Written Testimony of the American National Standards Institute

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Subcommittee on Commerce, Trade, and Consumer Protection

Hearing: "It's Too Easy Being Green: Defining Fair Green Marketing Practices"

Testimony on Standards and Conformity Assessment-Based Solutions for Sustainability

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Statement of

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Introduction

Today's consumer is shopping with sustainability in mind, placing ever-increasing value on the environmental and societal aspects of product design, manufacture, distribution, use, and disposal.

Where consumers see value in "going green," there is a competitive advantage to those companies that can supply environmentally sustainable products. But where an advantage can be perceived, there will be those who want to "game" the system. We need to ensure the credibility and consistency of environmental claims, and so the American National Standards Institute (ANSI) commends the U.S. House of Representatives Committee on Energy and Commerce, Subcommittee on Commerce, Trade and Consumer Protection for holding this hearing.

By collaborating across industry sectors, we can build upon some of the excellent standards and compliance programs that are already in use in the marketplace, identify gaps where new solutions will help, and start building consensus through a partnership between the public and private sectors.

Overview: Standards and Conformity Assessment

Standards have become such an integral part of our existence that most people give them little or no thought. But standards and the related compliance programs are more essential today than at any time in history. Voluntary consensus standards are at the foundation of the U.S. economy and are fundamental to the success of robust, fair and free trade.

They offer benefits to all segments of business and industry, government and consumers. They help to advance scientific discovery, and keep people safe by minimizing injuries and protecting key environmental resources.

When we talk about standardization, we're actually discussing a broad range of activities and ideas – from the actual development of a standard to its promulgation, acceptance and implementation.

Standardization also includes the methods of evaluating whether products, processes, systems, services and personnel comply with a standard – this evaluation is known as conformity assessment. Standards development and assessing conformity to standards go hand-in-hand.

More information on the U.S. standards and conformity assessment systems can be found in Annexes B and C of this document, respectively.

What is ANSI?

The American National Standards Institute (ANSI) is a private non-profit organization whose mission is to enhance U.S. global competitiveness and the American quality of life by promoting, facilitating, and safeguarding the integrity of the voluntary standardization and conformity assessment system. ANSI's membership is comprised of businesses, professional societies and trade associations, standards developers, government agencies, and consumer and labor organizations. Through this network of members, the Institute represents the diverse interests of more than 125,000 companies and organizations and 3.5 million professionals worldwide.

ANSI is the official U.S. representative to the International Organization for Standardization (ISO) and, via the U.S. National Committee, the International Electrotechnical Commission (IEC), and is a U.S. representative to the International Accreditation Forum (IAF). A memorandum of agreement between ANSI and the Commerce Department's National Institute of Standards and Technology outlines a mutual understanding of the roles of each organization. This includes ANSI's recognition as the official U.S. member of the International Organization for Standardization (ISO) and the International Electrotechnical Commission (IEC).

For more information about ANSI, please reference Annex A of this document.

Enabling Standards and Conformance-Based Solutions

ANSI was founded over 90 years ago by five professional societies and three federal agencies. These groups came together because they saw the need for an organization that could take on the difficult issues that fell in the gray area between regulatory mandates and private sector initiatives.

From its very inception, the Institute has coordinated a public-private partnership to address and help resolve the critical issues that face the nation . . . and the planet. Today, ANSI works to enhance U.S. global competitiveness and the American quality of life by promoting, facilitating, and safeguarding the integrity of the voluntary standardization and conformity assessment system.

Over the past nine decades, we have seen that the most effective solutions come about through a thoughtful, open, and consensus-based process. As the voice of the U.S. standards and conformity assessment system, ANSI leads and facilitates this process, providing the neutral forum where all affected stakeholders work together to:

- identify existing and emerging regulations, requirements and supporting standards and compliance programs,
- define where gaps exist, and
- recommend where additional work is needed.

Standards and Criteria for Sustainable Products:
ANSI Workshop Held April 8-9, 2009

With the concepts of "green" and "socially responsible" subject to varied interpretations in the marketplace, government, consumers, industry, and others are looking to product standards and criteria to help establish uniform technical requirements, methods, processes, and practices that address sustainability.

A workshop organized by the ANSI with the support of the U.S. Environmental Protection Agency (EPA – an ANSI member), *Toward Product Standards for Sustainability* brought together a broad range of experts and advocates to share insights and develop recommendations on product standards for sustainability. The workshop, which took place April 8-9, 2009, in Arlington, VA, was attended by over 240 in-person participants and over 100 more via a live webinar, representing government, industry, standards developing organizations (SDOs), consortia, and consumers.

The workshop centered on three focused panels, a keynote address, and breakout sessions for more in-depth discussion among attendees.

The first panel, a facilitated discussion with standards/criteria developing organizations, addressed the challenges involved in the development of successful sustainable performance criteria. Panelists agreed that while there are various approaches to standards development, the single most important component of a successful standard is participation by an inclusive set of stakeholders.

The industry perspective took center stage during the second panel, as representatives from four different companies explained how they rely on standards and criteria to help them respond to consumer demand for environmentally responsible products. Panelists agreed that – at a minimum – product standards for sustainability must be scientifically based and relevant. They should not be so narrowly focused as to stifle innovation, but they should also avoid emotional criteria and remain mindful of economic viability.

Finally, retailers gave their perspectives on product standards for sustainability during the workshop's third panel. Speakers described how their companies are working to market greener products to consumers, and how sustainability standards are being used in conjunction with vendor scorecards or rating systems to compare products.

During the keynote address, participants learned that a "good" standard probably hurts. When improvement remains the chief goal of a standards development process, it can be painful to question long-held perceptions and build consensus, but the quality of the final product justifies the effort.

Attendees divided into breakout groups at the end of the first day to discuss a set of questions on standards for product sustainability. On day two, a summary breakout report was presented to offer some common conclusions and take-away messages:

- There are pros and cons to each kind of standards development – proprietary, consensus-based, and government regulation. A consensus-based development process offers many advantages, but there may be a need for a multi-pronged approach, with government regulations to set the floor and voluntary standards to raise the ceiling.

- There is a need for an overarching body that will coordinate and guide the process going forward. Both the public and private sectors should have active roles in establishing next steps and examining the current standards landscape on both the U.S. and international levels.

- Consistent and globally-accepted nomenclature and terminology – the fundamental building blocks for any burgeoning industry – top the list of stakeholder needs. Until there is consensus, terms like "attribute" and "label" are at risk of being interpreted differently by consumers, standards developers, government, and industry.

- Standards should be clearly written so they can be effectively used for reliable certification. The marketplace needs claims that can be substantiated so consumers can reward good performance with their purchasing power and raise the baseline floor.

- Some participants noted that single-attribute standards reduce complexity and confusion in messaging, while other participants noted that multi-attribute standards may address environmental risk-shifting or lead to increased consumer confidence.

- Labels and communications to consumers about the degree to which a product addresses sustainability concerns need to be uniform and transparent.

These discussions and next steps will be highlighted in a workshop report to be released by ANSI in the coming weeks. In the meantime, presentations given during the event are available at ansiposts.ansi.org. To view the workshop agenda and further details, including speakers, visit www.ansi.org/events and follow the link for "Past ANSI Events and Proceedings."

Issue-Driven Standards and Conformance Coordination Activities

ANSI provides a neutral forum for all stakeholders – private and public sector alike – to come together to address key issues and priorities and to develop standards and conformance-based solutions. The workshop mentioned above is just the latest example of ANSI's issue-driven coordination activities:

Import Safety
In the wake of national concerns about the safety of imported products, many government agencies and regulators have turned to ANSI and the standards and conformity assessment community for help in developing practicable solutions.

The Toy Safety Certification Program (TSCP) – a collaboration between ANSI and the U.S. Toy Industry Association – is a strong example of a private-sector led program that is strengthening conformity assessment systems for the nation's consumer products. A rigorous third-party (i.e., independent) testing, inspection, and auditing program, TSCP targets toy production throughout the global supply chain, whether the manufacturing process occurs in the U.S., China, or other markets. Congress agreed with the strength of this approach in the *Consumer Product Safety Improvement Act of 2008*, which mandates third-party accreditation for laboratories working to test children's toys and other products like cribs and pacifiers.

ANSI is currently working with the food industry and the U.S. Food and Drug Administration (FDA) on issues surrounding the health and safety of the food products that our nation imports. Third-party obligations for testing, inspection, and auditing of food imports can be an essential addition to regulation and enforcement activities by the FDA and the U.S. Department of Agriculture (USDA).

Water Conservation

The Institute has teamed with the U.S. EPA on WaterSense, a public-private partnership that encourages the production and use of water-efficient products. EPA requires all WaterSense products to meet strict water conservation standards and ANSI accredits programs to certify that such products conform to the applicable specifications.

Healthcare Information Technology

A cooperative partnership between the public and private sectors, the Healthcare Information Technology Standards Panel (HITSP) is a national, volunteer-driven, consensus-based organization that works to ensure the interoperability of electronic health records in the United States.

Administered by ANSI under contract to the U.S. Department of Health and Human Services, HITSP develops guidance documents known as Interoperability Specifications (IS) that recommend the standards that will meet the defined clinical and business needs for sharing information across organizations and systems.

In response to the *American Recovery and Reinvestment Act of 2009*, HITSP's work products to date — 13 interoperability specifications and 60 related constructs — are being leveraged to create new streamlined electronic standards implementation guides reorganized around the milestones and priorities defined in the legislation. The final goal is to deliver compact, easy-to-implement, and flexible guidance that supports the meaningful use of EHRs and protection of privacy.

Homeland Security

The Homeland Security Standards Panel (ANSI-HSSP) works in partnership with the U.S. Department of Homeland Security (DHS) to catalog, promote, accelerate, and coordinate the development of voluntary consensus standards and conformance programs that are responsive to DHS priorities.

Efforts are ongoing to examine standardization needs in the areas of cyber security, credentialing and access control, transit security, and emergency preparedness for persons with disabilities and special needs.

Telecommunications and Radio Equipment

The U.S. federal government relies on ANSI to accredit telecommunication certification bodies under a Federal Communications Commission program that enforces rules for the manufacturers of telecommunications and radio communication equipment used in the U.S. and abroad. These programs include:

- Unlicensed Radio Frequency Devices
- Licensed Radio Frequency Devices
- Telephone Terminal Equipment

ANSI's accreditation of telecommunication certification bodies is also recognized by several other nations.

Nuclear Energy

In partnership with the National Institute of Standards and Technology (NIST), ANSI has launched the Nuclear Energy Standards Coordination Collaborative (NESCC). A cross-stakeholder forum open to any and all interested parties, NESCC participants work to facilitate and coordinate the timely identification, development, and revision of standards for the design, operation, development, licensing, and deployment of nuclear power plants.

The Value of Conformity Assessment

Conformity assessment is defined as a "demonstration that specified requirements relating to a product, process, system, person or body are fulfilled." There are many of these conformity assessment activities applied in today's marketplace including accreditation, certification, inspection, registration, supplier's declaration, and testing. The one dimension that ANSI is directly engaged with is accreditation.

By way of brief background, accreditation assesses the competence of bodies to determine compliance with standards. As an independent, third-party process, it helps to promote best industry practices while reducing the need for government agencies to individually monitor conformity assessment organizations, and strengthening consumer confidence in products, personnel, and services.

Ultimately, the marketplace and customers of conformity assessment services measure the beneficial value of accreditation. For most suppliers, the primary benefit of accredited third-party certification is to meet a purchaser's or regulator's requirement for this independent evaluation of compliance. Increasingly, suppliers' procurement organizations are specifying and government agencies are recognizing accredited, third-party certification as an optional dimension of their systems for risk management.

ANSI Accreditation Services

In the area of conformity assessment, ANSI provides accreditation services in the areas of product and personnel certification as well as greenhouse gas verification and validation. This means the Institute recognizes the competence of bodies to carry out these activities in accordance with requirements defined in International Standards. ANSI's accreditation programs operate in accordance with international guidelines and have been verified by government and peer review assessments.

In partnership with the American Society for Quality (ASQ), ANSI also serves the marketplace in the provision of an accreditation program for quality and environmental management systems registrars, laboratories, reference material producers and inspection bodies via the ANSI-ASQ National Accreditation Board (ANAB and ACLASS Brands). ANSI's (and ANAB/ACLASS) accreditation of the conformity assessment bodies (CABs):

- signals a clear indication that an organization desires to have a competitive advantage by undergoing a voluntary evaluation

- encourages marketplace confidence in CABs by their undergoing regular impartial and independent audits by an internationally respected body

- positively influences customer satisfaction with CABs and their clients via greater quality awareness and enhanced communication

- reduces liability insurance by the accountability and transparent aspects of the process

- sustains continual improvement for the CABs and their clients through the assessment of system effectiveness, efficiency and competence

- promotes consistency and demonstrates equivalence of assessments via mutual recognition based on peer review

- reduces multiple audits and removes barriers to trade in working towards the goal of "certified once – accepted everywhere."

Buyers in the global market demand that sellers and service providers fulfill their needs. Competing suppliers are motivated to convey assurance to their customers in the most efficient manner. Confidence that these needs can and will be met is built through a variety of means, including the assessment of conformity to standards.

Continuing pressures in the global marketplace to preclude redundant and costly barriers to trade drive the need for acknowledgement of equivalency across boundaries. Accordingly, ANSI is involved in several international and regional arrangements for multi-lateral recognition. These include the International Accreditation Forum (IAF), the

International Laboratory Accreditation Cooperation (ILAC), the Inter-American
Accreditation Cooperation (IAAC) and the Pacific Accreditation Cooperation (PAC).
ANSI is also recognized by the U.S. Department of Commerce via the National Institute
for Standards and Technology (NIST) and their National Voluntary Conformity
Assessment System Evaluation (NVCASE) program.

The Institute currently offers accreditation services for a variety of conformity
assessments that are directly related to sustainable products and practices, including:

Greenhouse Gas Emissions

With a growing global awareness of the need for environmental protection and
sustainability, organizations are eager to demonstrate their efforts to inventory,
report, and reduce greenhouse gas (GHG) emissions. In order to assure the
credibility of their claims, many of these organizations are turning to third-party
bodies to validate and verify emission assertions.

Often confused, the terms "validate" and "verify" represent two separate and
distinct processes. Validation comes at the beginning of a project and lays out the
framework by which emission reductions will occur. Verification assesses how an
organization or project has performed its GHG inventory and reported its results
against an established protocol, demonstrating the relevance, completeness,
consistency, transparency, and accuracy of the emission claim.

ANSI accreditation enhances the credibility and value of the process by attesting
to the competence and qualification of VVBs to perform these duties, offering
them a significant distinction from their competitors in the marketplace.

Sustainable Forestry

At the request of the Sustainable Forestry Initiative Board of Directors, ANSI
administers an accreditation service for certification bodies operating under the
Sustainable Forestry Initiative Chain of Custody (SFI CoC) and/or the PEFC
Chain of Custody (PEFC CoC) programs. These initiatives positively impact a
range of forest-based products and their movement from the forest to the end user.

Environmental Management Systems

The ANSI-ASQ National Accreditation Board (ANAB) is the U.S. accreditation
body for management systems and accredits certification bodies for ISO 14001,
an international management system standard that provides guidance and
requirements to establish, implement and maintain the policy and objectives of an
environmental management system. Guidance provided on the principles of
auditing an organization's environmental management system enables the
monitoring and verification of an effective environmental policy.

Food and Agriculture

Consumer confidence in safe quality food and the integrity of the food supply chain is enhanced by the partnership between ANSI and the Food Marketing Institute. ANSI provides an accreditation service for FMI's Safe Quality Food Initiative certification program.

ANSI is also recognized as the accreditor of the GlobalGAP program, a standard is primarily designed to reassure consumers about how food is produced on the farm by minimizing detrimental environmental impacts of farming operations, reducing the use of chemical toxicants, and ensuring a responsible approach to animal welfare.

Third-party accreditation demonstrates conformance, verifies competence, and strengthens consumer confidence in products, people, and services. As such, it has an important role to play in the success and credibility of environmental labeling efforts.

Conclusion

Labels and communications to consumers about the degree to which products, people, and services address sustainability concerns need to be uniform, transparent, and comprehensible.

In order to make this vision a reality, we need to make more efficient use of the standards and conformance resources that are already in place . . . and we need to identify every gap that exists. We also need to bring to bear new human and financial resources that can strengthen existing systems while satisfying future needs.

Government and industry need to work at a single purpose if we are to define fair green marketing practices.

ANSI stands ready to coordinate the public-private partnership and take the next step toward a meaningful solution to the challenges associated with standards and compliance programs that address the environmental and social impacts of products.

Annex A

**Background on the U.S. Standardization and Conformity Assessment System
and the Role of the American National Standards Institute (ANSI)**

The U.S. private sector-led, voluntary standardization and conformity assessment system has been in existence for more than 100 years. Highly decentralized, the system is naturally partitioned into industrial sectors that are supported by numerous independent, private sector standards developing organizations (SDOs). Marketplace demand drives the system's activities, with standards and conformity assessment programs typically developed in response to specific concerns and needs expressed by industry, government, and consumers.

Since 1918, this system has been administered and coordinated by the American National Standards Institute (ANSI) with the cooperation of the private sector and the federal, state and local governments. ANSI does not develop standards or conformity assessment programs. Rather, it functions as a central clearinghouse and coordinating body for its member organizations. The Institute is a unique partnership of industry, professional, technical, trade, labor, academic and consumer organizations, as well as government agencies. These members of the ANSI federation actually develop standards and conformity assessment programs, contributing their time and expertise in order to make the system work.

ANSI ensures the integrity of the U.S. standards and conformity assessment system by:

1. establishing a set of due process-based "essential requirements" that SDOs may follow in order to manage the development of consensus standards and conformity assessment programs in a fair and open manner,

2. accrediting SDOs and Certification Bodies (CBs) who adhere to these requirements,

3. approving candidate standards from ANSI-accredited SDOs as American National Standards (ANS), and

4. conducting regular audits of the ANS activities of ANSI-accredited SDOs to ensure ongoing compliance with ANSI's essential requirements.

ANSI has accredited hundreds of SDOs across a range of industry sectors. These industries include (but certainly are not limited to) telecommunications, medical devices, heavy equipment, fire protection, information technology, petroleum, banking, and household appliances. There are now approximately 10,000 ANSI-approved ANS that address topics as diverse as dimensions, ratings, terminology and symbols, test methods, interoperability criteria, product specifications, and performance and safety requirements. These standards development efforts serve the public interest and are being applied to

new critical areas such as the environment, healthcare, homeland security, and nanotechnology.

The Institute's approval of a candidate standard or conformity assessment program as an ANS verifies that the principles of openness and due process have been followed and that a consensus of all interested parties has been reached. Due process requires that all proposed ANS be circulated to the public at large for comment, that an attempt be made to resolve all comments, and that there is a right of appeal. In addition, ANSI considers any evidence that a proposed ANS is contrary to the public interest, contains unfair provisions or is unsuitable for national use. This basic formula has been the hallmark of the ANS process for decades, and it has garnered worldwide respect and acceptance.

One of the best indicators of confidence in the U.S. voluntary consensus standardization and conformity assessment system (as exemplified by the ANS process) is Congress's 1996 passage of the *National Technology Transfer and Advancement Act* (NTTAA). This law (P.L. 104-113) requires federal agencies to use voluntary consensus standards and conformity assessment programs for regulatory purposes wherever feasible and to procure equipment and services in accordance with such standards. It also requires agencies to increase their participation in the development process and directs the Commerce Department's National Institute of Standards and Technology (NIST) to coordinate federal, state and local voluntary standards and related conformity assessment activities.

ANSI also promotes the international use of U.S. standards and conformity assessment programs. The Institute serves as the U.S. national body representative in two major, non-treaty international standards organizations: the International Organization for Standardization (ISO) and, through the United States National Committee (USNC), the International Electrotechnical Commission (IEC). ANSI and the USNC play a leadership role in ISO and IEC, respectively, on both policy and technical matters.

Part of ANSI's role as the U.S. member of ISO includes accrediting U.S. Technical Advisory Groups (U.S. TAGs) which develop and transmit, via ANSI, U.S. consensus positions on the activities and ballots of technical committees and subcommittees. Similarly, the USNC approves TAGs for IEC activities. In many instances, voluntary standards and conformity assessment programs developed by U.S. SDOs are taken forward, through ANSI or the USNC, where they are approved in whole or in part by the ISO and/or IEC as International Standards. ANSI also encourages the adoption of international standards as national standards where they meet the needs of the user community.

In addition, ANSI advocates U.S. positions in various regional standards organizations and regularly meets with representatives from standards bodies in other nations. Thus, ANSI plays an important role in facilitating the development of global standards and related conformity assessment programs that support global commerce and which prevent regions from using local standards that favor local industries as trade barriers.

Conformity assessment is the term used to describe steps taken by both manufacturers and independent third-parties to determine fulfillment of standards requirements. ANSI's role in the conformity assessment arena includes accreditation programs for product certification bodies, personnel certification bodies, greenhouse gas validation and verification bodies, and standards developers. The ANSI-ASQ National Accreditation Board accredits management systems certification bodies under the ANAB brand and accredits testing and calibration laboratories, reference material producers, and inspection bodies under the ACLASS brand.

ANSI also is involved in several international and regional organizations to promote multilateral recognition of conformity assessments across borders to preclude redundant and costly barriers to trade.

In summary, through its various roles and responsibilities, ANSI advances its mission to "enhance both the global competitiveness of U.S. business and the U.S. quality of life by promoting and facilitating voluntary consensus standards and conformity assessment systems and safeguarding their integrity."

Annex B

Excerpt from the *United States Standards Strategy*

PRINCIPLES
It is well established in the community of nations that standards should meet societal and market needs and should not be developed to act as barriers to trade. In approving the World Trade Organization Technical Barriers to Trade Agreement, WTO members recognized that goal and established globally accepted principles as a framework to promote cooperation and discourage the use of standards as trade barriers. The U.S. standards and conformity assessment system is based on the following set of globally accepted principles for standards development.

- **Transparency**
  Essential information regarding standardization and conformity assessment activities is accessible to all interested parties.

- **Openness**
  Participation is open to all affected interests.

- **Impartiality**
  No one interest dominates the process or is favored over another.

- **Effectiveness and relevance**
  Standards and related conformity assessment programs are relevant and effectively respond to regulatory and market needs, as well as scientific and technological developments.

- **Consensus**
  Decisions are reached through consensus among those affected.

- **Performance-based**
  Standards are performance-based, specifying essential characteristics rather than detailed designs where possible.

- **Coherence**
  The process encourages coherence to avoid overlapping and conflicting standards and conformity assessment programs.

- **Due Process**
  Standards development accords with due process so that all views are considered and appeals are possible.

- **Technical Assistance**
  Assistance is offered to developing countries in the formulation and application of standards and related conformity assessment programs.

In addition, U.S. interests strongly agree that the process should be:

- **Flexible**, allowing the use of different methodologies to meet the needs of different technology and product sectors;

- **Timely**, so that purely administrative matters do not slow down the work, but meet market expectations; and

- **Balanced** among competing interests.

Annex C

Excerpt from the *National Conformity Assessment Principles of the United States*

The *National Conformity Assessment Principles for the United States* document articulates the principles for U.S. conformity assessment activities that will allow consumers, buyers, sellers, regulators and other interested parties to have confidence in the processes of providing conformity assessment, while avoiding the creation of unnecessary barriers to trade.

Conformity assessment includes sampling and testing, inspection, supplier's declaration of conformity, certification, and management system assessment and registration. It also includes accreditation of the competence of those activities by a third party and recognition (usually by a government agency) of an accreditation program's capability.

While each of these activities is a distinct operation, they are closely interrelated. The choice of the most appropriate assessment processes, as well as the quality with which any one of them is performed, can have a significant effect on the confidence in and reliance that can be placed on the results of the entire conformity assessment.

The definitions included in the *National Conformity Assessment Principles* document are based on ISO/IEC 17000:2004, *Conformity assessment — Vocabulary and general principles*. Some variances, noted in italics, occur where the term is not in ISO/IEC 17000 or has another specific meaning in the United States. Definitions are included in this document to preclude confusion and to make it more understandable. In different contexts, the same term can signify different types of activities.

- **Accreditation**
  Third party attestation related to a conformity assessment body conveying a formal demonstration of its competence to carry out specific conformity assessment tasks. *(These tasks include sampling and testing, inspection, certification and registration.)*

- **Certification**
  Third party attestation related to products, processes, or persons *that conveys assurance that specified requirements have been demonstrated.*

- **Conformity Assessment**
  Demonstration that specified requirements relating to a product, process, system, person or body are fulfilled. *(This may include any activity concerned with determining directly or indirectly that relevant requirements are fulfilled.)*

- **First, Second and Third Party**
  The first party is generally the person or organization that provides the object, such as the supplier. The second party is usually a person or

organization that has a user interest in the product, such as the customer. The third party is a person or body that is recognized as being independent of the person or organization that provides the object, as well as the user or customer of the object.

- **Inspection**
Examination of a product design, product, process or installation and determination of its conformity with specific requirements or, on the basis of professional judgment, with general requirements.

- **Recognition**
Procedure used to provide formal notice that an accreditation body is competent to carry out specific tasks. These tasks include accreditation of testing laboratories and inspection, certification and registration bodies. A governmental recognition system is a set of one or more procedures used by a Federal agency to provide recognition.

- **Registration**
Third party attestation related to systems that convey assurance that specified requirements have been demonstrated. Such systems include those established for the management of product, process or service quality and environmental performance.

- **Sampling**
Provision of a sample of the object of conformity assessment according to a procedure.

- **Supplier's Declaration**
Procedure by which a first party or supplier conveys assurance that the object of conformity fulfills specified requirements.

- **Test**
Technical operation that consists of the determination of one or more characteristics of a given product, material, equipment, organism, person's qualification, physical phenomenon, process or service according to a specified technical procedure (test method).

- **Testing**
Determination of one or more characteristics of an object of conformity according to a *specified technical* procedure *(test method). Action of carrying out one or more tests.*

- **Test Method**
Specified technical procedure for performing a test.