

22.8/11/1

16 March 1998

**PROPOSAL TO ESTABLISH A  
“EUROPEAN ACCREDITATION ADVISORY BOARD”**

**UNICE COMMENTS**

The procedures in place today for dialogue with accreditors at both European and national levels are not efficient. Industry is invited to contribute to elaboration of technical documents at European and international level. However, it hardly does contribute, partly because it feels that structures are not transparent, and also because accreditation assumes a fairly low profile in political discussions regarding the Internal Market.

However, with the increased importance of accreditation as a vehicle for free trade in the Internal Market – as well as in the context of the WTO – industry, as the main end-user of the system, is looking for a forum where it can discuss with accreditors technical problems, such as the contents of EA guides or other quasi-normative documents, which have an effect on industry's operations.

There is therefore a clear need at European level for a focal point where discussions can take place and, in areas where accreditation serves the public interest, industry sees the need to involve national authorities.

In this overall context, the Commission has suggested establishment a European Accreditation Advisory Board (“EAAB”) and published draft terms of reference for the proposed body. UNICE broadly welcomes this Commission initiative as responding to a need and it believes that the draft terms of reference can serve as a useful basis for further discussions on this topic. It would, however, like to offer some comments on the draft terms of reference.

*1. Mission statement - Objective*

Points 1 and 2 under this heading describe the mission and the objectives of European Accreditation, but not of the proposed Advisory Board and UNICE therefore believes that these two points would be better placed under a separate introductory heading.

Point 3, which describes the *raison d'être* of the Advisory Board is fairly unclear. The present wording seems to indicate that the Board would be discussing each and every problem arising with accreditors, in which case UNICE would question its added value. The mission statement should be developed further and UNICE would propose the following description:

- (i) The EA Advisory Board shall constitute an independent body composed of the major stakeholders to which EA accounts for independence, technical competence, impartiality and integrity in conformity assessment and its accreditation in the European Economic Area.

(ii) The Board seeks assurance from EA that accreditation in Europe is applied in such a way as to ensure openness and transparency in conformity assessment and quality-driven competition between conformity assessment bodies.

(iii) The Board shall constitute a focal point for discussion, consultation and guidance on matters related to the operation of accreditation in Europe.

## 2. *Composition*

In UNICE's view, the proposed composition would make the Board too large. Given the technical nature of accreditation, a Board thus composed would not be able to conduct meaningful discussions and give thorough advice on technical issues. This would hinder its efficiency and hence the value it could otherwise add to the accreditation process.

In addition, the proposed composition does not, in UNICE's view, constitute the "well balanced representation of the parties" which it is deemed to ensure. In particular, UNICE believes that industry is considerably under-represented in the proposal under discussion and that, as the main end-user, it should be given a greater role.

Since UNICE would be unwilling to participate in a forum where effective work will not be possible, it suggests that the composition of the Board be completely revised, based on the following principles:

- Membership should be based on technical competence.
- The Board ought to be small and effective, with a maximum of twelve members.
- These twelve members should represent only the three major stakeholders, i.e. industry, public authorities, whether national or European, and conformity assessment bodies, each for one third of the seats (i.e. three to four members for each of these categories of stakeholders).
- All other stakeholders mentioned in the Commission's proposal could be kept informed by receiving the agenda and proceedings of the Board meetings. For the sake of efficiency, their participation should otherwise be limited to the extent necessary to assure technical competence.

EA itself should not become a member of the Board. It should provide the secretariat and be represented by its Chairman. Neither the Secretary nor the Chairman should have voting rights in the Board.

## 3. *Tasks and responsibilities*

The main task of the Board should be to review the documents issued by EA with the aim of coordinating national accreditation from a technical point of view. It should thereby contribute to building confidence in the accreditation process in the eyes of industry and national authorities.

Consequently, it should have the task of:

- reviewing those EA documents of relevance to accreditation and certification policy, as well as reviewing procedures before they are used by accreditors,
- giving advice and recommendations to EA on accreditation policy.

In UNICE's view, it must be made quite clear that EA is responsible for its operation and accounts to the Board. The Board should therefore *not* have the power to overturn decisions

taken by EA nor to define accreditation policy. The full responsibility of accreditation bodies for their operations as well as their policies should in no way be diluted.

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