CERTIFICATION COMMITTEE

EA/CC FAQs

**QUESTIONS ASKED AND ANSWERS GIVEN
AT THE CERTIFICATION COMMITTEE MEETINGS
FROM SEPTEMBER 2016 ONWARDS**

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The answers presented here represent the consensus view of the EA Certification Committee - they are intended for informational purposes and should not be used as official guidance for the implementation of the requirements of the standards concerned When reading questions and answers take into consideration whether transition periods are on-going.

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Question 32.2 GFSI GFSI is requiring Scheme owners to comply with their requirements like additional new audit items, but also to 'audit' all elements during every audit. This appears in contradiction with the methodology of MS certification as determined for QMS and EMS through IAF MD5 or FSMS through ISO/TS 22003, which applies the audit time reduction for surveillance and recertification audits (of 2/3 and 1/3 of the initial time respectively). Yet AB's are giving with their accreditation logo's the impression that auditing all elements is equally effective as covering them during the whole cycle. The most clean example is comparison of ISO22000 versus FSSC22000. The question is: 1) How do we interpret that GFSI based schemes have to 'audit' all criteria whereas the methodology of MS certification applies the assessment of all criteria over the certification cycle which therefore allows to give a reduction for surveillance and recertification audits. 2) To enable the same amount of confidence to these different types of certification audits, should we require that these schemes apply a different time allocation scheme as well (i.e. above ISO/TS 22003)?	GFSI Guidance Document - Version 6.4 / November 2015 - Part II § 3.5.1 states : "The scheme owner shall have a clearly defined and documented audit frequency programme, which shall ensure a minimum audit frequency of one audit per year of an organisation's facility and has the scope to assess all elements of the scheme's standard." General understanding of the clause and the sentence is that the requirements of assessing all elements lies with the audit programme and not with the annual audit (which is in the sentence the first requirement put on the audit programme). There are no contradiction between GFSI requirements and ISO/IEC 17021-1 ISO/TS 22003 and related IAF MD documents.

Question 32.3 Duration Background: ISO/IEC 17021-1:2015 does not specify requirements for audit time and audit duration. IAF-MD5 and e.g. ISO/TS22003 describe this in more detail. MD5 describes in §4.1 that audit duration (on-site) should not be less than 80% of the audit time indicating that planning and reporting should typically be <20% of the audit time. ISO/TS22003 is a bit clearer by mentioning that preparation (and reporting) are not included in audit time. In practice it is noted that CAB's consider to allocate time for reporting (else no report would be made), but time for planning and more importantly preparation of the audit team is not included (nor mentioned) and thus depends on the personal time of the team members. Question: Could it be considered to suggest an amendment to IAF-MD5 to identify whether preparation time is required, that this be justified and recorded, and potentially indicate a 'minimum'?	Clause 9.1.4 of ISO/IEC 17021-1:2015 specifies the overriding requirements for audit time and requires that 'for each client the certification body shall determine the time needed to plan and accomplish a complete and effective audit of the client's management system.' This is confirmed by clause 0.6 of IAF MD 5 which states that 'notwithstanding the guidance provided by this document (MD 5) the time allocated for a specific audit should be sufficient to plan and accomplish a complete and effective audit of the client's management system.' It is, therefore, clear that preparation time to plan an audit is required by both ISO/IEC 17021-1:2015 and IAF MD 5. There will be evidence from witnessed audits and reports to determine whether or not the certification body has an effective process for planning audits. Providing the certification body has demonstrated an effective process for planning audits and is allocating sufficient on site time to accomplish a complete and effective audit, there is no need for it to separately justify and record planning time.

Question 32.4 2-Stage Some of the wording of the standard ISO/IEC 17021-1, related to stage I and stage II, having to be considered as one audit, conducted in two stages (9.3.1.1) cause some interpretation problems. It is stated in a NOTE under 9.3.1.2.1 that "Stage 1 does not require a formal audit plan (see 9.2.3)." Secondly, 9.2.3.1 states that "The certification body shall ensure that an audit plan is established prior to each audit identified in the audit programme…". Related questions are the following: 1. What is required as the audit plan for a stage I? Is a telephone conversation acceptable? 2. Since the stage II audit is not a separate audit, a formal audit plan is not required either? 3. Or does this mean that the stage II audit (or the overall «initial audit») plan has to be prepared prior to stage I (i.e. prior to «the initial audit»), maybe in a more generic way, but with the objective that the stage I provides further focus/adaptation to this plan (ref. 9.3.1.2.2.f)? 4. Do the requirements for 9.2.3 (and more specifically 9.2.3.2) apply to the audit plan for a stage II (even though that is not a separate audit)? Particular attention is requested to the requirement in 9.2.3.2.a (objectives) which are quite different for a stagel (9.3.1.2.2) from a stage II 'audit' (9.3.1.3). 5. Can it be required that the CAB prior to the stage I at least will have to inform the client that prior to stage II an audit plan is prepared in line with the requirements of 9.2.3? 6. A note normally does not contain requirements; how then can a note make requirements not applicable (as is the case here)?	The sequence of clauses in ISO/IEC 17021-1 is as follows : • § 9.1.3.2 and 9.3.3.1 : the initial audit (part of the audit programme)is a two-stage audit • § 9.2.3.1: ... an audit plan is established prior to each audit identified in the audit programme to provide the basis for agreement regarding the conduct and scheduling of the audit activities. • § 9.2.3.2 : "The audit plan shall be appropriate to the objectives and the scope of the audit." • § 9.2.3.2 and 9.2.3.3: give the elements to be found in each formal audit plan for each audit; It may come that some elements are not applicable/ necessary for stage 1. Then an audit plan is required before the initial audit (then before stage 1) so that the organisation to be audited is aware of what is to be audited and when ("agreement regarding the conduct and scheduling of the audit activities"). The CB may choose to draft one unique plan for stage 1 and 2, in the form required per § 9.2.3.2 and 9.2.3.3, the plan addressing all elements of 9.3.1.2.2 and 9.3.1.3. If there is only one plan, it has to be reminded to the client that the plan may be adjusted after stage 1, following the conclusions of stage 1. If the CB chooses to have a plan in 2 parts, one for stage 1, and then, after stage 1, one specific for stage 2, it may accommodate the form of the stage 1 plan, as all points of § 9.2.3.2 and 9.2.3.3 may not apply. What is captured in the NOTE , is not to say that a plan is not required but is only waiving the formal aspects of the plan. From there answers to questions : 1) A plan (whether separate or not) is required but does not have to be formal, focusing on the objectives stated in § 9.3.1.2.2. If the plan is specific to stage 1 (where not the full team is present and not all elements are audited) it may waive some points of § 9.2.3.2 (c-d-e-f) as not yet identified at this stage, and of 9.2.3.3 (b-c). As does not have to be formal maybe an email or a phone call is acceptable. Records on what has been agreed with the client needed to demonstrate implementation of requirements (e.g. 9.2.3.1) 2) See above : stage 2 plan is required, whether specific or integrated in the global "initial audit" plan 3) An overall plan may be prepared before stage 1 (in other words the audit plan communicated before stage 1 may include the elements of stage 2), with the information known by the CB at this stage , to be reviewed after stage 1 conclusions 4) All apply 5) Yes, it has to be required in the case that the plan is not drafted in once 6) According to ISO, Information marked as "NOTE" is intended to assist the understanding or use of the document. The NOTE intends to waive the "formal aspects" of the plan and not the full requirement

Question 32.5 2-stage Some of the wording of the standard ISO/IEC 17021-1, related to stage I and stage II, having to be considered as one audit, conducted in two stages (9.3.1.1) cause some interpretation problems. In 9.3.1.2.3, it is stated in a NOTE that "The stage 1 output does not need to meet the full requirements of a report (see 9.4.8). " We do consider that the report of the "initial audit" in its totality (i.e. the full report prepared after conclusion of stage II), does need to comply with the requirements of 9.4.8. This means that it shall also include or refer to the "k) audit findings (see 9.4.5), reference to evidence and conclusions, consistent with the requirements of the type of audit" (i.e. findings, evidence and conclusions consistent with the requirements of stage I and stage II). So although the stage I findings don't have to be reported immediately after the stage I in a report complying with all requirements of 9.4.8 (since then only "Documented conclusions with regard to fulfilment of the stage 1 objectives and the readiness for stage 2 shall be communicated to the client, including identification of any areas of concern that could be classified as a nonconformity during stage 2." have to be reported), the stage I findings (positive and negative) should find their way into the overall "initial audit" report after stage II. Please confirm that the above position, i.e. the report (whether consisting from several documents or not) in its totality shall comply with all requirements of 9.4.8 for both stage I and stage II audits.	In 9.3.1.2.3, it is stated that **"**Documented conclusions with regard to fulfilment of the stage 1 objectives and the readiness for stage 2 shall be communicated to the client, including identification of any areas of concern that could be classified as a nonconformity during stage 2." Actually "Documented conclusions" refers to "Stage I Audit Report" that does not need to meet the full requirements of a report as given in 9.4.8. That means not all items of audit report given in 9.4.8 are covered. This report or "documented conclusions" shall be communicated before stage II. Since the standard is not saying "immediately communicated", it can be communicated immediately or later stage I. However, it shall be communicated before stage II. According to related requirements of the standard, the CB can prepare one "Initial Audit Report" consisting of two separate parts (e.g. Stage I and Stage II) or prepare two seperate audit reports; "Stage I report" and "Stage II report". In the second case, most of requirements of 9.4.8 should be covered including sub-item "k)" "audit findings" since there is no need to report the conclusions of Stage I as "nonconformity", just "identification of any areas of concern that could be classified as a nonconformity during Stage II" is enough. Since the stage I "documented conclusions" shall be communicated in any format with the client of CB and these have to be based on findings (positive and negative), these (stage I findings) should find their way into the overall "initial audit" report after stage II provided that the conclusions are communicated with the client after or at the end of Stage I, and before Stage II.

Question 32.6 2-stage Some of the wording of the standard ISO/IEC 17021-1, related to stage I and stage II, having to be considered as one audit, conducted in two stages (9.3.1.1) cause some interpretation problems. Clause 9.4.1 states that "The certification body shall have a process for conducting on-site audits. This process shall include an opening meeting at the start of the audit and a closing meeting at the conclusion of the audit." Does this mean that the initial audit require only an Opening Meeting (meeting the requirements of 9.4.2) at the start of the stage I audit and a Closing Meeting (meeting the requirements of 9.4.7) at the end of the stage II audit (i.e. no Closing Meeting at end of stage I or Opening Meeting at the start of stage II)? These would seem like a silly consequence as these audits have clear and distinct objectives, i.e. both need full Opening and Closing Meetings.	Clause 9.4.2 of ISO/IEC 17021-1:2015 states that the purpose of the opening meeting is to '…..provide a short explanation of how the audit activities will be undertaken.' Since the audit objectives and activities for stage one and stage two are different, the requirement of clause 9.4.2 can only be met if there is an opening meeting for each stage. The requirement of clause 9.4.7 relate to a formal closing meeting which includes the recommendation regarding certification. A formal meeting complying with clause 9.4.7 is, therefore, not required at the end of stage one. However, clause 9.4.3.1 requires the audit team leader to '….periodically communicate the progress of the audit and any concerns to the client.' Clause 9.3.1.2.2 requires that an objective of stage one is to '….undertake discussions with the client's personnel to determine the preparedness for stage two.' Whilst a formal closing meeting, in accordance with clause 9.4.7 is not required at the end of stage one, there is clearly a need for a meeting with the client, at the conclusion of stage one, in order that the certification body can meet the requirement for communication with the client and the objectives of stage one.

Question 32.8 logos ISO/IEC 17021:2015, 8.3.1 denies any possibility of a labelling of products by an enterprise which is certified (only) with its management system. In contrast, the PEFC rules allow the use of the logo "on product" for forest owners (see PEFC ST 2001:2008 , 7.2.1 : „The PEFC Logo can be used on-product by a PEFC Logo user with valid PEFC Logo usage licence for group B (forest owners and managers) and group C (forest related industries)." This is also possible for the group members respectively members of the Regional Working Groups in Germany. In practice, the mark of conformity is not placed on the wood coming from forests under PEFC management, but there is one possble exemption to be discussed: a sign marking the entrance of the forest under PEFC management as "This wood is different. Certified and managed based on the accepted PEFC standards. Please ask for wood and paper with the PEFC logo". This statement is connected with the PEFC logo and the certification number. This can be interpreted as incorrect logo use.	As far as the question is about the use of the phrase "This wood is different. Certified and managed based on the accepted PEFC standards. Please ask for wood and paper with the PEFC logo", connected with the PEFC logo and the certification number (but no CB marks) as far as the mark of the CB is not used This statement is OK. There are no rules for the use of the Scheme owner marks (PEFC). The PEFC document was prepared in 2008 and revised in 2010 and "PEFC ST 2001:2008", date of entry into force is 2010-11-26. As a scheme owner, PEFC marks are different to CBs Marks. PEFC selected ISO/IEC 17021-1:2015 as accreditation standard for "Sustainable Forest Manegement System" certification bodies. According to EA-1/22 requirements 3.5 and 3.6, the scheme owner shall not contradict or exclude any of requirements of ISO/IEC 17021-1:2015 as EA MLA Level 3 standard. **EA-1/22:** **"3.5** The conformity assessment process described or chosen by the SO shall fall within the scope of one of the EA MLA Level 3 standards (see EA-1/06). **3.6** Scheme specific requirements placed on CABs by the SO shall not contradict, or exclude, any of the requirements included in the standard referred t: o in 3.5." All the above mentioned considers that the PEFC logo is not a third party mark of conformity, cl. 3.1, in ISO 17030 ("Conformity assessment. General requirements for third-party marks of conformity applies"). 

3. Questions relating to ISO/IEC 17065 – Product Certification

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Question 32,7 Other standards The question concerns certification schemes where inspection is (part of) the evaluation activities. Which independence criteria would apply to inspection bodies or individually hired inspectors? As certification and the inclusive components like inspection are a third party activity, we would assume that the requirements of ISO/IEC 17020: 2012 Clause 4.1.6.a / Clause A.1. apply in full.	It is for the certification scheme (and accordingly for the scheme owner) to specify the independence requirements applicable to the nature of the evaluation activity. So in general, inspection bodies type A, B or C might be specified to be used where inspection is (part) of the evaluation activities. In the other hand it is for the CB to demonstrate that both internal and external resources meet the independence requirements stipulated in the relevant standard. A) Individually hired inspectors (ISO 17065 6.2.1 internal resources) The requirements for personnel including the inspectors are described in the Standard.(ISO/IEC 17020:2012) regardless of the type (A, B or C) of inspection body from which they derive. B) Outsourced Inspection body (ISO 17065 6.2.2 external resources) ISO 17065 6.2.2.2 allows the CB to outsource activities to “non independent” bodies like the testing lab. of the client of the certification body. Certification is a third party activity, but Inspection as a part of the certification scheme may include “different parties´” activities : from Type A inspection Bodies (third party inspection) , Type B and/or Type C inspection bodies (first party inspection for its parent organization). Type A inspection bodies may always be used for evaluation activities complying with the rest of requirements of the ISO 17065. The use of type B and C implies that the CB analyzes the potential conflicts of interest and adopts measures to eliminate or reduce it. Type B inspection bodies all should not be involved in the certification of its parent company but may be used for evaluation activities complying with the rest of requirements of the ISO 17065.The use of Type C inspection bodies as part of the evaluation may be used for evaluation activities complying with the rest of requirements of the ISO 17065 but this fact should be communicated in advance to the client of certification. Probably it is going to be easier for a CB to demonstrate independence when using Type A inspection bodies while it will require more work when using Type C inspection bodies.

4. Questions relating to ISO/IEC 17024 – Certification of Persons

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Question 32.0 restriction The situation concerns invoicing of an initial certification which can in the same CB follow 2 different routes : - Registration directly to the CAB: payment of fees for initial and 1st surveillance in one go - Registration via a training body (with which the CBs has an agreement): payment of fees in 2 steps part before the initial examination, the other part before the 1st surveillance - The total amount of fees is the same in both cases One possible interpretation of the case is that these provisions are not acceptable regarding § 4.3.3 and 4.3.4 as they lead to 2 different treatments of the certified person : - In the first case, the applicant has to pay for the whole process no matter he/she succeeds in the certification or continue to work after the certification - in the second case, under the same circumstances, the applicant will have paid only a part. The CBs argues that : - conformity to § 4.3.3 from the definition of fairness (3.16 fairness : equal opportunity for success provided to each candidate (3.14) in the certification process (3.1)) the CB argues that the difference of invoicing does not affect the opportunity of success - Conformity to §4.3.4 : the CBs argues that o The price is the same for all applicants o The fact that there are 2 steps of invoicing is due to the fact as part of the initial exam can be included in some training financial support (which exist in some cases for helping working persons to go on professional training) o Each applicant is informed of this possibility and can apply through a training body Then the question is what interpretation of the 2 above is acceptable regarding (§4.3.3 and § 4.3.4 of the standard).	*ISO/IEC 17024 states :* *4.3.3 : Policies and procedures for certification of persons shall be fair among all applicants, candidates and certified persons.* *4.3.4 : Certification shall not be restricted on the grounds of undue financial or other limiting conditions, such as membership of an association or group. The certification body shall not use procedures to unfairly impede or inhibit access by applicants and candidates.* There is no apparent breach of clauses 4.3.3 (the opportunities to be certified are the same by either of the two ways) or 4.3.4 (access is not restricted or limited arbitrarily (unfairly) to a candidate to the detriment of another), as long as both options are available to all and the relationship between the CB and the training organisations meets all other requirements of the standard.