

Accredited Inspection Contractors (AIC)

PS20

1) Purpose

This statement sets out the Irish National Accreditation Board policy on requirements for Accredited Inspection Contractors (AIC) implementing the inspection scheme implementing European Council Directive 1999/13/EC (S.I. 543/2002 and S.I. 199/2007).

For the purposes of this scheme, the Competent Authority is the regional Local Authorities.

2) Abbreviations

2.1) AIC: Accredited Inspection Contractor

2.2) IB: Inspection Body

3) References

3.1) ISO17020 "General Criteria for the operation of various types of bodies performing inspection";

3.2) ILAC/IAF-A4 "Guidance on the application of ISO 17020:1998", current version;

3.3) European Council Directive 1999/13/EEC;

3.4) S.I. 543/2002 (Emissions of Volatile Organic Compounds from Organic Solvents Regulations 2002).

3.5) S.I.199 of 2007. Limitation of emissions of volatile organic compounds due to the use of organic solvents in certain paints, varnishes and vehicle refinishing products regulations;

3.6) EPA Best practice guidelines for the dry cleaning, vehicle refinishing and surface cleaning sectors, current versions available from www.epa.ie

3.7) National Protocol for the Implementation of a reporting mechanism in line with the requirements of S.I. 543 of 2002;

3.8) AIC Inspection Procedure for the 2007 Deco-paints Regulations.

4) Statement

It is the policy of the Irish National Accreditation Board (INAB) that all applicant and accredited inspection contractors implement the following requirements in full:

- 4.1) The published (current versions) of the EPA Best Practice Guides, where available clearly specify mandatory (Part 1) and excellent practices (Part 2). It is INAB policy that all requirements of Part 1 of each sector specific document are mandatory without deviation.
- 4.2) The AIC shall document an inspection audit trail in all instances, clearly documenting and cross referencing evidence verified (to include permissions for discharge from Local Authorities and certificates of waste disposal);
- 4.3) In order to add value to the process, the AIC shall discuss and encourage process improvements with the operator in keeping with Part 2 of each sectoral guide. The AIC shall document this as part of the inspection process either through raising observations (only) or on the audit trail.
- 4.4) The AIC is required to have a documented inspection procedure and checklist to demonstrate how each mandatory requirement (in 3.1 above) is inspected and clearly recorded in an audit trail; the AIC may choose to have separate procedures and checklists for each sector.
- 4.5) The AIC shall carry out all inspections for the emissions of volatile organic compounds from organic solvents in a planned, objective manner and document procedures and findings in accordance with the AIC templates set out in the applicable references above.
- 4.6) An AIC is permitted under the Regulations to prepare an AIC report. However, it is only the Competent Authority who is authorized to issue a certificate of compliance for an activity on foot of receiving an AIC report and being satisfied that the report demonstrates an installation's compliance with the Regulations. The AIC report shall contain a clear statement of compliance with a brief documented justification and follow the template in the National Protocol for the Implementation of a reporting mechanism in line with the requirements of S.I. 543 of 2002.
- 4.7) The AIC shall provide the operator with a full report clearly stating the Inspection Body's opinion, with documented justification, on whether the facility is compliant or not; the AIC shall advise the operator to forward a copy of the report to the relevant Local Authority.
- 4.8) The AIC is required to inform the Competent Authority where the AIC is aware that a requirement of the Regulations has been, or is being, breached by an operator as per Article 27 of the 2002 Regulations (Dry Cleaning Sector only).

4.9) The AIC shall make publicly available written information on its inspection process, including but not limited to, its obligations to Local Authorities and a clear description of its classification system of findings (non-compliances). The AIC is required to clearly document its policy in this document on managing repeat non-compliances and differentiating between major/minor non-compliances.

4.10) The AIC shall not engage in any activities that may impact on their independence or impartiality; all other business interests and activities shall be clearly described in the quality manual and accompanied by a documented impact/risk analysis in each case. Where an AIC provides certification or testing services, a similar impact/risk analysis is required and the relationship between the functions clearly described.

4.11) INAB shall annually conduct an AIC client survey on a representative sample of clients in advance of the head office visit.

5) INAB Scopes of Accreditation

5.1) INAB shall outline scopes of accreditation in accordance with Schedule 2 of S.I. 543/2002;

5.2) The AIC shall clearly demonstrate, as part of the INAB annual surveillance visit, that it retains the competence for inspection of each accredited sector.

6) Contact

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