



Joint Accreditation System of Australia and New Zealand (JAS-ANZ)

Submission to Productivity Commission (PC) on the Draft Research Report into Standards Setting and Laboratory Accreditation

General Comments

This submission is intended to supplement and complement the original JAS-ANZ submission (No 63, dated 21 April 2006) on the Study.

JAS-ANZ still has concerns that the Draft Report, as did the original Study Issues Paper, uses the generic word "accreditation" where what is meant in most cases is "laboratory accreditation" that is a subset of "accreditation". Likewise the Draft Report makes a number of observations about the activities of the Standards and Conformance Technical Infrastructure, which includes JAS-ANZ and the NMI as well as Standards Australia, but without any specific consultation with JAS-ANZ. Some of the proposal affects the operation of JAS-ANZ as the Australian (and New Zealand) National Accreditation Body for accreditation of Certification and Inspection Bodies.

Generally JAS-ANZ supports the Recommendations of the Draft Research Report; however there are a number of specific issues that could be treated differently as detailed below.

Specific Comments

DRAFT RECOMMENDATIONS 6.1 & 6.2

In considering what is in the national interest in international standards-setting, who should participate and what international Standards should be adopted as Australian Standards, due recognition needs to be taken of the work of the ISO CASCO committee that sets the rules for accreditation, certification, inspection and testing. The International Standards and Guides developed by ISO/CASCO underpin the national interest roles of JAS-ANZ and NATA. Likewise any national

interest criteria set for Standards Australia in respect of international and regional participation should apply to other members of the Standards and Conformance Technical Infrastructure, i.e. JAS-ANZ, NATA and the NMI.

DRAFT RECOMMENDATIONS 7.1 & 7.2

In developing proposals for the development of new or the revision of existing standards, the concept of the inclusion of impact statements is supported. However in preparing such statements, it is essential that consideration is given as to how the resultant standards are to be used in practice. Issues such as the need for accredited 3rd party certification need to be taken into account.

DRAFT RECOMMENDATION 7.3

Organisations that are certified by JAS-ANZ accredited 3rd party Certification Bodies often have a suite of Australian Standards and other publications as an integral element of their quality system and thus the cost of maintaining this suite can be very expensive. Further options are needed to ensure such standards and other publications can be kept up to date.

DRAFT RECOMMENDATION 9.1

JAS-ANZ supports the funding of non Standards Australia representatives to participate in ISO, IEC and regional standardisation. In doing so it is necessary to recognise that "industry" participation includes organisations such as JAS-ANZ that, unlike NATA, is not funded by the Australian Government to attend such meetings.

DRAFT RECOMMENDATION 12.1

While JAS-ANZ supports this recommendation in principle, it is concerned that no account has been taken in the development of this recommendation that "conformance assessment" in multilateral and bilateral arrangements equally applies to JAS-ANZ. The impression is given that this is only an issue for NATA.

It is suggested that JAS-ANZ should also be actively engaged by the Australian Government when considering its trade negotiations as the assurance provided by JAS-ANZ accredited product and management systems certification bodies

provides a substantial underpinning of business confidence and regulatory compliance of traded goods and services.

DRAFT RECOMMENDATION 12.2

The issue of recognition of overseas conformity assessment for regulatory purposes does not just involve test results. Many international recognition schemes and regulatory arrangements involve product certification, an activity that falls under the accreditation provided by JAS-ANZ and its regional and international partners in the Multilateral Recognition Agreements organised by the International Accreditation Forum (IAF) and the Pacific Accreditation Cooperation (PAC).

DRAFT RECOMMENDATION 12.7

JAS-ANZ supports the initiation of a comprehensive review of "accreditation" of radiology practices. ISO/IEC 17025 is not an appropriate standard to be used in this context as radiology practices are not laboratories.

DRAFT RECOMMENDATION 13.1

JAS-ANZ strongly supports the continued recognition of NATA as Australia's non-government national authority for the accreditation of laboratories but has some difficulties in the designation of NATA as "the" peak authority for the accreditation of Inspection Bodies.

The Australian and New Zealand Government Treaty for the Joint Accreditation System of Australia and New Zealand recognises JAS-ANZ as a peak body for the accreditation of Inspection Bodies. It is strongly suggested that NATA should be recognised in its MoU with the Australian Government "as a recognised authority for the accreditation of inspection bodies".