

Dear Sir/Madam

Please find below our response to the above consultation. Given our specific interest in accreditation, we offer the following comments relating to this particular aspect of the consultation.

The United Kingdom Accreditation Service is the sole national accreditation body recognised by government to assess, against internationally agreed standards, organisations that provide certification, testing, inspection and calibration services. Accreditation by UKAS demonstrates the competence, impartiality and performance capability of these evaluators. UKAS is a non-profit-distributing private company, limited by guarantee. UKAS is independent of Government but is appointed as the national accreditation body by [Accreditation Regulations 2009 \(SI No 3155/2009\)](#) and the [EU Regulation \(EC\) 765/2008](#) and operates under a [Memorandum of Understanding](#) with the Government through the [Secretary of State for Business, Innovation and Skills](#).

As the national accreditation body, UKAS strongly supports the proposed requirement for certification schemes to be underpinned by UKAS (or equivalent body) accreditation as the best way of ensuring the competence, impartiality and performance capability of the certification bodies involved. UKAS also welcomes the recognition given to the MCS which is delivered by certification bodies accredited to ISO/IEC 17065:2012 'Conformity assessment – Requirements for bodies certifying products, processes and services' (please note that it is not the certification scheme that is accredited but is the 'organisation' (i.e. certification body) which grants certification for the scheme compliant product/installer). ISO/IEC 17065:2012 makes reference to ISO/IEC 17067:2013 'Conformity assessment – Fundamentals of product certification and guidelines for product certification schemes' and this international standard is important when considering scheme equivalence particularly Clause 6 'Development and operation of a product certification scheme'. Any certification scheme put forward as 'equivalent' to the MCS should be able to demonstrably evidence how the guidance in ISO/IEC 17067:2013 has been followed. The assessment of a certification body by any national accreditation body will always seek to ensure that these guidelines have been followed before assessing and granting accreditation for the delivery of a new certification scheme.

UKAS also welcomes the recognition given to the EA and the concept of multilateral agreements (see 5.1). More information on this can be found [here](#). Ofgem ought also to be aware of a document published by the European cooperation for Accreditation (EA) - EA-1/22 'EA Procedure and Criteria for the Evaluation of Conformity Assessment Schemes by EA Accreditation Body Members' (found [here](#)) which contains the procedure and criteria to be applied by EA accreditation body members when evaluating conformity assessment schemes.

Finally, the consultation document makes specific reference to 'MCS equivalence and CEN Solar Keymark' (page 32) with Solar Keymark recognised by the MCS as an 'equivalent' scheme. It should be noted that Solar Keymark certification can only be obtained from certification bodies 'empowered' by the CEN Certification Board for issuing Solar Keymark licenses and as such, is a different approach when compared with accreditation from a national accreditation body.

I hope this is useful. Please feel free to contact me should you require additional information or clarification on any point(s).

Best Regards
Ian

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