

Joint Letter from the ISOA and SCEG

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To: Andrew Orsmond, Executive Director ICoCA
c/o ICoCA Secretariat
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15 January 2015

Dear Andrew,

You will be aware that both ISOA and SCEG are commenting on the draft ICoCA Certification papers circulated by your Secretariat. These comments have been staffed to ISOA and SCEG members respectively and they fairly reflect the members' views. As such they convey the US and UK industry view of the certification papers.

Such is the importance that the President of ISOA and Chair of SCEG place on these emerging ICoCA protocols that we have decided to write a joint letter ***mutually supporting each organisation's comments*** and highlighting the key areas. These are:

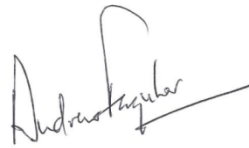
- There must be no duplication with existing activities. These may relate to the Certification Bodies, Government agencies in the country of operation or the PSC's country of registration or formal audits conducted by a client such as related to OHSAS 18,000 or ISO 14,000.
- Copies of existing paperwork, where client confidentiality or binding legislation is not breached, may be used to support an application for ICoCA membership or as part of the monitoring process but not where the administrative burden on the company is excessive.
- The scope of any Certification, Monitoring or investigation must be strictly limited to assessing compliance with the Code and not be expanded beyond that defined remit.
- The emerging protocols for Certification, Monitoring and Reporting, and Grievance Procedures must be clearly laid out in good time and agreed by the ICoCA Board Directors prior to being passed to ICoCA Members for a vote. The voting mechanism must enable options to be selected by Members where possible.
- The transition period where there will be a 'bottleneck' created, as there are only a limited number of Certification Bodies able to accredit PSCs to PSC.1-2012 and ISO PAS 28,000/28,007, must not be used as an excuse for lowering standards.

- Any restrictions, such as to projects or sites, on the scope of a company's certification to an approved standard must be clearly defined on the Certification Body's accreditation certificate and such restrictions must be clearly displayed on the ICoCA web site, and will be included on the ISOA and SCEG website as well.
- Certification must be possible for PSCs of all sizes and capabilities. The processes must be scalable both in terms of level of effort and costs to include all PSCs.

We believe this letter, which supports both the ISOA and SCEG comments sent separately, should assist the ICoCA Board Directors to deliver a more balanced process for Certification that meets the Code's requirements whilst not being overly burdensome.



Ado A. Machida
President ISOA



Andrew Farquhar
Chair SCEG