

Update on the temporary suspension of certification services.

Dear valued clients,

As promised last week, the following update is to keep you informed of the current state of play with our remedial actions after JAS-ANZ applied a suspension to our accreditation services.

As previously mentioned, JAS-ANZ has advised CMI that it can still continue with its surveillance activities in Australia of all clients during the suspension period.

In New Zealand, suspension under the Building Act 2004 means that CMI cannot carry out any functions of a CodeMark Certification Body including surveillance and reissuance of CodeMark New Zealand certificates until suspension is lifted. CMI will be providing a list of New Zealand Certificate Holders and their audit due dates to MBIE by the 25/07/2019.

JAS-ANZ has given CMI very clear directions as to the nature of the nonconformances issued against CMI. CMI has already provided an initial plan to JAS-ANZ addressing the non-conformances that have been raised and CMI will be working to have these non-conformances closed as quickly as possible.

In the interest of transparency, CMI has below, detailed the nature of the matters to be addressed and the actions taken by CMI to date. It is important for you to note that some of the following outcomes may impact on your company, primarily by the inclusion of enhanced Testing, Surveillance and Re-Accreditation/Renewal requirements.

It is also important to note that these matters are considered to be Major Non-Conformances and CMI is treating them with all due seriousness.

JAS-ANZ cited 6 non-conformances for CMI to resolve, these are as follows:

Note: The JAS-ANZ non-conformance comments have been edited to remove references to specific Certificate Holders in the interest of client confidentiality.

Non-conformance Raised by JAS-ANZ	Proposed Remedy by CMI	How this Impacts on you as a Certificate Holder.
<p>1. Certificate Holders</p> <ul style="list-style-type: none"> CMI was not able to demonstrate that the distributor can fulfil all of the responsibilities of Clause 35 of the CodeMark Australia scheme rules. CMI’s agreement with the distributor deals with many of the issues, however not all. The Product Quality Plan held by CMI is for the distributor not the manufacturer. CMI was unable to demonstrate that the distributor has formal arrangements with the manufacturer that allows the certificate holder to comply with Clause 35 e. ISO/IEC 17065 Clause 4.1.2.2 and CodeMark Australia Rule 35 apply 	<p>CMI are updating our policies and procedures to clearly clarify and identify the requirements for the Applicant/Certificate Holder to supply specific information pertaining to the effective control of manufactured product.</p> <p>The CMI Certification Agreement will also be updated to allow for a specific section to detail the Certificate Holders responsibilities as stated in the relevant scheme rules plus ISO 17065 section 4.1.2.2.</p>	<p>In the case of both Distributors and Manufacturers, CMI will be changing their procedures to require annual audits of manufacturing sites for high risk certified products. CMI, depending on the nature of the product will also be taking or organising samples for testing during the manufacturing audit.</p> <p>In the case of some high-risk products, there may also be a requirement for enhanced testing of each batch of the product. For example Aluminium Composite Panels will need to have Core flammability content testing undertaken on each batch manufactured.</p>

<p>2. Independence</p> <p>The certification process followed by CMI on a number of certificates reviewed did not provide the independence required by ISO/IEC 17065 Clauses 7.5 and 7.6. Clause 7.5.1 which requires CMI to assign at least one person to review all information and results related to the evaluation. The review shall be carried out by person(s) who have not been involved in the evaluation process. Clause 7.6.2 requires CMI to assign at least one person to make the certification decision based on all information related to the evaluation, its review, and any other relevant information. The certification decision shall be carried out by a person or group of persons that has not been involved in the process for evaluation.</p>	<ol style="list-style-type: none"> 1. Certificate Decision document is being updated removing existing reference to C7.4.9.1. New document created to satisfy the requirements of C7.4.9.1 to be completed by the appropriate person. 2. UBC Review document is being updated to clarify its function as a certificate content review as a function of Section 7.5 of ISO 17065. 3. The Executive Summary of the Technical Review document is being updated that the Technical Review satisfies C7.4.1.3 only. 	<p>These are procedural document changes that will be implemented as soon as they are approved by JAS-ANZ. All current clients undertaking certification will have their current documents amended to the new format once approved. All existing clients will have their relevant documentation amended at their next schedule surveillance audit.</p>
<p>3. Acceptance of Test Reports</p> <p>CMI has accepted some test reports without following their own procedure, CMI Acceptance Criteria CMI-TR-153 for test reports. The approach taken by CMI does not comply with ISO/IEC 17065 Clause 7.4.5. All of the evaluation plans indicate, on page 6, that testing was undertaken in accredited test facilities, which is incorrect. This is not obvious from the information provided that accredited test data has been used in the evaluation function.</p>	<p>The bodies involved in this testing, being CSIRO and CETEC are NATA accredited bodies and recognised for their ability to undertake Core Combustibility testing. However, the actual tests conducted were not on their current NATA testing scope.</p> <p>As result of the above, CMI have updated our Laboratory Test Report Acceptance Criteria with further information regarding non-accredited testing laboratories and have included within the Document Audit section of the Technical Review a column to identify the basis for report acceptance or refusal.</p>	<p>CMI has amended its policy on acceptance of test reports to account for extraordinary situations.</p> <p>Once this is reviewed and approved by JAS-ANZ, and CMI's Suspension has been lifted, CMI will forward this to all clients.</p>
<p>4. Competencies</p> <p>The competency framework developed by CMI is not compliant with ISO/IEC 17065 Clause 6.1.2.1. and 6.1.2.2. The documentation provided for review (Staff competency and training Policy and Procedure, CMI-SCT v2.00 and Staff competency matrix) does not demonstrate that CMI has determined the criteria for the competence of personnel for each function in the certification process for the CodeMark Australia scheme. CMI documented process does not detail the method of assessing personnel competence.</p>	<p>CMI is creating a specific Policy & Procedure to address ISO 17065 - 6.1.1.2 for each scheme utilising the scheme Rules as the basis for determining the minimum requirements of each stage.</p>	<p>This will not impact on you as a certificate holder.</p>
<p>5. Non-Conformities</p> <p>CMI has not complied with ISO/IEC 17065 Clauses 7.4.6 and 7.4.7 and CodeMark scheme rules C7.4.4.1. CMI does not identify and raise nonconformities throughout the evaluation process, as CMI does not raise nonconformities as part of the technical review. The CMI certification process does not appear to consider critical nonconformities</p>	<p>CMI's CodeMark Australia Process Document is currently being updated.</p> <p>Onsite Audit Report: These reports have been updated to specify the wording under C7.4.4.1, C7.4.4.2 & C7.4.4.3.</p> <p>Technical Review:</p> <ul style="list-style-type: none"> • CMI have now more clearly incorporated into the Technical Review an appropriate section that will allow for the detailing on any non-conformities. 	<p>CMI will be clearly identifying any non-conformances raised at the initial certification stage. Further, as a result of the full review currently underway, all documentation is being updated to clearly impress upon clients and applicants the requirements of the relevant scheme process, such as the issuance and rectification of Non-Conformities.</p>

<p>as the definition is not included in the onsite audit report template, not included in the CodeMark Australia process, CMI-CMAPD v4.00, is not detailed in the evaluation summary report or the certification decision makers form.</p>	<ul style="list-style-type: none"> • Checklist column added to the document audit table to identify the basis of acceptance/refusal. This column will effectively address specific concerns of each piece of supplied data to be discussed. Eg. <ul style="list-style-type: none"> ○ Age of Report ○ Accreditation of Testing Facility ○ Qualifications of report writer ○ Accompanying Validation ○ Testing is not representative of the product/system ○ Testing is representative of the product/system <p>Summary:</p> <ul style="list-style-type: none"> • CMI have added a requirement for the confirmation of any open conformities to the Certification Summary. <p>Decision:</p> <ul style="list-style-type: none"> • There is no requirement to address non-conformities at the decision. A certification will not move to the decision stage if there are open major or critical non-conformities. 	
<p>6 CodeMark Australia Process</p> <p>CMI-CMAPD v4.00 The document does not include a section on Evaluation. Neither the process document nor the Evaluation Plan details how the evaluation plan is put into action using persons or teams competent for the task. All of the requirements of ISO/IEC 17065 clause 7.4 apply. The Certificate review Team sign off form, CMI-CRTSO v2.00, is not included in CMI-CMAPD v4.00.</p>	<p>CMI is updating all Certification documents, including the CodeMark Australia Process Document.</p>	<p>This will not impact on you as a certificate holder, however, as identified, each document will now clearly identify the intentions of the relevant document and its relationship to the relevant scheme rules and the requirements of ISO/IEC 17065:2012.</p>

The process moving forward

1. CMI has received approval of our proposed plan of action and is finalising the changes to the relevant documentation as a matter of the utmost urgency. The documents will be sent to JAS-ANZ as a matter of priority.
2. CMI will then move current applicants to the new documentation.
3. JAS-ANZ will then conduct an onsite audit at CMI’s offices to verify the implementation of the new documents and procedures as well as our compliance with the sections of the CodeMark Scheme and ISO/IEC 17065:2012 that was raised as non-compliant by JAS-ANZ.

CMI wishes to thank all is client for their ongoing patience in this matter and assure you we are doing everything possible to address the maters raised by JAS-ANZ in a timely manner.

CMI will provide a further update, once the data has been supplied to JAS-ANZ and we have requested for the onsite audit to be conducted.

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