



International Accreditation Forum
Technical Committee Discussion Paper

Name of party submitting issue for discussion: IIOC

Statement of the issues:

1. Expectation of 'retrospective' application of IAF requirements,
 2. Interpretation of IAF decisions on specific topics as generally applicable
 3. Implementation process for IAF documents
1. IAF 要求事項の「遡及的」適用への期待
 2. 一般的に適用可能な特定のトピックに関する IAF の決定の解釈
 3. IAF 文書の実施プロセス

Discussion:

An AB has set a requirement that implementation of IAF MD1 2018 requires immediate review and updating of any existing client contracts to reflect the requirements of MD1, rather than implementing progressively at the next renewal as required by other ABs.

Supporting information:

Extract from published statements by other AB:

'(AB X) will assess implementation of IAF MD 1: 2018 at each Certification Body's next scheduled Head Office assessment. For this we will need to see that the Certification Body has updated their systems and procedures to reflect the new Mandatory Document and that references to IAF MD 19 have been removed. However, taking into account the above statement, we do not expect Certification Bodies to retrospectively change existing fixed/contracted arrangements but the requirements of IAF MD1: 2018 must be in place for each certified customer by the next renewal.'

Is it this clear difference in expectation an acceptable situation?

認定機関によって MD1 の適用開始日に違いがあることは、許容されるのか？

Subsequent to a challenge from a CB, the AB has justified its interpretation based on an IAF statement regarding the transition period for implementation of ISO 50003, which at the end of the transition period all contracts should be in line and has published a statement to that effect.



Supporting information.

Translated from statement from the AB.

*'Notice from AB Y about the meaning of 'final date' of an agreed transition in IAF
In 2017 IAF, in response to a question about end of ISO 50003 transition, clarified that the date agreed by IAF for the end of a transition, either a new normative document or revision of existing one, should be understood as the date on which the new requirements must be fulfilled, regardless of the content of existing contracts between parties. Therefore, at that date, all contracts (in particular for ISO 50003 between certification bodies and their clients) must have been revised to be adapted to the new requirements, including those relating to allocation of times (see Annex I). In 2018 this conclusion has become generalized, becoming a Resolution of the IAF General Assembly (see Annex II).'*

Is it appropriate and acceptable to apply an IAF position / interpretation across a much wider context, including where there is the absence of consistent features (e.g. a defined transition period)?

一貫性のある特徴（例：明確な移行期間）がない場合も含んで、はるかに広い範囲にわたって IAF の立場／解釈を適用することは、適切かつ容認できるか？

Can the IAF Transition MD Document ensure that each IAF 'transition', such as IAF MDs, or introduction of a new document, includes a full implementation plan?

移行に関する IAF 基準文書は、各 IAF 基準文書、またはすべての運用計画を含め新文書の導入を保証することはできるのか？

Requested action by the IAF TC:

An authoritative answer to the questions above and appropriate clarification of subsequent expectations.

上記の質問に対する正式な回答と説明。

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

The following expectations as it relates to IAF MD 1 (application date 29 January 2018):

IAF MD 1 (適用日：2018年1月29日)に関連する、次のような期待。

It is expected by now:

all contracts issued by a CAB after the IAF MD 1 application date are now in conformance to IAF



MD 1 contracts in existence prior to the application date of IAF MD 1 may not have been revised by the CAB by now (over a year later) the CABs are in conformance to IAF MD 1 and are implementing the requirements; no matter the contract.

現時点では以下のことが期待されている。

IAF MD 1 の適用日以降に CAB から発行された全ての契約は、IAF MD 1 に適合している。

IAF MD 1 の適用日より前に存在していた契約は、まだ CAB によって改正されていない可能性がある。

現時点で（1年以上経過の上）CAB は IAF MD 1 に適合しており、要求事項を遵守している：契約に関係なく。

The TC to answer the questions as follows:

質問に対する TC の回答は以下のとおり。

Question 1 - Is it this clear difference in expectation an acceptable situation? Inconsistency among ABs as to the application of IAF MD 1; one “immediately” apply to all contracts and one as contracts are renewed.

質問 1 - この明確な違いは受け入れ可能な状況であるか？

IAF MD 1 の適用に関して AB 間で一貫性がないこと：「即時に」すべての契約に適用されるものと、契約が更新されると適用されるものがある。

No; it is not appropriate for multiple ABs to have such a clear difference in implementation of the new/revised MD requirements. However, the MD does say that specific arrangements can be made between the CB and AB (last para in section 0).

否。新/改定 MD 要求事項の実施において、そのような明確な違いが複数の AB 間にあることは適切ではない。しかし、IAF MD は、CB と AB の間で特別な取り決めができると述べている（セクション 0 の最後の段落）。

Question 2 - Is it appropriate and acceptable to apply an IAF position / interpretation across a much wider context, including where there is the absence of consistent features (e.g. a defined transition period)?

質問 2 - 一貫性のある特徴（例：明確な移行期間）がない場合も含んで、はるかに広い範囲にわたって IAF の立場／解釈を適用することは、適切かつ容認できるか？

No and there is another resolution (2018-24) referring to the end of an application date that requirements become mandatory. Resolution states “...application date is the date by which requirements in a document become mandatory for application”.

否。また、要求事項が強制となる適用日を参照する別の決議（2018-24）がある。決議は次のように述べている。「…適用日は、文書の要求事項の適用が強制とされる日」。



Further WG Discussions

更なる WG 議論

IAF MD 1 was issued in 2018 through the fast track approach because of the withdrawal of IAF MD 19 and there is not consensus within WG whether the requirements changed or not (were requirements just moved from IAF MD 19).

IAF MD 19 が取消され、2018 年に IAF MD 1 が迅速な方法（ファストトラック）で発行された。要求事項が変更されたか、否か（要求事項は IAF MD 19 から移動しただけか）について、WG 内で合意はない。

When there is a transition, there is time for all entities to determine the conformance to the new requirements; internally and with customers. But the MD's application is immediate, the CB should be allowed to determine a common sense approach to apply the new requirements to clients. 移行があるとき、それぞれの機関は内部で、更に顧客と新しい要求事項に適合しているかを確認するための時間がある。しかし、当該 MD (MD1) の適用は即時であった。CB が新しい要求事項を顧客に適用するのに、常識的なアプローチをもって行えるよう認められるべきである。

Contracts between CBs and customers should address how to manage changed or new requirements within the validity period of the contract.

CB と顧客との間の契約は、契約の有効期間内に改定された要求事項又は新しい要求事項をどのように取り扱うかについて言及しておく必要がある。

Side note - Going forward MDs should not be published with an application date same as published date.

サイドノート - 今後、MD は、公開日と同じ適用日で公開すべきではない。