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Subject: Multiple CBs within one country / Commercial CBs

Introduction

Based on inquiries from two signatories of the CCRA, that intended to change their status from consuming participant to certificate authorising participant, multiple CBs within one country or purely commercial CBs became an issue which had to be addressed by the ES and MC.

Rationale

Although the wording of the arrangements would permit, in certain clauses, multiple CBs or purely commercial CBs within one country, the wording in the Preamble, in various Articles and Annexes indicates strongly, that the arrangement relies on governmental organisations in order to develop and maintain mutual understanding and trust in each other's technical judgement and to maintain general consistency through open discussion and debate. This is supported by the requirement that Participants are government organisations or governmental agencies and corresponding restrictions on participation in Working Groups and Committees within the CCRA.

Other issues identified, partly related to the above, with CBs operating on a purely commercial basis are:

- competence in licensing ITSEFs and performing oversight,
- carrying out certifications free from undue influence or control by anyone having commercial or financial interest in the certification/validation,
- impartiality,
- being able to afford effort required for oversight consistent with governmental CBs,
- ensuring confidentiality,
- participation in shadowing activities.

The ES concluded that the operation of multiple or purely commercial CBs does not comply with the intent of the CCRA, that the CCRA requires mutual trust and understanding between governmental organisations in addition to compliance with certain standards and that the operation of the CCRA cannot accommodate multiple or purely commercial CBs.

The MC discussed the issue based on the considerations from the ES and endorsed the ES conclusion.

Decision

The MC has decided to exclude purely commercial CBs or multiple CBs within one country from being authorised within the CCRA.