



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

Related to the comments received from A2LA:

Comment # 1: SCC agrees with this suggestion, as the accreditation cooperation websites list the scope of recognition of each accreditation body and these websites are kept up to date.

Comment # 2: Although the recognition cycle for the accreditation bodies is four years (unless specific situations related to the accreditation body require a shorter recognition period), SCC understands that ISED chooses to recognize accreditation bodies for a two-year period in order to align it to the recognition period of the conformity assessment bodies. SCC agrees that both a two-year and a four-year recognition period could be adequate, and there is no significant impact when choosing one period over another.

Comment # 3: SCC agrees with the intent of this suggestion. SCC suggests that “the latest version of ISO/IEC 17025” be replaced with “the current version of ISO/IEC 17025”. For the transition period, both versions of ISO/IEC 17025:2005 and ISO/IEC 17025:2017 are current, and once the transition period ends, only the latest version will be current.

Related to the comments received from Anonymous:

SCC has no comment on this suggestion. However, SCC supports the principle that the accreditation scope of the laboratory shall cover the tests actually performed in support of certification, and that only accredited tests be considered for certification purposes.

Related to the comments received from Bell Mobility:

SCC agrees with the intent of the suggestions made.

Related to the comments received from Cisco Systems, Inc.:

SCC agrees with the intent of the suggestions made.

Related to the comments received from Entidad Nacional de Acreditacion (Spain):

SCC agrees with the intent of the suggestions made.

Related to the comments received from Ministry of Economy and Industry (Israel):

SCC does not agree with this suggestion. The proposed changes to recognize both MRA and non-MRA accreditation bodies largely cover all situations, allowing for a large choice of accreditation bodies to be used by the conformity assessment bodies.

Related to the comments received from PCTest Engineering Laboratory Inc.:

SCC does not agree with the first suggestion made under 9.29. Renewal of accreditation of an annual basis would be an unnecessary burden to all actors involved.

SCC does not agree with the second suggestion made under 9.29. It is the responsibility of the accreditation body to ensure that an accredited laboratory continues to meet the requirements for accreditation when changes in key personnel occur. The accreditation bodies have mechanisms in place to address this aspect, as for example requiring the accredited laboratories to inform about changes that may affect the accreditation status of the laboratory, followed by an evaluation performed by the accreditation body to decide on course of action related to the maintenance of accreditation.



SCC does not agree with the suggestion made under Annex A.9.3. It is the responsibility of the accreditation body to ensure that an accredited laboratory continues to meet the requirements for accreditation, which includes competence of key personnel. ISED reviewing/evaluating personnel records and monitoring change in staff would be an unnecessary burden and would interfere with the roles of the accreditation body.