




# **Specific Accreditation Guidance Manufactured Goods**

## **Product Compliance Evaluation**

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## Product compliance evaluation

### Product standards and statements of compliance

The tests performed on manufactured goods, including most consumer products, present certain challenges in terms of accreditation scope expression due to the prominence of product standards within the conformity assessment space. While some areas of testing are well suited to a form of scope expression comprising a listing of test methods, in other areas a listing of product standards is more suitable. There are yet other areas where it is appropriate to list both types of documents (to suit the needs of different groups of clients, for instance). The situation is made slightly more complicated in that some product standards contain test methods and some test methods contain compliance information.

Depending on the particular standards for which an individual facility is accredited and how that facility's scope of accreditation has been expressed, the following may be relevant where aspects of compliance are to be reported.

1. Factual statements involving a comparison of the results of accredited test methods with threshold values defined within a nominated product standard may be reported as statements of compliance. Such compliance statements must include reference to the specific sections/clauses of the document from which the compliance criteria have been obtained (refer NATA ISO/IEC 17025 Standard Application Document Clause 5.10.3.1 b).
2. Statements of compliance which extend beyond a simple comparison of individual test results with defined thresholds may only be reported where accreditation has been granted for such activity.
  - To be regarded as forming part of a facility's accredited activities, relevant determinations (i.e., outcomes of testing and/or examining the product) which contribute to any such statement of compliance must be covered by the accreditation scope and the source of the compliance criteria (i.e. product standard or other reference) must be listed within the accreditation scope without any restrictions affecting the relevant determinations. Regardless of any such coverage, the constraints regarding the expression of opinion (ISO/IEC 17025 Clause 5.10.5) still apply.
  - Accreditation coverage is not offered for activities involving statements of compliance with a product approval 'scheme' (such would constitute a product certification activity, which is outside the range of activities for which NATA offers accreditation) or for any other conformity assessment activities which extend beyond testing and examination of the product.

### Referencing test procedures

When reporting statements of compliance of the type described in item 2 above, quoting the applicable clause/section from the (accredited) product standard may be regarded as an adequate means of referencing the applicable test methods (i.e., those methods referenced from within the quoted product standard), except where it is necessary to

additionally clarify the extent of testing conducted (for example, where alternative options may be allowed within a product standard).

However, where reporting statements of compliance of the type described in item 1 above (pertaining to a product standard which is not listed within the facility's scope of accreditation), certain additional obligations apply.

Where compliance statements are made in respect of a product standard which is not listed within the scope of accreditation, all of the following are to be met:

- Use of the NATA endorsement is limited to those test procedures (and sampling procedures if applicable) for which accreditation is held and any associated compliance statement which is to be covered by the endorsement must be based solely on the outcomes of those accredited procedures.
- All test procedures (and sampling procedures if applicable) carried out, even where referenced within a quoted product standard, must be identified within the report (refer ISO 17025 5.10.2 item e) since these provide the only transparent means by which an end-user is able to verify accreditation coverage based on the report itself.
- Additional criteria specified within the product standard pertaining to the application of those procedures (such as defined testing conditions) must also be reported (refer ISO 17025 5.10.3.1 item a).

**Note:** An explicit statement indicating that testing was undertaken 'in accordance with' the listed product standard may, in some circumstances, be an acceptable means of specifying such additional criteria. However, it is unacceptable to reference in this way such information that may itself be regarded as comprising a test (or sampling) procedure or which includes parameters that have to be established by the facility as a result of another test process which is not explicitly covered within the accredited scope.

## Amendment Table

The table below provides a summary of changes made to the document with this issue.

Section or Clause	Amendment
New Document	