Draft position on:

IAF CertSearch Database and proposal for further development

We welcome in principle the overall objectives pursued by the <u>IAF CertSearch database</u> and the progress that has been made on it since it was launched back in 2020.

As a central location for information on accredited management system certificates world-wide, the database can be of valuable assistance to end-users in businesses and industry who wish to search and validate the status of certificates issued, in particular regarding their global supply chains. However, that information is equally retrieved through other ways, including existing databases maintained by individual certification and accreditation bodies, or directly with the certified entities, if necessary.

Use of the database should remain voluntary and not be made mandatory. Further market research should be conducted to explore market demand and sustainability of a financial model.

We strongly believe that the CertSearch database, like other similar databases and service offerings by providers in the conformity assessment sector should remain market-driven and voluntary. Services should be paid for by whoever uses them, with the usage being dependent on their specific added value. If the demand and added value of the CertSearch database are further confirmed by the marketplace, such as is claimed by the proponents of its development, then its business model will become economically viable.

We are opposed to the idea of making the use of the database obligatory for certification bodies (and, indirectly, for the certified entities as the certificate holders), thus creating an artificial market need for it. The related costs would be handed down to all certified entities, without necessarily adding value for the individual certified organisation.

In this context, we would like to stress that we fully support and highly appreciate accreditation as an important instrument to promote and ensure the quality of certification, and thus of the certificates and their reliability. However, this does not mean that certificates not based on accreditation are *per se* to be considered as untrustworthy and of poor quality, or that related products supported by certificates not backed up by accreditation would by default be less credible or lack market acceptance. Indeed, important parts of industry have, for years, successfully relied on the high quality of certificates as ensured through the rules of the IEC Conformity Assessment systems, including peer assessment among the participating certification bodies, without accreditation being a formal requirement under these systems. In some cases (in particular concerning the IECEx system), this reliance even includes acceptance of certificates by a number of national governments and regulatory authorities.

Furthermore, and as a matter of principle (except where the publication of certificates is required by law), the certified entity/organisation must remain free to decide whether or not they wish or agree to publish, in a database managed by an external third-party organisation, information in relation to a certificate that has been issued to them and provided with data that is specific to their

entity/organisation. This disclosure decision is directly linked to the legal status of the certified entity/organisation as the certificate holder and to the right to share proprietary data and information, irrespective of any formal property right in the certificate itself.

Protection of business secrecy and proprietary information. No extension to product certification.

Finally, there are also important aspects in relation to the protection of business secrecy and confidentiality of proprietary and other competition-relevant information which need to be emphasised. These aspects play a bigger role in the area of product certification than in management system certification as product certificates and their scopes allow competitors and other parties to draw conclusions on business developments and company strategies. The protection of business secrecy and confidentiality of information relevant for competition must not be put at risk, which is why there are strict rules in EU product legislation to ensure this.

We therefore reject the idea, expressed at some point during the discussions on the further development of the CertSearch database, to extend the database to product certification, and expressly welcome the clear statements in this regard, as contained in Q8. of the *"IAF CertSearch Database FAQs"*. However, bearing in mind the experience of IAF Resolution 2018(13) (extension to product certification of the obligation for accredited certification bodies only to issue accredited certificates within their scopes of accreditation), we call upon IAF to provide more formal guarantees to reassure stakeholders that any such extension of the database to product certification is clearly excluded. We consider this as a pre-condition for the broader support for the database in the marketplace.

EAAB industry college 14 January 2022