



INTERNATIONAL CONFEDERATION OF INSPECTION AND CERTIFICATION ORGANISATIONS

## COMMENTS

**TO: The EA General Assembly**

### **EA Cross-Frontier Policy**

The criteria for cross-border accreditation are essential to conformity assessment bodies. Although most of the principles may be accepted, the conditions under which multi-site CABs with premises in foreign countries could for example carry out accreditation of all sites by one single AB has not been clarified. In this respect, CEOC International is disappointed to note that the latest draft EA cross-Frontier Policy Document does not take account of its previous comments sent out in October 2006.

The rules for subcontracting, initial assessments, surveillance, reassessment, sampling of premises, on-site assessment etc. are provided for in ISO/IEC 17011. These rules have to be applied also in the case of cross border accreditations. We would like to recommend ensuring that the EA Cross-frontier policy is consistent with ISO/IEC 17011 (e.g. EA paragraph 1.3 against clause 4.3.3 of ISO/IEC 17011 or clause 7.4.2 d) of ISO/IEC 17011 and EA paragraph 2.5 against clause 4.4 of ISO/IEC 17011).

European CABs have to compete with CABs from outside Europe. We therefore feel that The EA requirements for cross-frontier accreditation should not be more restrictive than the IAF/ILAC policies so as to avoid disadvantaging (e.g. costly and bureaucratic subcontracting) European CABs.

We therefore recommend to base the EA Cross Frontier Policy on the following cornerstones:

- (1) EA ABs offer and provide accreditation without proactive competition with other EA ABs.
- (2) EA ABs encourage CABs to use the local AB.
- (3) EA ABs propose multi-site CABs with premises in foreign countries to accept subcontracting of the assessments to the local EA ABs.
- (4) EA ABs provide accreditation to a foreign CAB or assessments of foreign premises of a CAB in cases the CAB refuses to use the local EA AB or to accept subcontracting of the assessment to the local EA AB unless an EA AB has limited its activities in its public available policies and rules to a defined area (see clauses 4.3.3 and 7.1.2 j) of ISO/IEC 17011) and the objects of accreditation (CABs/CAB premises) are outside this area.

(5) For subcontracting of assessments to foreign ABs and Cross Frontier Accreditations or assessments the relevant requirements of ISO/IEC 17011 apply.

Practically we would recommend again amending the text in paragraph 2.5as follows:

*In the exceptional case where the CAB refuses to use the local AB or to accept subcontracting of the assessment to the local AB the foreign AB shall provide the assessment and accreditation*  
~~*foreign AB is unable to sub-contract the assessment to the local AB, the foreign AB shall then take this into account in deciding whether it is able to provide or continue accreditation and when determining the effort required to undertake any assessment. The foreign AB shall inform the local AB and the EA MAC Secretariat of the reason why it has not been able to use the local AB and seek from the local AB any relevant feedback about the CAB concerned with the accreditation.*~~

CEOC International, May 2007.