Prot. DC2020OC144 Milan, 25/05/2020

Att. All conformity assessment bodies accredited by the Dept. of Certification and Inspection

Object: **DC department – Technical circular N. 12/2020**
Accreditation for the verification / validation of claims in compliance with the standard ISO/TS 17033

Introduction

The international Technical Specification ISO/TS 17033:2019 *Ethical claims and supporting information — Principles and requirements* **contains principles and requirements for the creation and declaration of ethical claims** and for providing supporting information **where specific standards have not been developed**, or to supplement existing standards.

A Technical Specification is a normative document, not a standard. This gives emphasis to the innovative aspect and the urgency regarding the publication of this document.

This document targets all types of organization and is applicable to all types of ethical claim relating to a product, process, service or organization.

This document can also be used by persons seeking better understanding of ethical claims and of their use. This document contains the requirements for supporting the definition, verification or the creation of programmes for ethical claims, especially when they are related to business associations or specific sectors or markets.

"Good for your health", "made with love", "real taste", "cruelty free", "make love with taste". The claims on labels which speak about our ethical and emotional side are always the most common. How can we know which claims are legitimate, verifiable, accurate, not misleading, and what do they really mean?

Jenny Hillard, ISO working group co-coordinator who developed this Technical Specification, affirmed that the area of ethical labelling is extremely complex: *"There are many types of etical labels and labelling schemes, as well as differences among the various countries and different ways of interpreting information. ISO/TS 17033 is designed to unite key elements from these schemes so that information provided in these claims is clear, well understood and reliable."*

Normative context

ISO/TS 17033 uses information from the series ISO 14020 on labelling and environmental declarations, from the ITC (International Trade Center) Guidelines for Providing Product Sustainability Information, as part of the 10YPF Consumer Information Programmeme, and from the ISEAL Sustainability claims – good practice guide.

ISO/TS 17033 was created jointly by the ISO committee on conformity assessment (CASCO) and by the ISO committee on consumer policy COPOLCO, involving a broad range of interested parties including government representatives, industry, ethical labelling systems operators, consumer associations and NGOs.

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With regard to the legal aspect, the main indicators in the regulations set out below are transversal and identical for all EU countries like those in force in the uSA, Japan and in many other countries. And even if the claims of every sector concern health, nutrition (the UN 2030 Agenda includes them among the ***social sustainability objectives***) are regulated by standards and evaluation against ISO/TS 17033, this strengthens their truthfulness, reliability and superiority with respect to the mandatory requirements. For example, is it not true that the "cruelty free" or the "made without child labour" claims have a social function?

With reference to the mandatory standard, the following factors are recalled:

- *Regulation (EU) n. 1169 /2011* which was drawn up essentially "*In order to achieve a high level of health protection for consumers and to guarantee their right to information, it should be ensured that consumers are appropriately informed as regards the food they consume. Consumers' choices can be influenced by, inter alia,* ***health, economic, environmental, social and ethical considerations."***
- *Regulation (CE) n. 1924/2006 of the European Parliament and of the Council regarding nutritional and health indications i*n order to ensure a high level of protection for consumers (as well as an effective functioning of the internal market) with respect to all claims appearing in commercial communications, labeling and in the presentation or advertising of food products. In order to comply with the law, the use of these indications, for each physiological or nutritional quality shall be based on broadly accepted scientific data. This means that, with respect to the regulated nutrition and health indications as being "of high protein content without sodium" or "without lactose" it will be possible to verify / validate and/or certify on a scientific and analytical basis, the presence or absence of components or ingredients listed below qualifying the claims. Taking into consideration the "*Guidelines on the analytical tolerances during official controls*" of the Ministry of Health, drawn up in the light of the European Commission's "Guidance document *for the control of compliance with EU legislation on reg.(EU)1169/2011 dir.90/496/EEC and dir.202/46/EC with regard to the setting of tolerances for nutrient values declared on a label ".*
- Regulation (UE) 655/2013 is applicable for the cosmetics sector with the aim of ensuring that the product claim is useful, understandable and reliable, and that it enables the final user to take informed decisions and to choose the products that best suit their needs and expectations.
- Article 1 par. 525 and par. 536 of the Finance Law 2019 introducing the prohibition of promotional health advertising.
- Given that TS 17033 also takes into consideration comparative ethical claims (17033 §3.4) we recall the mandatory standards on comparative advertising and competition: Law Decree 145 of 02.08.2007, Article 9 of Regulation 1924/2006, Law Decree n. 67 of 25.02.2000, the Law regarding Consumer Affairs and the Law regarding Advertising Self-discipline.

It must be remembered that <u>simple legal conformity is not certifiable</u> (although it can be submitted to a compliance audit – legal opinion), but it can also be implicitly confirmed in a programme related to quality/quantity characteristics which are above the law.

Socio-economic context

Sustainable development consists of meeting the needs of society by living within the ecological limits of the planet and without compromising the capacity of future generations to fulfill their needs[1]. Sustainable development has three dimensions: economic, social and environmental[2] - which are interdependant; for example, the elimination of poverty requires the promotion of social justice and economic development and environmental protection.

Sustainable development regards common economic, social and environmental objectives for everyone and therefore it can be used to gather together the broadest expectations of society which must be considered by organizations seeking to operate responsibly. The general objective of social responsibility of an organization should be to contribute to sustainable development.

The standard, structured as a stand-alone document, addresses claims which, for example, cover fair trade, animal protection, local sourcing[3] for making labels and other information reliable, accurate and not misleading.

For ethical claims, whichever medium is used (and this includes labelling). the principles contained in all the standards dealing with claims, indications and all the forms of communication of which commercial publicity is an integral part, are applicable. Radio and TV advertisements are to be considered modalities of diffusion of a claim.

An ethical claim can take the form of a statement, symbol, graphic or a logo (amognst the many possibilities), as a stand-alone or combined element/form, and placed on a product package or, an advertising communication or as an informative message (see note 1, § 3.1 of ISO/TS 17033).

1) Standards and rules of accreditation

Introduction	Before starting the evaluation against ISO/TS 17033 these conditions must exist: • It is definitely a claim • The claim is an ethical one • The claim is verifiable, accurate and not misleading • The object of the claim can be related to other standards/schemes • The relevant interested parties have been involved, if necessary Clarifications: **1) It is definitely a claim** It is necessary to distiunguish between ethical claims which are the object of

[1]Source: United Nations (UN), United Nations World Commission on Environment and Development (WCED): Our Common Future. 1987

[2] Culture – the fourth dimension? https://asvis.it/approfondimenti/208-4310/la-cultura-per-lo-sviluppo-sostenibile-nel-festival-2019-dallanalisi-innovativa-dei-modelli-alle-proposte-artistiche; http://www.ilgiornaledellefondazioni.com/content/la-cultura-sostenibile

[3] Definition according to the standard: statement, symbol or graphic that declares one or more ethical aspects (related to economic justice and sustainability issues) of a product, process, service or organization. e.g. local sourcing, fair trade, humane treatment of animals.

	ISO/TS 17033 and an emotional payoff, an exprssion which is associated with a particular brand or product because it embodies values and a philosophy. The payoff supplements and completes the identity of a brand, making it reconizable, memorable, coherent. Some payoffs: Adidas: Impossible is nothing. McDonald's: I'm lovin' it. Nokia: Connecting People. Dove c'è Barilla c'è casa. Amaro Ramazzotti: Milano da Bere. De Beers: A diamond is forever. ISO/TS 17033 is not applicable for payoffs which are <u>only</u> emotional. **2) The claim is ethical** As stated in point 3.1 of ISO/TS 17033, *ethical aspects can include a broad range of social, economic justice and sustainability issues, e.g. local sourcing, fair trade, humane treatment of animals.* A claim which, for example, simply highlights a product's technical characterisitics cannot be evaluated against the requirements of ISO/TS 17033 (e.g. the fuel consumption of a car, how long the battery lasts, the ingredients of a food product), or "the product does not contain sugar", "the product does not contain added sugar" – these are not ethical claims and ISO/TS 17033 is not applicable because they conform with the mandatory standads (Regulations CE 1169 and 1924). If the claim is "product 100% without sugar" this raises it to higher level than the mandaotry standard because it exceeds the tolerances envisaged by the Ministry of Health http://www.salute.gov.it/imgs/C_17_pubblicazioni_2509_allegato.pdf and it becomes, to all effects, an ethical claim because it takes health and nutritional aspects into consideration in accordance with UN Agenda 2030. With regard to validation of the claim in accordance with ISO/TS 17033 the supporting evidence of the claim "100% without sugar" could take the form of accredited laboratory or authorized body testing (e.g. by a university), or product certification. For the claim "Product made without added sugar" this could have, at the most, a compliance declaration with a mandatory standard. The validation / verification is different from other conformity assessment standards as follows: • it does not provide a characterization as a result (test) • it is not an exam (inspection) • it is not a declaration of conformity for a defined period (certification) A claim is ethical when it regards social, economic justice or sustainability issues. More generally, it is ethical when it involves the social aspect of consumer activities, the direct correlation between purchase and its possible social implications (see § 4.2 – reliability, and § 4.6 – equity, of ISO/TS 17033.) In order for a claim to be certifiable as "ethical" it must in some way be

different from a simple legal requirement and it must involve one or more aspects of the social, economic justice or sustainability factors.

3) The claim is verifiable, accurate and not misleading

It is not possible to certify generic claims which are not precise and objective.
Verification and validation are based on scientific and objective data and findings. It must be possible to demonstrate the truthfulness of the claim by means of thorough investigation (professional skepticism).

In order to be declared in conformity with ISO/TS 17033, *the supporting data must substantiate the field of application, the principles, hypotheses and the prevailing conditions (for example, the occurrence of storms). This should be sufficient to enable users (real or potential) and other interested parties to evaluate the statements in terms of scientific principles, pertinence and overall validity, and also to evaluate if a statement is in line with the applicable standard* (ISO/TS 17033, § 8.1).

It is indispensible that every claim is supported by objective, reliable, precise and relevant proof, in accordance with the standard ISO 17029 (points 3.2., 3.3, 4.2.1, 4.3.1, 4.3.5,4.3.7,8, 9.2.2 letter F, 9.4.1 + notes, 9.5.4, 9.6.3, 9.11.1 letter F) and 17033 (points 4.2.2, 4.3.2.1, 5.1.5 letters G and H, 8)

It is necessary to detail precisely what is ensured and how the verification of the requirements is undertaken. This information is provided in ISO/IEC 17029.

A programme is the set of rules, procedures and management for the performance of validation / verification activities in a specific sector or field, specifying the context analysis in which the claim is used, the area of validation / verification, the criteria of competence, process phases and the gathering of evidence. In ISO/IEC 17065 the programme corresponds to the certificatin scheme.

The verification of the correctness of the communication and of the use of the claim (ISO/TS 17033) shall be suported by a verification in accordance with a technical document (programme) which provides for compliance with the requirements on the basis of the claim itself in order to ensure to all interested parties the robustness and truthfulness of the claim.
The evaluation of the scheme in accordance with ISO/TS 17033 is therefore intended to be <u>additional to</u> a verification against a technical document (programme) relating to the specific preparatory and essential requirements for the correct communication of the claim.

4) How the object of the claim can be related to other standards/schemes

<u>a) It is not an alternative to existing certifications</u>

If there are already standards applicable to the claim it is not possible to use ISO/TS 17033 as a tool for alternative validation / verification. This is true for claims such as in the environmental area (e.g. carbon footprint, atmospheric emissions during the product life-cycle) or certain product certifications such as

	organic product or product guarantted by a CE marking, e.g. PDO, PGI. The verification/validation of a claim cannot subsitute other existing or possible future verifications/validations/certifications for product, process, service or organization to which the claim is referred. In order to safeguard the interests of consumers and other stakeholders to which the claim is referred it is necessary to distinguish clearly between the attestation of conformity of the claim and any certifications of the object to which the claim refers. If the claim regards the environment the standards ISO 14021, ISO 14024, ISO 14025 and ISO 14026 are applicable. In these cases, as well as ISO/IEC 17029, conformity assessment bodies (CABs) shall apply ISO 14065, and not ISO 17033. ISO standards on environmental labeling (ISO 14021 § 5.3) prohibit the use of vague claims (e.g. "the company respects the environment"). Alongside objective and verifiable criteria the claim must be coherent and transparent (e.g. use of renewable energy sources etc.) and not vague affirmations such as "respects the environment". **b) Possible relationship with other exisitng conformity assessments** A company seeking a conformity attestation for a claim against ISO/TS 17033 is more likely to obtain it if it already possesses other declarations or certifications having indirect relevance, as it will be better prepared to face the process. This is true, in particular, in cases where the certification/attestation – although distinct – are applied to the same object (for example a product or process). For example: in order to certify a "sustainable agri-food chain" (ISO/TS 17033), it could be useful, but not indispensible, to possess ISO 22005 certification on the traceability of the agri-food chain. Or, if one wanted to verify a claim "*product with 100% natural ingredients*" it would be necessary to take into consideration ISO/TS 19657:2017 - *Definitions and technical criteria for food ingredients to be considered as natural* (as well as any applicable mandatory standard). In addition to conformity assessment of an ethical claim against ISO/TS 17033, it is possible to include in the programme a reference to an existing certification of service, product or system as a qualifying element reinforcing what has been communicated and declared. An attestation of conformity to ISO/TS 17033, of a claim regarding a service, product, system or organization is different from a certification of the same object according to existing certification schemes. The concept is taken up on the ISO website with regard to the accreditation standard ISO 17029: "*This document is applicable to validation/verification*

	bodies in any sector, providing confirmation that claims are either plausible with regards to the intended future use (validation) or truthfully stated (verification). However, results of other conformity assessment activities (e.g. testing, inspection and certification) are not considered to be subject to validation/verification according to this document. Neither are situations where validation/verification activities are performed as steps within another conformity assessment process". If the claim refers clearly to verifiable/validatable characteristics regarding products covered by the standard (Reg. 1025/2012) or by ACCREDIA documents, the verification/validation can only be issued after the verification of the existence of the relevant certifications and related accredited tests on the basis of the EA/IAF/ILAC MLA/MRA agreements. Likewise, if the claim makes a reference to the possession of authorizations or licenses, these shall be submitted to a verification. Records shall be kept of the verifications as stated above together with the audit documents. **c) Obligatory relationship with other existing conformity assessments** If an ethical claim also asserts technical product characteristics the client shall provide supporting evidence for the claim in the form of accredited certification and/or tests, if applicable. Example 1 – 100% African wheat produced respecting workers' rights: the client possesses accredited tests (genetic sampling tests) / product certification proving the geographical origin of the product. Example 2 – the goodness which doesn't need aromas: the client does not hold product certification but can provide scientific proof conducted by a university with formal ministerial recognition attesting the truthfulness and reliability of the claim. The certification body can validate/verify the claim in accordance with ISO/TS 17033 without product certification or accredited laboratory testing. **5) Involvement, when necessary, of the interested parties** The verification/validation against ISO/TS 17033 also ensures that the claim and the related programme are made known and shared by the main interested parties in cases where their involvement is of major dimensions. Ethical claims are based on criteria developed through involvement of the interested parties, where relevant, including those arriving from developing countries. For example, interested parties must be involved in cases where the claim recognizes and preserves traditional local knowledge which contribute to environmental protection and numan well-being (§ 4.5.1 and § B.4 of Annex 2). The choice of which interested parties should be involved can alter depending upon the communicative context of the claim (e.g.: to involve a local interested party if the claim is only used on a local level, and a major national or international interested party for claims which will be used at national or

	international level) or depending upon the nature of the claim (e.g. to involve a local interested party if the claim refers to typical local area characterisitics).
Reference standards	**Reference documents** Accreditation: ISO/IEC 17029. This standard shall be applied together with ISO 17033 as well as the single programme established in accordance with ISO/IEC 17029. The accreditation is therefore based on, at least, these three fundamental elements. There could be a further normative document applicable to a category or group of claims (e.g. a UNI PAS relating to claims on sustainability) which must be taken into consideration if the claim comes within its field of application. The normative panorama applicable to a claim could therefore be: 1) Reference to ISO/IEC 17029 2) Reference to ISO/TS 17033 3) UNI PAS relating to sutainability claims (when available) if the claim refers to sutainability 4) The programme A programme for a certain typology of claim could be created for example by industrial associations, regional authorities (for their region) scheme owners and also by verification and validation bodies themselves. Requirements and indicators referred to in the programme must be clear and referable, where possible, to existing documents (e.g. Codex alimentarius, Agenda ONU 2030). The verification/validation can be issued only if evidence is provided that the requirements of Annex B have been fulfilled. Great attention must be given to the principles which, although they are not requirements, constitute a guideline for handling unforeseen situations. The principles refer to concepts of transparency, reliability, relevance, equity and the involvement of interested parties. **Duration of the verification/validation of the claim** Assessment to ISO/IEC 17029 constitutes a sort of picture of a certain situation and does not involve surveillance activities because it regards a single moment or a well-defined period of time. E.g. the validation of a claim on energy performance improvement (10% reduction in energy consumption in the next two years). See § A.6.1 of ISO/DIS 50003:2020. The verification/validation gives a picture of a moment, providing confirmation of whether a statement (regarding the past or the future) is plausible. *Rebus sic stantibus.* If there is a change in processes, technologies, ingredients etc. it becomes necessary to perform a new evaluation to confirm the outcome of the verification/validation. In other words a verification/validation is valid until

	there is a change, like unique product certification (not in a series) which is not submitted to surveillance activities. **Negative result of the evaluation** In cases of a negative outcome of the verification/validation, the body issues the relative negative attestation in line with ISO/IEC 17029 or with the requirements of the programme. **Conflicts of interests of the CB** A body accredited to ISO/IEC 17029 cannot offer verification/validation services to the same client and on the same claim which is the object of a consultancy service offered by the same body.
Scope of the audit	The objective of the audit is to verify/validate the conformity of an ethical claim as defined in ISO/TS 17033. Audit activities and relative modalities (e.g. duration of audit activities) depend on the nature of the claim and shall be clearly defined in the programme. To give an example, it is one thing to evaluate a "cruelty free" claim made by a large cosmetic company and another to evaluate a cheese made by a small producer in a rural mountain area making the claim "cheese made from animals breathing mountain air". **Commercial communication campaign, labeling and packaging** Claims must respect the standards regarding declarations and the ethical codes regarding means of communication used for diffusion. Hence the importance of considering the context[4] in which ethical claims are entered; in fact, the nature of the claim will be influenced by how and where (means of diffusion) the claim will be used. ISO/TS 17033 refers only to the claim (phrase, logo, graphic or symbol) and not to the advertising campaign or to the labeling and packaging. It is therefore correct procedure to evaluate the consistency of the claim within the context without evaluating the context itself. Only the claim is the object of the verification/validation. If a claim is part of a commercial communication campaign and is present on the labeling and packaging, although it is included in the evaluation activities, these activities cannot be extended to the entire communication context and the verification/validation of the claim cannot be interpreted as a verification/validation of the advertising campaign or of the labeling and

[4] Below are the references to ISO/TS 17033 underscoring the importance of the context for ethical claims:
- introduction
- §3.1. note 1
- §4.6.2
- §5.1.5 letters J & S
- §9, 9.1.1., 9.1.2, 9.1.3, 9.1.4 + note
- §9.3 letter E

See also ISEAL Sustainability Claims Good Practice Guide (page 3)

	packaging. **Certification body documentation** The body shall prepare and have available adequate documentation which includes examples of claims which are not verifiable/validatable in the area in question (claims which are outside the application field of ISO/TC 17033).
Competence criteria of the CB's audit team	Competences shall be adequate for the complexity of the claim due to be evaluated. The body shall demonstrate the presence of these competences on a case-by-case basis. • specific knowledge of ISO/TS 17033:2019 • adequate competences, also legal, where required (e.g. normative documents and laws regarding commercial fraud, misleading advertising or unfair competition) • specific competence regarding the claim (as set out in the programme) On the basis of the claim the possession of competences in communication with special regard to professional rules and behavior of operators in the advertising sector may be necessary.
Competence criteria of persons performing the file review before the decision	• specific competence regarding the claim (with reference to the programme) • knowledge of ISO/TS 17033:2019
Competence criteria of the CB's decision makers	The CB shall demonstrate that it possesses: • knowledge of ISO/TS 17033:2019 • knowledge of the applicable accreditation standard (ISO/IEC 17029) Persons undertaking review activities may also be decision makers. Persons undertaking decision / review activities cannot be members of the audit team.
Attestation or statement issued by a verification or validation body	**ISO/IEC 17029** This shall refer to ISO/TS 17033:2019 It shall state • the verified/validated claim • ISO/IEC 17029 • ISO/TS 17033 • the programme, which shall be made readily available to the public upon request (see the principle 4.3.2 of ISO 17033) • if one exists and it is applicable, it shall make reference to the normative reference document regulating claims in a certain field (e.g. UNI PAS for sustainability claims). The outcome of the audit and the confirmation that the claim has a level of assurance which is reasonable or limited and is free of material error (at least

	below the threshold of required stability) or if the outcome is negative. For more details see ISO/IEC 17029.
Modalities, times and periodicity of audits	The modalities, times and periodicity of audits vary according to the set programme as envisaged in ISO/IEC 17029. An audit programme shall be prepared, including, for example, on-site and documental activities, self-declaration, involvement of suppliers, inspections and laboratory tests. The audit programme shall be an obligatory part of the programme For more information on the programme see Annex A of ISO/IEC 17029.
Logos	In accordance with point 10.3.2 of ISO/IEC 17029:2019 it is possible to use the wording and the logos relating to the claim validated/verified in the modalities set out in the rules of the accredited body performing the validation/verification. During the accreditation process ACCREDIA verifies that the rules are not misleading, for example with references to product certification or to wording required by the law.

1) Process of accreditation

There are various possibilities depending upon the ACCREDIA accreditations already held by the body applying for accreditation or extension.

The requirements of the ACCREDIA regulations remain applicable for granting accreditation or extension.

If the body has accreditations from other accreditation bodies a case-by-case evaluation must be performed in accordance with the EA / IAF MLA agreements.

a) Evaluation of the programme

The accreditation is granted for a specific programme (and the accreditation certificate shall state the accredited programme) unless there are reference documents available for a specific area (e.g. if a standard or a UNI PAS on sustainability claims is available, a claim by claim accreditation would not be necessary: accreditation against a standard or PAS for sustainability claims would be sufficient for the verification/validation of all types of claim coming within the area of sustainability).

If a programme has never been verified/validated under accreditation, ACCREDIA procedure PG-13-01 is applicable (it is therefore necessary to submit this new programme to ACCREDIA's accreditation committee and to its Directive Council) unless there is a reference document for a specific area (in the above case it is sufficient to present to the accreditation committee and to the Directive Council, the first time, only the standard or UNI PAS on sustainable claims).

If no specific area is defined the interested party has the option of promoting reference documents for the area for which a regulation is considered necessary.

b) Assessments for accreditation

A	CB not yet accredited to ISO/IEC 17029 but accredited to other accreditation standards	Document review of 1 day. On-site assessment at the CB's location of 2 days. 1 witness assessment of a duration consistent with the control programme decided by the CB. ACCREDIA has the right to evaluate case-by-case the suitability of organizations and audit teams set up for accreditation and the subsequent surveillance activities.
C	CB not yet accredited to any accreditation standards	Document review of 1 day. On-site assessment at the CB's location of 4 days. 1 witness assessment of a duration consistent with the control programme decided by the CB. ACCREDIA has the right to evaluate case-by-case the suitability of organizations and audit teams set up for accreditation and the subsequent surveillance activities.
D	CB accredited to ISO/IEC 17029 Extension to other claims / programmes	For each new claim or programme the document review: - is not performed if it has already been conducted in accordance with PG-13-01 for evaluation of the scheme. - duration of 1 day if it has not already been conducted in accordance with PG-13-01 for the assessment of the scheme as it is a reference document for a specific area (e.g. UNI PAS on sustainability claims). --- To be evaluated on a case-by-case basis whether to plan 1 assessment of a duration consistent with the control programme decided by the CB. ACCREDIA has the right to evaluate case-by-case the suitability of organizations and audit teams set up for accreditation and the subsequent surveillance activities. It is possible to make a case-by-case evaluation of the application of the flexible scope (see AACREDIA regulation RT-37).

Documentation to be submitted to ACCREDIA for the document review

a) Programme developed relating to claims which undergo an evaluation (if not already evaluated against PG 13-01).
b) Instruction (also in the form of a checklist) prepared by the CB for the audit team;
c) Criteria of qualification for auditors, for persons performing the review and for decision makers;
d) Curricula and evidence of qualifications of auditors and of persons performing the review;
e) Procedure for the setting up and management of the audit team;
f) Attestation issued by the CB;

g) List of attestations of verifications/validations already issued and of the upcoming audit activities (necessary data for planning witness assessments);
h) Procedures / contractual regulations applicable to audits and internal procedures for the management of verification/validation files (from the quotation to the attestation);
i) For CBs without accreditation for standards requiring accreditation, as well as the documents stated above, it is necessary to send the documentation requested in the application for accreditation.

2) Maintenance of accreditation

Annual office assessment at the CB.
During the cycle of accreditation, a witness assessment shall be carried out of all the programmes, if applicable.
If it is not possible to perform a witness assessment owing to the type of verified/validated claim, the assessment shall be undertaken at the CB's location.

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Director of the Department of Certification and Inspection

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