

EA TEMPLATE FOR COMMENTS

Please use the document line numbering as a reference for your comments whenever available, so that we can easily see what your comments are referring to.

Date: 01 June 2018 Deadline 29 June 2018	Document: Draft proposal for a new management structure for EA
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1	2	(3)	4	5	(6)	(7)
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ATCG, ATS, DAKKS, IARM, ISRAC, LA, MOLDAC, SNAS, BAS, CAI	No Comments			ATCG, ATS, DAKKS, IARM, ISRAC, LA, MOLDAC, BAS, CAI, SNAS have no comments.		
BELAC	GENERAL DOCUMENT			<p>Although BELAC is convinced that the structure of EA should be adapted to improve the operational activities of EA, BELAC cannot agree to the current proposal.</p> <p>This disagreement on the current proposal is based on the following main reasons:</p> <ol style="list-style-type: none"> 1. There is no straightforward link between the activities and perspectives presented on page 1 of the document and the elements presented on page 2 . BELAC doesn't agree with the translation into some of the principles on page 		<p>The document will be changed and provide more details about role and responsibilities on all levels.</p> <p>The role and responsibilities of the GA will not change. But the role and responsibilities of the GA shall be included in the revised paper.</p> <p>The number of the EX Board can be adjusted as needed.</p>

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				<p>2.</p> <p>2. It is not clear how the General Assembly, through its responsibility in terms of strategic and policy issues, will have the possibility to take initiative or provide input to the Executive Board with respect to the development of policy and governance issues .</p> <p>3. Disagreement to the fact that the total number of the Executive Board members shall be limited to 4.</p> <p>4. Lack of clarity in the proposal on how to manage the co-operation between the TMB and Executive Board.</p> <p>5. Lack of clarity with respect to the role and responsibilities of the Executive Secretary, and their limits.</p> <p>The disagreement should not discourage the authors, but encourage them to detail the document.</p> <p>As explained during the last General Assembly we feel that the current text remains very unclear, unprecise and allows a lot of uncertainties in many aspects. This would result in a text that , even if approved, could result in a blocking of the subsequent process of implementing the details of this structure.</p> <p>Despite its general concern with respect to the intention of the document, BELAC provides hereafter some specific comments on the text.</p>		<p>In principal the total number of EX Board and Technical Board members will not be (significantly) changes in relation to the existing EX.</p> <p>Therefore the proposal is to have 6 EX Board members.</p> <p>According the role and responsibilities of the EX Board the board/members should have competencies in regard to business activities (finances, marketing), strategy issues and governance. Therefore the Board members should be CEO or senior management persons from the EA members.</p> <p>Note: The profile of the Board (members) may be defined more in detail if needed.</p> <p>The Technical Board members shall have technical profile.</p> <p>The Technical Committee Chairs could be recommended by the Technical Board and endorsed by the GA.</p>

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						<p>The role and responsibilities between the EX Board and Technical Board will be explained more in detail.</p> <p>The relation between the ES/Secretariat and the EX and Technical Boards should be explained more in detail, e.g. report by the ES to the Technical Board.</p>
TURKAK				TURKAK finds the proposal suitable in general manner to achieve more efficient management of EA, you can find couple of comments below and otherwise ok.		
SAS				<p>Not clear from the text what will be the benefit of the change.</p> <p>Missing analysis of opportunities and risks.</p> <p>There is also no information on cost considerations, no information on the type of new posts or positions, which will be necessary at the EA Secretariat, etc...</p> <p>The document also shows that there will be a clear reduction of EA members responsible to define and implement EA policy, to take various decision including technical decisions and to manage the</p>	A more comprehensive document is to be prepared.	<p>Costs for running the EX Board and Technical Board will be estimated and compared to the existing structure.</p> <p>Secretariat positions are not relevant at this stage.</p>

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				<p>organisation (including financial management).</p> <p>The current proposal does not provide sufficient safeguards to allow appropriate representations from different sized economies at top management level (i.e. at EX and/or TMB level).</p> <p>We are more in favour of empowering the various Technical Committees rather than restricting the decision-making on technical aspects to a TMB where representation will be extremely limited.</p> <p>It can also be likely that these members will not possess sufficient competence for such decisions. Therefore, it makes more sense to empower the technical committees with decision making on technical aspects.</p> <p>The overall proposed setup does not really offer sufficient balance of powers or means of self-regulation.</p> <p>The final sentence on Page 7 regarding the General Assembly namely <i>“if more decision-making power will be delegated to the EX, the task and responsibilities of the General Assembly may be evaluated (in a second step).”</i> is of great concern</p>		<p>Task of the TFG 2</p> <p>TFG 2, see above</p> <p>See above, the EA GA power will not be changed, unless TFG 2 will recommend differently.</p>

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				<p>as it has the potential to relegate the role of the EA GA to a lower level.</p> <p>So far, EA GA acts as “guardian” of all that is happening within EA. We think that EA GA should remain the final organ to take decisions on policy; especially, where such policies will have a financial impact on EA or an impact on the operations of the individual EA members.</p> <p>Briefly, the document as presented for the “proposal for a (new) management structure of EA” is not complete and sufficiently detailed. This makes it unacceptable, with one of the main concerns being that all the responsibilities, formulation of policies and decision-making will be taken over by a very limited number of persons and/or ABs with sufficient resources or particular personal intention and business orientations.</p>		<p>Yes, see above</p> <p>See above</p>
OLAS				<p>The document is presenting a new management structure for EA to replace the current rules of procedure described in the document EA-1/17 A: 2017.</p> <p>The aim of the document is to propose a most efficient structure to achieve efficient governance in EA by simplifying the rules currently applicable.</p> <p>From a general point of view the document</p>		<p>See above</p>

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				<p>propose to reduce drastically the number of EA members responsible to define and implement EA policies, and manage the organisation (including financial management).</p> <p>The new management structure will attribute the responsibility of the policies, governance and operational issues on the hands of very limited number of persons.</p> <p>Today, policy and governance issues are under the responsibility of the executive committee, which is represented by 12 representatives of full members. With the proposal under discussion, the same responsibilities will be shared between 4 persons (including the EA chair and vice-chair) in the executive board. Finally, only 2 representatives of full members will have access to this level of responsibility.</p> <p>This proposal is in complete contradiction with the willingness of EA to give a chance to small ABs to participate to the executive board and/or the Technical Management Board.</p> <p>Moreover, the proposal, if validated by the EA-GA, will give full power to the executive secretary to execute all the operational activities that result from the executive board.</p> <p>With this new management structure, the role of the EA-GA will be limited to endorse the decision prepared under the responsibilities of 5 persons (including the EA chair and vice-chair).</p> <p>Moreover, the last part of the proposal explains that</p>		<p>See above</p> <p>See above</p>

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				<p>depending on the decision-making power delegated to the executive board, the technical management board, and the executive secretary, the tasks and the responsibilities of the EA-GA may be evaluated. In other words depending on the level of power in the hands of a very limited number of persons, the role of the EA-GA could be relegated to an advisory / registration committee.</p> <p>Concerning the EA Committees, Councils, Working Groups and Task Forces, they will be replaced by a Technical Management Board (TMB) managed by the EA Chair / Vice-Chair and the technical committee Chairs. With this proposal, the number of members will also be reduced, and the Chair / Vice-Chair will have the opportunity to influence consistently the policies of the TMB. Thus, it will be more difficult to prove that such few number of persons involved at technical level will have sufficient competences on technical domains to provide an efficient service to all the members.</p> <p>Considering all these observations, the proposal for a new structure of management of EA is not acceptable because it gives all the responsibilities and decisions on a very limited number of persons that could influence the management of EA for their own interest and not the interest of the majority of the EA members.</p>		Not agreed
IQNet			ge	The proposed structural changes will impact the resource planning and the related costs. Additional meetings, additional involved people, expected	It is strongly recommended to make this more transparent and clear.	The costs, compared to the existing structure, will be clarified.

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				technical resource increase at the secretariat, increased coordination, etc. will change the future cost basis of EA significantly. No impact on the costs have been shown on the draft proposal.		
NAB MALTA				<p>The document does not provide enough information to help one decide whether this “simplification” will lead to the expected benefits. For e.g. it does not provide an analysis of the risks introduced by this restructuring, there is no information on cost considerations, no information on the type of new posts or positions which will be necessary at the EA Secretariat, etc...</p> <p>There is a clear indication that this document is proposing to reduce drastically the number of EA members responsible to define and implement EA policy, to take various decision including technical decisions and to manage the organisation (including financial management). Taking into consideration that this is a European organisation which is partly financed by the EU as well as the roles proposed, it seems rather odd that the Executive Board (EX) will be limited to 4 persons. This also contradicts the fact that “EA is a democratic association”.</p> <p>The current proposal does not provide sufficient safeguards to allow appropriate representations from different sized economies at top management level (i.e. at EX and/or TMB level).</p> <p>We are more in favour of empowering the various Technical Committees rather than restricting the</p>	A more comprehensive document is to be prepared.	See above

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				<p>decision making on technical aspects to a TMB where representation will be extremely limited and therefore will not possess sufficient competence for such decisions. Therefore it makes more sense to empower the technical committees with decision making on technical aspects.</p> <p>The overall proposed setup does not offer sufficient balance of powers or means of self regulation.</p> <p>The final sentence on Page 7 regarding the General Assembly namely “if more decision-making power will be delegated to the EX, the task and responsibilities of the General Assembly may be evaluated (in a second step).” This is of great concern as it has the potential to relegate the role of the GA to a low level. The present role of the EA GA as guardian of all that is happening within EA must be conserved.</p> <p>The EA GA should remain the final organ to take decisions on policy, especially where such policies will have a financial impact on EA or an impact on the operations of the individual EA members.</p> <p>In a nutshell, the document as presented for the “proposal for a management structure of EA” is not complete and sufficiently detailed. This makes it unacceptable, with one of the main concerns being that all the responsibilities, formulation of policies and decision-making will be taken over by a very</p>		

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				limited number of persons and/or ABs.		
IPAC			Ge	<p>Organisations need to evolve from time to time to adapt to new environments and framework, and IPAC accepts and welcomes that.</p> <p>However, the justification in terms of <u>advantages and disadvantages, both financially and operationally</u> have not been presented, so that we can ascertain that the proposed change will meet needs and expectations, and provide better results and outcomes for its members.</p> <p>The rationale for the proposed solution and not others is not explained, it seems artificially imposed - were other governance models discussed? If not, why?</p>	<p>Present the justification for the changes: what was not functioning well, what are the expectations.</p> <p>Then present the advantages and disadvantages, financially and operationally, for the current situation and the proposed change.</p> <p>It will be helpful in evaluating the current proposal to learn what other models have been considered (or if not, why not) - e.g.:</p> <ul style="list-style-type: none"> - reducing/eliminating the Executive Board to Chair&Vice-Chair; - using a technical director or other function for replacing some or all Committee chairs; - adopting open governance with e-tools; - separating current Executive Committee meetings in the two parts for the different functions; - etc. 	<p>It seems not to be wise to transfer all powers to the Chair/Vice.</p> <p>The proposal to separate meetings of the existing EX was discussed. But due to liability issues it was not further considered.</p>
INAB				<p>1. I think like any business proposal there should be a risk/opportunity analysis including financial aspects (vs. the current format), in order to make an informed decision that this is in fact the correct change.</p> <p>2. What will be the measure of success for</p>	<p>The business analysis for this proposal is not evident. I understand it is part of the strategy</p>	<p>See above</p> <p>The benefit (e.g. efficiency) can</p>

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				the new structure – at some point a review process should be included to measure success against the objective of the change		be reviewed after a defined period. The new structure shall be reviewed after 4 years.
IIOC			ge	Overall, there is no explanation of the issues this new structure is trying to address and the improvements it is hoped to deliver. This needs to be made very clear, without which, the comments below reflect the belief that these changes add more confusion to the decision-making process, increase the levels of bureaucracy within EA and make no reference to how the role of Recognised Stakeholders and non-AB input into EA can be embraced to deliver better decision-making.	Provide the reasons behind the need for change and the objectives it aims to deliver.	Yes, must be explained (see above). Recognised stakeholders is another Strategy issue.
ESYD				<ol style="list-style-type: none"> 1. There shall be a risk / opportunity analysis regarding the new proposal in order the GA to have the information for decision. 2. I think that it shall be analyzed what was the objective of the change and if this objective will be fulfilled with the new structure . This shall be clearly presented to the members. 3. As it seems that more and more members want to participate in the EA management structure , this was very clear in the last EA GA meeting in the elections for the additional member of the EX, and this is very good for EA which is a membership organization, we need to maintain the representation of many ABs 		<p>See above</p> <p>Yes, that would be a benefit of the new structure,if more people want to get engaged.</p> <p>Yes, shall be considered in the new structure as well.</p>

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				<p>in the management structure. So based on this my proposal is to maintain the concept of the today requirement in the EX that each AB can have only one representative either in the Exec Board or in TMB. I don't agree with the " <i>Note: Small NABs should get a chance to participate in the Executive Board and/or the Technical Management Board</i>" because does not mean anything. This is not an issue of small and big ABs , what does this really mean? The issue is to achieve the representation of many ABs in the management structure , "big or small " , this will be decided by the GA.</p> <p>4. I think that the MAC chair shall be member and not observer of the TMB.</p> <p>5. It will be a good exercise to take the example of two real Executive meetings and to analyze which items would be discussed by the Exec Board , which by the TMB and which by both in order to see in practice which is the added value to change the current structure. I think that this exercise is useful because from my point of view apart from the financial issues the items that are discussed in the Executive can not be separated in purely technical and governance.</p> <p>6. The position of the CPC shall be clearly described in the document.</p>		<p>OK, an example of agendas will be prepared as annex to the paper.</p> <p>The CPC will be maintained, no difference to the existing structure.</p>

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						The EA Communication is under the EX Board. The CPC will report to the EX Board.
DANAK			ge	The document gives a good overview of a new structure. DANAK is positive to the new structure that will strengthen EA		
	TITLE					
IQNet	INTRODUCTION (Part 1 - Activities)		te	Add another activity	Add "Promotion and external communication: establishing effective communication and information channels with the market, promoting the value of accreditation and conformity assessment"	noted
RvA			Ge	In the sentence "In general terms the governance of EA shall be able to handle and manage the following activities:" the word activities is not correct. The numbers 1-8 are not activities but responsibilities or processes for which responsibilities should be defined. Also it looks a little silly to state that the governance of EA shall be able to handle and manage the Governance of the association	Change the sentence to: "In general terms the management structure of EA shall define the responsibilities for the following:"	Agreed, to be covered in the revised document.
BELAC	1			Towards the principles BELAC does not agree to point 1 on page 2: "Strategic and policy decisions must be taken by the membership through its elected organs." The wording "membership	Strategic and policy decisions must be taken (<i>and whenever relevant initiated</i>) by the membership through the General Assembly.	Agreed, to be considered (see above)

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				through its elected organs” is confusing. Since there is no mechanism to ensure parity of different types of NAB’s, this principle does not ensure that all decisions take into account the differentiating aspects of the NAB’s (size, ownership, cultural, focus domains,...) and therefore would be contra-productive to improve the working of EA. We agree that proposals of strategy and policies should be prepared in the elected organs, but strategic and policy decisions have to remain to the General Assembly.		
IQNet			te	Some aspects missing from Governance of the Association	Include “quality management system”	noted
SAS				The term “Governance” is very extensive. If “governance” will be the role of the EX, then in practice, the role of the EA General Assembly will be made somewhat redundant and we can go towards a company structure (but a company is never “something” democratically managed). ...and all of us pay membership fees and want to see a proper representation for our remuneration! The term “governance” also inherently includes, for e.g. defining a strategy. This is one of the aspects, which should remain within the domain of the EA General Assembly.		See above, GA will not be changed
RvA			Ge	Governance is about the internal organisation, management and leadership of EA, including the financial, legal aspects. There is no need to refer in this to EA strategy and financing.	Change to: “Includes financial and legal aspects, operation of the association and the management of the secretariat, and fulfilling the employer role for its personnel.	Agreed, to be considered

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NAB MALTA				The term “Governance” is very extensive. If “governance” will be the role of the EX, then in practice the role of the General Assembly will be made redundant. The term “governance” also inherently includes, for e.g. defining a strategy. This is one of the aspects which should remain within the domain of the General Assembly.		See above
IPAC			Te	The employer role is relevant not only for the Exec Sec, but also for all the contracted staff.	Change to: “..., internal operation of the association and the management of the internal and contracted staff secretariat, and fulfilling the employer role for the executive secretary.”	To be considered
IQNet	2		te	Some aspects missing from Provide service to its members	Include “exchange of experience and promote harmonization”	noted
RvA			Ge	Mentioning “Provide relevant information mainly in EC developments ... ” denies that importance of information from other stakeholders.	Change to: “Provide relevant information related to developments from EC and other stakeholders”	To be considered
IQNet	3		te	Some aspects missing from technical developments	Include “and development of new MLA accreditation schemes”	To be considered
RvA			ge	The use of normal in “Includes the normal functioning of technical committees” makes no sense. This is also about abnormal technical developments.	Delete “normal”	Agreed, to be considered
	4					

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RvA	5			Not only other authorities may need support. Any stakeholder (private scheme owners, branches) that rely on accreditation and accredited conformity assessment should be supported.	Change “Authorities” to “Stakeholders”	To be considered
	6					
	7					
IIOC	8		ge	<p>Currently this states, ‘the governance of EA shall be able to handle and manage the...<i>Relationship with all other stakeholders</i>: the European quality infrastructure, EAAB, Scheme owners, industry, NGO’s, CABs associations’.</p> <p>This implies a very passive role for all the above groups, not one which encourages active participation, listening by EA and implementation of actions based on the views of these groups.</p> <p>It is exactly the situation that meant EA Resolution 2017 (40) 13 was adopted against the express comments made by numerous Recognised Stakeholders, the EAAB and the EC.</p> <p>There needs to be a complete change in the involvement of these key stakeholders in EA activities, where their opinions are valued and actions taken to deliver for the ultimate users of this system – business, public sector and consumers.</p>	Build into EA stronger involvement of non-AB organisations within EA, ensuring their voice is heard, including allowing these groups to vote on issues at the EA General Assembly.	noted

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EA-member NAB or stakeholder organisation	Part, Section, Clause No, Sub-clause No, Annex/Figure/Table (e.g. 3 or 3.1 or 3.1.1, Annex 1, Table 2)	Line No to be detailed when several § are under the same clause (eg.1-4 or 11)	Type of comment (see foot- note)	Comment (<u>justification for change</u>) by the NAB or stakeholder	<u>Proposed change</u> by the NAB or stakeholder	Observations by the body owing the document
IQNet			te	Some aspects are missing from relationship with all other stakeholders	Include “as well as with regional and global standardization bodies”	noted
RvA	INTRODUCTION (Part 2 – Perspectives)		Ge	In connection to above remark: The activities 1-8 are not activities. Furthermore the four mentioned aspects are not distinct perspectives (strategy is also policy, by operational is also policy). What in fact is meant and implied later in the documents are the distinct level of decision making.	Change to: “Additionally, each of these responsibilities has to be defined taking into account 4 different levels of decision making: “	To be considered
RvA	1			See above	Change to: “Strategical decisions: long term decisions about mission and vision of EA and about the objectives to realise these.	To be considered
RvA	2		ge	Not clear what is meant with the word “policy”. Policy may be about strategy, tactics and operations. Policy is the way you want to achieve objectives on these levels.	Change to “Policy decisions: defining how to achieve the objectives, for example taking into account the resources available, best or optimal technical solutions, views stakeholders etc.”	Definition/explanations regarding strategy, policy technical and operational may be reconsidered.
RvA	3		ge	See above	Change to: “Technical decisions: decisions about technical issues, for example on use of the harmonised standards.”	Technical issues, agreed, but not only decisions. Decisions are taken by the GA (see above).
RvA	4		ge	See above	Change to: “Operational decisions: day-to-day decisions that needs to be taken on the level of the secretariat to ensure the level of service.”	See above
	INTRODUCTION (Part 3 – Principles to be respected)					

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INAB	1		ge	I think the proposal should include some mechanism to guarantee continued representation of small ABs on the exec Board.	Membership criteria for Exec Board to be defined	Not agreed
SA				1.Strategic and policy decisions must be taken by the membership through its elected organs. This is not in line with proposed new structure on page 3 where General Assembly is responsible for strategic and policy issues.	1.Strategic and policy decisions must be taken by the membership through General Assembly.	Agreed, see above
IQNet			te	For clarification purposes replace : "1 Strategic and Policy decisions must..."	with "1.Strategic directions must be given by the members through the General Assembly. 2.Policy decisions must be taken by the membership through its elected organs."	See above
NAH	2			Who is the "an elected organ?" Please specify! Nothing is told, that who controls, gives orders, asks or gives deadlines to Executive Secretary.		Agreed, to be considered
RvA	3		ge	It is not clear what is meant with "Technical activities to be run in the long term ..". This document is about responsibilities assigned to certain organs or persons and not about activities to be run."	Change to: "Responsibilities for technical decisions must be assigned to the technical committees."	To be considered

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IPAC	4		Te	This is a very open statement and can be read as the Ex Sec being the only person legally able to take technical decisions, or to whom the association delegates the power to do it in all cases, and this is certainly not what was meant. Does this mean that the Ex Sec is the only person authorised to provide feedback to the Commission on technical issues of the regulations and directives?? Or technical feedback to scheme owners??	Clarify...	Agreed, to be considered
RvA			Ge	This makes it absolutely unclear who is responsible for these kind of technical decisions. What are “contractual” conditions and what is “with support of”? Besides: for each answer a timeframe shall be given. If the EA is required to have a structure that enables the EA to respond very quickly to technical questions then there shall be a mechanism to facilitate this, safeguarding the responsibility for technical decisions by the technical committees.	Change to: “Technical issues to be resolved within a short timeframe (< 5 days) may need to be communicated by the Ex. Secr. after consultation of the chair of the respective TC without discussions in the committee.	noted
RvA	5		Ge	What are decisions in the peer evaluation process? Are the qualification of a TM or TL, the approval of a template for the report, the setting of a date for a PE, the composition of a team such decisions? If so, is the MAC competent to make these decisions, and is the MAC independent in its decisions on a given peer evaluation if the MAC is responsible for the team composition etc.? According to the AoA and RoP the MAC takes decisions on the results of a peer evaluation, in a	Specify in more detail the responsibilities of the MAC and consider to make the process the responsibility of the secr., based on the policies and rules set by the members (GA).	No change to the existing structure

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				independent manner!		
DANAK	6		ge	Ex secretariat is not defined in the document. All responsibility of work from the secretariat shall be for the Ex Secretary	Operational activities must be performed under the responsibility of the Ex secretary	agreed
IPAC			Te	Again a very open statement - it can be read as all the technical committees reporting to the Ex Sec	Clarify...	Yes, to be considered
SAS				The EX Secretary and not "Secretariat" will be responsible to perform the operational activities.		To be considered
NAB MALTA				Operational activities have to be performed under the responsibility of the EX Secretary and not "Secretariat".		See above
IQNet	PROPOSED NEW MANAGEMENT STRUCTURE		ge	The proposal of the new management structure does not include a list of responsibilities to show the updated picture of EB and TMB responsibilities in the new proposed context. It does therefore not allow to judge on the appropriateness of planned power sharing and coordination and the way stakeholder related issues are assigned. This makes the proposal insufficient to get final approval.	The list of responsibilities EB/TMB need to be added when bringing the document forward to get approval (also if it is only a basic approval to the fundamental change and not yet the detailed set of definitive duties and details)	noted
ACCREDIA	Structure			Not clear what happens to the other committees (CC, IC, LC, Communication..)		No change, will be clarified in the paper.
NAH				The GA and the Exec. Board has policy issues. Reading the table the difference between the three levels is not clear.		See above, will be considered
SAS				Page 3 of the document establishes that the "General Assembly" and the "Executive Board" and the "Technical Management Board" as being		See above

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Draft proposal for a new management structure for EA

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				<p>responsible for “policy issues” <u>without distinguishing the various roles</u> of these three organs.</p> <p>The table on Page 3 then reduces the role of the EA GA to “strategy” and transfers all aspects related to policy to the “Executive Board”.</p> <p>The extent of the term “policy” is not clear at all.</p> <p>“Governing issues” should still be within the domain of the EA GA as long as there is no better definition than the one given on Page 1 where the definitions of governance refers simply to financial aspects without distinguishing between budgeting, etc...</p> <p>Who will define what and how much human resources will be required within the EA Secretariat?</p> <p>Who will benefit from this increase of resources and who has to pay for it?</p> <p>Does the employment conditions include the knowledge about salary and other benefits?</p> <p>Who will ensure that this is a transparent process and that vacancies within EA are open to all EA members?</p>		<p>See above</p> <p>Will be clarified, recommended by ES, discussed and recommended by the EX Board with final endorsement by the GA.</p> <p>No link to the new structure</p>
NAB MALTA				Page 3 of the document establishes that the “General Assembly” and the “Executive Board” and the “Technical Management Board” as being responsible for “policy issues” without		See above

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				<p>distinguishing the various roles of these three organs. The table on Page 3 then reduces the role of the GA to “strategy” and transfers all aspects related to policy to the “Board”. The extent of the term “policy” is not clear.</p> <p>“Governing issues” should still be within the domain of the EA GA as long as there is no better definition than the one given on Page 1 where the definitions of Governance refers simply to financial aspects without distinguishing between budgeting, etc...</p> <p>Who will define what human resources will be required within the EA Secretariat? Who will the employment conditions including salary? Who will ensure that this is a transparent process and that vacancies within EA are open to all EA members?</p>		
IQNet			te	For a better wording replace “General Assembly: Strategic and Policy issues”	With “General Assembly: Strategic and <u>general</u> policy issues”	noted
IPAC			Ge	<p>This separation of issues is theoretical - in most of the cases, and normally the more important ones, operational issues will have an impact of financial issues and strategical issues will impact on operational and financial issues.</p> <p>Separating the discussion of issues according to the nature might result in underestimating or overestimating impacts.</p>		To be considered
			ge	What is reporting relationship of MAC chair to exec	Articulate reporting & other relationship of MAC	No change

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INAB				board	chair in proposed structure to Exec Board and TMB	
IIOC			Ge	<p>Overall, this seems to create a more complex and hierarchical structure. Not only does this mean more bureaucracy but adds additional levels of potential confusion as to who makes decision.</p> <p>An example (the EA view of the IAF/ILAC/IHAF MOU) at the May 2018 EA General Assembly illustrates very clearly that the existing decision-making process already has problems and begs for a simpler system, not a more complex system. In this instance, a position was stated to the IAF Executive Committee which had not been debated or a consensus concluded anywhere within the EA system. Will this new system stop this kind of instance happening or with additional levels and organisations actually increase the likelihood of this kind of problem arising?</p> <p>The worrying part of this new structure is that more committees and more layers could have the net result of more of this kind of error being made as it becomes less clear.</p>	Clarity needs to be given on how this new structure delivers clearer decision-making, listening to the views of all, in a more efficient manner. It is unclear how this is delivered.	Noted TFG 2
DANAK			ge	Governance issues is not a perspective like strategic, policy, technical and operational issues. The GA is responsible for the strategic part of governance issues	-Executive Board: Policy issues	See above, to be considered
BELAC	Table			In the proposed Management structure the text talks about policy and governance issues, where		To be considered

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				governance is not present in the table. We feel that extending the table with this aspect could enhance clarity about the proposed structure.		
RvA			Ge	<p>Table is not clear on a number of issues for example:</p> <ol style="list-style-type: none"> 1. The row policy (decisions) indicate that for peer evaluations a MLA decision is a policy decision. This is not correct. The decision on a PE is for the MAC an operational decision. And this is based within and according to the policies set by the GA. 2. What are technical decisions to be taken in the MAC? Any interpretation issue on requirements for MLA signatories is the responsibility of the HHC, so what technical decisions are taken in de MAC? 3. The issue technical developments suddenly is renamed to “internal technical developments”, why? <p>See previous remarks that need revision of table.</p> <p>It would make clear to members if examples of decisions that has been taken in the past would be elaborated in this document. How will these decisions be taken in the new structure? For example:</p>	Complete revision of table is necessary. And include example. If the orientation is changed 90 degrees this would be possible (columns to rows, vs)	The table shall be re-considered

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				<ul style="list-style-type: none"> - Decisions on extension of scope of the MLA, who will decide how and when this will be done? - Decision to publish a mandatory document on one of the standards? - Decision to revise a procedural document? - Etc. 		
INAB			ge	It is unclear how strategic and policy issues are differentiated under various columns to distinguish the role of GA and Exec Board	Outline what are strategic and policy issues. The role of the GA should be clearly described in the document as is Exec Board, TMB, Exec Sec etc	Agreed, see above
IQNet			te	Some responsibilities should be reviewed for adequacy	<ul style="list-style-type: none"> - Add “Board/MAC/TMB (<u>depending on the subject</u>) to the technical line vs relationship with ILAC/IAF column - Add “TMB” to the technical line vs relationship with stakeholders column 	noted
IIOC				<p>Under this proposal, EA would now have the following layers:</p> <ul style="list-style-type: none"> • General Assembly • Executive Committee 	As above, need to clarify how this system will improve the current decision-making process, in terms of efficiency and effectiveness.	That will be clarified.

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				<ul style="list-style-type: none"> Technical Management Board <ul style="list-style-type: none"> Committees, e.g. Certification <ul style="list-style-type: none"> Food WG, Environment WG <p>This creates a huge level of bureaucracy and very significant cost with all groups meeting once or twice annually. It will be hard to understand exactly who gives the final approval for any one EA action and the role of each of these tiers in the decision-making process. Overall, it seems to cloud the decision-making system rather than clarify.</p>		
ACCREDIA	EXECUTIVE BOARD			<p>Board of 4 people is not a democratic approach.</p> <p>It is not reasonable that strategic and political decisions are prepared by a so limited number of people.</p> <p>To clarify also if the same AB can have more chairs in the Executive Board. The composition of Executive, as it is today, guarantee a balance presence of ABs and also a good balance between technical and managerial people</p>	<p>Keep the Executive Committee like today</p> <p>To be considered if to require that Chair and Vice Chair of EA shall be composed of Senior Management staff of EA Full members (CEO or Deputy CEO)</p>	Will be explained.
SAS			Ge	We are positive to the idea of having an Executive and a Technical Management Board.	Retain the basic idea as proposed.	noted
SAS			Te	The proposal states that the Executive shall include a maximum of four members. This may lead to an	We suggest six members plus a chairman.	Will be considered, see above

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				extensive concentration of power to a very limited number of persons.		
SAS			Te	It is very important for EA to also at this level have access to the stakeholder perspective.	Let EAAB appoint a representative to the Executive.	Not relevant for the new structure. Note: The EA Chair may invite persons/stakeholders, if needed.
SAS			Te	For both the Executive and the Technical Management Board it is stated that the chair or the vice-chair should chair the meeting. This leaves it open to choose that the Chair participates and chairs both or none of the fora.	Be more specific as to participation and chairmanship of the Chair and the vice-Chair.	To be considered Only one person, chair or vice-chair will chair the TMB.
SAS			Te	The proposal says nothing about term of election. This is an important consideration.	We propose a maximum of two times three years. The members should not come up for re-election at the same time.	No change, but can be clarified.
NAH				Electing or appointing of the Exec. Secretary.	The Exec Secretary is elected by the GA (Secret ballot)	No change
SAS				In any case, the EA GA shall decide about new member bodies' applications, member exclusions, stakeholders' agreements and cooperation agreements. It shall never be simply "endorsed"! <p>If the role of the EA GA is reduced to that of "endorsing", in practice, it will be rather difficult to overturn such approvals. EA is still and should remain in the future an association of equal members and not become a company with hierarchical structures!</p>		No change

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				<p>effective for the following reasons:</p> <ol style="list-style-type: none"> 1) Duplication of decision makers, with possible conflict between the 2 bodies 2) Most of the decisions are technical and political, in EA. So, no need to split. Who has to decide if a decision is for one body or for another? 3) If the reason of this change is to speed up the decision process, it would be useful to merge all the committees (like in PAC, or in IAF/ILAC) 4) There is already in EA a board for financial issue, that bring to EA Executive the advice related to balance / turnover 	<p>Merge the meetings in 2 periods of the year (start with technical committee and finish with the GA that makes the decision). This will be also beneficial for the costs of the meetings and travelling.</p> <p>Consider the opportunity to include in the Executive Committee the presence, as observers, of 1 representative of Associate members</p>	
NAH				Where is the border of “technical issues”?		To be considered
ACCREDIA	TECHNICAL MANAGEMENT BOARD			There is a duplication of activities for EA Chair and Vice Chairs, that has to attend now to an additional committee.		To be considered (shall be explained)
SAS				Might there be conflict of responsibilities between HHC and TMB,		No change, but the roles shall be clarified.
NAB MALTA				The proposal establishes that the TMB will be comprised by the EA Chair or Vice Chair (who will be the Chair of the TMB) plus the Technical Committee Chairs. It is indeed important to have more coherence and interaction amongst the various technical committees		See above

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				<p>It is our opinion that it would be better to empower further the Technical Committees rather than try to give power to just 5 ABs (or less, if it is allowed to have the EA Chair/Vice Chair from the same AB).</p> <p>Actually the proposal has the potential to nullify the work done by the Technical Committees as the TMB will take “decisions regarding technical issues”. The TMB can never match the technical competence of the various specialised technical committees within the current EA structure.</p>		
SAS				<p>The proposal establishes that the TMB will be comprised by the EA Chair or Vice Chair (who will be the Chair of the TMB) plus the Technical Committee Chairs.</p> <p>It is indeed important to have more coherence and interaction amongst the various technical committees</p> <p>It is our opinion that it would be better to empower further the Technical Committees rather than try to give power to just 5 ABs (or less, if it is possible to have the EA Chair/Vice Chair from the same AB).</p> <p>Actually, the proposal has the potential to reduce</p>		See above

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				<p>the value of the work done by the Technical Committees as the TMB will take “decisions regarding technical issues” even when there is no guarantee to have enough technical background.</p> <p>The TMB can never match the technical competence of the various specialised technical committees within the current EA structure else these committees and working group feel rather useless.</p>		
INAB			ge	What is position of CPC	Articulate the vision and purpose of CPC within proposed structure	Will not change, but will be explained (see above)
IIOC				<ol style="list-style-type: none"> 1. It is stated that, ‘Responsibility for the general management of the technical committee structure within the framework of policies established by the Executive Board, followed by endorsement of the General Assembly’. Does this 100% mean that the Executive Board does not get involved in the decisions of the TMB, but the TMB reports directly to the General Assembly? 2. At present, technical matters are discussed at technical committee level (Inspection, Laboratory, Certification, etc.) with the representatives of CABs. With the proposed new Technical Management Board, it appears the TMB will be able to make decisions, ‘Decisions regarding technical issues’. If this is the case, there 	Clarify where the authority lies in decision-making, where recommendations are made and where decisions are taken.	<p>No change</p> <p>TFG 2</p>

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				must be the presence of Recognised Stakeholders/EAAB in the TMB to ensure CAB involvement. Without this, there is the risk of CABs being totally outside this process and so they would have to accept resolutions they have not been able to discuss or vote on (CABs have no voting rights at EA GA). In terms of democracy and stakeholders' consultation, improvements are needed and clearly defined areas of involvement.		
IFIA			ge	<p>Today technical matters are discussed at technical committees level (Inspection, Laboratory, Certification, Horizontal harmonisation) with the representatives of CABs. Then these committees propose resolution to EA GA. With the changes proposed the Technical Management Board will be able to make decision on its own and resolution endorsed by EA. The CABs are totally outside this process as they will not participate in the TMB and so they should accept resolutions they have not been able to discuss (CABs have no voting rights at EA GA). In terms of democracy and stakeholders consultation some improvements shall be proposed.</p> <ul style="list-style-type: none"> The relationships and interactions between the TMB and other technical committees are not so clear In the role of TMB, it is written "Decisions regarding technical issues". More 		<p>No changes</p> <p>See TFG 2</p>

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				<p>clarification is required.</p> <ul style="list-style-type: none"> The process In terms of decision making will be more complex with a new "entity" i.e.TMB Why is CAB representation within the TMB avoided as the decisions may impact them? 		
BELAC				Topics often cannot be clearly distinguished as technical or governance, since both are interrelated. BELAC encourages the task force group to include a mechanism of collaboration for issues that have an impact on both aspects.		To be considered
IQNet	Note for TFG 2		te	Clarify MAC activities	Add " <u>Management and Operation of Peer Assessment evaluations ...</u> "	No change
SAS			Te	The transfer of technical decisions from the GA to the Technical Management Board Is a very important change. To safeguard membership input, EA should be a lot more careful to formulate technical decisions not as resolutions, but as change requests to EA M documents.	Phrase the reference to technical decisions so as to emphasise this consideration. E.g. add a sentence after the 1 st sentence in the note, saying "Whenever possible such decisions shall be formulated as change requests to existing EA documents, or as requests to develop a new EA document, in order to ensure membership involvement in the decision and implementation process.".	<p>No change, but that must be explained</p> <p>See TFG 2</p>
	MULTILATERAL AGREEMENT COUNCIL (MAC)					

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IPAC	COMPOSITION OF THE EXECUTIVE BOARD AND TECHNICAL MANAGEMENT BOARD (TMB)		Te, Ge	<p>Currently, since EA is a democratic association, there is an understanding that each NAB will not elect more than one representative to the Executive Committee.</p> <p>With the proposed separation in two Boards, nothing is said about how this democratic and broadest representation approach will be implemented or not, and this is a vital issue. IPAC will not agree with EA being managed by the same (or almost the same) group of 4 or 5 EA members.</p> <p>With this safeguard, the GA might become more reluctant in delegating powers and authority to the organs of EA.</p>		To be considered
TURKAK				Only 3 CEOs/Deputy CEOs representing in Executive Board which becomes main Organ for decision making and operations might not be so democratic that is defined in AoA when you think there more than 36 full members and 14 associate members.	It should be further discussed,	See above
OLAS				The document does not give information on the criteria to use to define who can be member of the executive board or the TMB. For example, is it possible to have two members of the same country in the executive board or TMB?		See above
BELAC	The Executive Board			BELAC strongly feels that a setting of maximum 4 members is insufficient to have an Executive Board that is able to take into account all tasks in an	<i>To consider an Executive Board of 8 members</i>	See above

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				effective and efficient way and to represent the interests and expectations of the whole membership.		
OLAS				The rule of composition is only opening the executive board to 2 full members (apart from the Chair and the Vice Chair), instead of 12 today in the current structure.		See above
SAS				<p>The proposed composition of the Executive Board is not clear. It states that it will be made up of EA members not being council or committee chairs.</p> <p>But is it possible that an EX board members from the same AB as a council or committee chairs? This is not addressed within the current document.</p> <p>The proposed composition is only opening the EX to 2 full members (in addition to the Chair and Vice-Chair) compared to the 12 full members participating in the present EA EX.</p> <p>To our understanding such limiting participation to such a small number of members is not perceived as being democratic enough for such a European institution. How is the distribution between EU and EFTA members in such a board?</p> <p>It is always better to have an odd number of members sitting on a committee in case a vote needs to be taken. In addition, it is also not clear if the EA Chair can have a casting vote.</p>		See above

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				There is a reference to “observers”. The role and limitations of such observers are to be defined. What are the possibilities and limitations of such a position?		
NAH				<p>Exec. Board Note: 1. Exec members – CEOs</p> <p>2.What those it means:”...with the objective to ensure a good spread of experience and profile.” How to execute?!</p> <p>3.Further details shall be defined in the AoA and the RoP. – Not agree.</p> <p>4. The Exec. Board is limited max. to 4 persons. How it is formulated, the Board could consist two persons only as well.</p>	<p>Add. 3.: All the details must be known now.</p> <p>Add 4.: Total number of Exec. Board shall be minimum 6 max. 10 persons.</p>	<p>See above</p> <p>Will be explained</p>
NA			ge	The number of members of the Executive Board seems very low (4).	Recommend to increase the number to allow for a broader NAB representation.	See above
NAB MALTA				<p>The proposed composition of the Executive Board is not clear. It states that it will be made up of EA members not being council or committee chairs. But...can EX members be from the same AB as council or committee chairs? This is not addressed within the current document.</p> <p>The proposed composition is only opening the EX to 2 full members (in addition to the Chair and Vice-Chair) compared to the 12 full members participating in the present EX. Limiting participation to such a small number of members is</p>		See above

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				<p>not perceived as being democratic enough for such a European institution.</p> <p>It is always better to have an odd number of members sitting on a committee in case a vote needs to be taken. It is also not clear if the EA Chair can have a casting vote.</p> <p>There is a reference to “observers”. The role and limitations of such observers are to be defined.</p>		
IIOC				<p>The EA Executive Board needs representation from the Recognised Stakeholders/EAAB. They must have responsibility for reporting all key EA Executive Board issues and gaining consensus from these groups into the key decision of the EA Executive Board. An example of the key need for these other groups in these EA groups is very simply that many decisions which come out of these groups will have an impact on CABs and most importantly their customers and clients. Involving CABs at the key points of the decision-making process helps ensure better decisions and vitally, easier implementation.</p>	State clearly where EAAB/Recognised Stakeholders can be involved.	No change
DANAK				<p>The work for the board is too big for only 4 persons. Small NABs have a better changes to participate in a bigger board.</p> <p>If it is possible to have a board, led by the Chair, and a TMB led by the Vicechair, it will be possible</p>	The total number of board members shall be limited to max. 6 persons including the EA Chair and/or EA Vice-Chair (but excluding observers).	See above

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				to have parallel meetings		
COFRAC		Note, line 2	ge	Increase the number of board members, without duplicating the present composition of the EXE	Max 6 instead of 4 (preferably CEO or Deputy CEO), including the EA Chair and EA vice-Chair,	No specific requirements in terms of number of representatives per country See above
IIOC	The Technical Management Board			As with the EA Executive Board above, the EA TMB also has the same need for Recognised Stakeholder/EAAB involvement	State clearly where EAAB/Recognised Stakeholders can be involved.	No change
OLAS				The rule of composition give also a large place to the Chair and the Vice Chair in the TMB. If we consider the 4 existing committees (laboratory, inspection, certification and horizontal committees), all the technical and policy issues will be managed by a very few number of full members.		See above To be considered
SAS				The following points are not clear: <ul style="list-style-type: none"> Will the TMB Chair have a casting vote? This is important as it may give extraordinary powers to the EA Vice Chair or in general again to the EA EX board. In such a situation, he/she can overturn the discussion held by a technical committee. Can the EA Chair/Vice Chair and a Technical Committee Chair be from the same AB? If this is the case, one AB may have extraordinary powers to set technical policies for all the rest of the EA membership. Again this possibility is more likely given to larger ABs. 		No, but will be explained See above

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				<ul style="list-style-type: none"> Will the various “management groups” within the various Technical Committees be disbanded? If not, what would exactly be their role? <p>To empower the present Technical Committees and their management boards would be the better approach.</p>		TFG 2
NAB MALTA				<p>The following points are not clear:</p> <ul style="list-style-type: none"> Will the TMB Chair have a casting vote? This is important as it may give extraordinary powers to the EA Vice Chair. In such a situation, he/she can overturn the discussion held by a technical committee. Can the EA Chair/Vice Chair and a Technical Committee Chair be from the same AB? If this is the case, one AB may have extraordinary powers to set technical policies for all the rest of the EA membership. Will the various “management groups” within the various Technical Committees be disbanded? If not, what would exactly be their role? As per my previous comment, it would be better to empower the present Technical Committees and their management boards. 		See above
NAH				The TMB Chair is the EA Exec. Chair or Vice-Chair. Why, I don't understand the reason behind.		Will be explained
IQNet			te	The list of the TMB related responsibilities mentions in addition to the main duty to coordinate the EA technical activities also “decisions regarding technical issues”. Recognizing that the structural composition of the TMB as well as the meeting	The type of technical decisions should be more clearly defined as many strategic decisions may be of technical nature and this is not the authority of TMB or TMB alone.	No change

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				agenda will provide a coordination mechanism respecting the executive board's authorities (e.g. responsible for monitoring strategy implementation).		
BELAC	Note			BELAC appreciates the intention but takes the view that this goal may be impossible to achieve if the number of members of the Executive Board and the TMB is too limited.		Will be explained
RvA			Ge	What is the reason for this note? As all members are chosen in a democratic process each AB has the chance to participate. What are small NABs?	Delete note	Agreed, but should be explained why that note is not useful
SAS				This note seems rather isolated and out of tune with the rest of the document. It will be rather difficult for small NABs to participate to the EA and/or the TMB. Is there a definition of "small NAB"?		See above
NAH				Small NABs... - How to ensure it? please define!		See above
OLAS				The note invite the small ABs (definition of small ABs ?) to get involved in the executive board and / or the TMB but, the chance to reach this goal is very weak due to the very limited number of places in the different committees.		See above
NAB MALTA				This note seems rather isolated and out of tune		See above

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				with the rest of the document. As per the rest of our comments, it will be rather difficult for small NABs to participate to the EA and/or the TMB. Is there a definition of “small NAB”?		
IQNet			ge	The note states that “small NABs should get a chance to participate in the Executive Board and/or the TMB.” considered to be not enough reference to small NABs	This aspect merits be more than just a note and also it should be much more specific how this intent shall be addressed- It is cost relevant and of tremendous strategic importance to give small NABs a stronger voice.	See above
EAAB	Note	Page 5	ge	EAAB Chair should be member of the Executive Board. This is living and proved best practice in IAF. At least EAAB chair or another EAAB member should get an observer status.	The MAC Chair and the EAAB Chair or another EAAB member may be observers of the Executive Board.	Noted No change
EAAB	Note	Page 5	ge	In addition to or alternatively, the EAAB Chair or another EAAB member should be a member/observer of the Technical Management Board	The MAC Chair and the EAAB Chair or another EAAB member shall be permanent observers in the TMB.	noted
IPAC			Te	EA (like EU) is composed mainly of small and medium NABs - so small NABs “shall” and not “should” have a chance to participate in the Boards	Change “should get” into “shall have”	See above No change
ACCREDIA	MEETINGS REGIME			The meetings regime will push to have meetings together. So, no reason to split the 2 committees!	Keep as today the Executive Committee	Will be explained
nah				GA is the highest decision-making body. The note is unclear.		Note shall e deleted
SAS				Will the minutes of the meetings of the EX be available for the EA Members?		No change

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				Will the minutes of the TMB be available for the EA Members? ...or will we create some different clearance levels of information, which can only be accessed by the selected few?		
NAB MALTA				Will the minutes of the meetings of the EX be available for the EA Members? Will the minutes of the TMB be available for the EA Members? Or will we create black boxes of information which can only be accessed by the selected few? This does not augur well for transparency.		See above
IQNet	Note		te	We agree that the GA, or rather the content of the GA, may be improved. For e.g. the verbal reports from the various Chairs may be limited to issues on which decisions need to be taken.	<ul style="list-style-type: none"> - Consider Stakeholders representative to participate in the TMB (even if just as an observer) - Consider reviewing Stakeholders status within EA (following IAF example) 	See above
SAS				We agree that the EA GA, or rather the content of the GA, may be improved. For e.g. the verbal reports from the various Chairs may be limited to issues on which decisions need to be taken. In the contrary, many attending the EA GA may hear at this occasion the first time in more details what was really performed in the technical committees and can compare it with the		See above

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				information coming back (if any) from their representatives.		
ACCREDIA	EXECUTIVE SECRETARY			<p>"The Exec. Secretary shall be the chief executive." Not clear the meaning of this sentence. Please clarify.</p> <p>The Exec. Secretary applies the decisions taken by the Organs of EA, with no power to influence or modify the decisions of the organs.</p>		Clause will be deleted
TURKAK				<p>ExCOM still exist in this new regime?</p> <p>There are 4 members of ExBoard, and it might be hard to supervise TFGs with these members of Board, especially one of the member of is EA Chair/Vice Chair</p>	The Executive Secretary shall be responsible to develop the projects agreed with the EC when EA is acting as consultant for the commission. To achieve the agreed outcome the Executive Secretary shall appoint a "project leader" member of the secretariat and will join a TFG comprised by experts from NABs to develop the work. Each TFG shall be supervised by a member of the Ex Board or an assigned NAB representative.	Clause will be deleted
SA				<p>Note 1: Communication and publication activities are operational activities and therefore in the remit of the Executive Secretary.</p> <p>Note 2: The status of the CPC shall be discussed in the Executive Committee and in the GA.</p> <p>We agree that some communication and publication activities in relation with EA are pure</p>	<p>Note 1: Some communication and publication activities are operational activities and therefore in the remit of the Executive Secretary.</p> <p>Delete Note 2.</p>	agreed

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				operational activities and should be under the responsibilities of Executive Secretary. However there are other communication and publication activities that are in relation with ABs. In the past CPC have played very important role developed strategies in relation with communications and publication activities and have been also the center where ABs could exchange the experience in relation with promotion, so our proposal is to keep the CPC also in future.		
RvA			ge	<p>Having the CPC only mentioned in a note in this part is not a true reflection of the importance of the CPC.</p> <p>It is not clear what is meant by “The position of the Executive Secretary should be a corporate body (“Organ”) of the Association with all related rights and duties”. Why and what is the impact?</p>	<p>Make a special paragraph stressing that CPC is a committee and the chair will be in the board.</p> <p>Explain or delete.</p>	See above
NAH				<p>“The Exec. Secretary shall be the chief executive.” Not agree. The Exec. Secretary is the chief of staff.</p> <p>Who controls the Exec. Secretary?</p> <p>Communication and publication related execution is the responsibility of Exec Secretary only.</p> <p>Communication strategy and policy is in the hand of CPC – Exec Board – GA on the end.</p> <p>Note 3:I’m afraid, I don’t understand fully...</p>		See above
IQNet			te	Some of Executive Secretary responsibilities are only addressed in the matrix on page 3, which is	The list of the executive secretary responsibilities shall include a specific task to	

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				not enough	undertake active stakeholder dialogue with recognized stakeholders on relevant issues and inputs.	
IPAC			Te	1 st line: operational activities can be understood as covering the technical committees and not only the secretariat.. 3 rd bullet: "...have the broadest powers..." seems very open and wide ranging 4 th bullet: "...shall be authorised by the..." seems to prevent any delegation (which is not good management) and even to overcome the Chair and Vice-Chair authority.	Change 1 st line to "... be responsible for the management of the internal staff and day-to- day business of the association" Change 3 rd bullet to "...have the necessary powers..." Change 4 th bullet to "...shall have the authority to..."	Will be revised
IIOC				What does, 'The Executive Secretary shall be the chief executive', mean?	Clarify	Will be deleted
BELAC				General: <ul style="list-style-type: none"> Information on the competence criteria and type of contract (limited mandates or long-term contract) of the Executive Secretary should be provided and taken into account together with the definition of tasks and responsibilities of the Executive Secretary. The text does not include the responsibilities and obligations of the Executive Secretary in terms of reporting lines 	To be added: <i>Competence criteria, type of contract and tasks delegated by the General Assembly shall be approved by the General Assembly</i>	No change

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		<p>3d bullet point</p> <p>4th bullet point</p> <p>7th bullet point</p>		<p>At anyway, BELAC takes the view that the tasks of the Executive Secretary shall reflect the structure and therefore the following statements should be reconsidered with respect to the intentions of the text.</p> <p>“The Executive Secretary shall have the broadest powers to manage and administer the association’s day-to-day business and shall implement the decisions...”. => when managing day-to-day business requires decisions not fully in line with the predefined strategy or framework of EA, the executive secretary shall not be allowed to handle without backing of the other organs of the organisation.</p> <p>“All documents committing the association in its day-to-day business shall be authorised by the Executive Secretary,” => This sentence is very unclear. To which documents does this statement extent ?. This sentence may be read as a “veto-right” for the Executive Secretary in case EA-procedures deal with the day-to-day business. BELAC requests further clarification since it also acknowledges the authority of the Executive Secretary to authorise certain types of documents.</p> <p>“The Executive Secretary shall be responsible to establish relationships with the EC DGs in order to promote accreditation in the EC. The Executive Secretary shall report to the TMB and the Ex Board</p>	<p><i>To identify the reporting line(s) for the executive Secretary</i></p> <p>The Executive Secretary shall have the power to manage and administer the association’s day-to-day business <i>within the framework defined by the organization.</i> The executive Secretary shall implement the decisions ...</p> <p>The Executive Secretary shall, be responsible to establish relationships with the EC DGs in order to promote accreditation in the EC . <i>The</i></p>	Agreed

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EA-member NAB or stakeholder organization	Part, Section, Clause No, Sub-clause No, Annex/Figure/Table (e.g. 3 or 3.1 or 3.1.1, Annex 1, Table 2)	Line No to be detailed when several § are under the same clause (eg.1-4 or 11)	Type of comment (see foot- note)	Comment (<u>justification for change</u>) by the NAB or stakeholder	<u>Proposed change</u> by the NAB or stakeholder	Observations by the body owing the document
				as appropriate.”, BELAC understands that the Executive Secretary will act following interaction with the relevant EA organs. Although this interaction may be more frequent with the Executive Board and the TMB, relationship with the General Assembly and the MAC should also be considered. .	<i>Executive Secretary shall act based on the mandates given to him by the relevant EA organs and will report to them as appropriate..</i>	Agreed, no change
COFRAC		14	ed	Replace ExCom by TMB		To be considered
SAS	Note 2: The status of the CPC shall be discussed in the Executive Committee and in the GA.			Certainly, it is useful to have some discussion but the task of the EA CPC cannot just be taken over by the secretariat of EA. Perhaps it may be useful to see if the role of the CPC within the committee structure can be adapted as it always has (like a lot of other committees and working groups) an educational benefit to the members being interested in such topics covered by the EA CPC.		No change
ACCREDIA	GENERAL ASSEMBLY			EA wants to be democratic. Stakeholders opinion is well taken into consideration in the technical committee, but not in GA decisions.	Recognize in the decision-making process the importance of Stakeholders. Reply the IAF structure for decision in the GA.	No change

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SAS				<p>We have strong reservations against the statement <i>"If more decision-making power will be delegated to the EX, TMB...the tasks and responsibilities of the GA may be evaluated (in a second step)"</i>.</p> <p>This is aggravated by the fact that in reality, only 4 ABs (the EX) and the Executive Secretary will in essence have the power.</p>		Will be deleted
IPAC			Ge	With the decrease of the representation of EA members in the new Boards, it becomes more unlikely for the GA to delegate more powers to a smaller group or members	Ensure that no duplication of EA members in the Boards is allowed; Adopt e-governance tools, or other solutions to ensure that members do not lose their influence in the important decisions of EA, etc.	Will be deleted
BELAC				EA is an Association of NAB's and ensuring the commitment of the EA members in the governance of the Association should be an essential goal. This should be taken into account when considering any type of transfer of the decision-making power of the General Assembly to other EA organs.		Will be deleted
NAH				Don't agree. The GA is the highest decision-making body of EA, so this question should be treated very carefully.		See above
NAB MALTA				<p>We have strong reservations against the statement <i>"If more decision-making power will be delegated to the EX, TMB....the tasks and responsibilities of the GA may be evaluated (in a second step)"</i>.</p> <p>This is aggravated by the fact that in reality, only 4 ABs (the EX) and the Executive Secretary will in essence have the power.</p>		See above

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OLAS				The paragraph concerning the General Assembly is not clear. However, it could be understood that, depending on the decision-making power assigned to the other committees, EA would be in a position to modify the tasks and responsibilities of the GA. Therefore, according to the objective of the proposal, the duties of the GA should only be limited to endorse / validate / register the policies developed by the other committees.		See above

Comment made by Jan van der Poel as member of the TFG 1 in October 2018:

I do not support the position of the MAC and MAC chair as presented in the revised text (document prepared for the GA in November 2018). I am of a strong opinion that the MAC should not be under the TMB, preferably also not in the EXB, but reporting as independent council to the GA . Of course for some things the MAC chair should have access to the HHC and/or the EXB.

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