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EA policy to speak with “One Voice”

PURPOSE

This document sets out the general policy for EA to speak with “One Voice”

Authorship

The publication has been prepared by the EA Horizontal Harmonisation Committee

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The text may be translated into other languages as required. The English language version remains the definitive version.

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1 INTRODUCTION

From October 2015 on a project team of the European co-operation for Accreditation (EA) developed a strategy for the development of EA for the years from 2017 to 2025. This “EA Strategy 2025” was approved by the General Assembly (GA) of EA during its meeting held in Borås, Sweden, in November 2016. In May 2017 the GA also approved the corresponding implementation plan for implementing the strategy.

Among other results the EA Strategy 2025 identified three strategic objectives, the first of which reads “Good governance to deliver consistent and sustainable results”. In parallel to this the strategy established the “EA-core values” to support the implementation of the strategy and to enable the whole organization to speak with “one voice”.

This document was developed by a task-force-group (TFG) of the EA Horizontal Harmonization Committee (HHC) and discussed and endorsed by the HHC with the aim of providing a contribution to reach the concept of “one voice”. It is intended to give policies and guidelines on how this concept should be understood and how it can be realized in specific areas. It has been approved by the GA and is understood to be a policy to be followed by the HHC and the other technical committees and not a detailed procedure as laid down in other EA documents.

2 WHAT WE UNDERSTAND AS THE “ONE VOICE”:

The EA Strategy 2025 together with its implementation plan, only gives very limited information on how the “One Voice-Concept” should be understood. It is linked to the first strategic objective “Good governance to deliver consistent and sustainable results” and has been included in the implementation plan as action no. 1.0 “Implement the EA core values in order to reach the ‘one voice’”. This action is divided into two sub-actions: 1.0.1, which is aimed at reaching a common understanding of the core values included in para 7 of the EA-strategy 2025 on all levels of the organization, and 1.0.2 which is the subject of this document.

Sub-action 1.0.2 requires to

- a) Develop a mechanism to identify, analyze and manage situations where the same activity is accredited under different level 3 and 4 standards by different EA members
- b) including the identification of the preferred standard for that activity.

The concept of one voice is not only limited to usage of the same level 3 and 4 standards but could (and should) also be applied to various different levels of the work of EA and its members. It ranges from sharing the same core values on the very top level to answering detailed interpretational questions from our customers and stakeholders in a uniform way. It might also include comparable processes of national accreditation bodies (NAB) when processing applications, assessing conformity assessment bodies (CAB) and granting accreditation. It thus includes activities such as comparison of NAB processes within the framework of a benchmarking project as well as establishment of FAQ (frequently asked questions) lists by the various technical committees (TCs) and the HHC.

Nevertheless the expectation to reach “one voice” of all members of EA in all areas of accreditation may be very difficult to achieve and is perhaps unnecessary, not cost-benefit advantageous, or with low risk of practical consequences, and might even be harmful for the efficient development of a single NAB having to react and/or adapt to specific challenges or for the introduction of innovations in NAB’s operations.

Taking all this into account this document understands the principle of “one voice” as being applicable to various levels of the work of EA and its members but being limited to areas and cases in which harmonization of positions, processes and interpretations of NABs delivers an advantage to the whole membership organization of EA and its stakeholders and especially helps to avoid situations of unbalanced competition between CABs in Europe and/or other EA member countries. Harmonization of usage of level 3 and 4 standards is a vital need of EA in this context.

This document therefore establishes a policy and a mechanism to reach usage of the same level 3 and 4 standards for the same activities by NABs.

3 GENERAL POLICY TO REACH THE “ONE VOICE”

As a general policy to reach the one voice principle of EA and its members it is stipulated that, whenever a situation arises in which different level 3 or 4 standards are used or could be used by NABs for the same activity, it should first be decided whether this case constitutes a case for application of the one voice principle. Only comparable situations should be analyzed for the preferred standard. Significant differences in the usage of conformity assessment activities might lead to different and incomparable situations thus making the choice of a preferred standard simply impossible or inadequate. These cases should not be subject to the search for a preferred standard and should be considered as being incomparable. Work to identify a preferred standard in these cases should be stopped at an early stage of the process and existing differences in the corresponding approaches should be accepted as being justified.

Where the case constitutes a case for application of the one voice principle the search for a preferred standard is started the necessary analysis and the next steps taken should be done as much as possible by technical experts and its results should be technically justified as much as possible. It is recognized that the decision on the choice of a preferred standard may require stakeholder consultation as this may have influence the need to change existing practices of some NABs and/or CABs. Nevertheless the principle objective in all cases which constitute a case for application of the one voice principle should be to identify a preferred standard and to foster the usage of this standard as the single standard for accreditation in the corresponding area.

NOTE: In this document the phrase “usage of different level 3 and 4 standards” is intended to also cover the case where usage of a particular level 4 standard in combination with a level 3 standard is an alternative to using this level 3 standard only.

4 WHICH AREAS ARE AFFECTED:

The need to look for a preferred standard might arise in different areas of application of accreditation, and the tools needed (or already available) for addressing these situations might be different for these different areas.

Three different areas of accreditation have been identified and presented in this paper which need to be addressed. The differentiation of these areas might be considered to be artificial or not selective enough but should serve the possibility to identify necessary areas of further action and to establish a clear relationship between the areas identified and the tools which are already available to EA and/or which should be used in the future to manage these areas.

Areas identified in this respect are:

- 1) area of scheme-owners establishing and providing their scheme for usage by CABs in the voluntary area, e.g. in the food sector
- 2) regulated area especially with regard to the regulations/directives of the EU in the framework of the so called “new legislative framework” but also with regard to other – even national – legislation
- 3) other areas in the voluntary field of accreditation, e.g. conformity assessment activities of CABs using publicly available standards and/or self-developed schemes/methods

These three areas are characterized by very different situations with respect to usage of different level 3 and 4 standards for the same activity. While in area 1) the level 3 and 4 standards to be used is normally laid down in the scheme itself, this may not be the case in area 2). In area 3) it is possible that different level 3 and 4 standards are used by different NABs for the same activity which could result in an unbalanced competition evolving between economies, providing unfair advantages to some and disadvantages to others.

Considering the tools already available to EA for areas 1) and 2) as explained below in this document it is concluded that new efforts to find tools to reach the “one voice” principle should concentrate on area 3) while improving existing tools for areas 1) and 2).

5 WHICH TOOLS WE PRESENTLY HAVE:

Over recent years EA has already developed a number of tools which could potentially contribute to reach the one voice principle and which are already used by EA, its members and TCs. This includes the following tools, documents and mechanism:

- A) Document EA-1/22 “EA Procedure and Criteria For the Evaluation of Conformity Assessment Schemes by EA” has established a framework for co-operation between members when evaluating new or revised schemes of scheme-owners in the voluntary area. It is mainly focused on area 1) as identified above and its procedure guarantees the identification of a preferred standard for the activity in question. The document meanwhile proves to be an efficient and necessary tool to reach the one voice principle. For this to remain effective and fit-for-purpose it will need to be

applied consistently: The HHC is in charge of managing this and to revise the document as and when the need for this becomes apparent.

- B) Document EA-2/17 “EA Document on Accreditation for Notification Purposes” has been developed by EA based on the results of the “EA Accreditation for Notification Purposes (AfN) Project” and its usage has been promoted by EA towards all members. The document is exclusively focused on area 2) as identified above. The application of this document has been mandatory since 23rd of November 2017 and all NABs must provide a justification for any case where they deviate from the documented preferred standard. Thus the document contributes significantly to the goal of reaching one voice. However it should be appreciated that EA-2/17 needs regular revisions in order to effectively assist in achieving the one voice principle.
- C) Regular liaison and co-operation of EA with the EC and of NABs with their national authorities has been established over recent years which enables the development of new legislation and schemes owned by the EC/regulators to be influenced so that they are suitable for accreditation purposes and to have a clearly identified preferred standard. This significantly contributes to the one voice concept in area 2) as identified above, and there are already examples of where this has happened such as the development of the ERA scheme for application in the area of the railways interoperability directive.
- D) Some guidance papers have been developed during recent years or are currently under development which attempt to give TCs and/or NABs guidance on how to decide between different level 3 standards and could also serve as a basis of trainings provided by the NABs to their staff. The HHC guidance document “Validation of conformity assessment schemes” (presently under development) as well as the Certification Committee (CC) document on how to decide between ISO/IEC 17065 and ISO/IEC 17021-1 could be mentioned in this respect. Further documents – especially with regard to deciding between ISO/IEC 17020 and ISO/IEC 17025 and between ISO/IEC 17020 and ISO/IEC 17065 should be developed in the near future. They will provide a valuable contribution to the establishment of a preferred standard in all areas, including area 3) as indicated above. However it must be highlighted that the tools available for area 3) are currently not sufficiently robust and urgently need development in the framework of the one voice concept.

6 HOW TO FURTHER USE, DEVELOP AND COMPLEMENT THESE TOOLS:

Based on the general assumptions and policies as explained in this document the EA will follow the one voice principle with the following activities:

- I. The HHC will continue to promote, apply and further develop the tools mentioned above under paragraphs A) to D) as far as possible and try to co-operate with other TCs in this respect as much as feasible.
- II. As situations where the same activity is accredited under different level 3 and 4 standards by different EA members are not that easy to identify the HHC will use three main sources of information to find them:

- Information provided to EA via queries and complaints or feedback from peer evaluators will be used as one source.
- Regular information on “new activities” provided to the HHC and to other TCs as required by paragraph 3.3.3 of the implementation plan will be used to identify cases with a need for identifying a preferred standard.
- An additional survey will be conducted by the HHC among all NABs and the EA Advisory Board in order to receive information on areas with (potentially) differentiating level 3 and 4 standards.

(A systematic review of all areas of accreditation and of all NABs for potential differences in the applied level 3 and 4 standards has also been considered but has been identified as being too exhaustive and not efficient enough to be included in this policy paper.)

- III. In order to analyze situations of differentiating level 3 and 4 standards the chairs of all TCs and the HHC (the Technical Management Board, TMB of EA) will act as a review-group. This review-group might – on a case-by-case-basis – utilize additional members or experts from the TCs or (if necessary) even from outside of the TCs. The activity will stay under the management of the HHC in order to be based on a neutral position with regard to the preferred standard selected by the review-group.
- IV. The review-group should first collect information on application of accreditation in the different economies involved (e.g. Who are the customers of the conformity assessment activity? Who interpret the results/outcomes? Who relies on the results/outcomes? Is there national legislation imposing specific standards? etc.). Based on this information it should be decided whether it relates to a comparable situation and whether a preferred standard is necessary. The outcome of the review may also recommend that it would be better for the corresponding issue to be addressed at the international level via IAF and/or ILAC.
- V. If the review-group decides that a preferred level 3 or 4 standard is applicable then it may utilize different working techniques chosen on a case-by-case basis. These might range from discussions, application of questionnaires as used during the AfN project or systematic analysis of the situation to even using a ballot as required by the individual case. The result shall be formulated as a preferred standard together with a clarification whether and if yes under which circumstances a deviation from that standard might be acceptable.
- VI. The results of the work of the review-group are to be presented to the HHC for endorsement and after this to the GA for adoption. It is considered that normally a resolution of the GA for the (preferably mandatory) application of the preferred standard will be appropriate to address the individual case. Nevertheless the result of the review might lead to the conclusion that other means like development of a new EA document might be more appropriate.

These steps are considered to be appropriate to further implement the one voice concept in for level 3 and 4 standards. They are considered to be particularly relevant to the other areas in the voluntary field of accreditation - area 3) as explained in this document - which need improvement in regard to a uniform application of level 3 and 4 standards. They are also considered to be proportional in regard to effort and result and can be further developed in the future with regard to gained experience with these tools.