INTERNATIONAL ACCREDITATION SERVICE®

August 5, 2023

TO: **IAS – PRODUCT CERTIFICATION AGENCIES AND OTHER INTERESTED PARTIES.**

SUBJECT: Proposed Revisions to the Accreditation Criteria for Product Certification Agencies, AC370-202310-R0 (KE/DM)

Hearing Information:
IAS Accreditation Committee
Wednesday, October 4, 2023
8:30 am (Pacific Time Zone)
WebEx Meeting – Refer to IAS website for details.

Dear Madam or Sir:

Proposed Revisions to the Accreditation Criteria for Product Certification Agencies, (AC370) has been placed on the agenda for committee consideration at the above-noted meeting.

Proposed changes include:

1. Line No. 49: Section 1.2.10: Added reference to MD25.
2. Line No. 98 to 100: Note 2 and 3 to Section 5.1: Added to give clarity to “Minimal use”.
3. Line No. 112 to 119: Section 5.2.2.1 and 5.2.2.2: Section 5.2.2.1 was revised to make it clear that the CAB needs qualified personnel to do the evaluation of non-accredited labs and inspection agencies. And Section 5.2.2.2 requires the CAB to have procedures and keep the records of the monitoring of labs and inspection agencies.
4. Line No. 151: Editorial change to match the wording in ISO/IEC 17065.
5. Line No. 156 to 166: Section 5.7: States the requirement to follow MD25.
6. Line No. 167 to 177: Section 5.8: Added new section that covers IAF Resolution 2018-13.
7. Line No. 182: Section 6: Remove the ICC reference.
8. Line No. 198 to 199: Annex A: Added BRCGS and IFS to the list of schemes.

You are cordially invited to submit written comments, or to attend the WebEx committee hearing and present verbal comments. Written comments will be forwarded to the

committee, **prior to the hearing**, if received by September 4, 2023. For your convenience, a comment form is provided. The link can be found on the Accreditation Committee meeting page on the IAS website, www.iasonline.org. Comments must be emailed to iasinfo@iasonline.org.

Parties interested in proposed revised criteria may deliver written communications and submissions regarding such proposed criteria to IAS within approximately 30 days of posting of the public notice on the IAS website. The committee shall be informed of all pertinent written communications received by IAS. Any relevant communication and changes to a criteria arising from the written communication/submission shall be posted to the IAS website prior to the meeting.

Participants at the accreditation committee meetings shall have the opportunity to speak on the proposed criteria to provide information to the committee. Committee meetings are generally held by electronic means. Participants are responsible to ensure access to appropriate computer equipment, software, and internet connectivity to ensure effective participation during the meeting.

Your cooperation is requested in forwarding to IAS, as noted above, all material directed to the committee. Prior to the hearing, parties interested in the deliberations of the committee should refrain from communicating, whether in writing or verbally, with committee members regarding agenda items. The committee reserves the right to refuse communications that do not comply with this request.

If you have any questions, please contact IAS at 562-364-8201. You may also reach us by e-mail at iasinfo@iasonline.org.

Yours very truly,

Raj Nathan
President

Enclosures: Proposed Revised AC370

cc: Accreditation Committee

INTERNATIONAL ACCREDITATION SERVICE®

PROPOSED REVISIONS TO THE ACCREDITATION CRITERIA FOR PRODUCT CERTIFICATION AGENCIES

AC370

Proposed October 4, 2023

PREFACE

The attached accreditation criteria have been proposed to provide all interested parties with an opportunity to comment. These criteria may be further revised as needed. The criteria are developed and adopted following public hearings conducted by the International Accreditation Service, Inc. (IAS), Accreditation Committee and are effective on the first of the month following approval by the Accreditation Committee, but no earlier than 30 days following the approval.

ACCREDITATION CRITERIA FOR PRODUCT CERTIFICATION AGENCIES

1. INTRODUCTION

1.1. **Scope**: These criteria set forth the requirements for obtaining and maintaining International Accreditation Service, Inc. (IAS), Product Certification Agency accreditation. These criteria supplement the IAS Rules of Procedure for Product Certification Agency Accreditation.

1.2. **Normative and Reference Documents**: Publications listed below refer to current editions (unless otherwise stated).

1.2.1. ISO/IEC Standard 17065, Conformity assessment – Requirements for bodies certifying products, processes and services.

1.2.2. ISO/IEC Standard 17067, Conformity assessment – Fundamentals of product certification and guidelines for product certification schemes.

1.2.3. ISO/IEC Standard 17020, Conformity assessment – Requirements for the operation of various types of bodies performing inspection.

1.2.4. ISO/IEC Standard 17021-1, Conformity assessment – Requirements for bodies providing auditing and certification of management systems – Part 1: Requirements.

1.2.5. ISO/IEC Standard 17025, General requirements for the competence of testing and calibration laboratories.

1.2.6. ISO/IEC Standard 17000, Conformity assessment – Vocabulary and general principles.

1.2.7. ISO/IEC Standard 17011, Conformity assessment – General requirements for accreditation bodies accrediting conformity assessment bodies.

1.2.8. IAF MD 4: IAD Mandatory Document for the use of Information and Communication Technology (ICT) for Auditing/Assessment Purposes.

1.2.9. IAF MD 12: Accreditation Assessment of Conformity Assessment Bodies with Activities in Multiple Countries.

~~1.2.9.~~1.2.10. IAF MD 25: Criteria for Evaluation of Conformity Assessment Schemes

~~1.2.10.~~1.2.11. IAF ML 2: General Principles on the Use of the IAF MLA Mark.

~~1.2.11.~~1.2.12. APAC TEC4-001 Guidance on Description of Scope of Accreditation – Product Ver 1.0 (20190101)

~~1.2.12.~~1.2.13. APAC TEC4-002 Guidance on Application of ISO-IEC 17065 Organic Certification Ver 1.0 (20190101)

2. DEFINITIONS

2.1. Applicable definitions of ISO/IEC Standard 17000 series apply.

2.2. Pilot project: A certification project processed by the Certification Agency to provide objective evidence of their ability to meet requirements of ISO/IEC 17065 and this accreditation criteria.

3. ELIGIBILITY

Accreditation services are available to a third-party certification agency that:

3.1. Certify products, processes or services,

3.2. Operates, or maintains a subcontract agreement with, a testing laboratory and inspection agency, that meet the requirements of ISO/IEC Standard 17065, Sections 6.2.2, External resources (outsourcing),

3.3. If the certification agency requires accreditation prior to issuing a certification, the certification agency shall show compliance to ISO/IEC 17065 by means of a pilot project during the assessment.

4. REQUIRED BASIC INFORMATION

4.1. Certification agencies shall demonstrate compliance with the following requirements:

4.1.1. ISO/IEC Standard 17065, Conformity assessment – Requirements for bodies certifying products, processes and services;

4.1.2. IAS Rules of Procedure for Product Certification Agency Accreditation;

4.1.3. Scheme requirements under which the certification is granted.

4.2. Certification programs for processes and services shall have requirements for determining continued compliance, that include assessment of the management system and the actual process or service, at least once per year.

5. ADDITIONAL INFORMATION (AS APPLICABLE)

5.1. When the certification system used as the basis for a certification activity requires surveillance at the point of manufacturing or assembly, the certification agency shall have requirements that every manufacturing or assembly plant producing certified products be visited to perform surveillance activities for certified products. In the absence of a generally recognized minimum surveillance frequency, the certification agency shall require that each manufacturing or assembly location authorized to produce the certified product be subject to at least one surveillance activity each calendar year.

Note:

1. Regardless of the surveillance techniques used, the content of the surveillance and what is reviewed during the surveillance will be the same. Surveillance techniques, include, but are not limited to:
    - Announced (planned) onsite audits
    - Remote audits
    - Unannounced visits

- A combination of the above

2. It is recommended that onsite surveillance be performed as the primary technique. Minimal use of remote surveillance is ~~recommended~~ allowed. Minimal means the majority of the surveillances are not remote. Use of remote surveillance shall be justified.
3. As a minimum t~~T~~hings to consider during surveillance:
    - Material traceability
    - Inspection and quality control test and measurement equipment calibration
    - Manufacturer's management system, where required by the scheme.
    - Assessment of production process

5.2. Inspection agencies and testing laboratories used as part of the certification process shall meet one of the following criteria:

5.2.1. Accreditation by IAS, or by another signatory to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement (MRA); or

5.2.2. Comply with applicable requirements of ISO/IEC 17020 and/or ISO/IEC 17025, determined through assessment of the inspection agency and/or testing laboratory by qualified certification agency personnel.

5.2.2.1. In addition to the requirements given in ISO/IEC 17020 and/or ISO/IEC 17025, evidence of compliance shall include the qualifications of certification agency personnel conducting the ~~assessment~~ evaluation, and a system for determining continued compliance that includes periodic assessments, review of reports, and corrective action reports.

~~5.2.2.~~5.2.2.2. Product certification agencies shall have procedures and retain records related to monitoring the performance of testing and inspection agencies, and of compliance of reports to all requirements of the certification scheme.

5.3. Product certification agencies shall comply with regulatory requirements of Authority Having Jurisdiction (AHJ) or other regulatory entities, including specific compliance requirements for qualification, licensing, etc., of personnel and operation of product certification body.

5.4. **Witnessing Inspection Activities**: When the certification scheme used as the basis for a certification activity requires the onsite evaluation of the production process or management system, IAS will periodically witness actual onsite inspections by each accredited certification agency. The selection of location and scope for witness activity shall be made by IAS, in consultation with the certification agency, based on various factors – risk, complexity, personnel changes, technology utilized, etc. Where possible, the full scope of accreditation will be reviewed over a full accreditation cycle.

5.5. **Witness Testing**: All witness testing activities conducted at a manufacturer's facility shall be witnessed by technically competent certification agency staff who are trained not only in the test being witnessed, but in the appropriate sections of ISO/IEC Standard 17025. If the certification scheme to which the product is to be certified contains specific requirements or limitations pertaining to witness testing, the requirements of the certification scheme shall also apply. Appropriate measures shall be taken for long-term testing or sample collection, where constant witnessing is not feasible, to ensure tampering of the sample or testing equipment does not take place.

5.6. **Use of Manufacturer's Data**: If the certification scheme to which the product is to be certified contains specific requirements or limitations pertaining to the use of manufacturer's data, the requirements of the certification scheme shall also apply.

If a certification agency plans to use test data generated and submitted by a manufacturer that is not part of witness testing, the certification agency shall have a program in place to ensure validity and independence of the test data. The certification agency shall consider one or more of the following for such a program, and shall have justification for those it chooses not to utilize:

5.6.1. Auditing, including unannounced random visits to the manufacturer's laboratory, to ensure applicable~~key~~ requirements of ISO/IEC Standard 17025 are satisfied;

5.6.2. Performing random duplicate analyses;

5.6.3. Having the manufacturer's laboratory participate in proficiency testing programs, where available, for applicable test method;

5.6.4. Technical review of the raw test data rather than acceptance of just the result.

5.7. Conformity Assessment Schemes:~~Product Certification Schemes:~~

5.7.1. All conformity assessment schemes shall ~~be evaluated per~~ comply with IAF MD25 unless exempt. Exempt schemes are:

5.7.1.1. Schemes included or invoked by legislation/regulation, and/or

5.7.1.2. Developed by national, regional or international standardization bodies.

5.7.2. ~~There are national and international conformity assessment schemes~~certification ~~schemes that conformity assessment bodies (CABs) use to meet national and international requirements.~~ Annex A lists a few of the schemes that are accepted by IAS. These are considered third-party schemes. ~~The third-party schemes that IAS accepts and accredits CABs to are listed in Annex A.~~ Annex A may be revised periodically as an editorial revision to this criteria.

5.8. Non-Accredited Product Certification where the CAB is accredited for the same scope (IAF Resolution 2018-13):

Resolution 2018-13 states: Non-Accredited Product Certification where the CAB is accredited for the same scope - The General Assembly acting on the recommendation of the Technical Committee resolved that IAF Accreditation Body members shall have legally enforceable arrangements with their accredited CABs for product certification that prevents the CAB from issuing non-accredited product certification in scopes for which they are accredited.

~~5.7.~~ Note: If there is an exception to the above, the CAB must justify the exception to IAS, and if accepted by IAS, the certification is still considered accredited.

6. LINKS TO ADDITIONAL REFERENCES

6.1. Asia Pacific Accreditation Cooperation –http://www.apac-accreditation.org

6.2. IAS – www.iasonline.org

~~6.3. International Code Council – www.iccsafe.org~~

~~6.4.~~6.3. International Accreditation Forum – www.iaf.nu

~~6.5.~~6.4. International Laboratory Accreditation Cooperation – www.ilac.org

These criteria were previously issued May 2007, April 2008, October 2009, October 2011, June 2013, February 2014, February 2015, April 2017 September 27, 2018 and Editorially revised January 22, 2019 and December 2020.

Annex A

Product Certification Schemes

A.1 CARB ATCM – https://www.arb.ca.gov/toxics/compwood/compwood.htm

A.2 EPA Energy Star – https://www.energystar.gov/

A.3 EPA Formaldehyde – https://www.epa.gov/formaldehyde

A.4 EPA WaterSense – https://www3.epa.gov/watersense/

A.5. GLOBALG.A.P – https://www.globalgap.org/uk_en/

A.6 BRC Global Standards (BRCGS) – https://www.brcgs.com/

A.6 International Featured Standards (IFS) – https://www.ifs-certification.com/index.php/en/