October 23, 2020

TO: IAS- PRODUCT CERTIFICATION AGENCIES AND OTHER INTERESTED PARTIES.

SUBJECT: Proposed Revisions to the Accreditation Criteria for Product Certification Agencies, AC370-202012-R0 (DM)

Hearing Information:
IAS Accreditation Committee
Monday, December 14, 2020
8:30 a.m. (Pacific Standard Time)
WebEx Meeting – Refer to IAS website for details.

Dear Madam or Sir:

Proposed Revisions to the Accreditation Criteria for Product Certification Agencies, (AC 370) has been placed on the agenda for committee consideration at the above-noted meeting.

Proposed changes include:

1. Change the mandatory language from “must” to “shall”.
2. Add three documents to the Normative and Reference Document section of the criteria.
   a. IAF MD 4: IAD Mandatory Document for the use of Information and Communication Technology (ICT) for Auditing/Assessment Purposes.
   b. APAC TEC4-001 Guidance on Description of Scope of Accreditation – Product Ver 1.0 (20190101)
   c. APAC TEC4-002 Guidance on Application of ISO-IEC 17065 Organic Certification Ver 1.0 (20190101)
3. GlobalG.A.P. General Regulations is being removed from the Normative and Reference Document section. Since there are many schemes, and most of them private scheme, it would be impossible to name them all. Therefore, we are removing schemes from the criteria.
4. Add clarity to Section 5.1 by adding to the Notes for this section.
5. Editorial changes in Section 5.2.2
6. Remove the list of schemes from Section 6.
7. Revision to reflect merger of APLAC and PAC to APAC in Section 6.
8. All modifications to the criteria are presented in attached draft

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 November 25, 2020. 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 may be postal mailed to the address above or emailed to iasinfo@iasonline.org.

Any written material submitted for committee consideration will be available for public distribution as set forth in the Rules of Procedure for Accreditation Committee Meetings found on the IAS website. Since this is a web meeting, comments for public distribution will be placed on the IAS website prior to 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
PROPOSED REVISIONS TO THE ACCREDITATION CRITERIA FOR PRODUCT CERTIFICATION AGENCIES

AC370

Proposed December 14, 2020

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.
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.


1.2.3. 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 MD12: Accreditation Assessment of Conformity Assessment Bodies with Activities in Multiple Countries.

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

1.2.11. GLOBALG.A.P. General Regulations.

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

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

2. DEFINITIONS

Applicable definitions of ISO/IEC Standard 17000 series apply.

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. Has operated and provided certification services for at least six months in accordance with ISO/IEC 17065 and completed a minimum of one certification per major category of certification, including completion of the decision-making process and issuance of certificate.

4. REQUIRED BASIC INFORMATION

4.1. Certification agencies must 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 must 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 must 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.

3. Things 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 must 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 as applicable, determined through assessment of the inspection agency and/or testing laboratory by qualified certification agency personnel. In addition to the requirements given in ISO/IEC 17020 and/or ISO/IEC 17025, evidence of compliance shall include the qualifications of personnel conducting the assessment, and a system for determining continued compliance that includes periodic onsite assessments, review of assessment reports, and corrective action reports.

5.3. Product certification agencies must 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 must 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 must 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 **must** 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 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.

6. **LINKS TO ADDITIONAL REFERENCES**

6.1. Asia Pacific Laboratory Accreditation Cooperation – www.aplac.org www.apac-accreditation.org
6.2. CARB ATCM – https://www.arb.ca.gov/toxics/compwood/compwood.htm
6.4. EPA Formaldehyde – https://www.epa.gov/formaldehyde
6.5.6.2. EPA WaterSense – https://www3.epa.gov/watersense/
6.6.3. IAS – www.iasonline.org
6.8.6.5. International Accreditation Forum – www.iaf.nu
6.9.6.6. International Laboratory Accreditation Cooperation – www.ilac.org
6.11. GLOBALG.A.P – https://www.globalgap.org/uk_en/

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