Stack Emissions Monitoring – Who can you trust?

As an operator with a permit from the Environment Agency under the Environmental Permitting Regulations (EPR), you will be aware that it requires you to ensure the monitoring of process emissions is performed correctly to ensure your emissions are within the permitted limits.

Where third party organisations are used to conduct this monitoring, it is an Environment Agency requirement that the organisation holds accreditation to ISO/IEC 17025 for MCERTS for the monitoring being performed.

What does MCERTS and ISO/IEC 17025 Accreditation mean?

Many organisations provide stack emissions monitoring services. Selecting a company accredited by the United Kingdom Accreditation Service (UKAS) to ISO/IEC 17025:2005 for MCERTS is the best way to ensure you use a competent organisation that will both understand and meet not only your requirements but also those of the Environment Agency.

UKAS, on behalf of the Environment Agency, assesses and accredits organisations to the Agency’s MCERTS (monitoring certification scheme) performance standard. UKAS accreditation to ISO/IEC 17025 for MCERTS is a mandatory requirement for any organisation performing monitoring of a Part A1 site.

Accreditation to ISO/IEC 17025 for MCERTS provides an independent and authoritative declaration that the organisation carrying out the emissions monitoring has the people, facilities, equipment, technical expertise, management systems and track record to undertake the activity professionally and competently.

If a stack emissions monitoring organisation who is accredited to ISO/IEC 17025 for MCERTS fails to meet these standards, then UKAS can impose sanctions on that organisation. Sanctions include; additional assessment, partial or total suspension or in the most severe cases a total withdrawal of accreditation.

Details of any sanction imposed on stack emissions monitoring organisations can be found on their accreditation schedules at www.ukas.com. This information stays on the accreditation schedule for two years from date of clearance of the sanction.

For further information visit www.ukas.com and www.gov.uk/government/collections/monitoring-emissions-to-air-land-and-water-mcerts
The Accreditation Process

UKAS currently accredits about 30 stack emissions monitoring organisations to ISO/IEC 17025 for MCERTS.

Accreditation is a rigorous and ongoing assessment of stack emissions monitoring to establish that:
- The organisation is impartial
- The organisation employs technically competent staff
- The organisation uses technically suitable sampling methods
- The organisation has the appropriate resources, equipment and facilities
- The organisation meets the required standard.

Technical Competence

The organisation must demonstrate that individuals carrying out emissions monitoring are technically competent to do so and that methods and equipment are valid and fit for purpose. This includes:
- Staff holding all relevant MCERTS qualifications
- Robust internal training
- Routine competence monitoring
- Regular technical internal auditing by qualified auditors
- Regular participation in recognised proficiency testing schemes
- Equipment calibrated with traceable standards and meets MCERTS requirements
- Verification and demonstration of ability to perform methods to National, European, International and Environment Agency specified standards.

 Organisation and Management

The organisation must demonstrate that:
- It has implemented processes for working safely within the guidelines of the health and safety at work act, working at heights regulations and specific MCERTS requirements
- It has a process to ensure that customer requirements are fully understood, work is adequately resourced and any deviations to the work are immediately brought to the attention of the customer
- It has a complaints process (with referral to UKAS if required)
- It has robust procedures to ensure that it routinely audits its own work that any areas of concern are investigated and dealt with in a timely and appropriate manner.
ISO 9001 Certification does not ensure technical competence and validity

ISO 9001 is the generic standard for quality management systems applicable to all organisations irrespective of type, size, product or service provided. It can be applicable to organisations that provide sampling and testing but cannot be interpreted to mean that an organisation has demonstrated their technical competence and ability to produce accurate and valid results. This is because with certification to ISO 9001 the emphasis is on establishing an organisation’s compliance with requirements for a quality management system. It does not contain technical requirements for personnel and operations, in other words you do not have the assurance for technical competence and the validity of their data.

Independence, Impartiality and Integrity

The organisation must demonstrate that:
- All emissions monitoring work is carried out independently and impartially
- Staff are free from undue financial, commercial or other pressures that may adversely affect the quality of work.
What are the risks of using a stack emissions monitoring organisation that is not accredited to ISO/IEC 17025 for MCERTS?

- Inexperienced staff – competence is built on qualifications, knowledge and experience
- Insufficient resource leading to inadequate and incomplete monitoring work and possibility of incorrect test results being reported
- Regulator refusal or query of reports
- A lack of impartiality
- No comeback (no formal complaints procedure, no accountability to UKAS or the competent authority)
- Lack of due diligence/exposure to future claims
- Use of inappropriate sampling and analysis equipment.

How do I know what scope an organisation is accredited for?

All organisations accredited to ISO/IEC 17025 for MCERTS are listed on the UKAS website and can be searched by test parameter or method. An organisation is only accredited for the tests listed on their schedule. These schedules clearly identify the parts of an organisations accreditation that is relevant to the MCERTS scheme. Tests meeting the requirements of MCERTS are mandatory when carrying out monitoring work on processes regulated by the Environment Agency.

If a sanction has been imposed on a stack emissions monitoring organisation this will appear in a separate table at the end of the accreditation schedule, sanction details will remain on the schedules for two years.

Look for the UKAS symbol

Make an informed choice and have confidence in your suppliers by looking for the UKAS and MCERTS symbols. Only an organisation accredited to ISO/IEC 17025 for MCERTS is permitted to display both the MCERTS symbol and the UKAS testing symbol, one of the National Accreditation symbols.

A full list of UKAS-accredited stack emissions organisations can be found at [https://www.ukas.com/search-accredited-organisations/](https://www.ukas.com/search-accredited-organisations/)

Further information can be obtained from the Environment Agency, DEFRA Environmental Protection and UKAS website.

Alternatively contact UKAS Corporate Communications:
Tel: +44 (0) 1784 429000 Email: info@ukas.com

For further information visit www.ukas.com and www.mcerts.net