

International Accreditation Forum
Technical Committee Discussion Paper

Name of party submitting issue for discussion (optional): IFIA

Statement of the issue:

Concerns regarding implementation of *2018 IAF GA: IAF Resolution 2018-13 – (Agenda Item 9) Non-Accredited Product Certification where the CAB is accredited for the same scope.*

IAF 決議 2018-13 – (議題項目 9) 認証機関が認定を受けている範囲での非認定の製品認証 – の実施に関する問題

2018 IAF GA: IAF Resolution 2018-13 – (Agenda Item 9) Non-Accredited Product Certification where the CAB is accredited for the same scope:

IAF 決議 2018-13 (議題項目 9) 認証機関が認定を受けている範囲での非認定の製品認証 –

The General Assembly acting on the recommendation of the Technical Committee resolved that IAF Accreditation Body members shall have legally enforceable arrangements with their accredited CABs for product certification that prevents the CAB from issuing non-accredited product certification in scopes for which they are accredited. The enforceable arrangements shall require full implementation within three years from 31 October 2018.

総会は、技術委員会の推薦に基づき、認定されている範囲において非認定の製品認証を発行することを防ぐために、IAF 加盟認定機関は、認定している製品認証機関との間に法的拘束力を有する取り決めをもたなければならないことを決議した。この法的拘束力を有する取り決めは、2018 年 10 月 31 日から 3 年間以内に完全に実施されなければならない。

Additionally, CABs for product certification must transition certification documentation to include the accreditation symbol and/or must make reference to the accreditation status of the CAB including the identification of the AB, no later than 31 October 2021.

さらに、製品認証機関は、2021 年 10 月 31 日までに、認定シンボルの表示を含むように認証文書に移行、及び／又は認定機関の識別を含む認定の地位について、言及しなければならない。

Note: If there is an exception to the above, the CAB must justify the exception to the AB, and if accepted by the AB, the certification is still considered accredited.'

注記：上述の内容に対して例外がある場合、製品認証機関は認定機関に例外に対する正当化をおこなわなければならない、また、それが認定機関に容認された場合には、当該認証は認定されているものとみなされる。

Through direct participation in the IAF Technical Committee Product Certification Working Group at its last meeting, IFIA understands that the accreditation body concern that prompted the



proposal of this Resolution is that accredited product certification bodies are issuing certificates in accordance with a scheme, the scheme is under their scope of accreditation, but the certification body is not including the accreditation logo or mark on the certificate. Specifically, this practice was characterized as a problem of issuance of non-accredited certificates. This concern appears to have originated with an accreditation body, since no market (including regulators) concerns were provided to substantiate the concern.

Per the ISO/IEC 17000 series standards the above problem statement is incorrect. Only conformity assessment bodies are accredited, not individual certificates and certifications.

Further, IAF actions based on the concept that individual certificates or certifications are accredited inappropriately communicate that accreditation bodies have responsibility for oversight or assurance regarding individual certificates and other attestations.

Also, unlike management system certification, product certification schemes are extremely varied in the forms of attestations issued. Examples include marks, letters, certificates, internet site listings, and directory entries, many of which do not reference applicable accreditations. This has been the case for many decades, which is a reasonable basis for concluding that in these cases, the market (including regulators), are satisfied that accreditation covers all certification body actions when performing one or more specific schemes in the scope of accreditation.

Finally, where a need exists for linking an accreditation with individual attestations the certification scheme has included this requirement. The scheme owner (including regulators) will include that requirement, not the accreditation body.

Based on the above comments the IFIA requests clarification of the Resolution. Specifically, why is IAF promulgating a Resolution when

- It is based on a flawed understanding of ISO/IEC Standards,
- It implies to the market that accreditation bodies provide oversight or assurance regarding individual product attestations,
- It disrupts and adds costs to the functioning of a great amount of product certification in the worldwide market with no evidence of any problems, and
- It interferes with the role of scheme owners (which include regulators).

IFIA seeks this clarification because the flaws of the Resolution work against the mutual desire of



accreditation bodies, and the TIC industry, to provide an effective and efficient means of meeting confidence and assurance needs for the market (including regulatory needs).

With the benefit of additional time to reflect, IFIA suggests the concerns brought to the IAF Technical Committee Product Certification Working Group are more appropriately addressed by an IAF Resolution regarding product certification that states:

“The IAF General Assembly resolved that all attestations issued by a product certification body using a certification scheme are covered by the requirements and assurances related to their accreditation when the body and the scheme are both in the scope of accreditation, regardless of whether the specific form of the attestation refers to accreditation or not.”

IFIA believes this is a much more appropriate and impactful Resolution that reflects the long history and effective functioning of product certification that supports both the market and regulatory needs in virtually all economies.

IFIA は、「IAF 決議 2018-13（議題項目 9）認証機関が認定を受けている範囲での非認定の製品認証」に関して、明確化を求める。認定されるのは、適合性評価機関であって、個々の認証ではない。また、マネジメントシステム認証とは異なり、製品認証は、発行する証明書の形式は多岐にわたる。などの理由から、IFIA は、IAF による製品認証についての新たな決議案を提案する。

Requested action by the IAF TC:

IFIA requests the IAF pause the implementation of the Resolution until clarification of the IFIA questions is developed and endorsed by IAF Member Bodies.

IFIA は、IAF 決議事項の運用開始の延期を要請する。

As the Resolution was discussed at length and approved at the Plenary, the PC WG does not recommend further discussion at the TC. The Working Group indicated a Note is provided for exceptions.

Note: If there is an exception to the above, the CAB must justify the exception to the AB, and if accepted by the AB, the certification is still considered accredited.'

Consensus of the IAF TC (also to be documented in the meeting summary):

As the Resolution was previously discussed at length and approved at the GA, the TC does not recommend further discussion. The TC indicated a Note is provided for exceptions.

この本決議は、これまでに詳細な議論が行われ総会で承認されたものである。従って、技術委員会はこれ以上の議論を推奨しない。技術委員会は、例外のために注記が提供されていることを示



した。

Note: If there is an exception to the above, the CAB must justify the exception to the AB, and if accepted by the AB, the certification is still considered accredited.

注記：上述の内容に対して例外がある場合、製品認証機関は認定機関に例外に対する正当化をおこなわなければならない、また、それが認定機関に容認された場合には、当該認証は認定されているものとみなされる。