis of costs and potential revenue should precede any formal arrangements, and agreements made on how investment costs will be financed. Take willingness-to-pay of accreditation candidates into consideration.
- **Financial management:** As noted before, accreditation mechanisms can be sensitive to (suspicions of) corruption. For this reasons a transparent financial administration needs to be kept of the financial flows. It can also be prudent to take measure that limit possibilities of financial mismanagement, such as a ban on cash-payment, or clear separation between parties that accept the payment and those that undertake assessments.
- **Managing the quality:** To ensure that accredited parties continue to deliver good practice EIAs, there should be repercussions when their EIA work falls below par. Accreditation may be revoked if an accredited party that is underperforming does not raise the quality of their EIAs. Feedback on the quality of EIA work can come from the EIA review step in the EIA procedure, but also through a complaints registrar.
- **Mechanisms for appeal:** To ensure credibility of the accreditation, it should be possible to appeal decisions on granting or revoking accreditation. Appeals should be settled by a separate body, that is not directly involved in the day-to-day of the accreditation, and will be perceived as sufficiently independent.

Box 3. Expert acknowledgement in Flanders

Flanders, a subregion of Belgium, has an obligatory system in place for professional recognition of EIA experts. The professional recognition system acknowledges different kinds of experts. First of all, there is accreditation for the EIA co-ordinator, who is expected to head a team working on an EIA. Secondly, experts can be accredited for a range of “domains” that are relevant to EIA, such as water, noise, and landscape. The criteria for acknowledgement are a mix of the following:

- No convictions for violating environmental law;
- Criteria concerning education, including specific topics that should have been addressed in the experts educational programme;
- Number of years of relevant work experience.

At the scoping stage of each EIA a ToR is prepared, which has to be approved by the environmental agency. The ToR includes an overview of the domains relevant for the EIA, for which an acknowledges expert will need to be engaged. The agency can add domains to the ToR.

The environmental agency of the Flanders region is responsible for managing the accreditation system. An expert seeking recognition submits a dossier demonstrating their expertise to the agency. The dossier is judged by agency staff. If needed, a hearing is organised during which the candidate is interviewed. Once granted, the acknowledgement is valid for a lifetime, but will be re-evaluated every 5 years.

Formally the acknowledgement is granted by the permitting department of the Flanders Environmental Agency. This department can also prosecute any experts that violate the conditions of the acknowledgement, or experts that undertake EIA work without the necessary recognition. In addition, the agency can revoke the recognition of experts whose work repeatedly comes up short in the EIA reviews that the agency performs as part of the EIA procedure. Conversely, experts can appeal the agencies decision on EIA accreditation with the Council of State.

The environmental agency regularly organises workshops for experts to update them on recent developments in EIA. These workshop count toward the compulsory 8 hours re-fresher training that each experts has to follow annually to stay current in their field.

Acknowledgement: Special thanks to the permitting department of the Flanders Environmental Agency for providing information on the Flanders experts acknowledgement system. However, any misrepresentation of information is the responsibility of the NCEA.

4. Summary of options for accreditation

Key question to answer at first
<p>1. Will investment in accreditation deliver desired increase in EIA quality? Consider investing in accreditation, as compared against investing in other quality control mechanism, such as EIA review.</p> <p>2. Should the accreditation be voluntary or obligatory? Options include:</p> <ul style="list-style-type: none"> • Voluntary accreditation for all types of EIAs; • Obligatory accreditation for all types of EIAs; • Obligatory accreditation for certain types of EIAs only; • Start with voluntary accreditation and evolve to obligatory accreditation over time.

EIA accreditation: Overview table of options

Component	Sub-components	Design options
<p>Responsibilities regarding EIA accreditation</p>	<p>Managing body</p>	<ul style="list-style-type: none"> • Government agencies <ul style="list-style-type: none"> ○ Department within authority/authority responsible for the environment/permitting ○ Separate body set up for accreditation (Committee, for example) • Professional Association related to sector <ul style="list-style-type: none"> ○ Association for impact assessment ○ Association for environmental sector more generally • Existing accreditation body
<p>Accreditation procedure</p>	<p>Who will be accredited</p>	<p><i>Level at which to accredit:</i></p> <ul style="list-style-type: none"> • Organizational (consultancy) accreditation • Individual expert accreditation • Combination of organizational and individual accreditation <p><i>(If individual level) Types of experts to accredit*:</i></p> <ul style="list-style-type: none"> • Different types of experts are considered for accreditation, according to their role in the EIA process: <ul style="list-style-type: none"> ○ EIA coordinator ○ EIA maker ○ EIA reviewer • Different types of experts are considered for accreditation, according the 'domain' relevant to EIA

	<p style="text-align: center;">Accreditation process</p>	<p><i>Accreditation methods*:</i></p> <ul style="list-style-type: none"> • Review of sample reports • Interviews • Exams • Assessment of application dossier <p><i>Accreditation criteria*:</i></p> <ul style="list-style-type: none"> • Criteria for individual accreditation: <ul style="list-style-type: none"> ○ Education ○ Knowledge of relevant regulation ○ Track record in EIA ○ Quality of work • Criteria for organizational accreditation: <ul style="list-style-type: none"> ○ EIA-related expertise ○ Facilities available to the organization ○ Organizations track record ○ Quality of work <p><i>Outcome of the accreditation process*:</i></p> <ul style="list-style-type: none"> • Inclusion in list/register of EIA experts/consultancies • Certification
<p style="text-align: center;">Quality assurance in accreditation</p>	<p style="text-align: center;">Requirements for ensuring quality in the long-term</p>	<p><i>Duration of acknowledgement:</i></p> <ul style="list-style-type: none"> • Life-time accreditation • Accreditation needs to be renewed regularly <p><i>Mechanisms for sustaining quality of accredited parties after acknowledgement*:</i></p> <ul style="list-style-type: none"> • Use of feedback from EIA review step in EIA procedure on a case-by-case basis • Complaints register • Assessment combined with regular renewal of accreditation <p><i>Revoking accreditation:</i></p> <ul style="list-style-type: none"> • Revoke accreditation after poor performance • Offer feedback and a chance to improve, before revoking accreditation
	<p style="text-align: center;">Right to appeal accreditation decision</p>	<p><i>possibilities to appeal decision to grant/voke accreditation:</i></p> <ul style="list-style-type: none"> • Set up a dedicated mechanism for accreditation appeal • Make use of existing mechanisms (administrative appeal, for example)

* = Several options can be selected

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