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**ACCREDITATION AND THE COMMUNITY'S POLICY
IN THE FIELD OF CONFORMITY ASSESSMENT***[Document Certif. 97/4 Rev. 2]***UNICE COMMENTS**

UNICE has noted Commission document Certif. 97/4 Rev. 2 and, being one of the major stakeholders in the accreditation process, it would like to present the following comments.

The starting point of the Commission's thinking in this document is the support which accreditors can give national authorities in their task as notifying bodies according to the New Approach Directives. On this particular point, maximum coherence of national practice is indeed necessary. A key point is comparability and UNICE would argue that uniform application of the EN 45000 series standards is therefore desirable.

The relationship between accreditation and notification is the main issue of this paper. Accreditation plays a role in the markets in that it creates transparency and confidence with regard to certification or laboratory services. In this field, accreditors have to be flexible if they are to meet market needs. Consequently, the second issue to be discussed is customer satisfaction.

The document provides valuable thoughts on the first issue. However, by not differentiating between the needs of the markets and those of the authorities involved, the Commission draws conclusions that might have detrimental effects on the second aspect of accreditation, i.e. customer satisfaction. This, in turn, might endanger the proper functioning of accreditation in respect of its first aspect of creating transparency and confidence.

In UNICE's view, the needs of the markets should be addressed first. The fact that accreditors can offer their services to the national authorities in charge of notifying bodies should not in turn lead to an approach that would narrow down their role to being the "technical arm of public authorities".

It is not clear, however, what the Commission has in mind when it stresses "public accountability". Given the technical nature of accreditation, the main stakeholders are undeniably industry and public authorities, i.e. those who have to give confidence to certificates in the market. UNICE does not see accreditation as relevant for the public at large and would argue that, indeed, most consumers are not even aware of the existence of these services.

Concerning the relationship between accreditation and notification, UNICE believes that the Commission should:

- assist accreditors in obtaining the confidence of national authorities in the quality and equivalence of their services;
- assist notified bodies in producing equivalent results;
- advise member states in organising efficient structures for selecting and supervising notified bodies.

In UNICE's view, the Commission should, on the other hand, refrain from:

- blurring the clear line between requirements of the EN 45000 series standards and the requirements of the directives concerning the technical competence of notified bodies;
- mixing up the clear borders between accreditation and notification by imposing on accreditors the task to police accredited bodies, if this is to imply anything beyond the requirements in the EN 45000 series standards.

On the whole, UNICE believes that this document goes beyond the powers of the Commission and it would therefore suggest that the Commission should limit itself to solving the problems encountered with the good functioning of national notification practices. Much remains to be done in this area and UNICE is willing to enter into some form of structured dialogue with the Commission on this topic.
