

MEMO

TO: IAS Accreditation Committee

FROM: Raj Nathan, IAS President

DATE: September 27, 2023

SUBJECT: Proposed Revisions to the Accreditation Criteria for Product Certification Agencies, (AC370).

As required by Clause 4.2.2 of the IAS Rules of Procedure – Accreditation Committee and Accreditation Committee Meeting (“Rules”), proposed revisions to AC370 were posted on the IAS website on August 5, 2023 for public review and comments. Clause 4.2.3 of the Rules allows interested parties to deliver written comments to IAS within approximately 30 days of such posting. IAS staff is required to inform the committee of all pertinent written communications received by IAS regarding the proposed criteria.

Since the posting of the Criteria, IAS received the following feedback from Interested Parties and Applicants on the proposed criteria:

Line/Section	Proposed Change	Justification for Change
Lines 98-100 Section 5.1 Note 2	Do not include proposed changes	The documentation required during a remote audit is sufficient to provide validation that the certified products are in compliance. Requiring the majority of surveillances to be done onsite is too burdensome for both the PCA and the manufacturer.
Lines 112-119 Sect. 5.2.2.2	Do not include proposed changes	This is IAS's job to monitor ISO-17025 labs and should not be the responsibility of a PCA.
Lines 98-100 Section 5.1 Note 2	Minimal means 1/3 of the surveillances are not remote.	Current worldwide issues (Covid) have proven that onsite surveillances are getting difficult. Add in the fact that the State Department has been adding countries to the list of unsafe countries for Americans to travel to. Requiring more than half of the surveillances to be onsite may not be possible.

These inputs were provided by two individuals during the leadup to the this committee meeting. IAS staff has reviewed this comment and intends to make the recommendation during the committee meeting on October 4, 2023.

Should IAS receive further comments between now and the committee hearing, those shall be appropriately forwarded to the committee. As always, interested parties may also participate at the committee meeting, and shall have the opportunity to speak on the proposed criteria.

End