

NATURAL ACCREDITATION PROCEDURE

NACC.03.01/00-06.01.2017- These criteria issued January 2017

1. SUBMISSION OF APPLICATION

1.1 Anyone seeking accreditation submits to NATACCS an electronic copy and a hard copy of the following documents:

- a) A completed Application Form,
- b) The Quality Manual where applicable,
- c) The relevant procedures,
- d) The necessary legal documents and
- e) A copy of the bank deposit receipt showing the payment of application fees.

The applicant may not submit the technical procedures if evidence can prove that these enclose proprietary and confidential information. In that case it is obligatory that the subsequently assigned assessment team shall be acquainted on the procedures during an extra visit at the applicant's premises, debited against the applicant.

1.2 NATACCS examines at first the completeness of the Application Form and the submitted documentation. If there are obvious major deficiencies, the documentation is returned to the applicant for reviewing. If the applicant does not respond within one (1) month from the date the deficiencies were made known, the application ceases to be in effect and it is filed, notifying simultaneously the applicant.

1.3 Next, the MU examines whether NATACCS is in the position to respond to the submitted application. This can be done when the following requirements are fulfilled:

- a) NATACCS has the appropriate technical competence,
- b) The applicant complies with the requirements set by NATACCS Accreditation Rules and Criteria,
- c) The applicant fulfils the requirements set by the Law,
- d) Granting of accreditation will not pose a risk to NATACCS reputation,
- e) There is no acceptable risk regarding the impartiality of NATACCS

1.3.1 In a positive answer, the Director of the relevant Division nominates the assessment team according to the procedure that is described below.

1.3.2 In a negative answer, notifies the applicant and put the reimbursed application fees at his disposal.

1.3.3 During the reviewing of the documentation if NATACCS finds that cannot proceed with the initial assessment of the body according to the foreseen time limits of the present procedure, then the body is informed accordingly

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1.3.4 In case there is no acceptable risk regarding the impartiality of NATACCS the decision to not proceed the accreditation procedure is taken by the BoD of NATACCS after recommendation of the Accreditation Council.

2. APPOINTMENT OF THE ASSESSMENT TEAM

2.1 Following a MU's proposal, the Director of the relevant Division appoints the Lead Assessor and the other Assessors and/or Experts, which will conduct the assessment.

2.2 For Certification Bodies the Director of the relevant Division determines also at first after MU's proposal, the type, the number and the audits / inspections which, where necessary, the applicant will perform, and will be witnessed by the assessment team, as well as the composition of the corresponding assessment team including observers. The assessment team has to be appointed within forty-five (45) days from the submission of application. The time required for the submission of any additional documentation is not counted in the above interval.

2.3 The assigned assessment team is notified to the applicant, who has the right to express any reasonable objections against team's composition; in such a case, the Unit tries to propose an alternative composition, including the employment of a foreign assessor, from an equivalent accreditation body-member of MLA. When an alternative is not possible, NATACCS notifies the applicant that it can not proceed to the requested accreditation.

2.4 The applicant is also informed, additionally to the composition of the assessment team, about the following:

- a) Estimated duration of the Assessment Procedure,
- b) Required assessment time,
- c) Accreditation fees and applicant's obligation to pay the 70% of the accreditation fees in cash, three (3) days before the scheduled date of the assessment, at the latest.

2.5 If the applicant does not respond within ten (10) days, this means that there is no objection and the procedure continue, as foreseen.

2.6 In the case that the 70% of the accreditation fees is not paid three (3) days before the scheduled date of the assessment at the latest, the relevant application ceases to be in effect if it is an initial assessment. As for surveillances and reassessments the visit is postponed with simultaneous suspension of the accreditation until the natural conformity assessment body (NCAB) pays the relevant amount.

2.7 In the cases of Natural Certification Bodies, immediately after the notification of the assessment team, the applicant should schedule the witnessed assessment (find available clients). The assessment plan will be finalized during the assessment in the head offices.

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2.8 After the nomination of the assessment team, the submitted documents, together with the remarks of the Unit are forwarded to the Lead Assessor, and the members of the assessment team are informed on the imminent assessment.

2.9 The Lead Assessor reviews the documentation of the applicant, and within ten (10) days submits to the Unit his/her report; which is notified to the applicant, referring to the completeness of the documentation and informs whether a plan for the pre-assessment or the main assessment can be prepared, or the applicant is not yet ready for pre-assessment or for main assessment.

2.10 If the applicant does not respond, within one (1) month from the date of notification of any deficiencies, the relevant application ceases to be in effect, with simultaneous notification to the applicant.

3. PRE-ASSESSMENT (VOLUNTARY)

3.1 Pre-assessment is voluntary and is carried out prior to the assessment after the confirmation of the applicant. The pre-assessment is proposed for the applicant, in order to avoid problems or delays during the assessment.

3.2 The date of pre-assessment is arranged with the applicant in writing.

3.3 The pre-assessment, where necessary, shall begin within three months from the submission of application.

3.4 In the cases where a pre-assessment visit is required, this is carried out by the Lead Assessor, lasts up to one (1) day. In any case, it is charged as one (1) Lead Assessor's manday. The results of the pre-assessment visit are recorded in a report, which is notified to the applicant. Depending on the findings of pre-assessment it can be judged that:

3.4.1 A plan for assessment can be prepared, after the applicant implements any corrective actions that might have been raised as a result of the pre-assessment visit;

3.4.2 A further pre-assessment visit is required.

3.5 The maximum time for discharging the possible deficiencies shall not exceed three (3) months, from their notification. This time period can be extended to five (5) months, if the nature of deficiencies requires so. If this is not the case, the application ceases to be in effect, with simultaneous notification to the applicant.

3.6 The composition of assessment team is finalised immediately after the completion of the pre-assessment visit.

3.7 In cases of force majeure (e.g. natural catastrophe etc.) the estimated time limits between application for accreditation and pre-assessment, application for accreditation and assessment (when there is no pre-assessment) and pre-assessment and assessment can be extended after decision of the Director of the relevant Accreditation Division. In any case, before the assessment, the applicant shall send to NATACCS the changes that may have occurred in the documentation of the quality management system.

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3.8 In the case where the time between the pre-assessment and assessment is more than twelve (12) months, the applicant is informed for possible necessity of repetition of the pre-assessment.

4. ELABORATION OF THE ASSESSMENT VISIT PLAN

4.1 For the preparation of the assessment team the applicant is asked to provide copies of any in-house methods or procedures. In case the applicant refuses to provide the above methods, the assessment team shall be acquainted on the methods during an extra visit at applicant's premises, arranged between the applicant and the Unit. This visit is debited against the applicant.

4.2 The Lead Assessor shall prepare the plan of the assessment visit in applicant's premises and inform the Unit that notifies the assessment plan to the applicant, in writing.

4.3 The applicant shall respond in writing if accepts the plan of assessment. If the applicant does not respond before the date of the arranged assessment, this means that there is no objection and the procedure continues as it is foreseen.

5. COMMENCEMENT OF THE ASSESSMENT

5.1 An observer may be present in the assessments of the applicant. 5.2 The assessment visit begins with an Introductory Meeting, which takes place in the premises of the applicant, in which the assessment team and representatives of the applicant participate. The purpose of the Introductory Meeting is to clarify any possible difficulties, to confirm the purpose of the assessment and to become explicit what is expected by the applicant during the assessment.

5.3 The assessment team communicates exclusively with the personnel of the natural body involved in the quality system. Any consultant on the QMS of the applicant or the organization being audited during a witnessed assessment may be present during the assessment/audit provided that remains a silent observer.

6. LABORATORIES / PT PROVIDERS ASSESSMENT

6.1 Following the Introductory Meeting, an examination of the laboratory's quality system / PT provider and an assessment of on-going work will be conducted, in order to verify by observation, that the work carried out by the laboratory / PT Provider meets the accreditation criteria and standards and the documented quality system of the laboratory. During the assessment every assessor/expert is accompanied by an authorised member of the laboratory, which does the laboratory manager assign for this purpose.

6.2 Assessors/experts shall evaluate the competence of the laboratory / PT Provider, the suitability of the methods used and of the equipment involved, including their state of calibration and maintenance. They will establish the traceability of the measurements to national or international standards, especially for those that have serious influence on the precision or validity of the calibration and testing. The assessors/experts will also

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evaluate the competence of the laboratory staff, especially those who perform calibration and testing procedures, and the effectiveness of the quality system, so as to verify that there are no mistakes or failures in recording, analysing and reporting of the results.

6.3 The observations made will be based on objective evidence and will be recorded and verified before assessors/experts leave the area under assessment. Assessors/experts have to make detailed observations and to record their findings in specific forms. The accompanying laboratory representative shall countersign each finding.

7. ASSESSMENT OF A NATURAL CERTIFICATION

7.1 Following the Introductory Meeting the assessment starts in the premises of the applicant. During the assessment, the assessors/experts examine the quality system, seek for objective evidence for the implementation of policies and procedures and record the observations in specific forms. Each finding shall be countersigned by the applicant's representative.

7.2 The assessment of Natural Certification shall always include witnessed assessments.

7.3 The Lead Assessor in cooperation with the assessment team will inform the applicant for the audits that is interested in attending and shall finalize the program of the witnessed assessments, taking into account the relevant nomination by NATACCS and the record of the auditors / inspectors for each technical field on sampling. The date of the witnessed assessments shall be agreed at least twenty (20) working days before the assessment with probability of divergence one (1) or two (2) days. The Lead Assessor gives to the applicant the relevant form to complete it and send it back to NATACCS.

7.4 The applicant shall accept the plan in writing.

7.5 The assessment team witnesses the audits/inspections avoiding at any way to influence them. The assessment team witnesses any activity that auditors / inspectors of the body perform and record the observations in specific forms. The performance of all auditors / inspectors individually and as a team is evaluated.

7.6 The non-conformities observed are recorded in specific forms and shall be countersigned by the applicant's auditors / inspectors, which means that they accept that the findings are documented and to propose relevant corrective actions.

8. ASSESSMENT COMPLETION

8.1 The assessment of the applicant is finalised with an Intermediate Meeting after the completion of the assessment in the head offices. During this Intermediate Meeting the Lead Assessor presents a summary of the findings and the applicant representative shall propose corrective actions for the discharge of any non-conformity that may have been raised during assessment, and a time schedule for their implementation. Within

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ten (10) working days, after the Intermediate Meeting at the premises, the Lead Assessor shall send his report to the Unit, which in turn will send it to the applicant.

8.2 After the completion of the witnessed assessments, a Closing Meeting is held, if necessary, at the applicant's premises in order for the Lead Assessor to finalize the proposed Scope of Accreditation and to inform the representative of the applicant about his recommendation. Within ten (10) working days, after the completion of the witnessed assessment and the Closing Meeting, the Lead Assessor shall send his final recommendation to the Unit, which will be send by the Unit to the applicant. In the cases that there are no witnessed assessments, the Intermediate Meeting is considered as the Closing Meeting. In case the final recommendation is different from the outcome of the assessment presented in the Closing Meeting (or in the Intermediate Meeting when a final meeting is not applied), the body shall receive a written justification.

8.3 The maximum time provided for the discharge of any possible non-conformities cannot exceed three (3) months, after issuing them. This period can be extended to five (5) months, if the nature of corrective actions requires so. In an opposite case the applicant shall submit a new application for accreditation, as appropriate. Submission of the corrective actions should be accompanied by an analysis of the extent and causes of non-conformities by the applicant.

9. EXAMINATION BY THE ACCREDITATION MANAGER

9.1 After the receipt of the corrective actions, the Lead Assessor prepares within fifteen (15) days, in the case when the corrective actions are totally accepted, his/her final recommendation and forward it to the Unit together with the proposed Scope of Accreditation

9.2 The Director of the relevant Division appoints the Accreditation Manager for the specific issue. The Accreditation Manager is member of the relevant division, trained on the specific standard, with at least three (3) years working experience in NATACCS as Assessment Manager and should not have participated in the specific assessment team.

9.3 The Accreditation Manager examines the submitted information and the recommendation of the Lead Assessor, and either:

9.3.1 Approves Lead Assessor's recommendation, forms the proposed Scope of Accreditation, and forwards his recommendation to the Accreditation Council, or

9.3.2 Refuses Lead Assessor's recommendation and decides that further corrective actions shall be performed and then notifies the Lead Assessor and the applicant the reason for these further corrective actions and asks for their implementation. In case of any dispute between the natural body and the Lead Assessor concerning the characterization and the correctness of non-compliances, the Accreditation Manager in collaboration with the relevant Director examines the subject and proposes as appropriate.

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9.4 In specific cases, the Accreditation Manager in collaboration with the Director has the potentiality / possibility to either consult a technical/s expert/s on the specific issue or/and to establish a special working group comprising of the Heads of the Unit in order to evaluate / examine the specific assessment.

9.5 When necessary an additional assessment visit is conducted.

9.6 The MU calculates the total time spent for the assessment.

10. ACCREDITATION GRANTING

10.1 The Accreditation Council at its meeting examines the recommendation of the Accreditation Manager and further recommends to the Board of Directors the granting of accreditation.

10.2 NATACCS Board of Directors decides on granting accreditation.

10.3 NATACCS's decision, the rest of economic obligations of the applicant and the corresponding expenses for surveillance and maintenance are notified to the applicant, who shall accept them in writing, settles his debt and returns mandatory the document NATACCS DEIP properly filled.

10.4 The Certificate of Natural Accreditation, valid for four years, as well as the Scope of Natural Accreditation, is issued by NATACCS after signed by the Managing Director of NATACCS.

11. SURVEILLANCE OF NATURAL ACCREDITED BODIES

11.1 The purpose of surveillance of natural accredited bodies is to ascertain that they continue to comply with NATACCS requirements.

11.2 The surveillances normally take place once per year and are scheduled according to the issue date of the natural accreditation certificate. In specific cases, the Unit can decide for the construction of an extraordinary assessment.

11.3 The surveillance takes place according to the natural accreditation programme prepared by the relevant Division. Adherence to schedule is under the responsibility of the Unit.

11.4 The surveillance follows the same procedure as the above described for the initial assessment, with the following modifications:

11.4.1 Instead of an assessment team, the surveillance visit can be conducted by a Lead Assessor who is technically competent for the one third of the Scope of Natural Accreditation of the natural accredited body.

11.4.2 The final recommendation of the Lead Assessor, the proposed Scope of Natural Accreditation and the relevant documentation of the assessment are examined by the Accreditation Manager who also approves the maintenance of the accreditation in the cases where there is no modification of the Scope of Natural Accreditation or when the modification is related only with the update of the Scope of Natural Accreditation based on new editions of NSO-NAP series or ISO/IEC standards. Accreditation Manager in cooperation with the

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Director can ask for contribution from technical experts or establish an internal working group (§ 9.4) in specific cases of surveillance assessments.

11.5 During the surveillance visit, the assessment team is not expected to examine the whole Scope of Natural Accreditation of the natural accredited body. The surveillance planning is prepared in a way in order to ensure that between the initial assessment and the re-assessment are examined all elements of the assessment criteria at least once as well as the full scope of natural accreditation of the natural accredited body.

At each surveillance visit shall be assessed at least the following elements:

- Internal audit and periodic review
- Complaints against the natural body
- Previously identified non-conformities
- The proper use of NATACCS natural accreditation symbol by the natural accredited body

11.6 If, during a surveillance visit, non-conformities are found, a period of one month is provided for their discharge. Suspension or withdrawal of accreditation or part of the Scope of Natural Accreditation is possible until their discharge. If during the Closing Meeting of the visit the assessment team detects that there are non-conformities the closing of which can not be implemented in the period of one month, then the period may be extended for one (1) additional month. The same can happen if the body submit a written request during the above mentioned period of one month for extension of time for one (1) additional month due to difficulties which may be arise during the closing of the non-conformities. All correspondence is brought to the attention of the responsible MU. The Lead Assessor is responsible for monitoring the compliance with the time limits for the closing of the non-conformities and also for the compliance with the respective response times of the assessment team in the correspondence with the body. For any deviation of the above, the Lead Assessor shall inform the Unit.

11.7 If during the surveillance visit, very important non-conformities or deficiencies are found, the Lead Assessor shall send immediately recommendation for suspension or withdrawal for a part or the whole Scope of Natural Accreditation of the natural accredited body.

11.8 During the surveillance visits of the certification / inspection / verification bodies or environmental verifiers, there shall be appropriate and prompt planning of the audits of the accredited body to its clients, so that the witnessed assessments to be finalized in a period of eight (8) months at the maximum, starting from the notification of the assessment team to the body. The above is sole responsibility of the accredited body. For this reason, the planning of the witnessed assessments shall be done during the assessment in the premises of the accredited body. The exact date of the witnessed assessments shall be agreed at least twenty (20) working days before their conduction with possible deviation one (1) or two (2) days. Otherwise NATACCS has the right to consider the specific witnessed assessment as it was not done, since the planning which was done by the accredited body was not realistic. If a witnessed assessment is not conducted because of force majeure either

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for the auditor / inspector or for the client of the accredited body or even for the member of NATACCS assessment team during an eight (8) month period, then it can be transferred to the next surveillance visit to the accredited body. If the transferred witnessed assessment will not also be conducted in the next surveillance visit or in the case where there is no cooperation between the accredited body and its client in a specific field / code, then withdrawal of the specific natural standard/scope/codes according to the provisions of NATACCS Accreditation Criteria, is decided. If a witnessed assessment is not conducted within a period of eight (8) months because of reasons attributed to the accredited body, except the above mentioned case, or when there is a systematic deviation then NATACCS Accreditation Criteria is applied.

11.9 Findings that are referred to NATACCS Accreditation Criteria are written down either in a report by the assessment team or in a recommendation of the responsible MU, if there is not any current assessment team.

12. EXTENSION OF THE SCOPE OF NATURAL ACCREDITATION

12.1 For the extension of the Scope of Natural Accreditation, including the addition of new specialised staff, the natural accredited body shall submit an application, the necessary documentation and settles up the corresponding fees.

12.2 For the extension of the Scope of Natural Accreditation, the same procedure is followed as in the case of initial accreditation. Moreover, it is possible that the assessment will be conducted by one assessor only.

12.3 The natural accredited body can submit application for extension of the Scope of Natural Accreditation any time during the assessment cycle. In the cases that at the time of submission of the application for extension, a surveillance visit is in progress, it is recommended the assessment of extension to be included in the surveillance visit of the accredited body. If this is not the case, the assessment for the extension of the Scope of Natural Accreditation will be conducted separately.

12.4 In the cases that an natural accredited body applies for extension of the Scope of Natural Accreditation in a technical field which is similar to the Scope of Natural Accreditation that the natural body already has and as for the applied extension, the same technical competence is required, concerning the involved staff and equipment, and the only difference is the implementation of a procedure, it is possible, after decision of the Accreditation Manager, a supplementary assessment to be conducted. In this case, the submitted documentation is reviewed by the Lead Assessor or by the technical assessor who then forwards his recommendation to the Accreditation Manager, without the conduction of on-site assessment in the natural accredited body's premises or of witnessed assessment.

13. RE-ASSESSMENT OF NATURAL ACCREDITED BODIES

13.1 Natural Accredited bodies are subject to re-assessment once every four years. Re-assessment follows the same procedure as the initial assessment. Concerning the witnessed assessment, the paragraph 11.7 of this document is applied.

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13.2 If during a re-assessment visit non-conformities are found, a period of one month is provided for its discharge. Suspension or withdrawal of accreditation is possible until their discharge.

13.3 In the case where, during the reassessment the valid period of the Certificate of Natural Accreditation is exceeded, this period can be extended, only if responsible for the delay is NATACCS, until the completion of the reassessment according to NATACCS Accreditation Procedures, after a documented proposal of the relevant MU and a decision of the Accreditation Council. In any case the maximum time limit for the extension of the natural accreditation certificate is 6 months. After the expiration date of the natural accreditation certificate, the relevant accreditation file ceases to be in effect and a new application for accreditation will have to be submitted. In the case the natural body's assessment is successfully completed, the same Natural Accreditation Certificate may be reissued by decision of the Director of the Division.

14. NATURAL ACCREDITATION CYCLE

The accreditation cycle of NATACCS is defined at 4 years with the option of extending it by 6 months based on a documented recommendation from the Unit. Initiation of the accreditation cycle is defined as the issue date of the natural accreditation certificate.