

## **EA IC - Convener's Report**

### **Introduction**

The EA Inspection Committee (EA IC) is the forum for discussion of all questions related to the accreditation of inspection bodies (IBs) in EA. The EA IC's main task is to harmonise the accreditation activities for IBs within EA. The EA IC also promotes the exchange of experience between EA member accreditation bodies (ABs) and stakeholders (SH) as well as with ILAC IC regarding the application of ISO/IEC 17020:2012 in different technical fields including the regulated field in Europe.

The chapters in the report follow the new template of the EA Work Programme 2018 and gives the status of the implementation of the committee's work plan after the 36<sup>th</sup> meeting as well as the corresponding follow-ups for activities until end of 2018 (if needed to be already reported for better understanding). In addition, there is a continuation of the standing work item concerning EA strategy 2025.

The 36<sup>th</sup> meeting of the EA Inspection Committee (IC) took place on 13 September 2018 in Warsaw, Poland after the meeting of the EA Certification Committee.

Rolf Straub (SAS) chaired the Committee. In addition, a one day workshop followed the meeting.

The EA GA in Bled, Slovenia, beginning 23.05.2017, approved the new WP 2018 that was considered for the activities of EA IC in 2018.

This convener's report follows the work programme of EA IC and reports activities until October 2018. The WP 2018 was closely followed and will be mostly completed before end of 2018.

### **(1) Operation and management of the peer evaluation system**

So far, the EA IC has no work item directly related to the peer evaluation system of EA. Therefore, no activities and comments reported.

### **(2) Interpretation and harmonization of accreditation criteria for national accreditation bodies and conformity assessment bodies**

#### **(2.1) Common understanding and application of ISO/IEC 17020 by treating current questions from members including follow up on the revision of ISO/IEC 17020.**

At this stage, the activity helps to clarify unclear issues in the 2012-version (current valid version) of the standard ISO/IEC 17020 and in the assessment practice (review of the discussion in EA IC depending on the actual need).

The agenda points are covered by discussions of current problems of members such as national accreditation bodies (NABs) as well as stakeholder (SH) organisations. If possible, the effort will help generating consolidated interpretation of requirements of ISO/IEC 17020:2012 as well as a presentation of the answers for lack-ups.

#### **Decision: Questions and Answers (Q/A's)**

- The EA IC approved all EA IC frequently asked questions (FAQs) as updated after the 35<sup>th</sup> meeting in March 2017 except the question from NA concerning the type of inspection body (IB) related to the item inspected (see former convener report).
- NA was requested to rework the question again else a clear answer from the Review Group (RG) is not possible.

- EA IC agreed that by the next meeting, the FAQ list would be further extended with the new question from UKAS discussed during the meeting in Warsaw in September 2018.

**NOTE** Approved questions are added to the global FAQ list. It is not the intention to review previously agreed Q/A's which does not prevent EA IC members from looking at them regularly. The list is extending continuously. The Chair made all participants again aware to first consult the FAQ list before asking questions to EA IC or giving answers to questions submitted by others.

**NA:** An organization wants to use its in-house inspection body (type B) to inspect items that have been sent in for service by an external customer. The organization would assume temporary ownership of the items while the items are in its possession?

General Situation: Customer sends item to an organization for service following by an accredited inspection. According to NA, the organization assumes temporary ownership when item is received and performs service. After, the in-house inspection body (type B) inspects the serviced item, the organisation sends item back to customer and customer takes back ownership.

Encountered specific situation: A Norwegian hospital sends its pressurized gas containers to an organization (notified body) outside of Norway that has an in-house IB accredited as type B inspection body by another NAB. The process of the encountered situation is as described above.

In all cases, the inspection report issued by a type B IB is primarily for its parent organization (organization of which the inspection body forms a part).

As one approach, it can be concluded that the inspection report primarily covers the quality and conformity of the performed service / the maintenance of the gas containers performed by the parent organization. The ownership of the container may not be the crucial aspect in this case to be considered for decision about the type but rather the work done on the item. But, of course it depends on what exactly the inspection report states and the work order covers.

If the container really belongs to the organization performing the service and the inspection, and the hospital only rents the containers (and has appropriate contracts to prove it) to get the pressurized gas in a proper way stored, then an inspection by a "type B" IB is possible without any further consideration as long as the item inspected is the container.

If the container belongs to the hospital, the approach with a temporary transfer of ownership (as applied in the example) seems to be a sort of dodge to justify through the suddenly changed ownership of the item inspected (the gas container) a proper use of a "type B" IB. This approach seems not to be very appropriate. As the question is formulated, "type B" is not appropriate. If the containers are owned by the hospital a "type C" IB is the appropriate alternative for the inspection part.

To conclude: Depending how the item inspected is defined, the type of inspection body that is allowed to operate on the pressurized gas cylinder (to inspect the filled cylinder) may change. Looking at the gas cylinder itself or to the service provided on the gas cylinder (as the item inspected) may change the type of inspection body.

**UKAS:** If an IB is generally seen to comply with "type A" independence requirements and then hires specialist resource (to increase competence for specific tasks) to complete defined tasks but identified that the hired specialist resource has provided design, manufacture, supply or installation etc. within the scope of the 'items inspected' but not for the specific task assigned (i.e. the actual inspection activity undertaken) does this prevent the IB from continuing to claim "type A" independence?

For example - If an IB hired a rail vehicle designer (scope of the item inspected) to verify the fulfilment of a design process for 'vehicle A' and it can be demonstrated that the rail vehicle designer does not engage in any design of 'vehicle A' (the item inspected) does this comply with "type A" as defined by ISO/IEC 17020 and ILAC P15?

Some comments, especially regarding interpretation under ILAC P15 were given. The differing ISO/CASCO recommendations concerning the item inspected were discussed. For finding solutions, the possibility that the ERA scheme owner (railway sector) could allow "type C" or not mentioning the "type" of inspection body by stating only "being accredited under ISO/IEC 17020" was mentioned. This would help to be more flexible for such particular situations.

## **(2.2) Establish and run technical networks (TN), working groups (WG), task forces (TF) or review groups / review panels (RP) to facilitate the work and to treat technical issues of EA IC.**

### **(2.2.1) Technical network (TN) motor vehicle ("car") inspection).**

According to members involved in car inspection, CITA issued some documents with recommendations/guidelines for specific areas in car inspection. Now, the documents are only available for CITA members but certainly not limited to them. The EA IC wishes to make available these documents to EA members.

Further, presentation of issues related to type approval and the main changes included in the new regulation (EC) 2018/858 took place.

The Chair raised his concern to the proposal to expand the TN car inspection with type approval. According to him, EA IC should not include type approval into the scope of TN PTI because from his point of view it should not be mixed together as the purpose of the involved tasks is completely different. Instead, EA IC should open another TN dealing with the particularities of type approval.

### **WG EA-CITA revised terms of reference (ToR);**

The final version of the ToR contains three main changes:

- The convener period became 2 years instead of 3;
- The (initial) WG became a TFG;
- There is a limitation of the number of members in the TFG;

Regarding the rather limited actual number of members, EA IC decided to remove the maximum amount of 6 but left the minimum of 4.

Following a comment for enhancing a balanced representativeness, the EA IC agreed putting the following additional sentence to the ToR:

"The results of TFG is based on a common agreement of both parties (EA TN PTI and CITA)"

### **EA-5/02 INF: 2015 - EA Guidance on the Application of ISO/IEC 17020 in Periodic Inspection of the Roadworthiness of Motor Vehicles and their Trailers**

Patrik Andersson (SWEDAC) reported that proposals were made for the revision of the document. At the moment, the TN is not ready to present the review of EA-5/02. Further updates concerning the revision would be presented at the next meeting of EA IC.

Patrick Andersson will present the proposal to change EA-5/02 and give an update from the TN at the next meeting.

As the minutes of the last meeting of the TN in Madrid are needed to be revised on item 6.1 "Independence of PTI centres", the part must be re-worked.

Claudia de La Calle and Patrik Andersson will give the feedback of EA IC to the keeper of the minutes.

### **(2.3) Organize workshops for members of EAIC on special issues of ISO/IEC 17020:2012 and document ILAC P15 or other guidelines for inspection.**

#### **(2.3.1) Warsaw workshop, September 2018, on ISO/IEC 17020:2012 and ILAC-P15:07/2016.**

Three issues to be finally dedicated to be covered in the EA IC workshop of 14 September 2018:

- (1) Examination issues in inspection, including the added point of inspection as a whole service package as expected by some clients (presented by FINAS).
- (2) Interface issues related to the application of ISO/IEC 17020 and ISO/IEC 17025 – (confirmed by EA IC plenum).
- (3) Evaluation risks associated with contracts for combined activities on the market, e.g. periodic service / maintenance and subsequent inspection of lifts (in use) done by the same or by related companies (related to (1)).

The three priority themes (see above) treated and presented in different order and comprehensiveness by all six workshop groups considered aspects related to:

- Examination issues in inspection - General Issues in Assessment  
Discussion in the working group of examples encountered in assessment practice and giving pros and cons.
- Examination issues in inspection - Interface issues related to the application of ISO/IEC 17020 and ISO/IEC 17025.  
Analysing text containing paragraphs A to H mainly related to inspection and testing activities and discussing in the working group the statements mentioned in each paragraphs.
- Extension of inspection to a 'whole service package' as expected by some clients, who want a full service without taking care too much about all details of accreditation and risks associated. In addition, check of the risks associated with contracts for combined activities on the market (e.g. periodic service / maintenance and subsequent inspection of lifts (in use) done by the same or by related companies).

#### **(2.3.2) Requirements for accreditation bodies and for accredited IBs**

First results of actual survey from 2016 on inspection scopes on accreditation certificates covering pressure vessels (regulated field) and periodic inspection of lifts (non-regulated field) showed that it was most difficult and actually impossible to identify similarities, even more since some examples are not in English (there is a large difference in presentation of scopes in Europe).

Therefore, the Chair presented a new survey on inspection scopes on accreditation certificates covering:

- Pressure vessels (regulated field)
- Periodic inspection of lifts (non-regulated field)

This new survey is based on more precise and identical case studies for easier comparison and harmonisation purposes. For same purposes, scopes have to be provided in English, not in local languages. In addition, for educational purposes some background information was provided with the questions.

The Chair and Vice Chair presented the obtained result of the survey listed by national AB, number of columns, detail of columns and product / field of inspection for the example of inspection of lifts and pressure vessels. It seems, that despite the fact that

the task was the same for all participants in the survey, the presentation of the (hypothetical) scope of the inspection body still alters very much among national AB.

ILAC G 28 and EA 2/17 M (A3) are the base to draw up a scope of accreditation. Check all scope presentations submitted to the EA IC secretariat to respond to the survey.

The participants were asked to go through the scopes and check what they have and what is missing according to the requirements in the two documents. For this, the Chair will draft some questions to members to answer in a structured way (will start end of 2018).

## **(2.4) Review of new and existing guidance documents and standards.**

### **(2.4.1) Accreditation of bodies performing NDT activities (ILAC IC WG5)**

Was not discussed at the meeting. See report of the recent ILAC IC meeting in Singapore, October 2018 (point 7 in this report).

### **(2.4.2) ILAC-P15:07/2016 – Application of ISO/IEC 17020:2012 for the Accreditation of Inspection Bodies**

Ger Nijhoff (RvA) presented the issue regarding the revision of ILAC P15. He started by giving elements of history: A workshop on impartiality and independence was on the agenda of the ILAC IC meeting in Vancouver, October 2017. The results were presented at the EA IC meeting in Windsor, March 2018. Now, ILAC IC formed a TFG to identify the needs to amend ILAC P15 in order to include a clarification on a relationship between impartiality and independence. Due to the outcome of the ILAC IC workshop as well as due to other topics not fully clear in the ILAC P15, the policy document needs again clarification.

Brahim Houla, the TFG convener, based on comments of the TFG members, made a list of proposed changes for further consideration. According to Ger, the ILAC IC will make the decision to revise or not ILAC P15. If yes, the TFG will start to re-draft the text in October 2018.

Ger Nijhoff concluded that the actual status is that the TFG convener requested EA IC for a position on this item. To set the EA IC position to be forwarded to ILAC IC, the Chair asked the audience if it supported the revision of ILAC P15. A large majority of EA IC members were in favour of a revision of ILAC P15 and that the TFG would start the work.

EA IC agreed to support the intention of ILAC IC on the revision of ILAC P15.

**NOTE** The future of this document was discussed at the ILAC IC meeting in Singapore, October 2018; see point 7 in this report. The ILAC IC meeting in Singapore in 2018 gave more evidence whether a revision of ILAC P15:2016 is necessary and what exactly has to be amended.

### **(2.4.3) EA-5/02 INF: 2015**

The TN “car inspection” together with the TFG “EA-CITA Cooperation” have already identified some paragraphs in the document that need revision (e.g. EA-5/02 clause 7.3.1) for better guidance. For further information, see point 2.2.1 in this report.

### **(2.4.4) ILAC G27 - Guidance on measurements performed as part of an inspection process and ILAC G28 - Guideline for the Formulation of Scopes of Accreditation for Inspection Bodies**

As a result of an ILAC ballot earlier this year, the guidance document has been approved for publication. The documents are now applied (see also further tasks in the survey under point 2.3.2).

## **(2.5) Revision of Standards**

### **(2.5.1) Revision of ISO/IEC 17011 - Repercussions on ISO/IEC 17020**

No points to report.

#### **(2.5.2) Revision of ISO/IEC 17020:2012**

No points to report.

#### **(2.5.3) Revision of ISO/IEC 17025**

No points to report.

### **(3) Cooperation with the European Commission, EFTA and competent National Authorities**

#### **(3.1) EU ETV (Environmental Technology Verification)**

The Chair reported on behalf of Mr. Pierre Henry (EC DG ENV) about the latest development on EU ETV including the adoption of Version 1.3 of the general verification protocol (GVP), which came into effect on 1st April 2018.

The Chair concluded that this is the latest programme requirements on verification for those who were involved in this field of activities. EC DG ENV took into consideration everything that was previously forwarded by members of EA IC to Mr. Pierre Henry.

The leading group list was not adapted as the members that are interested in EA ETV issues are still the same.

#### **(3.2) European Railway Agency (ERA)**

Patrik Andersson reported that the ToR for the working group consisting of ERA and EA representatives was set up. He commented that ERA wishes a larger group with more EA members attending the meetings (UKAS and SWEDAC are already part of it).

#### **(3.3) Ship inspection and inspection of ship recycling**

##### **(3.3.1) Inspection of Seaworthiness of Ships and Recycling of Ships**

No activities to be reported

### **(4). Cooperation with the private sector in development, maintenance and implementation of accreditation and conformity assessment**

#### **(4.1) Development of new schemes / activities covered by inspection. Depending on the actual situation and need. There is no activity to report from the meeting.**

No activities to be reported.

### **(5) Cooperation with stakeholders (SH) and other interested parties**

Andreas Kinzel (AK), the EUROLAB representative in EA IC, presented an update on latest developments in EUROLAB.

### **(6) Cooperation with third countries**

There is no particular activity to report from the meeting.

### **(7) Cooperation with international organisations**

#### **(7.1) Co-operation with the relevant ILAC (IC) committee.**

EA IC representatives attended the 14th meeting of the ILAC Inspection Committee on 26th October 2018 in Singapore.

#### **WG 3 - Scopes of Accreditation - ILAC G28:2018**

The WG is disbanded. No further actions needed from EA members

#### **WG 4 - Measurements performed as part of inspection**

Circulate the updated document for ILAC comments as the next step. → Comment the document!

#### **WG 5 - Accreditation of bodies performing NDT activities**

There are 40 pages of comments in the 2<sup>nd</sup> ILAC comment phase. For further work an increased commitment to continue the work. It seems that some members do not like the document despite the initial intention of both committees ILAC IC and AIC to produce such a document. It also seems that the document is too technical. Document will be archived without any copyright open for use also for EA. There would be a need of a more generic document.

**NOTE** ILAC G19 and ILAC G7 are from the same type but seem to be further supported.

#### **TFG on revision of ILAC P 15**

Decision to revise ILAC P 15, on the ToR for the WG and on WG composition.

#### **Publication of Q&As on ILAC website**

Go public with the database for Q/A in about 4 weeks.

#### **TFG on procedure for handling Q/As**

Presentation of the revision of the process for the treatment of question and answered from members. There will be some slight changes in the process. To further work on the process the ILAC IC will check the ToR concerning the voting process.

Submission of questions at least 6 weeks in advance to be able to deal with the questions from members. Questions submitted from consultants will no more be accepted in ILAC IC as questions from members as they follow other interests than those from members.

#### **Survey on workshop on independence and survey on possible workshop topics**

Decision on whether to organise workshop activity in 2019 and on topic for any workshop activity in 2019

Survey for workshop topics showed following points:

1. Impartiality
2. Measurements - application of ILAC G27
3. Independence
4. Scopes - application of ILAC G28
5. Subcontractor - application of ILAC P8
6. Facilities and equipment - application of ILAC P9

Topics: Workshop on risk based approach in inspection in one year from now (before see planned IAF workshop on product certification in Mexico covering similar topics)

#### **Questions from members**

All questions related to confidentiality, liability, subcontracting and use of quality management manual in inspection were submitted by a consultant and former member of EGAC. In future, only questions from members are treated in ILAC IC.

#### **Report from ILAC IC liaisons (relevant for EA IC members)**

ILAC AIC WG sampling: Guidance documents about sampling contains information concerning testing aspects but not sufficient for inspection purposes (looking about more generic information therefore produce a guidance document). In addition, example for scoping in ILAC G 28 is needed. If a guidance doc is developed, sampling will be most probably linked to testing (ISO/IEC 17025:2017 and not to ISO/IEC 17020:2012).

## 8) Consolidation of the European Accreditation Infrastructure and Management of EA

### (8.1) Report on EA Committee Work

#### (8.1.1) EA committee meetings

...EA GA meeting in Sofia 2018: The EAIC Chair's report and his presentation at the EA GA was published among the meeting papers of EA GA.

#### (8.1.3) EA IC elections

No points to report.

### (8.2) EA IC Work Programme (WP)

#### (8.2.1) Work Plan (WP 2018)

The Chair indicated that this year's WP 2018 was in line with the current discussions. So far, the EA IC addressed all issues and no change needs to be made in WP 2018.

#### (8.2.2) Work Plan (WP 2019) and Terms of Reference (ToR 2018)

The EA GA confirmed the WP 2019 at the EA GA in Sofia with no further comment.

The ToR of EA IC were endorsed at the last EA GA in Sofia and confirmed.

No resolution of particular interests for EA IC from the last EA GA meeting in Sofia in 2018.

#### (8.2.3) Review of IC documents, including IC-owned ILAC documents + Level 3/4/5 standards

##### Decision

At the moment, no EA IC-owned document should be revised.

ILAC IC-owned document recommended to the EA General Assembly in November 2018 for adoption by EA are:

**ILAC G27:06/2017** – *Guidance on measurements performed as part of an inspection process* has been published and is available from the Publications section of the ILAC website since 02nd June 2017.

**NOTE (1)** This document is intended to provide guidance on measurements carried out as part of an inspection activity for both inspection bodies and the accreditation bodies assessing inspection bodies.

The key objective of this guidance is to help ensure the validity of the measurements performed as part of inspections carried out in accordance with ISO/IEC 17020. It also provides examples via case studies of measurements carried out in inspection that may need to take into consideration the requirements included in ISO/IEC 17025 and ISO 15189.

**NOTE (2)** There are still some discussions in ILAC IC on potential inconsistencies in ILAC G 27 but they should not prevent an endorsement by EA GA as a guidance document for EA.

**ILAC G28:07/2018** *Guideline for the Formulation of Scopes of Accreditation for Inspection Bodies* has been published and is available from the Publications section of the ILAC website since 11th July 2018.

**NOTE** The aim of this document is to assist accreditation bodies in consistently meeting the requirements of ISO/IEC 17011:2017 associated with scopes of accreditation for



inspection body accreditation and to encourage an effective and harmonised approach to scopes among accreditation bodies in relation to ISO/IEC 17020:2012.

### **(8.3) EA Strategy 2025**

The Chair highlighted some issues of the strategy:

- The paper on the strategy presented by the EA GA, TFG 1, received a lot of comments;
- Redefining the responsibility and composition of the Executive Committee and reconsidering the Technical Committees structure and the decision making power of them are part of the new EA Strategy;
- Secretariat role and Stakeholders policy were mentioned in the strategy;
- Having a formal common position at international level was promoted.

### **(9) Further activities, not mentioned above**

No points to report.

---

#### **Next meetings of EA IC**

- 12 March 2019 in Oslo, Norway, hosted by NA
- 5-6 September 2019 in Berlin, Germany, hosted by DAkkS
- Dates of spring meeting 2020 in Bulgaria hosted by BAS to be set up
- Dates of autumn meeting 2020 in Paris, France, hosted by COFRAC to be confirmed

---

#### **For the EA IC Convener's Report for EA GA:**

Rolf Straub (SAS) / Bern 11.11.2018 (v2)

+ / + / + / + / + / + / + / + / +