

GNB-CPR GNB-AG	Co-ordination of the Group of Notified Bodies for the Construction products Regulation (EU) No 305/2011	NB-CPR/20-836 Issued 21 February 2020 DRAFT Guidance
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DRAFT GNB-CPR position paper:

Interlaboratory comparisons for notified bodies

1 INTRODUCTION

When notified bodies carry out assessment of performance by testing, it is utmost important that measurements are done at the same level.

For some essential characteristics however, indications exist that notified bodies are not measuring at the same level. Even when using well maintained laboratory equipment traceably calibrated to the same international reference, different measuring levels may exist amongst notified bodies.

For instance, a recent study, which has been presented to SG06, has indicated that notified laboratories may measure the thermal transmittance of roof windows quite differently.

Such differences of measuring levels may result in different assessments of performance, which may be detrimental to the functioning of the harmonisation.

In the CPD regime, it was generally considered outside the scope of the GNB coordination to organise or to provide guidance on the participation in interlaboratory comparisons. However, given the importance of assessment of performance being carried out at equal levels, it seems relevant for the GNB also to consider use of interlaboratory comparisons as a means of achieving the uniform level of performance of notified bodies, which is aimed for by CPR.

In fact, some sector groups are already conducting different kinds of interlaboratory comparison schemes, and some have been doing it for years.

This position paper aims to define the general conditions for interlaboratory comparison as part of the GNB coordination.

2 DEFINITIONS

Interlaboratory comparison

A scheme by which laboratories are comparing their performance for the purpose of achieving a uniform level.
Abbreviation: *ILC*.

Measuring level of a laboratory

The average difference between the results obtained by the laboratory and the reference value.

Example: If a laboratory generally obtains test results 2% higher than the reference values for the samples tested, that laboratory would have a measuring level of + 2%.

3 BASIC CONSIDERATIONS

Interlaboratory comparison is an essential part of ensuring the performance of laboratories. Accordingly, ISO/IEC 17025 requires laboratories to take part in interlaboratory comparisons.

ISO 17025, clause 7.7.2 states:

The laboratory shall monitor its performance by comparison with results of other laboratories, where available and appropriate. This monitoring shall be planned and reviewed and shall include but not be limited to, either or both of the following:

a) participation in proficiency testing

NOTE – ISO/IEC 17043 contains additional information on proficiency tests and proficiency testing providers. Proficiency testing providers that meet the requirements of ISO/IEC 17043 are considered to be competent.

b) participation in interlaboratory comparisons other than proficiency testing.

Notified bodies are supposed to adhere to ISO/IEC 17025 for their testing activities, including taking part in interlaboratory comparisons. However, taking part in proficiency testing programmes and other interlaboratory comparisons is only possible when relevant programmes are available.

Experience has shown that for some essential characteristics of some types of products, notified bodies may obtain different test results when testing the same or similar samples. Hence, the test result may depend on by which laboratory the testing is done.

For several reasons, such differences will be detrimental to the functioning of the harmonisation; for example:

- reduced confidence in declared performances of construction products on the market,
- unfair competition amongst manufacturers,
- reduced effectiveness of market surveillance,
- reduced credibility of notified bodies,
- unfair competition between notified bodies.

For the above reasons, sector groups should consider the possibility of such differences between the test results obtained by different notified bodies. When such differences are identified appropriate measures should be taken to reduce them.

It needs to be recognised that the participation in interlaboratory comparisons will involve both costs and work from the participating laboratories. Therefore, sector groups should only guide notified bodies to participate in ILC programmes when a need has been identified.

It also needs to be recognised that test results obtained and submitted as part of ILC programmes would be most sensitive information requiring a high degree of confidentiality. For instance, manufacturers should not have the possibility to make their choice of laboratory on the basis of the results of an ILC programme.

4 Identification of need

In the below cases, it may be considered relevant to initiate an ILC programme.

- Indications of different measuring levels
- Lack of knowledge regarding measuring levels.

To be relevant, the differences in measuring levels must have the potential to significantly impact the result of the assessment of performance.

5 Use of proficiency testing programmes

If a sector group considers that an existing proficiency testing programme would serve the needs of that sector, the sector group may decide to guide notified laboratories to participate in that proficiency testing programme.

A sector group may also request one or more providers of accredited proficiency testing to develop programmes serving the needs of that sector.

Generally, accredited providers of proficiency testing are considered as competent and meeting the requirements regarding independency and confidentiality.

6 Confidentiality

It is of utmost importance that a high degree of confidentiality is maintained through the entire ILC process.

Knowledge of the results submitted by the individual participants would be sensitive and hold a potential for misuse.

Therefore, for each ILC programme a data controller must be appointed to whom all test results shall be submitted.

The data controller shall be independent of the participating laboratories and shall commit itself to absolute secrecy with regard to all data about the participating laboratories and the results submitted by them.

The data controller shall assign a secret, unique code to each participant. Each participant shall be informed about his own code only.

Accredited providers of proficiency testing may be considered to meet the confidentiality requirements.

Each participating laboratory shall observe secrecy with regard to its own code and the test results it submits.

Participating laboratories may inform their own notifying authority and national accreditation body about their participation in the ILC as well as their identification code and the results they submit.

7 Costs

All ILC programmes coordinated by sector group should be on a non-profit basis. The costs related to the provision of test samples, shipment, fee for the data controller, etc. shall be shared evenly amongst the participants.

Sponsorships, e.g. from industry confederations, may be accepted as long as the sector group ensures that independency and confidentiality is not affected.

8 Reporting

An ILC report shall be worked out with a description of the ILC programme and the results obtained.

All results shall be anonymised. The results of the individual participants shall be traceable only by means of the secret participant codes.

The ILC report shall be available on CIRCABC.

9 Guidance regarding equalisation

On the basis of the reporting, sector groups may decide on guidance to participants about measures to undertake for the purpose equalising the measuring levels.