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PPI HSB IRC

Acceptance of Data Policy

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Outline

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Policy Overview (high-level only)

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- Acceptable Demonstration of Compliance/ Conformance
- Evidence Valid Accreditation: Commercial Laboratories, Certifying Body (CB) that is or collaborates with a test laboratory:
- Evidence of Confirmation of Compliance for a manufacturers In-House test laboratory by an accredited Certifying Body.

Path Forward

- Implementation Plan
- Resources
- Q&A

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Background

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Purpose

Key Purpose

- To develop a minimum level of assurance, that the supporting listing request regression data were generated in accordance with the applicable standards using best laboratory practices and by those demonstrating the necessary expertise.

Additional Thoughts (change in the "landscape" over time)

- Many knowledgeable people continue to exit the industry (e.g. retirements).
- New folks, new manufacturers (resin, pipe, fittings, additives, etc.) and new test laboratories are participating in North America: *All will experience the learning curve as done by those currently in the industry.*
  - New to the manufacturing of pressure grade resins.
  - New to the manufacturing of thermoplastic pressure pipe.
  - New to the inline compounding pipe manufacturing process.
  - New to plastic pipe testing.
  - New to quality systems such as standards, inspections (audits), certifications, code bodies, etc.

Importance

- **It is important:**
  - To continue to drive expectations for quality plastic pipe systems.
  - To ensure the credibility of the PPI HSB listings.
  - To continue the success of plastics pipe systems where in the USA, the industry has been developing since the early 1950s.
- *Considering the changing "landscape" our industry is experiencing and will most likely continue to experience, the above aspects will grow in importance.*

History (high-level only)

- **Project Name (No. HSBTG7):** This was originally “Recognized Laboratories”.
  - This was later revised to **Acceptance of Data Policy** to clarify the focus.
- **2012 – 2020: Ballots (9)**
  - **Recognized Laboratory (5)**: HSB 12-02, 13-03; 15-01; 17-18; 18-01.
  - **Acceptance of Data Policy (3)**: HSB 18-09; 20-09, 20-11
  - **Certifying Body (1)**: HSB 19-02. ***After review, the langauge was included directly into the policy and the this project was subsequently closed.*
- **2016: HSB Request for Information (HSB RFI)**
  - Distributed to ~30 recipients to seek input on proposed terms and definitions, draft policies, international considerations, testing capabilities on a global scale and inspection/certification capabilities on a global scale.
  - 40% response: 12 responses comprising compound manufacturers and the majority of test laboratories (North America and Europe). ***This identified ISO 17000 Conformity Assessment Series and the European Co-Operation for Accreditation (EA) body. These items and others resulted in a reassessment and redraft of the policy.*
- **2017: Trial Run**
  - A company conducted a trial run of the draft policy and provided input: The policy needed revisions to clarify items.
  - Key clarification needed: That in-house laboratories do NOT accredit to ISO 17025 (not laboratories for hire).

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Policy Overview

(high-level only)

Applicable Scope of Testing

- The policy is applicable to **PPI TR-2 and PPI TR-4 listings**.
- The policy is specific to **regression data generated in accordance with ASTM D1598 or ISO 1167.**
  - The two standards address HDB, PDB and MRS data.
  - Other relevant data is excluded (e.g., cell classification data, predefined property data, etc.).
- **Test environment:** water in/ water out or water in/ air out.
  - Materials requiring a different test environment or specific test conditions are currently routed through the HSB Special Case process until policy is completed (e.g. polypropylene and polyamide compounds). This is practice continues.

Acceptable Demonstration of Compliance/ Conformance

Three laboratory scenarios:

- **Commercial Laboratories (for hire):**
  - Evidence of valid accreditation to ISO 17025 *for the applicable scope of testing during the test time*.
- **Certifying Body (CB) that is or collaborates with a test laboratory:**
  - Evidence of valid accreditation to ISO 17025 *for the applicable scope of testing* for the test laboratory and *during the test time*.
- **Product manufacturer's "In-house" Laboratory:**
  - A certifying body (CB) shall confirm compliance to ISO 17025 for *the applicable scope of testing during the test time*.
  - NOTE: For in-house laboratories, "confirm compliance" does NOT mean accreditation to ISO 17025 as these are not a laboratories for hire.

Evidence of Valid Accreditation

Commercial Laboratories and **Certifying Body (CB) that is or collaborates with a test laboratory:**

- "The ISO 17025 accreditation of the laboratory shall be granted by an Accreditation Body (AB) listed by the International Laboratory Accreditation Cooperation (ILAC), International Accreditation Forum (IAF) or European Co-Operation for Accreditation (EA)."
  - ILAC: https://ilac.org/
  - IAF: https://www.iaf.nu/
  - EA: https://european-accreditation.org/
- NOTE: Accreditations are site specific for each test laboratory (e.g. Ypsilanti, Michigan; Toronto, Ontario Canada; Tystberga, Sweden, etc.)

Confirmation of Compliance – In-House Laboratory

For In-House Laboratories:

- "The CB, confirming compliance, shall meet the requirements of ISO/ IEC 17020 (inspection) and ISO/IEC 17065 (certification) and shall be listed by ILAC, IAF or EA for the applicable scope of testing described in Part A.1.3.1.."

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Path Forward

Implementation Plan

Phase I: HSB IRC (in Q2 2021)

- Policy posted for Industry Review & Comment for a **minimum** of 30-days.
- If comments are received from the industry, resolve.

***Note, industry comments received from the HSB IRC might shift the timelines for the following phases.*

Phase II: Industry Wide Communications (begin in Q2 2021)

- Begin heavy communications regarding the policy details, use and implementation timeline.

Phase III: ISO 17025 Laboratory Compliance: 2YRS (January 1, 2022 – EOY2023)

- Laboratories to confirm compliance to the Acceptance of Data Policy (e.g. send link to their accreditation body (ILAC, IAF, EA) for the applicable scope of testing).
- If not accredited by the ILAC, IAF, EA:
  - Work to obtain accreditations or;
  - Present an HSB Special Case for acceptance of their accreditation and accrediting body.

Phase IV: In-House Laboratory Compliance: 3YRS (January 1, 2022 – EOY2024)

- Work to obtain confirmation of compliance to the Acceptance of Data Policy.

Resources

Commercial Test Laboratories (laboratories for hire)

- The test laboratories manage their accreditations to ISO 17025. They should be able to provide the link(s) to their accreditations on the ILAC, IAF or the EA web pages for the applicable scope of testing.

Process Explained Document (under development)

- Release pending the policy completing the HSB IRC process.
- The document will explain how to:
  - Confirm a test laboratory's accreditation to ISO 17025.
  - Confirm a certifying body's accreditation to ISO 17020 (inspection) and ISO 17065 (certification).

Initial Questions & Answers

Q1: When will the sustained pressure pipe data not be accepted if generated at a laboratory that does not meet the requirements?

- The routine listing request process can be utilized for ASTM D1598/ ISO 1167 data for testing that began **prior** to the effective dates.
- An HSB Special Case can be made to accept ASTM D1598 / ISO 1167 data for testing that began **after** the effective dates.
- Effective Dates:
  - Phase III (ISO 17025 laboratories): January 1, 2024
  - Phase IV (in-house laboratories): January 1, 2025

Initial Questions & Answers

Q2: Is a letter enough to confirm accreditation for the ISO 17025 laboratories?

- No. Laboratories accredited to ISO 17025 should appear on their accrediting body's list.
  - The link to their accreditation must be included in the request.
  - The accreditation must explicitly state ASTM 1598 and/or ISO 1167 in their applicable scope of testing.

Q3: What happens if a laboratory loses their accreditation while pipe is on test? How is this situation managed?

- If this unfortunate situation occurs, please bring to the attention of the PPI HSB Chair for a discussion.

Initial Questions & Answers

Q4: What is the required confirmation of compliance for the in-house laboratories?

- This is a question best asked to the certifying bodies, those holding accreditation to ISO 17020 (inspection) and ISO 17065 (certification) as they must maintain their own accreditations. Please know, accreditation to ISO 17025 is NOT required but only confirmation of compliance by the certifying body.

Q4: How often should the evidence of valid accreditation be presented?

- With every listing request. The request templates will be modified to include a place for the accreditation link, pending completion of the industry review and comment.

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Thank You.

Please reach out to
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to have questions addressed.