ISO 17020:2012 - Subsection 1.15.3.8 ADN

Transmitted by the Recommended ADN Classification Societies

1. The aim of submission.

The Recommended Classification Societies Group would like to re-arrange the following ADN Requirement (Part 1, para 1.15.3.8):

*The classification society shall have prepared and implemented and shall maintain an effective system of internal quality based on the relevant aspects of internationally recognized quality standards and conforming to the standards EN ISO/IEC 17020:2012 (except clause 8.1.3) (inspection bodies) and ISO 9001 or EN ISO 9001:2008 + AC:2009. The classification society is subject to certification of its quality system by an independent body of auditors recognized by the administration of the State in which it is located.*

2. Reasons

2.1 The International Standard ISO/IEC 17020:2012 is an **accreditation** standard applying requirements to the inspection bodies (full name: Conformity assessment - Requirements for the operation of various types of bodies performing inspection).

2.2 Since standard ISO 17020:2012 is an accreditation standard and **not** a certification standard, the **certification** mentioned in the second sentence of para 1.15.3.8 may imply **only certification** for compliance with ISO 9001 and does not require **accreditation** of the classification society according to ISO 17020:2012.

2.3 The field of the certified activities is not restricted in both standards, so the classification activities for inland navigation may not be separated from marine activities; the **certified processes** for both issues are the same.

2.4 The certification of any classification society in accordance to the standards shall be subjected to circle-wise auditing Head office and several Branches to complete the cycle audit of all the company's offices within **two certification cycles**, and the Certificate may be valid for the complete quality system covering HO and operational centers.
2.5 The Certifying Body may be one of internationally recognized or recognized only by the country of the Branch activities (in this case the Certificate becomes valid for the exact Branch(es) based in the specified Country only).

3. Proposal

The Informal Group of Classification Societies would prepare a proposition for rephrasing §1.15.3.8 for a uniform understanding.

4. Annex

The letter from IACS dated Dec.23, 2015, clarifying position of IACS QSCS towards ISO 17020 and mentioning ADN requirements, is appended for information and reference.
23 December 2015

To: IACS Quality Committee Members

From: IACS Quality Committee Chairman (QCC)

Subject: Paragraph 1.15.3.8 of European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN) including the Annexed Regulations, applicable as from 1 January 2015, Volume I

The aim of this memo is to clarify the approach of IACS Quality System Certification Scheme (QSCS) to the EN ISO/IEC 17020 standard with respect to the included requirements in the Quality Management System Requirements (QMSR) and the requirement cited in the subject line of this memo.

Your attention is drawn to the following text contained in section 2.1.1 of QMSR, which states: "NOTE 3: REGULATION (EC) No 391/2009¹ & RO Code² refer to different versions of ISO 9001 & 17020 standards. QMSR is generally updated to reflect the currently valid versions of the ISO 9001 & 17020 standards. For EN ISO/IEC 17020, the current version of the standard (2012) is the primary basis for inclusion of the relevant requirements, mindful that the 1998 and 2004 versions are still referenced in documents of interest to classification societies and recognized organizations.

Recalling the text of ADN Requirement (Part 1, paragraph 1.15.3.8):

"The classification society shall have prepared and implemented and shall maintain an effective system of internal quality based on the relevant aspects of internationally recognized quality standards and conforming to the standards EN ISO/IEC 17020:2012 (except clause 8.1.3) (Inspection bodies) and ISO 9001 or EN ISO 9001:2008 + AC:2009. The classification society is subject to certification of its quality system by an independent body of auditors recognized by the administration of the State in which it is located."

² International Maritime Organization: Code for Recognized Organizations (RO Code)
It is the policy of IACS that all member societies are independently certificated against the current version of ISO 9001 by certification bodies. Indeed ISO 9001 in its entirety is an integral part of IACS IQMSR. IQMSR also addresses parts of the ISO 17020 standard as deemed relevant by the IACS Quality Committee.

The International Standard ISO/IEC 17020 is an accreditation standard applying requirements to the inspection bodies (full name: Conformity assessment - Requirements for the operation of various types of bodies performing inspection).

Since the ISO 17020 standard is an accreditation standard and not a certification standard, the certification mentioned in the second sentence of paragraph 1.15.3.8 is understood as to imply that certification for conformance with ISO 9001 only is required, though not a formal accreditation of the classification society according to ISO 17020.

A result of the 32nd meeting of the Committee on Safe Seas and the Prevention of Pollution from Ships (COSS) (23 April 2014) is recalled in part as follows: “All ROs hold ISO 9001 certificates and IACS QSCS statement of compliance, but not explicitly certificate of compliance with ISO 17020. Considering that IACS QSCS requirements incorporate the ISO 9001/2008 and ISO 17020/2004 standards, the Commission and EMSA accept this situation for all ROs. The Committee took note of this information.”

Best Regards,

Stephen Hryshchyshyn
IACS Quality Committee Chairman