

Information for manufacturers of construction and similar products concerning the temporary adaptation of procedures relating performing inspections and surveillance in factories during the validity of measures adopted for the health protection and preventing the spread of coronavirus

Dear manufacturers,

Based on the situation in the Slovak Republic and measures adopted by the Slovak government, Building Testing and Research Institute (hereinafter as „TSÚS“) also adopted measures to protect the health of our employees and preventing the spread of coronavirus (hereinafter as „measures“).

Therefore we would like to inform you that TSÚS has temporarily adopted common procedures of inspection activities for inspections of construction products performed at the factories producing construction products (regulated field) and at the factories producing construction and similar products (non-regulated field). These procedures are described in our internal regulations, i.e. in the Directive S 33 Inspection procedures and in the Directive S 07 Product certification procedures and related work procedures.

Inspection activities performed at the factories are divided into initial inspections at the production site and production management system (hereinafter as „initial inspections“) and continuing surveillance/inspections of the production control system, i.e. inspections to maintain the validity of the certificate issued (together referred as „inspections“).

A. Initial inspections

The initial inspection (at the time of manufacturing of the assessed product) requires inspection at the production site. For performing initial inspections following methods can be used:

1. Performing the initial inspection at the factory

(applicable outside the Slovak Republic after the opening of borders)

TSÚS inspector can perform initial inspection at the factory by physical visit in a case the following conditions are met:

- The manufacturer's representative (hereinafter as „the manufacturer“) and TSÚS inspector have to agree to perform initial inspection by physical visit. This agreement will be confirmed in the plan of inspection.
- In the plan of inspection, the inspector shall require from the manufacturer to send all supporting documents to be checked within the initial inspection in advance, i.e. at the place of work of the inspector. Before performing the inspection, inspector will read all documentation provided by the manufacturer (additional information should be required, if needed).
- By reading up necessary documentation provided by the manufacturer, the inspector will reduce the time needed for the physical inspection at the factory which is limited only to the inspection at the production site.
- In the plan of inspection, the inspector is obliged during the initial inspection to require from the manufacturer compliance with the safety measures.
- Representatives of both parties have to comply with all security measures; i.e. the inspector and the manufacturer's staff have to wear face mask, gloves, safety glasses (recommended), clothing should protect and cover the skin of the body.
- The inspector should keep a minimum distance of 2 meters from others. It is appropriate to ensure that the inspector meets as few of the manufacturer's staff as possible.
- The inspector will perform the initial inspection according to the range specified, including the completion of the checklist and photo or video documentation (if needed).
- Once the initial inspection is done, the manufacturer is obliged to sign the checklist and affirm the truth of the findings and/or comment the course of the inspection and findings.
- All other administrative procedures related to the evaluation and completion of the initial inspection shall be performed by the inspector in accordance with commonly established and documented procedures.

2. Performing the initial inspection at the factory via videoconference

For the initial inspection which cannot be performed by physical visit, applications as FaceTime, WhatsApp, Skype, etc. can be used:

- The manufacturer and the TSÚS inspector have to agree that the physical inspection will be replaced by using one of the above-mentioned applications. In the course of the manufacturing of the products concerned, manufacturer's representative must be present at the factory.
- Their agreement as well as the confirmation of technical support for the inspection have to be confirmed in the plan of inspection.
- In the plan of inspection, the inspector shall require from the manufacturer to send all supporting documents to be checked within the initial inspection in advance.
- The date and the time of the initial inspection via application will be agreed between inspector and manufacturer's representative in the plan of inspection.
- During the initial inspection, the manufacturer's representative shall move at the factory according to the direct instructions obtained from the inspector in order to be able to check „on-the-spot“ the place of production, in particular the crucial production operations. The inspector must be during the inspection at the computer, having all documentation obtained in advance from the manufacturer. Based on current findings, the inspector may require taking pictures. All pictures taken by the manufacturer in the course of the initial inspection and sent to the inspector should be marked with the date and time of the inspection. Pictures of staff present have to be taken from the back.
- The inspector may also interview staff present at the factory.
- Based on the supporting documents obtained before and after the inspection and based on the findings, the inspector fills in checklist and sends it to the manufacturer. Manufacturer is obliged to sign and confirm the findings and may comment findings and the course of the inspection.
- All other administrative procedures related to the evaluation and completion of the initial inspection shall be performed by the inspector in accordance with commonly established and documented procedures.

3. Performing the initial inspection at the factory via phone call

For the initial inspection which cannot be performed by physical visit, phone calls with manufacturer's representative in some cases can be used:

- The manufacturer and the TSÚS inspector have to agree that the physical inspection will be replaced by phone call. During the manufacturing of the products concerned manufacturer's representative must be present at the factory.
- Their agreement as well as the confirmation of technical support for the inspection have be confirmed in the plan of inspection.
- In the plan of inspection, the inspector shall require from the manufacturer to send all supporting documents to be checked within the initial inspection in advance.
- The date and the time of the initial inspection via phone call will be agreed between inspector and manufacturer's representative in the plan of inspection.
- During the initial inspection, the manufacturer's representative shall move at the factory according to the direct instructions obtained from the inspector in order to be able to check the place of production vicariously, in particular the crucial production operations. The inspector must be at the computer during the inspection, having all documentation obtained in advance from the manufacturer. Based on current findings, the inspector may require taking pictures. All pictures taken by the manufacturer in the course of the initial inspection and sent to the inspector should be marked with the date and time of the inspection. Pictures of staff present have to be taken from the back.
- The inspector may also interview staff present at the factory.
- Based on the supporting documents obtained before and after the inspection and based on the findings, the inspector fills in checklist and sends it to the manufacturer. Manufacturer is obliged to sign and confirm the findings and may comment findings and the course of the inspection.
- All other administrative procedures related to the evaluation and completion of the initial inspection shall be performed by the inspector in accordance with commonly established and documented procedures.

4. Performing the initial inspection by admission of reports already drawn up

The initial inspection which cannot be performed by physical visit, by admission of reports already drawn up in some cases can be done. Following procedure is applied:

- In the plan of inspection, the inspector shall require from the manufacturer to send all supporting documents to be checked within the initial inspection in advance, including reports documenting the inspections performed at the factory.
- Reports drawn up by TSÚS as well as by other AB/NB that sufficiently document the place of manufacture may be admitted in a case that not more than 12 months have elapsed since the inspection.
- Based on the supporting documents obtained, the inspector fills in checklist and sends it to the manufacturer for the signing.
- All other administrative procedures related to the evaluation and completion of the initial inspection shall be performed by the inspector in accordance with commonly established and documented procedures.

B. Continuing surveillance and inspections

1. Performing the continuing surveillance of the factory production control system

(in the regulated field of the construction products)

Continuing surveillance does not include on-site inspection. Nevertheless, the current guidelines of the Group of Notified Bodies (GNB) require continuing on-site inspections. Continuing surveillance focuses on evaluating the functionality of the factory production control system established. Those measures should not replace continuing surveillance but may be the basis for a decision to maintain the validity of certificates.

For this reason the following procedure can be applied:

- In the surveillance plan the inspector shall require from the manufacturer to send all supporting documents necessary to evaluate the functionality of the production control system established.
- In the surveillance plan delivery date of all required supporting documents for continuing surveillance will be confirmed. If necessary, the inspector shall contact the manufacturer for additional information or supporting documents.
- Based on the supporting documents obtained, the inspector fills in checklist and sends it to the manufacturer. Manufacturer is obliged to sign and confirm the findings and may comment findings and the course of the inspection.
- All other administrative procedures related to the evaluation and completion of the initial inspection shall be performed by the inspector in accordance with commonly established and documented procedures.

2. Performing the continuing inspection of the factory production control system

(in the non-regulated field of the construction products and similar products)

Continuing inspection does not include on-site inspection. It is aimed at the evaluation of the functionality of the production control system established. Those measures should not replace continuing inspection but may be the basis for a decision to maintain the validity of certificates.

For this reason it is possible to perform continuing inspection using the same procedure as described in B.1 of this information.

C. Sampling

For the products with destined system of parameters assessed 1+, I+, exceptional measures may be used in order to ensure that the certificate issued can be maintained.

Following this procedure, AB/NB will enable the manufacturer to take samples based on AB/NB instructions and monitoring of sampling using videoconference applications.

Attention to the manufacturers

An integral part of the use of the above-mentioned temporarily adopted measures is the risk level, that needs to be assessed on an individual basis for each manufacturer prior to the inspection/surveillance.

The following effects of coronavirus spread should be considered:

- a) the activity of the manufacturers – it may limit production, the scope of scheduled tests performed or temporarily suspend production.
- b) the activity of the AB/NB – it must consider its own ability to provide a sufficient basis for decisions on the maintenance, restriction, suspension or deprivation of the certificates.

The impact assessment shall also take into account the experience of previous cooperation with the manufacturer – the history of evaluations, the stability of the production management system, experiences with the products.

Based on the risk level to the results of inspections/surveillances, the AB/NB can decide on the procedure for particular manufacturers. In a case risk level is high, the inspection can be done by visiting the factory only.

The AB/NB must be sure it can persuasively demonstrate the ability to assess the outcome of the inspection/surveillance properly. Risk level is assessed by determination of the situation of manufacturer, assessing his response and assessing whether the proposed method of inspection is feasible with a sufficient degree of certainty that the result of the inspection/surveillance will be proper. Risk level assessment of the results of the inspection supervision performed is a part of the inspection/surveillance documents as well as of the report.

Dear manufacturers,

we believe that by introducing and applying the above-mentioned temporary procedures for performing inspections and surveillance in production sites, we will jointly overcome the current complicated situation without significant restrictions on activities. We will do our best to perform all inspections and surveillances agreed as soon as possible. We hope that you will accept temporarily adjusted dates of inspection/surveillance in the factories and you will provide us with full cooperation in assessing the risk level of inspection/surveillance in preparation as well as performing the inspection/surveillance.

Should you need more information or if you have additional questions, please do not hesitate to contact TSÚS inspectors.

Thank you very much for your understanding and we wish you good health.