



Heads Up

Issue: 01

Date: 2002/10/18

To: ANSI-RAB NAP Accredited Registrars and Accreditation Auditors

From: Randy Dougherty, Director of Registrar Accreditation

Re: Heads Up as a New Communication Tool

This is the inaugural use of a proposed new communications tool that we are calling "Heads Up." I will appreciate your comments about it.

The purpose of this tool is for us to be able to communicate to our registrar clients in an informal and unofficial manner issues and information of interest. Such information may include trends from audits, developments at the ANSI-RAB NAP, or IAF, or other information that can be of value to you in your business.

For this issue, I want to share with you information for doing business in China, learned from complaint investigations of registrars in China, potential issues relating to the transition to ISO 9001: 2000, and re-affirmation of the ANSI-RAB NAP's position on re-assessment audits by CRB.

China

The Chinese government body responsible for oversight of third-party conformity assessment activities in China, is CNCA. CRBs who want to operate in China should review the Web site of CNCA: www.cnca.gov.cn. All the relevant regulations, requirements, and application forms can be found on this Web site. Please read the relevant documents before placing inquiries to CNCA. Unfortunately, this Web site is in Chinese only and all the documents are in Chinese so you will need Chinese language software or a translator to browse this site.

The ANSI-RAB NAP's understanding is that any CRB wishing to do business in China has to meet certain requirements including having an office in China, having a copy of all records maintained in China, having a minimum of 10 full-time auditors, and having a substantial capital investment in the "bank."

After learning what is available on the Web site, for answers to additional questions CNCA has asked us to inform our CRBs to contact Mr. Lin Feng of CNCA at linf@cnca.gov.cn. The following is Mr. Feng's response to our understanding of the requirements for a CRB to operate in China: "Foreign CRBs can set up representative office or joint venture or have subcontractor in China. Your understanding of the minimum requirements is basically correct. But if the CBs

need more precise and detailed explanation, please ask them to refer to the relevant documents published in our Web site.”

CNCA earlier this year filed complaints with the ANSI-RAB NAP about three of our accredited registrars. (CNCA also filed complaints with other accreditation bodies).

The ANSI-RAB NAP investigated each as an individual complaint, as the ANSI-RAB NAP had already initiated actions to improve its oversight of transnational registrations with Advisory 16.

UKAS imposed a moratorium while it investigated the complaints, and subsequently lifted the moratorium after announcing new processes.

One thing learned from the China complaint investigations is that registrar quotes should specifically include the number of employees and number of auditor days, and audit reports should specifically include a comment by the audit team about the number of employees. This is so that the U.S. office responsible for the registration decision has this key information available for it to confirm conformance with the audit man-day requirements of IAF guidance. Note: There is no specific requirement for what we recommend, but the lack of this information in the translated documents provided to U.S. office reviewers resulted in serious adverse consequences that could have been avoided.

Issues about the transition to ISO 9001: 2000

IA, at its annual meeting in September 2002 re-affirmed that the deadline for transition will not be extended from 2003/12/15.

Some registrars may be actively promoting (advertising) that they will issue non-accredited certificates to organizations that do not make the transition. While issuing non-accredited certificates is not prohibited and many registrars may do this for clients that do not make the transition by the deadline, promoting this is bad for everyone.

I have also had more than one consultant call me about comments registrar auditors are making to their clients. The auditors are telling the clients that the transition ‘is no big deal and not to worry,’ creating a perception that a client does not have much to do to make the transition. This may be very misleading to these clients. (As I get more specific information, I will inform appropriate individuals at each registrar).

It is to the benefit of all of us to actively encourage organizations to make the transition as soon as possible during the next 14 months.

Re-Assessment

The following was officially communicated to all registrars in June 2002. However, I continue to receive a few queries about this.

The IAF guidance that became effective 2002/07/01 is quite clear that a re-assessment of a duration of 2/3 the auditor man-days in the annex is expected to be conducted in the third year of a registration cycle. This is the expected norm.

It is not acceptable for a registrar to add time to each surveillance audit in lieu of conducting this re-assessment in the third year.

The guidance does allow a registrar flexibility to vary from these new expectations, on a case-by-case basis. The ANSI-RAB NAP will be expecting any such variance to have justification documented in the file for any client with such variation.