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Standards and Accreditation Study
Productivity Commission
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Email: standards@pc.gov.au

03 May,2006

ABN: 95 090 507 664

Dear Sirs,

Re: Standards and Accreditation Study

The Electrical Compliance Testing Association (ECTA) of Australia has been established as the peak industry body representing the interests of Australian testing laboratories accredited by the National Association of Testing Authorities (NATA) in the fields of electrical safety testing, telecommunications testing, electromagnetic compatibility (EMC) testing and electromagnetic radiation testing (EMR).

Our 14 member laboratories are located around Australia. Members participate in standards writing committees, provide advice to Government agencies on policy issues and provide accredited testing services to manufacturers and importers of electrical appliances. They are therefore continuously engaged in all aspects of standards from formulation to interpretation and use and all the associated issues of laboratory accreditation.

The members of the Electrical Compliance Testing Association (ECTA) of Australia offer the following comments in relation to this study.

Is the standard setting activity efficient?

Standards setting impacts on the ability of members of ECTA to provide manufacturers and importers with the service of compliance testing and product evaluation.

ECTA has members active in standards writing committees in areas of electrical safety, EMC, radiocommunications, telecommunication, energy performance etc. ECTA is represented in 32 standards working committees - this imposes high costs on employers as staff are absent from their daily activities and incur travel and other expenses.

Since the lowering of Technical Barriers to Trade Agreements, Standards Australia has been adopting IEC standards.

As such, ECTA members strongly believe that it is more relevant to be participating at the International level - to influence the IEC - rather than wait until the standard is adopted in Australia and then find it is unsuitable. Participating at the international level is more time consuming and costly since most meetings are held in Europe/US.
Whilst the Government provides funding to attend meetings this typically only covers a portion of the costs.

The Government recognises the importance of Australia's technical infrastructure yet still relies on voluntary participation for Standards setting committees.

Recommendation: To undertake a study of costs involved in participating in standards writing committees and contribute representation funds to working participants.

Is the laboratory accreditation service provided by NATA effective and efficient?

NATA is the only Australian provider of laboratory accreditation services. In more recent times, ECTA members have experienced that NATA is no longer providing a timely and responsive effective service. This

impacts on the ability of testing laboratories to extend the scope of their accredited standards and offer services to customers.

ECTA members also believe that NATA is not fully effective in putting the case to regulators and other bodies to accept test results only from accredited facilities.
But the main issue of concern is related to the Mutual Recognition Agreements (MRA's) NATA has developed with foreign certification bodies.

Some of the problems experienced are:

1. Australian regulators routinely use test results from overseas laboratories accredited by MRA partners of NATA. These test reports are used by overseas manufacturers wishing to export their products into Australia and are readily accepted in many countries including Europe, USA and many Asian countries.
However, NATA accredited reports issued by ECTA members in Australia and intended to be used by Australian manufacturers wishing to export to China and Korea for example, are not accepted in those countries and local retesting is required. This is effectively a technical barrier to trade and imposes unnecessary testing costs and results in delays to market. This lack of acceptance of NATA accredited reports has negative implications on ECTA test laboratories and leads to additional costs and competitive disadvantage for Australian manufacturers. It also shows the NATA MRA recognition process to be a one-way system in China and Korea. The Australian government will accept reports from NATA MRA accreditation bodies CNLA (China) and KOLAS (Korea) but NATA reports are not accepted by the regulators in China and Korea. NATA has MRAs in place with CNLA (China) and KOLAS (Korea) but the Australian government has no such MRA in place to allow acceptance of NATA reports by the appropriate regulators in China and Korea.

Recommendation: NATA to lobby Australian Government (DFAT, DISR) to negotiate MRA with China and Korea so that NATA endorsed reports are accepted in those countries without the need for retest.

2. Although NATA accredited laboratories are all given thorough technical audits for every standard listed, many overseas MRA organisations only assess quality documentation. For example in a link on NATA's web site, Links, (under USA) International Accreditation Services Inc, Accreditation Criteria, AC89, the following wording will be found:

5.0 ASSESSMENT

5.1 Prior to accreditation, laboratories shall be subject to an on-site assessment by IAS. This assessment is to determine compliance with this criteria (AC89) and to evaluate expertise and equipment in the area(s) of testing where accreditation is sought.

5.2 After the initial year of accreditation, laboratories are subject to an on-site surveillance assessment. The surveillance assessment shall include review of at least the following: internal audit reports; minutes of management review meetings; results of proficiency testing, if any; any changes in key personnel, facilities and/or major test equipment; and information on any other significant changes in the quality system of the laboratory.

This wording could be taken many ways but the reality is (as this wording implies) with lots of MRA's, only regular QA audits are performed, not technical audits.

These reduced audits lead to overseas test facilities being easily accredited for Australian standards, examples are in the field of electromagnetic compatibility (EMC) or telecommunications testing.

For example, on NATA's Recognised Testing Authority (RTA) list, many laboratories from the US, Canada or China are accredited against Australian telecoms standards via MRA's. On the other hand, no Australian labs are accredited to such standards as FCC68 (US), CS03 (Canada), TBR21 or Chinese standards via NATA. This creates an unfair advantage for overseas testing laboratories.

Recommendation: NATA to request foreign MRA partners to perform the same level of technical and quality assessments as NATA when accrediting overseas laboratories to Australian standards.

The Association is prepared to send a representative to any forums which may be held in conjunction with this study.

Yours faithfully

[Signed]

M. Mulcare
Secretary