



Please see below for comments from the Standards Council of Canada on the recent Consultation on New Requirements for Wireless Device Testing Laboratories.

General comment:

The Standards Council of Canada agrees with transitioning to mandating accreditation for testing laboratories performing compliance measurements to ISED's technical standards for wireless devices in non-MRA countries. However, it should be noted that this requirement extends to the certification of such devices (when certification is mandated). Therefore it should be further clarified in the text that tests on which certification is based shall be conducted by accredited laboratories with a scope of accreditation covering the tests in question. This clarification is important because the accreditation standard for certification bodies certifying product, ISO/IEC 17065, does not specifically mandate accreditation for the laboratories providing tests on which certification is based.

Comments related to clauses:

9. Proposed transition period and renewal period for accreditation of testing laboratories

SCC recommends deleting the following sentence: "Furthermore, ISED proposes that each test laboratory renew their accreditation every two (2) years."

This is recommended because accreditation bodies have different accreditation cycles, and therefore various renewal periods. The accreditation cycle is based on the international standard for accreditation bodies, ISO/IEC 17011. Furthermore, the peer assessment of internationally recognized accreditation bodies ensures that recognized accreditation bodies have a cycle that meets the requirements of ISO/IEC 17011. Therefore, it is advisable to leave the flexibility regarding the renewal of accreditation, and review the renewal period when an accreditation body is recognized by ISED. The text may be interpreted to say accreditation bodies that do not have a 2-year renewal period will not be recognized. If this is not the intention, then this sentence should be removed.

ANNEX A - Procedure to recognize an accreditation body in non-MRA countries (ANNEX A)

5. Accreditation body recognition procedure for non-MRA countries

2. General information

SCC recommends adding a new point: 2 i "brief description of the process the accreditation body will use to accredit testing laboratory, including a description of the accreditation cycle".

3. Technical qualification

SCC recommends adding: being a signatory to an accreditation agreement that is acceptable to ISED for a scope recognition that includes testing and calibration laboratories, ISO/IEC 17025 (when accrediting laboratories) and product certification, ISO/IEC 17065 (when certifying wireless devices).



SCC recommends adding clause d: expertise and capability to accredit certification bodies certifying wireless devices to the latest ISO/IEC 17065, Conformity assessment -- Requirements for bodies certifying products, processes and services

#### 8. Retaining recognition

SCC recommends replacing “The accreditation body shall provide evidence of its accreditation status and scope upon request by ISED” with “The accreditation body shall provide evidence of its signatory status to an accreditation agreement that is acceptable to ISED and its scope of recognition upon request by ISED.” Accreditation bodies are responsible for “accrediting,” the term accreditation applies to the clients of an accreditation body, not to the accreditation body itself.

#### 9. Suspension or withdrawal

SCC recommends adding “An accreditation body whose recognition has been suspended or withdrawn may reapply for recognition once the causes leading to the suspension or withdrawal have been eliminated to the satisfaction of ISED. “

### Annex B—Procedure for the recognition of foreign testing laboratories

#### 15. Suspension or withdrawal of recognition

SCC suggests adding: “A testing laboratory whose recognition has been suspended or withdrawn may reapply for recognition once the causes leading to the suspension or withdrawal have been eliminated to the satisfaction of ISED and of its designating authority.”