



Standards Council of Canada
Conseil canadien des normes

Canada

Proposed ORD process

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Standards **experts**. Accreditation **solutions**.



Presentation outlook

- What is the current ORD process?
- What led to the creation of the ORD task force?
- Who is part of the ORD task force?
- What is the mandate of the ORD task force?
- What is the work done to date?
- What are the next steps?
- What are the legacy issues?



ORD process

- Every day, multiple industries find themselves in a situation where a product cannot be certified because there is no applicable Recognized Standard for use in Canada.
- Over the years, the certification bodies (CABs), the industry, the regulators, and Standards Council of Canada (SCC) have developed and used a process for certification of products using Other Recognized Documents (ORDs). This process has been imbedded in SCC's technical requirements for the certification of products (CAN-P-1500) and is still in use today.



ORD process – a number of issues

- Ever since the inception of the ORD process, it has been understood by those involved that the ORDs should be used as a temporary measure until applicable standards are developed.
- Over the years, the ORD process has helped to certify products but the process has not been perfect and has led to numerous issues that have been raised multiple times by the parties involved.
- We have heard issues from all stakeholders: regulators, conformity assessment bodies, industry and SCC



Example of issues:

From the Regulatory Authorities perspective (RAABs):

- What was the ORD process created for in the first place? is it still the tool that we need?
- Are the members of the RAABs responsible for approval ?
- Approval process and rules on decisions are not consistent among the RAABs – if one province does not agree, what happens ?
- No official record of what was approved by whom
- No record or process in place to ensure 5 year re-approval or incorporation into standard (lots of ORDs are more than 10 years old)
- No evidence provided as required by 4.5.5c of CAN-P-1500
- No regular reports on usage or issues as per 4.5.8 of CAN-P-1500
- Other – there is a sense that the research that would lead to the decision to develop an ORD is not done by the CABs: is there a standard available, what are the other CABs might be doing, etc...



Issues

From the RAABs (continued):

- Some requests appear frivolous and do not seem to have been researched and the basic information is not provided by the CABs so regulators can make an informed decision
- What happens for sectors that are not as consistently regulated through out the jurisdictions ?



Example of issues

From the CABs perspective:

- Lack of transparency in initiating the development of an ORD – what is the process? are there rules or guidelines?
- Is there proper research done by the CAB on what is available - are there competition issues?
- Large disparity of what information is being presented to the regulators for approval of ORDs
- Most ORDs don't get transformed into a standard after 5 years
- How do I deal with expired ORDs? Can I still certify to them?
- Other – the procedures described by the RAABs and CAN-P-1500 are not followed



Issues

From the CABs perspective (continued):

- What should be considered required as needing to be an ORD?
- The approval process by the RAABs is an issue – too long, inconsistent, etc...
- What type of info should be presented to the RAABs and industry associations?
- Accountability and responsibility within the process are not clear
- Industry associations are not involved in the process



Example of issues

From the Industry Perspective:

- Is the tool still relevant to our needs ?
- Are we part of the process ?
- What should be our role ?
- Other – industry associations do not feel that they are adequately involved in the process
- Consultation on potential ORDs should be done at the beginning – only done at the tail end currently if at all



Example of issues

From SCC's perspective:

- More than 75 % of the ORDs listed on our website have expired (>5 yrs)
- No idea if the ORD has been approved and no record to prove it – lack of transparency for the whole process
- Search engine on SCC web needs to be improved
- List on the web contains ORDs not approved by the RAABs
- List contains ORD developed for US market and not Canada
- Are ORDs really meant to be temporary if many are >10 yrs?



Membership of task force

- Normand Breton, ESA – Chair
- Total of 19 members
- Stakeholders represented: CABs, regulators and industry
- SCC acts as Secretariat



Mandate of the ORD task force

In early 2013, at the invitation of SCC, interested parties in the ORD process, namely the CABs, the regulators and industry, attended a meeting to discuss what could be done to find solutions to the identified issues. The ORD Task Force was created and agreed to strive to achieve the following mandate:

To review and revise the current ORD process from inception to approval with the objectives of creating a baseline document to be used by all sectors so the process is relevant, consistently applied, lean, simple, efficient and transparent to all stakeholders.



Work to date

Once the task force agreed on a mandate, the work focused on:

- 1) Identification of the main issues with the current process
- 2) Definition of the scope of ORDs
- 3) Identification of the main criteria to decide when an ORD is needed
- 4) Design of a new ORD process describing the main steps and requirements – high level document and detailed document on requirements
- 5) Proposed process was sent for survey from February to April to 198 stakeholders (plus NPSAC and PTAC)



Work to date (continued)

6) Responses from the survey are currently being analyzed

General support for the proposed process

Most questions and suggestions have to do with the governance of the ORD process in particular around how RAABs would make decision on ORDs



Next steps

- 1) Complete the analysis of the responses of the survey and follow up on any action items identified
- 2) Review the high level document based on the comments received as well as the detailed requirements document
- 3) Establish potential implementation plan of the new ORD process. The plan should consider:
 - assessment of impacts of proposed changes on stakeholders
 - potential schedule of implementation
 - the new process would only apply to new ORDs
- 4) Establish a plan to deal with the existing ORDs (legacy issues)
 - Main issue: a large number of ORDs are more than 10 years old (this is currently outside the mandate of the ORD task force)



Questions ?

