

# Template for comments – EA Cross Frontier Policy

CEOC International comments

Date: 12-03-2007	Document: EA 2-13 Draft 6
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1	2	(3)	4	5	(6)	(7)
MB <sup>1</sup>	Guidance Clause No./le (e.g. G.3.1.1, Table 2)	Paragraph/List item/Bullet Note (e.g. Note 2)	Type of comment <sup>2</sup>	Comment (justification for change) by the MB	Proposed change to Text by the MB	Secretariat observations on each comment submitted
CEOC			ge	<p>The criteria for cross-border accreditation are of essential importance for conformity assessment bodies (CABs).</p> <p>The rules for subcontracting, initial assessments, surveillance, reassessment, sampling of premises, on-site assessment etc. are given in ISO/IEC 17011. These rules have to be applied also in cases of cross border accreditations. Extra guidance is not necessary.</p> <p>The EA cross frontier policy should be based on the following cornerstones:</p> <p>(1) EA ABs offer and provide accreditation without proactive competition with other EA ABs.</p> <p>(2) EA ABs encourage CABs to use the local AB.</p> <p>(3) EA ABs propose multi site CABs with premises in foreign countries to accept subcontracting of the assessments to the local EA ABs.</p> <p>(4) EA ABs provide accreditation to a foreign CAB or assessments of foreign premises of a CAB in cases where good reasons justify not to use the local EA AB or to accept subcontracting of the assessment to the local EA AB unless an EA AB has limited its activities in its public available policies and rules to a defined area (see clauses 4.3.3 and 7.1.2 j) of ISO/IEC 17011) and the objects of accreditation (CABs/CAB premises) are outside this area.</p> <p>(5) For subcontracting of assessments to foreign ABs and cross frontier accreditations or assessments the relevant requirements of ISO/IEC 17011 apply.</p>		

1 MB = Member Body

2 Type of comment: ge = general te = technical ed = editorial

NB Columns 1, 2, 4, 5 are compulsory.

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CEOC	2.5		te	It is obvious that in exceptional cases there are situations where a CAB's foreign affiliate may have considerable advantages in using the AB of the CAB's home country.	Amend paragraph 2.5 as follows:  In the exceptional case where the <u>CAB has considerably good reasons not to use the local AB or to accept subcontracting of the assessment to the local AB the foreign AB shall provide the assessment and accreditation unless it has limited its activities in its public available policies and rules to a defined area (see clauses 4.3.3 and 7.1.2 j) of ISO/IEC 17011) and the objects of accreditation (CABs/CAB premises) are outside this area.</u> <del>foreign AB is unable to sub-contract the assessment to the local AB, the foreign AB shall then take this into account in deciding whether it is able to provide or continue accreditation and when determining the effort required to undertake any assessment.</del> The foreign AB shall inform the local AB and the EA MAC Secretariat of the reasons why it is not advisable to use the local AB and <del>seek from the local AB any relevant feedback about the CAB concerned with the accreditation.</del>	

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