



Perry Johnson Registrars, Inc.

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# Suspension or Withdrawal of Registration Certificates

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Third-party certification demands adherence to a rigorous standard or specification. In order for PJR certification to maintain its high degree of credibility and customer acceptance, there must be an effective enforcement mechanism for dealing with unauthorized actions. This procedure describes a method whereby alleged offenders are treated fairly, while at the same time protecting the viability of third-party certification.

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# SUSPENSION OR WITHDRAWAL OF REGISTRATION CERTIFICATES

## 1 General

- 1.1 Purpose: Defines the procedure for suspending and/or withdrawing registration certificates.
- 1.2 Scope: Covers all PJR registration activities.

## 2 Related Procedures, Definitions, Exhibits

- 2.1 ISO/IEC 17021, latest revision
- 2.2 PJR-1 Quality Manual
- 2.3 PJR-0 By-Laws, Article 8
- 2.4 PRO-10 Dispute Procedure
- 2.5 PRO-1 Registration Procedure
- 2.6 R2 Code of Practices
- 2.7 AS9104/1, latest revision

## 3 Responsibilities

- 3.1 The Programs & Accreditations Manager (PAM) and/or designee is responsible for ensuring this procedure is implemented effectively. The Front Office Supervisor is responsible for sending warning, suspension and withdrawal letters and notifying applicable sector-specific database owners of certification status changes.

## 4 Prohibited Acts

- 4.1 Prohibited acts include, but are not limited to, violations of F-3tc Terms and Conditions, Front Desk Supervisorification, fraud, failure to submit timely and acceptable corrective actions, failure to schedule required audits, serious valid complaints from interested parties and other situations as determined solely by PJR Program Management. Some industry sectors document additional requirements violations of which warrant a change in the certification status. These additional requirements are covered in this procedure.

### 4.2 Prohibited Acts Specific to R2

For R2, the following situations prompt initiation of the suspension process:

- 4.2.1 Knowingly misrepresenting Focus Material shipments, domestic or international, including shipments to other vendors not qualified under the R2 Standard, in contradiction to the information provided to customers and/or PJR.
- 4.2.2 Non-functioning equipment knowingly sold and misrepresented to customers or PJR in contradiction of R2 Standard requirements under Provision 6.
- 4.2.3 When R2-certified companies continue to operate in non-compliance, beyond the standard time to take corrective action, of legal requirements, such as permitting, after being notified of concerns of compliance by PJR or a regulatory body.
- 4.2.4 Failure to demonstrate a current licensing agreement with SERI in a timely manner to PJR during the audit process.
- 4.2.5 Facility closure or discontinuation of R2 scope activities.
- 4.2.6 Misrepresentation of the certification status of any facility affiliated with the company.
- 4.2.7 If SERI licensing fee has not been paid, the client is suspended one day after the due date. If the licensing fee is not paid within the next 45 days, then the certificate is withdrawn. Stage 1 and Stage 2 audits are required to reinstate the certificate.

### 4.3 Prohibited Acts Specific to R2V3

The CB shall consider suspension of an R2 Facility's certification for contractual, administrative or performance reasons. This suspension review of the R2 Facility shall be documented and maintained in the R2 Facility's certification documents. The following criteria shall be used for initiation of a potential suspension:

- 4.3.1 Illegal imports or exports
- 4.3.2 Repeat NCs, with insufficient corrective actions
- 4.3.3 Alteration and misrepresentation of the description of types and status of equipment and/or materials to mislead Auditors or downstream suppliers

- 4.3.4 Conviction or settlement of regulatory actions against the company due to egregious environmental, health or safety violations
- 4.3.5 Hiding or omitting transactions, equipment, materials, or any other form of deception to the Auditor, CB, and/or SERI
- 4.3.6 Misrepresentation of the R2 Certification and status of any Facility affiliated with the company
- 4.3.7 Failure to provide correction and/or corrective actions for SERI complaints

## 5 Failure to Submit Acceptable Corrective Actions

### 5.1 For all PJR audits (other than FSSC and aerospace audits)

- 5.1.1 Clients must submit acceptable corrective actions to auditor by day 60 of the last day of the audit. If the Lead Auditor has not received acceptable corrective actions and submitted them to the Audit Support Assistant (ASA) by day 75 of the last day of the audit, the ASA will elevate the issue to the Executive Committee by logging the “75 days past due” event in PJView.
- 5.1.2 The Programs & Accreditation Liaison will look at all audit packages that are approaching 90 days post audit. These will be triaged. Where corrective actions were never received, the Programs & Accreditation Liaison will contact the client to explain the situation and that a letter is forthcoming. Only in situations where received corrective actions are unacceptable will technical Executive Committee resources get involved.
- 5.1.3 If acceptable corrective actions have not been received by day 91, the Program & Accreditation Liaison will then send the client a 30-day warning letter.
- 5.1.4 If acceptable corrective actions are still not received by day 121, then the client is suspended.
- 5.1.5 If acceptable corrective actions have not been received 136 days after the last day of the audit, the client’s certificate is withdrawn.
- 5.1.6 Stage II audits: If PJR is unable to verify the implementation of correction action for any major nonconformity (or accept the corrective action plan for any minor nonconformity) within 6 months of the last day of the audit, the client will be required to repeat Stage II.
- 5.1.7 Re-certification audits: If PJR is unable to verify the implementation of corrective action for any major nonconformity (or accept the corrective action plan for any minor nonconformity) within 6 months of the certificate expiration date, the client will be required to repeat Stage II.
- 5.1.8 Only the Programs & Accreditations Manager is able to approve deviations to this process. Note: No deviations are allowed relative to the six-month rule described in 5.1.6 and 5.1.7. The Programs & Accreditations Manager reserves the right to suspend a client immediately and not extend the 30 day grace period, which is granted by the warning letter.

### 5.2 For PJR aerospace audits

- 5.2.1 Clients must submit acceptable corrective action plans to auditor by day 30 of the last day of the audit. If the Lead Auditor has not received acceptable corrective action plans by this deadline, he/she will notify the ASA. The ASA will notify the Programs & Accreditation Liaison, who will then send a suspension letter to the client updated the OASIS database. (Note: PJR’s Aerospace Technical Committee has the authority to exercise discretion in suspending clients in this situation).
- 5.2.2 The ASA must receive evidence of containment/correction for all nonconformities from the Lead Auditor 60 days after the last day of the audit. If this evidence is not received, the ASA will notify the Aerospace Program Manager. The Aerospace Program Manager will determine if the client should be suspended. When a suspension decision is made, the Aerospace Program Manager will notify the Programs & Accreditation Liaison to send the aerospace suspension letter that is specific to failure to re-establish conformance within 60 days. The organization must submit evidence that proves they have re-established conformance within 30 days of the date of the letter. If acceptable evidence is not received, then the organization’s certificate is withdrawn. The Programs & Accreditation Liaison also suspends the client in the OASIS database.
- 5.2.3 The organization must still submit evidence of acceptable corrective actions (root cause

and corrective action) in accordance with section 5.1 above.

- 5.2.4 If, for any reason, PJR will not be able to issue a new aerospace certificate prior to expiry of the existing one, then the existing certificate must be withdrawn the day before it expires.

### 5.3 For FSSC 22000

- 5.3.1 The following four (4) criteria apply;
- a) The CB shall suspend a certification when there is evidence that their client is either unable or unwilling to establish and maintain conformity with Scheme requirements within the time frames applicable to the clearance of major nonconformities (see Annex III for applicable timeframes).
  - b) The CB shall withdraw a certification when there is evidence that their client is either unable or unwilling to establish and maintain conformity with Scheme requirements, within the timeframes applicable to the clearance of critical nonconformities (see Annex III for applicable timeframes).
  - c) When the CB has evidence that their client holds a certificate whose scope exceeds their capability or capacity to meet, the CB shall reduce the certification scope accordingly.
  - d) For FSSC 22000 certification, when an annual surveillance audit was not performed due to significant incident such as disaster and pandemic, certification shall be suspended (however, when FSSC Foundation approves the incident as an exception, certification is not suspended).
- 5.3.2 Examples include:
- a) The organization's certified management system has persistently or seriously failed to meet the Scheme requirements, including requirements for the effectiveness of the management system.
  - b) Immediate risk to the safety of the product impacting consumer health.
  - c) The certified organization does not allow surveillance or recertification audits to be conducted at the required frequencies.
  - d) The certified organization has voluntarily requested a suspension.
- 5.3.3 Action upon suspension, withdrawal and scope reduction
- 5.3.4 In case of withdrawal or suspension, the organizations' management system certification is invalid. The CB shall:
- a) immediately change the status of the certified organization in the FSSC 22000 database and its own Register of Certified Organizations and shall take any other measures it deems appropriate;
  - b) inform the organization in writing of the withdrawal or suspension decision within three (3) days after the decision was made and confirm the decision;
  - c) instruct the organization to take appropriate steps in order to inform its clients through various forms of communication such as advertising and product labelling where applicable.
- 5.3.5 In case of scope reduction the organizations' management system certification is invalid beyond the revised certification scope statement. The CB shall:
- a) immediately change the scope of the certified organization in the FSSC 22000 database and its own Register of Certified Organizations and shall take any other measures it deems appropriate.
  - b) inform the organization in writing of the scope change within three (3) days after the last day of the audit or any other intervention and confirm the decision.
  - c) instruct the organization to take appropriate steps in order to inform its clients through various forms of communication such as advertising and product labelling where applicable.

### 5.4 For R2V3

- 5.4.1 Evidence of correction of all NC's, majors and minors, issued at any certification body audit must be submitted to the CB within 30 days from issuance. If the organization is unable to submit evidence of corrections within 30 days of issuance of NC's the organizations certificate shall be suspended.
- 5.4.2 The CB has 60 days to verify the effectiveness of the CA from the date of issuance. If the CA are not effective the R2 facility's certificate shall be suspended.
- 5.4.3 For surveillance audits, a remote or on-site audit shall be scheduled by the CB within 6

months to verify that CA for minors/majors have been implemented and are effective to address the closure of NCs prior to audit package approval or certification decision. Failure to comply with this requirement will result in the suspension of certification.

## **6 Failure to Schedule**

### **6.1 Failure to Schedule all PJR audits, excluding the ANS1 after the Stage 2 Certification Decision**

- 6.1.1 If an organization has not scheduled their audit by the required due date, the Scheduler will send the Notification of Failure to Comply form (F-157) to Customer Service, the Front Office Supervisor, and Sales Representative on day 25 of the audit due date. If known in advance that the organization is not going to schedule their required audit, the Notification of Failure to schedule may be sent sooner.
- 6.1.2 If the client still has not scheduled their audit 30 days past their audit due date, the client's certificate is suspended. Program Management has the authority to make a decision not to suspend in exceptional circumstances.
  - 6.1.2.1 PJR Italy is taking an exception to this and will not suspend clients for failure to schedule until the end of the calendar year. EA 28 clients in Italy, bearing only the Accredia seal will need to schedule and conduct their ANS1 audit within 15 months of the certificate effective date and then ANS2 within 27 months of certificate effective date.
- 6.1.3 The maximum suspension time is six months. The audit must be conducted within six months of the suspension decision date. (Note: The six-month suspension period may be cut short in some situations, e.g. due to the requirement to have an audit conducted once per calendar year or certificate expiration falling before the end of the six-month suspension period.) If the audit is scheduled, the Scheduler must notify the Front Office Supervisor.
- 6.1.4 If the required audit is not scheduled and conducted within the allotted six months while under suspension (or prior to certificate expiration or before the end of the calendar year), then the certificate is withdrawn.
- 6.1.5 If the required audit is not scheduled and conducted because the client is seeking to transfer to another certification body, PJR will not suspend the certificate in an effort to facilitate the transfer process as long as there is evidence demonstrating that the requirement to have one audit per calendar year can be met.
- 6.1.6 If the client expresses a desire not to continue certification but requests to keep the certificate active for as long as permitted by requirements, the one audit per calendar year requirement must still be met. If the calendar year has ended and the client has not conducted an audit, the certificate will be cancelled at the end of that calendar year, prior to the actual certificate expiration date.
- 6.1.7 If the client has multiple standards and intends to drop one, a Dead File (F-186) must be initiated for the standard that they intend to drop.
- 6.1.8 A Cancelled Audit Report is run once per month (on the 16<sup>th</sup> of a given month for the prior month) to identify cancelled but not yet rescheduled audits. A multi-disciplinary team consisting of the Scheduling Supervisor, International Client Services Manager and the Administrative Supervisor will meet on a monthly basis to reconcile this report.

### **6.2 Failure to Schedule the ANS1 after the Stage 2 Certification Decision**

- 6.2.1 If the first annual surveillance (ANS1) is not conducted within one year of the certificate issue date, the client's certificate is suspended, effective immediately. If the audit is scheduled, the Scheduler must notify the FRONT DESK SUPERVISOR.
- 6.2.2 If the client has not had an audit conducted 30 days past their audit due date, the client's certificate is withdrawn. (Note: The requirement to have one audit per calendar year must still be met.)
- 6.2.3 PJR's Program Management has the authority to determine whether the client's certificate will not be withdrawn.

## **7 Voluntary suspension**

- 7.1 Clients may voluntarily request a suspension. The maximum suspension time is six months (Note: the once per calendar year audit requirement must still be met.) A special audit equivalent in duration to a

recertification audit is required to lift suspension and does not result in issuance of a new three-year certificate.

## **8 Immediate Suspension or Withdrawal**

8.1 Under certain circumstances, an organization's certificate can be suspended or withdrawn immediately. These circumstances can include:

- 8.1.1 Partial or complete withdrawal of PJR's accreditation by an Accreditation Body.
- 8.1.2 Any situation that causes the certification to be invalid (i.e. the criteria were not met).
- 8.1.3 Client fabricates data/evidence.
- 8.1.4 Declining an audit selected by an Accreditation Body and/or Standard Licensing Body for the purpose of witnessing PJR's audit team.
- 8.1.5 Poor performance by the organization, when substantiated by objective evidence from a customer or other interested party.
- 8.1.6 Declining an internal witness audit of a PJR auditor.
- 8.1.7 No evidence of audit activity in a given calendar year.
- 8.1.8 Failure to make payment for certification services rendered.
- 8.1.9 **For R2V3:** SERI may notify the CB when license fee payment is not received from the R2 Facility by the license/payment due date. The R2 certificate shall be suspended by the CB upon notification from SERI and effective the day the CB has been informed. The R2 Facility name will be removed from the SERI directory during the suspension period. Failure to make payment of license fees to SERI within 30 days shall result in the withdrawal of the R2 Facility(s) certification.
- 8.1.10 **For R2V3:** A spot inspection is an unannounced or announced assessment conducted by SERI or its designee of an R2 Facility. As part of SERI's quality control program and authorized in the R2 Certified Facilities Agreement, SERI may periodically conduct spot inspections of R2 certified facilities. Spot inspections are a proactive measure to verify conformity as part of the quality control program and not always in response to a complaint or concern. If any concerns arise from the inspection, they will be communicated to the R2 Facility's CB. The CB shall be responsible for managing the concerns through its complaint process, and any NCs issued by the CB be closed and verified. Appropriate actions may be taken based on the quantity and severity of any NCs identified up to possible suspension or revocation of the R2 Certificate and/or R2 Certified Facilities Agreement.
- 8.1.11 **For R2V3:** The CB shall suspend the certificate for the previous R2 Facility location if the new facility location cannot be audited prior to the move of its certified scope of operations.

## **9 Method of client notification**

- 9.1.1 Warning, suspension, withdrawal letters are sent to clients via certified mail or equivalent traceable methods.
- 9.1.2 For clients in Italy, certified e-mail notification is an acceptable method.
- 9.1.3 For clients in Mexico and Canada, warning, suspension, or withdrawal notices are first sent via e-mail with a request for a read receipt. Then, a letter is sent via certified mail.
- 9.1.4 The persons responsible for updating the OASIS database, IATF database and QuestForum are copied on the monthly Dead File report. These individuals will use this report to ensure that all certificates that should have been withdrawn or cancelled are reflected as such in the respective databases.

## **10 Dispute Procedure**

10.1 Registrants have the right to dispute any certification status change decision. The Dispute Procedure (PRO-10) will be followed.

## **11 Informing the Public**

11.1 PJR will inform the public of the organization's suspended/withdrawal/cancellation status, if so requested. Organization is responsible for following industry-specific and/or contractual requirements for timely notification of their customers of the suspended/withdrawal/cancellation status of the certificate

- 11.1.1 For R2 and R2V3 certificates, the suspended status must be reflected on PJR's website, and SERI must be notified within five days of the suspension decision. The Audit Logistics Manager (ALM) or designee must e-mail this to SERI.
- 11.1.2 For R2 and R2v3 certificates, the withdrawn status must be reflected on PJR's website, and SERI must be notified within five days of the withdrawal decision. The ALM or designee must e-mail this to SERI.
- 11.1.3 For AS91XX certificates, the OASIS database will be updated within 14 calendar days of the certification status change.

## 12 Reinstatement

- 12.1 Where the client remedies the suspension situation, PJR reinstates the certificate in its client software management system, PJView, changes the certificate back to "certified", updates applicable sector-specific databases to reflect the changed status, and notifies the client.
- 12.2 In order to be reinstated after withdrawal, the client will have to undergo a new registration audit. The PAM must approve any exceptions to this rule.
- 12.3 **For R2V3:** The CB shall only re-instate an R2 Facility's R2 Certification once evidence of implementation of corrections or corrective action(s) have been submitted by the R2 Facility and verified as effective in accordance with the COP. CB shall inform SERI of notification of reinstatement.