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Международная Организация по Стандартизации



**TO THE MEMBERS OF CASCO AND
ORGANIZATIONS IN LIAISON**

Your ref.
Our ref. CASCO 30/2009 Rev1

Date 2009-07-29

CASCO interpretation on clause 15, ISO/IEC Guide 65

Dear Sir or Madam,

Please find below the proposed interpretation agreed by the CASCO CPC with regard to two questions on clause 15 of ISO/IEC Guide 65. You are requested to indicate if you are in favour or against the proposed CPC response to both questions and to include any comments you have on the CPC response.

Please note that in case you vote - with comments - in favour of the CPC proposed response to both questions, your vote shall not be dependant on your comments being included.

The interpretation was requested by an ISO member body and included below in their motivation. The motivations will form part of the interpretation.

The electronic ballot will be initiated on **2009-07-30 with a closing date on 2009-08-13.**

Background provided by ISO member body

The following nonconformity has been raised by an accreditation body member of PAC(Pacific Accreditation Cooperation):

The CABs documentation is not clear as to how the CAB verifies that the client/manufacturer/supplier complies with the provisions of keeping a record of all complaints, made known to the supplier relating to a product's compliance with requirements of the relevant standard, take appropriate action with respect to such complaints and document the actions taken.

The CAB did not accept the nonconformity on the following basis:

ISO/IEC Guide 65 does not require verification and/or review of any of the complaints during surveillance or at any other point in the certification process. If such a requirement applied to surveillance activities it would appear in section 13 of ISO/IEC Guide 65, not Section 15. Our (the CAB) contract with the supplier creates the obligations specified in ISO/IEC Guide 65 Section 15. ISO/IEC Guide 65 is silent on how the CB will utilize this supplier's information to which it has access. In this CABs case, this information is available for use in addressing complaints the CAB receives about certified products.

*The CAB is aware of other accreditation bodies that have worked through the same issue and have concluded there is **NO** ISO/IEC Guide 65 requirements that links the Section 15 information with surveillance undertaken as part of a certification scheme/system. No other conclusion is*

possible since ISO/IEC Guide 65 is acknowledged as applicable to certification schemes/systems with no surveillance (e.g., a certificate that expires based on type testing). If the Section 15 requirements were linked in some way to surveillance, then the requirements therein would never be applied to certification schemes/systems that do not include surveillance. Clearly this illogical conclusion is neither the customary nor expected understanding of ISO/IEC Guide 65.

ISO/IEC guide 65 clause 15 specify the following requirements:

15 Complaints to suppliers

The certification body shall require the supplier of certified products to

- a) keep a record of all complaints made known to the supplier relating to a product's compliance with requirements of the relevant standard and to make these records available to the certification body when requested;**
- b) take appropriate action with respect to such complaints and any deficiencies found in products or services that affect compliance with the requirements for certification;**
- c) document the action taken.**

Question 1:

Is it sufficient for the CAB to require the supplier to establish a process that satisfies the requirements of Clause 15 through enforceable arrangements with NO ongoing verification.

Proposed response from CPC: YES

Motivation: The CB through its contractual requirements for certification must require the supplier of certified products comply with a) to c) of clause 15. Therefore this requirement is fulfilled through the contract between the CB and the supplier.

Question 2:

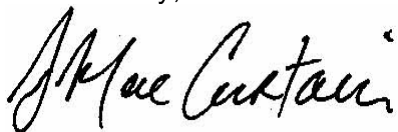
Does ISO/IEC Guide 65 Clause 15 require the CAB to require the supplier to establish a process that satisfies the requirements of Clause 15 through enforceable arrangements and then the CAB verify that the process is being maintained on an ongoing basis.

Proposed response from CPC: NO

Motivation: Access to and use of the complaint information related to clause 15 is the decision of the certification scheme owner. If a CB receives evidence of non-compliant product it should investigate this with the supplier. The CB should request to see the suppliers complaint log as required by clause 15 and determine and agree appropriate corrective remedial action. The standard as its written does not require any more than this.

I would like to thank you in advance for your cooperation and I look forward to receiving your votes and comments.

Yours faithfully,



Sean Mac Curtain
Head, Conformity assessment
CASCO Secretary