
Thank you for allowing us to provide our feedback and we hope this will be considered.

As an accredited Testing Laboratory to ISO 17025 and Recognized by ISED, we support the idea of free trade and making the approval process easy for manufacturers to import and export products locally and internationally.

We are NOT in support of Annex A – Procedure for the recognition of accreditation bodies for non-MRA countries or Annex B - Procedure for the recognition of foreign testing laboratories, for the following rational:

1. The main objective of the department is to implement systems and procedures to safe guard and protect the Canadian public. This should also include Canadian businesses who welcome the opportunity to export products to global markets, creating jobs and helping the local economy. By allowing recognition of accreditation bodies from non-MRA countries only hurts the Canadian economy by creating trade barriers for Canadian manufacturers. Without a bilateral MRA, our own Canadian exports are not able to market their products with the same flexibility as others. For example, if a Canadian wireless device manufacture wishes to export a products to Brazil, South Korea, China, India, Japan or other non-MRA countries with a bilateral agreement they are forced to test the product by an approved testing laboratory **in the respective country**. Where a bilateral agreement is in effect, manufacturers in each country are allow free trade with lack of same barriers and the flexibility to test the products locally.

We believe ANNEX A will only be hurting our local Canadian manufacturers and continue to help maintain trade barriers.

2. In ANNEX B, Recognition should only be allowed for Testing Laboratories in countries by bilateral MRA with Canada. The reasons are noted above. Only with the bilateral MRA, will there be free trade and free movement of products to comply with the national standards and help to make sure products entering the Canadian market comply with the ISED requirements for Canadian consumer safety.

Thank you we look forward to supporting the ISED. If any additional information or clarification is required please feel free to contact me.

Regards,

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