OPERATIONAL DOCUMENT

ECS 026

Mutual recognition of product factory surveillance Guidelines for procedures

(former OD CIG 026)

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1. Objective

The main objective of this document is to provide a general guidance for the conduct of surveillance activities related to the operation of certification schemes at national level.

A practical consequence is to allow a Certification Body C to hand over to a Certification Body D following specified procedures, the care of making on its behalf all or part of surveillance visits of factories and manufacturing products certified or meant to be certified by C.

Surveillance visits carried out by D on its own behalf and on the behalf of other Certification Bodies allow appreciable time and money savings, for Certification Bodies and for manufacturers.

2. Terminology

In the following text:

- letter C denotes the Certification Body to which application is made for certification at national level;
- letter D denotes the Certification Body requested by Certification Body C to perform surveillance in country D on its behalf.

3. Scope

The scope of surveillance activities shall be recorded in an agreement between Body C and Body D.

4. Documents

Documents used to report pre-licence and routine factory inspections are permanent documents CIG 022 and CIG 023. The use of appendices is possible for special national requirements during a transitional period, until these deviations are withdrawn.

5. Checking of availability, operation ability and use of testing and measuring equipment

Testing and measuring equipment essential to assure conformity of the complete product with the relevant standards must be the subject of careful examination by the inspector.

As this equipment varies according to the type of product, the inspectors of the different CB's will use a same guide, type of product by type of product, to check its availability, operability and use for routine tests (100 % tests).

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6. Reporting delay

After the inspection results have become available, the maximum delay for Certification Body D should not normally be greater than a month. Serious deviations which can endanger conformity to standards shall be immediately reported to C by D (Telefax or E-mail).

7. Annual number of routine factory inspections

Frequency of inspections is a function of the nature of the product, volume of production, manufacturer's quality system against EN 29000 series standards and manufacturer's performance.

No frequency of inspections shall be less than one per year.

Commonly used, however, are:

- twice a year for household appliances, luminaires, electrical accessories for household and conduits;
- four times a year for cords and cables, although some operations use considerably higher rates.

The inspections should be combined with selection of samples.

8. Sampling

During factory inspections, the Certification Body representatives are liable to select samples of products entitled to the Mark(s) for which the inspection is being carried out.

These samples may be selected from the manufacturing process or from the stock and are normally sealed by the Inspector who tells the address to which they have to be shipped.

It is within the manufacturer's responsibility to take the necessary steps to dispatch the units, clear them through customs and pay carriage, in order that the addresseeorganisation should not handle any possible custom clearance.

9. Organisation of bi-lateral arrangements

When a Certification Body C entrusts a Certification Body D with factory inspections on its behalf, it is advisable that:

- a written memorandum define the general conditions of the agreement, such as the type of inspections entrusted, the types of products and some particular conditions relating to them, etc.
- that the annual content of the surveillance programme be settled during the last quarter of previous year, divided if necessary into quarterly sub-programs to avoid some excessive delays, still leaving as much flexibility as possible to Certification Body D to fix its detailed work schedule and to adapt it to batch productions;

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• that Body C gives to Body D precise technical directions, if necessary with particular instructions in critical instances.

See Appendix A.

10. Financial matters

Although in usual conditions, all freedom has to be left to client Body C for negotiations with manufacturers of the products which it certifies, it is an obligation when Body D works on behalf of several Bodies C, that the economies of the situation be passed onto manufacturers.

11. Confidentiality

Information gathered by inspectors of a Body D on behalf of one or several Bodies C belong respectively to each of these Bodies C. This means in particular that remarks specifically concerning a Body C made during an inspection on behalf of several CB's, shall not be disclosed to other Bodies.

Consequently, precautions shall be taken in this specific case (for example permanent document CIG 023 shall be filled up separately for each Body C, or a common basic report shall be made, with specific individual notes attached in appendix).

12. Special inspections

When a routine inspection has shown a deviation, CB's should be allowed agreed sanctions including supplementary factory inspections which allow to check the corrective actions taken.

These inspections, sometimes called sanction inspections, are normally excluded from the scope of the present procedures, but can be managed as the other inspections by agreement between Bodies C and D.

13. Statistics

The growth of the use of the present procedures will be followed by statistics, which form a particular chapter of the CCA statistics kept by EEPCA.

For that purpose, each CB will annually send to EEPCA, under a form and at a date to be defined by EEPCA, the number of factories entrusted to it by other CB signatories of CCA, the number of pre-licence inspections and the number of routine inspections it has made the previous year in application of the present procedure, these information being broken down between the different client CB's.

14. Factory surveillance staff meetings

Factory surveillance staff meetings shall be organized to enable the Certification Bodies to discuss and solve the matters encountered during routine inspections as well as to propose steps to the CCA to improve the factory surveillance rules whenever needed.

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The arrangement between Certification Bodies should include definition of:

- 1) Scope of the products which are the subject of the arrangement
- 2) The method of establishing that body D meets general requirements for acceptance of inspection bodies, within the scope of the arrangement.
- 3) The manner of implementation of the arrangement, in particular the method of establishment of confidence in transferring routine factory surveillance e.g. training in specific technical requirements or/and accompanied initial visits or/and audit of surveillance process.
- 4) The process to be used in specifying the product sampling requirement.
- 5) The process to be used where special visits are required or during sample failure.
- 6) The process to be used in establishing and ensuring factory inspection programmes.
- 7) The proposed phasing of the implementation period.
- 8) Agreed financial matters.

The arrangement is to be signed by Certification Bodies.

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