WaterMark Certification Scheme
Guidance Notice
Product testing, on-site assessment and factory inspections during COVID-19 (Coronavirus) Global Pandemic

Intent

The intent of this notice is to provide guidance to Approved Certifiers on product testing, on-site assessment and/or factory inspection, and product conformity surveillance requirements for plumbing and drainage products certified under the requirements of the WaterMark Certification Scheme during the period impacted by the COVID-19 (Coronavirus) Global Pandemic.

Background

The closure of some accredited testing laboratories and the ongoing travel restrictions associated with the COVID-19 pandemic may impact an Approved Certifier's capacity to obtain product test reports, to conduct on-site assessments and/or factory inspections for new or re-evaluated WaterMark certificates, and to undertake product surveillance and licensing.

The Manual for the WaterMark Certification Scheme (Manual) requires the following:

Initial evaluation of a product – testing and on-site assessment

Clause 8.5.1 I. a) The Approved Certifier shall conduct an on-site assessment of the manufacturing quality management system and production process at each location.

Clause 8.5.1 I. b) Type testing shall be conducted by an accredited testing laboratory.

Re-evaluation of a product – testing and on-site assessment

Clause 8.5.1 IV. b) Re-evaluation testing and on-site assessment, with defined scope, prior to the term of the WaterMark certification expiring.

Surveillance of a product – testing, factory inspection and re-testing

Clause 8.5.1 VI. a) If required by the product specification and when one or more of the following occurs: a change in the specification, design, material, manufacturing process or location, type testing shall be conducted by an accredited testing laboratory.

Clause 8.5.1 VI. e) If, during annual product conformity surveillance, the Approved Certifier has concerns arising from the annual review, those concerns shall be investigated and resolved prior to re-issuing a WaterMark Licence. This may require follow up activities including but not limited to factory inspection and re-testing.

In order to provide some flexibility to Approved Certifiers and Approved Users whilst product testing laboratories are closed and travel restrictions remain in place, the ABCB is issuing the following guidance.

Guidance

Approved Certifiers should follow IAF ID 3:2011 Informative Document for the Management of Extraordinary Events or Circumstances, including as it pertains to the specific guidance below. This document was made available to all Approved Certifiers, accredited to operate in the WaterMark Certification Scheme, by the Joint Accreditation System of Australia and New Zealand (JAS-ANZ) in February 2020.

In addition, an Approved Certifier should follow the requirements of IAF MD 4:2018 Mandatory Document for the Use of Information and Communication Technology (ICT) for Auditing/Assessment Purposes (including for remote audits and assessments) if the Approved Certifier has this document in their scope of accreditation. If an Approved Certifier does not have this document in their scope of accreditation they should contact JAS-ANZ to attain such accreditation.

Initial evaluation of a product – testing and on-site assessment

<u>Clause 8.5.1 I. a)</u> During the period where an on-site assessment of capability is not possible due to travel restrictions, the Approved Certifier may conduct a remote ICT audit taking into consideration the guidance given in Annex A of this document.

<u>Clause 8.5.1 I. b)</u> During the period where testing is not possible, due to accredited testing laboratory closure, certification should not be issued by an Approved Certifier.

Re-evaluation of a product – testing and on-site assessment

<u>Clause 8.5.1 IV. b)</u> During the period where an on-site assessment is not possible due to travel restrictions and/or re-evaluation testing is not possible due to accredited testing laboratory closure, an Approved Certifier may extend WaterMark certification by not more than 12 months if there are no concerns arising from the most recent annual product conformity surveillance, and provided that the Approved Certifier has completed a remote ICT audit of the factory following the guidance given in Annex A of this document.

If an on-site assessment is not possible after the 12 month extension, the certification may be extended for a further 12 months, providing all the re-evaluation testing in accordance with Clause 8.5.1, b), i to v has been completed and the Approved Certifier has conducted a remote ICT assessment considering the guidance given in Annex A of this document.

Surveillance of a product – testing, factory inspection and re-testing

<u>Clause 8.5.1 VI. a)</u> If type testing is required by the product specification and/or a change in the specification, design, material, manufacturing process or location occurs, testing by an accredited testing laboratory may be deferred for not more than 12 months.

<u>Clause 8.5.1 VI. e)</u> If the Approved Certifier considers the concerns arising from the annual review have not been adequately addressed through other aspects of the annual product surveillance, including product inspection, desktop review and the Approved User's declaration of conformity, the need for an on-site assessment and/or product re-testing may be deferred for not more than 12 months provided that the Approved Certifier has completed a remote ICT audit of the factory following the guidance given in Annex A of this document.

Approved Certifiers may consider including alternative local site product inspection (product conformity surveillance) activity, at the distributor's site or at point of sale, as an interim means of assurance where visits to the manufacturing site to perform annual product conformity surveillance are not possible due to COVID-19 related travel restrictions.

It is acknowledged that some domestic distribution and retail outlets may not be able to accept Approved Certifier sample selection and product inspection visits during the COVID-19 pandemic. In such circumstances, provided the Approved Certifier retains a documented record of the reasons, the need for in-person sample selection may be temporarily waived and the product selected by the distributor under instructions from the Approved Certifier and sent to the Approved Certifier for off-site inspection.

In relation to Approved Users that are yet to transition from WaterMark Level 1 to the current WaterMark Certification Scheme, where the annual on-site surveillance audit is not possible due to travel restrictions, Approved Certifiers may utilise a combination of remote ICT audit following the guidance given in Annex A of this document, plus sample selection and inspection at the distributor's site or at point of sale, as the means for verifying continued product conformity and continued manufacturing quality assurance capability.

Documentation

In all instances where testing requirements, on-site assessments and factory inspections are affected by the COVID-19 pandemic, Approved Certifiers should develop documented procedures and keep records of the action taken in relation to product certification.

Approved Certifiers should follow all guidance published by JAS-ANZ. If there is a conflict between the guidance issued by JAS-ANZ and this document the guidance in this document will prevail.

Lifting of travel restrictions and/or re-opening of testing laboratories

Once travel restrictions have been lifted and/or the relevant accredited testing laboratory has re-opened, Approved Certifiers should obtain product test reports and resume on-site assessments and/or factory inspections for new or re-evaluated WaterMark certificates, and product surveillance and licensing, in accordance with the Manual for the WaterMark Certification Scheme.

Approved Certifiers should re-schedule all on-site assessments and factory inspections deferred during the period impacted by the COVID-19 pandemic and ensure any concerns have been addressed. The order of re-scheduled activity should be determined by the Approved Certifier via a risk-based approach provided that those conformity assessment activities in relation to certifications that have been directly impacted by the COVID-19 pandemic are allocated a high priority.

This guidance is applicable from the date of its issue until revoked or amended by the ABCB.

Further Information

Should any WaterMark Certification Scheme stakeholder require further clarification, they should contact the WaterMark Administration on 1300 134 631 or email WaterMark@abcb.gov.au.

Date of issue: 18 November 2020.

ANNEX A   JAS-ANZ Guidance for the Use of Remote ICT Auditing of Factories under the WaterMark Certification Scheme

1. Scope and objective

This guidance is intended for Approved Certifiers utilising remote ICT as a means of verifying continued management and implementation of quality plans in accordance with the Manual for the WaterMark Certification Scheme (WMCS) Appendix 5.

2. Limitation

This guidance is limited to verification that the factory is maintaining a quality management system that supports the continued conformity of manufacturing output with the WMCS.

This guidance includes witnessing of factory-performed inspection and testing associated with routine production control but highlights some limitations thereof.

3. Pre-requisite

Before implementing remote ICT as a conformity assessment tool in relation to WMCS, Approved Certifiers shall apply for and obtain a scope extension to include IAF MD-4:2018 in the scope of JAS-ANZ Accreditation.

4. Guidance

Remote ICT is a tool that permits third-party certifiers to perform conformity assessment remotely in lieu of a physically visiting a site where activities related to the scope of certification are performed.

Product certification of the type defined by the WMCS incorporates testing, auditing and inspection. This guidance relates to auditing.

For the purposes of the WMCS, factory auditing satisfies the following needs:

a) The factory's documented quality plan is implemented.

b) Product design is controlled.

c) Process design is controlled.

d) Batch testing and inspection capability is maintained.

e) Batch testing results support the Approved User's claim of conformity.

Remote ICT auditing of the factory is able to provide some information to support the above needs but the extent to which a remote ICT audit of a WaterMark product factory can be relied upon to support the WMCS is limited by available technology. Accordingly, this tool may not be a reliable substitute for in-person witnessing of factory processes critical to product conformity.

Technology that is most likely to be available for the purposes of WMCS remote ICT audits is on-line meeting, using platforms such as Zoom®, Skype®, Cisco Webex® and GotoMeeting®. These platforms may be used in conjunction with webcams and shared screens to enable aspects of an on-site audit to be achieved remotely as follows:

- Request a detailed floor plan of the manufacturing plant prior to the audit. The floor plan should indicate where each manufacturing process is carried out and

the location of incoming product inspection, quarantine areas, hold-points, WIP storage areas, finished product storage, quality control office and in-house laboratory.

- Perform a walk-through tour of the factory where the client representative holds an on-line webcam or smartphone camera.

- Using the webcam or similar, show particular processes in progress, machine settings, personnel at their workstations, work instructions posted at workstations, product identification, segregation of NCP, calibration status, workshop housekeeping, warehouse configuration.

- Discussions with personnel may be conducted remotely such as with workshop supervisors, and operators where conditions are favourable.

- Remote viewing of IQC, IPQC and FQC inspections may be attempted although the information gained may be limited by the inability of the auditor to physically interact with the product.

- Remote viewing of the factory's product batch testing arrangements similarly is possible but may be limited for the same reason and therefore the liability of the Approved Certifier for whatever finding the auditor makes as a result of a remote ICT viewing of a product test should be considered. Such limitations would presumable be particularly acute if a product failure was witnessed during a remote ICT audit.

- Review of procedures may be achieved using shared screens and records may be reviewed via webcam where these are paper-based.

- Similarly, records of routine activities (such as internal audits, toolbox meetings, management reviews) can be reviewed via webcam or shared screen.

5. **Considerations**

a) Given the potential for distraction, the person holding the webcam may need to be accompanied by a colleague providing direction and safety alerts as the individual walks through the factory workshop.

b) Additional effort may be needed at the planning phase to ensure that the ICT tools are of sufficient capacity (for example, audio clarity, video resolution, internet bandwidth) and are used effectively, with more time allocated to live viewing of factory walk-throughs.

c) The use of hand-held mounting arm for webcams may be considered to allow the remote auditor improved vision in the factory.

d) In situations where product failures are witnessed by the remote ICT auditor and the Client disputes such finding, the Approved Certifier may require a third-party evaluation to verify results.

e) Approved Certifiers are advised to notify their professional indemnity insurers concerning the intention to perform remote ICT audits of WaterMark factories (highlighting for example the extent to which the Approved Certifier can be held liable for findings related to product testing witnessed during a remote ICT audit).