

Strengthening Canada's Standardization Network Avoiding Duplication of Standards and Effort

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Context

As the leader of Canada's standardization network, the Standards Council of Canada (SCC) has been working with numerous stakeholders to address the duplication of standards used in Canada, and the duplication of effort of those involved in standards development activities. Concerns related to duplication were raised by stakeholders following SCC's recent accreditation of two standards development organizations (SDOs): ASTM International and Underwriters Laboratories (UL). Based on stakeholder feedback received to date, this report outlines the actions SCC is taking to address the duplication of standards and effort in Canada. SCC will continue to communicate and work alongside its stakeholders moving forward.

Background

In 2012, SCC undertook a complete review of its policy and program requirements for the accreditation of SDOs and for the approval of National Standards of Canada (NSCs). The result was the updated version: [CAN-P-1:2012 - Program Requirements for the accreditation of Standards Development Organizations and for the Approval of National Standards of Canada.](#) With feedback from SCC's Standards Development Organizations Advisory Committee (SDOAC), SCC received approval in November 2012 from its governing Council on the updated CAN-P-1:2012. Earlier this year, SCC accredited two additional SDOs in an effort to offer more standardization options to government, industry and consumer stakeholders in Canada.

In April 2013, SCC and SDOAC agreed to address the issue of duplication of standards and effort. At the heart of this collaboration was the creation of a SDOAC Task Force (TF) comprised of representatives from all six SCC-accredited SDOs. The TF was asked to provide recommendations on ways to best avoid duplication of standards and effort within Canada's standardization network. The TF report was presented to SDOAC with four recommendations, and was approved. In early July 2013, SDOAC provided the TF report to SCC.








From July to September 2013, SCC held a public consultation via an online survey to capture the views of a wide group of stakeholders, including industry associations, consumer organizations, government departments and regulatory bodies. The survey was created to obtain feedback on the TF's four recommendations, as well as, to provide an opportunity for stakeholders to submit other concerns they may have with respect to Canada's standardization network. Over 150 people completed the survey and a broad majority, 81%, felt that the recommendations could be effective in preventing duplication (Annex A – Public Consultation: Summary of each survey question).

On September 5, 2013, SCC briefed SDOAC members on the preliminary results of the survey. SDOAC members then provided their feedback as to how SCC should proceed (Annex B – Feedback from SDOAC on the Public Consultation).

Overview of Survey Results

This public consultation was launched July 19, 2013 and closed September 6, 2013. It was circulated via direct email to stakeholders, and was available on SCC's website and through various social media channels.

The following chart outlines the stakeholder groups respondents identified themselves with:

Response	Chart	Percentage	Count
Standards development organization		16%	24
Industry or Industry Association		39%	59
Regulator - federal, provincial or territorial		13%	20
Government - federal, provincial or territorial		8%	12
Consumer or public interest group		7%	11
Academic		1%	2
Other		16%	25
Total Responses			153

- The TF's recommendation #1 aimed at redefining the principles and definition of Subject Area of Responsibility (SAR). SAR is a long-standing collaborative approach between SDOs, which requires them to keep each other informed of new projects to develop NSCs in an effort to prevent duplication. A clear majority stated that the principle of recognizing expertise through the granting of a SAR should apply to all standards developed under SCC's accreditation program.
- Almost three-quarters of the respondents felt that the number of technical experts the SDO has available in a specific subject area should be taken into account when determining expertise.
- The TF's recommendation # 2 was proposed as a tool to facilitate the identification of projects or existing standards that may potentially create duplication. The majority of respondents supported the use of a centralized tool that would provide notifications of new work items, standards under development and lists of published standards as an effective solution to identify potential standard duplication. However, views were varied as to what information should be included in this central repository.
- The TF's recommendation #3 suggested that a collaborative process be developed to resolve disputes relating to duplication between SDOs. Regarding the question as to who should be involved when a project to develop a new standard is identified as being potentially duplicative, 62% of those who responded chose SCC, 61% chose technical experts, and 55% chose users/proponents (respondents could choose more than one option).

In addition, when respondents were asked who should be the authority/decision-maker in a conflict resolution process, a clear majority (62%) selected SCC. The next highest choice selected by respondents was third party/arbitrator at 27%. There was also broad acknowledgement that SDOs needed to be active participants in the resolution process.

- The TF's recommendation #4 suggested a mark be developed to differentiate between standards that meet SCC's accreditation requirements and standards that are not subject to the accreditation program. Of the 151 who responded to this question, 72% felt that a mark may be necessary to clarify when a standard has been developed under SCC's accreditation requirements.
- On whether a mark could be used to address the confusion with other standards originating from other regional or international standards development bodies 57% responded "yes" and 65% felt that if a mark is used for clarification purposes that it should be made mandatory for SCC-accredited SDOs.
- Notably, 81% of the respondents stated that "yes", the TF recommendations are sufficiently comprehensive to address duplication of standards and effort in Canada.

There were 38 responses to the final question of the survey which provided participants the opportunity to express any other recommendations or comments on Canada's standardization network. The most common responses followed two key themes:

- Stakeholders disagreed with recommendation #4 on the creation of a new mark, but agreed with the other three recommendations.
- Stakeholders emphasized the importance of developing ways to harmonize standards development in North America, whether through Canada-U.S. standards, or through the accreditation of other SDOs.

A more detailed breakdown of the survey results can be found in Annex A.

Key Messages, September 5, 2013 SDOAC Meeting:

SDOAC members clearly supported the proposal that SCC should start the implementation of a Centralized Notification System and a Dispute Resolution Mechanism. SCC should assess the impacts that these new tools will have in addressing the duplication of standards and effort within Canada's standardization network. SDOAC expressed some concerns over the additional work involved on their part to implement these new processes and tools. It was recommended that SCC consider a phased approach when implementing these tools.

Some SDOAC members questioned the value of moving forward with recommendation #1 of the SDOAC TF to redefine SAR and its underlying processes.

Regarding SDOAC TF recommendation # 4, SDOAC suggested that caution should be exercised when implementing the use of a mark to distinguish standards meeting SCC's accreditation requirements. Users of a standard bearing this mark may infer that an accompanying certification program is part of the proposed solution.

Next Steps

Based on the recommendations contained in the SDOAC TF report, the public consultation on the recommendations and the September 5, 2013 meeting of SDOAC, SCC decided to proceed as follows:

Task Force Recommendation #1: Redefine the principles and definition of SAR in terms of where it applies. The TF recommends that future SAR principles apply to both NSCs and SDO standards compliant to SCC's accreditation requirements. SCC's processes facilitating the granting by SDOAC of SAR (CAN-P-1006C:2005) should be updated to reflect this concept.

SCC Action: SCC is committed to reviewing this TF recommendation with careful consideration of the additional feedback received from the SDOAC September 5, 2013 meeting. SCC believes that the implementation of a Centralized Notification System together with the implementation of a Dispute Resolution Mechanism, will address duplication at the level of the standard. SCC will assess to what extent these implementations will address the reliance on SAR as a mechanism to keep SDOs informed of potential areas of duplication.

Task Force Recommendation #2: Develop a centralized, transparent reporting system to address the duplication of standards and effort. This system includes: a notification process for both new work and work in progress through inclusion of the SDOs' work programs, and a list of current standards that are subject to SCC accreditation.

SCC Action: Feedback from stakeholders indicated the need for SCC to provide a publicly available Centralized Notification System for new projects generated by SCC-accredited SDOs. This Centralized Notification System would be used by all stakeholders as an effective tool to identify and mitigate duplication of standards and effort. The benefits of the proposed system include:

- A single point of access to information on standards development activities, where stakeholders can go to find proposed standards, standards currently under development and a list of published standards.
- A greater ability to focus on standards that may be duplicative and resolve associated issues, more immediately.

Working collaboratively with SDOAC members and their staff, SCC will implement a Centralized Notification System in November 2013. The new platform to be housed on SCC's corporate website will include notices of intent for new projects from SCC-accredited SDOs, and a library of their published standards. SCC will develop accompanying procedural requirements. SDO staff will be provided with an opportunity to review these requirements and to test the new platform to provide their feedback.

To facilitate the implementation of the new platform, SCC will:

- include a demonstration of the Centralized Notification System to SDO staff;
- provide a beta testing site to allow SDO staff to familiarize themselves with the new system; and
- include a transition period to account for required changes in SDO's procedures and corresponding activity, where required.

Noting SDOAC's concerns regarding the additional work involved in implementing the work program portion of the Centralized Notification System, SCC will not include this content at this time. Inclusion of the work program content in the Centralized Notification System will be

considered at an appropriate future date. In the meantime, SCC will continue to maintain the current links to each SDO's work programs available on their respective websites.

Task Force Recommendation #3: Develop a dispute mechanism to facilitate the resolution of conflicts.

SCC Action: SDOAC and the majority of SCC's stakeholders support the development and use of a mechanism to resolve disputes. SCC will develop and implement a new collaborative approach to conflict resolution. SDOs involved in the dispute would be provided with the opportunity to develop a mutually satisfactory arrangement that ensures Canadian stakeholders are provided with the standards they need. Should the collaborative process be unsuccessful, the complainant SDO will then have the option to proceed to the existing complaint resolution process under SCC's accreditation program (in compliance with [CAN-P-15:2012- Policy for the Suspension and Withdrawal of Accreditation and the Resolution of Complaints, Disputes and Appeals- August 2012](#)).

SCC will develop accompanying procedural requirements for the new collaborative conflict resolution process. SDO staff will be provided an opportunity to review these requirements, and provide feedback.

Task Force Recommendation #4: Develop a mark for differentiating standards that are subject to SCC's accreditation program (CAN-P-1:2012) from standards used in the Canadian marketplace that were developed outside of the scope of SCC's accreditation program.

SCC Action: SCC noted the concerns expressed by SDOAC members on the proposed use of a mandatory mark on standards. It has been noted that users of standards bearing this mark could mistakenly infer that these standards are part of an accompanying certification scheme.

As a result, SCC will not proceed with the implementation of a mark. Instead, SCC will consider introducing the use of a mandatory statement in the introductory pages of standards indicating that the standard meets SCC's SDO accreditation requirements. This statement would be introduced at the next planned revision of SCC's SDO accreditation policy and program requirements (CAN-P-1:2012).

SCC will offer SCC-accredited SDOs the option of a voluntary mark related to their accreditation status with SCC. This voluntary mark may be used for promotional purposes, and for marketing their good standing under SCC's accreditation program. SCC's Accreditation Services branch will manage the agreements related to the use of this voluntary mark.

Conclusion

SCC is mandated through the *Standards Council of Canada Act* and committed to providing a responsive, flexible and well-coordinated standards and accreditation system that protects Canadians' health and safety and enhances Canada's economic competitiveness. The introduction of a Centralized Notification System and a Dispute Resolution Mechanism represents a necessary step for the effective management of standards development in Canada.



As SCC continues to enhance its programs and services to better meet the needs of Canadian stakeholders, it will continue to seek feedback from and communicate with a broad base of stakeholders to ensure Canada's standardization network remains strong and viable.

Annex A

Public Consultation: Summary of Each Survey Question

Below is a summary of the results of each survey question.

Question #1: Should the principle of recognizing expertise through Subject Area Responsibility (CAN-P-1006C) apply to all standards developed under SCC's accreditation program (i.e., National Standards of Canada and other standards developed by a SCC-accredited standards development organization?)

Response	Chart	Percentage	Count
Yes		93%	139
No		7%	11
Total Responses			150

Respondents who were in favour, primarily included: industry, regulators, SDOs and those classified under "other". Respondents who were not in favour, primarily included: consumers or public interest groups.

There were 89 additional comments received relating to this question. Overall these comments pertained to expertise and who it should apply to and what it should focus on.

A total 6% of respondents agreed that the principle should apply to all standards developed under SCC's accreditation requirements, but with caveats. Some of these caveats included recognizing that exceptions may occur, needing increased flexibility to allow for overlapping subject areas, and ensuring cooperation among SDOs, such that, monopolies within subject areas are limited.

Respondents felt that recognition of expertise through SAR should be applied to all standards developed under SCC's accreditation but noted too that this concept should also apply to all SCC-accredited SDOs equally. Respondents stated that ensuring all SCC-accredited SDOs have the ability to participate, in recognition of their expertise, was important. Respondents felt this form of participation would reduce market confusion and would encourage coordination, consistency and competition amongst SDOs.




Suggestions to improve SAR were provided by 5% of respondents. These suggestions included the development of an open and transparent bidding process for the development of a standard; updating the process for assigning SAR, including a dispute resolution mechanism and the ability for more than one SDO to develop a standard within a particular subject area.

A total of 7% of respondents felt that recognizing expertise and applying it to all standards within SCC's accreditation program was not possible and/or could create confusion in Canada's standardization network. In some cases, respondents stated that expertise is often project based and, therefore, could be difficult to apply to broader subject areas. Additionally, respondents noted that SAR is a tool to recognize expertise, but that the concept of expertise should not replace SAR.

There was 5% of respondents who were unsure or did not feel they were qualified to provide constructive feedback.

Overall, respondents were largely in favour of the principle of expertise and its application to all standards developed under SCC's accreditation program.

Question #2: In determining whether a standards development organization (SDO) has expertise in a particular subject area, what are the criteria or elements that should be considered?

Response	Chart	Percentage	Count
The number of active standards that the SDO has in that subject area		42%	65
The number of technical experts that the SDO has available in that subject area		73%	112
Other		38%	58
Total Responses			153

Note: Multiple responses were permitted.

Respondents that were in favour of the number of technical experts that the SDO has available in that subject area were primarily industry and industry associations, followed by those classified under "other", SDO, regulators, and government. The majority of respondents for this question were from industry and industry associations.

A total of 157 comments were received for this question. Elaborating on their selection, respondents highlighted what they believed should determine SDO expertise in a particular subject area:

- 10% of respondents felt that an SDO should demonstrate expertise in a particular subject area based on the experts it had available in the related fields;
- 8% of respondents felt that an SDO should demonstrate expertise in a particular subject area based on the type and number of current standards it had in related fields;
- 7% of respondents felt that an SDO should demonstrate understanding and expertise in a particular subject area;
- 4% of respondents felt that industry recognition of the standard was necessary;
- 4% believe that the SDO must show capacity to develop a standard in that area;
- 4% believed that access and use of Canadian expertise was essential;
- 3% of respondents believed historical examples of work were important to demonstrate SDO expertise in a particular subject area.

A small minority of comments stated that the following factors should be included when determining SDO expertise in a particular subject area:

SCC accreditation, standard(s) referenced in regulations, public/international acceptance of standards in certain areas, product section scopes of an SDO, lack of expertise by other SDOs, input of affected stakeholders, availability of industry experts in a subject area, certification activity, and balance of stakeholder representation in a subject area.

Question #3: To enable the identification of standards activities in Canada that pose potential for the duplication of standards and/or effort, it was recommended that SCC develop a centralized, transparent reporting system. This system would include information from each stage of the development process, such as notification of new work, standards currently under development as outlined in a work program, and a comprehensive list of published standards. What elements should be captured in this reporting system to enable identification of duplicate work (e.g., title of standard, scope of standard, etc.)? Are there other sources of information that should be included in this centralized repository?

Response	Chart	Percentage	Count
Scope		54%	71
Title		37%	49
Industry sector		13%	17
Work program		10%	13
Rationale		11%	15
The related SDO		7%	9
Product Types		7%	9
Committee Members		7%	9
Total Responses			132

Note: Multiple responses were permitted.






There were 132 responses to this question which varied considerably on what should be included in a centralized repository. Responses were categorized according to each separate recommendation. In all, there were 63 separate recommended subjects for inclusion.

The top responses regarding what should be included in a centralized repository were: scope (54%), title (37%), industry sector (13%), work program (10%), and rationale (11%), the related SDO (7%), product types (7%) and committee members (7%).

Responses followed three main themes: respondents recommended that the different stages of development that the standard has reached should be provided, as should information on the committee, and information on binational, trinational and/or international standards, where applicable.

The majority of respondents were in favour of a centralized repository, although views varied as to what information should be included in this repository to enable for all users and stakeholders to identify and address cases of potential duplication.

Question #4: To help resolve conflicts associated with duplication of standards, which individuals and/or organizations do you think should be involved in this process?

Response	Chart	Percentage	Count
Technical experts		61 %	94
User/Proponent of standard		55 %	85
Standards Council of Canada		62 %	95
Third-party arbitrators		24 %	37
Other		20 %	31
Total Responses			154

Note: Multiple responses were permitted.

There were 154 responses to this question. Respondents had the option of four choices as to who should be involved in helping to resolve conflicts: SCC, technical experts, users/proponents or a third-party.

Overall the top three individuals and/or organizations to be involved were: SCC (62%), technical experts (61%) and the user/proponent (55%). When looking more specifically at the industry experts that answered this question, 46% chose user/proponent, 47% technical experts and 40% chose SCC. Other stakeholder responses were distributed fairly equally over the five categories.

Question #5: What roles should the following individuals and/or organizations play in the resolution of conflicts over standards duplication?

The following charts outline the responses to question #5. Respondents could choose more than one role for each category.

	The complainant	The standards development organization	Standards Council of Canada	Third-party arbitrator	Other	Total responses
Non-participant (NP)	44 (52%)	9 (11%)	1 (1%)	26 (31%)	20 (24%)	85
Participant	72 (60%)	82 (68%)	19 (16%)	8 (7%)	13 (11%)	121
Facilitator	5 (5%)	20 (19%)	36 (34%)	44 (42%)	5 (5%)	105
Authority / Decision-maker	4 (3%)	23 (18%)	80 (62%)	35 (27%)	10 (8%)	129


A majority of the responses, 62%, identified SCC as the authority/decision maker; 34% stated it should be the facilitator; 16% believed that SCC should be a participant of the resolution of conflicts over standards duplication; and 1% said SCC should not participate.

A majority of responses, 68%, chose SDOs as a participant, 19% chose them as a facilitator, 18% chose them as the authority/decision maker, and 11% chose them as a non-participant.

The complainant was noted as a participant in 60% of the 121 responses, and non-participant in 52% of the 85 responses.

The third-party arbitrator was chosen as the facilitator 42% of the time, as a non-participant 31% of the time, and as an authority/decision-maker 27% of the time.

Question #6: It is recommended that a mark be created and applied to published standards to clearly identify standards developed under SCC's accreditation program, to differentiate those SDO standards that serve the Canadian market versus those standards that have been developed under other authorities and related requirements. Do you believe that such a mark is necessary?

Response	Chart	Percentage	Count
Yes		72%	108
No		28%	43
Total Responses	151		

Question #7: Do you believe that having such a mark will address confusion with other standards originating from other regional or international accreditation bodies?


Response	Chart	Percentage	Count
Yes		57%	87
No		39%	59
Other, recommendation(s):		11%	17
Total Responses	152		

Note: Multiple responses were permitted.

Seventeen survey participants chose to add their own recommendation in the “other” category. Respondents generally elaborated on whether they felt a mark would help address any confusion. Nine stated they were in favour of the mark, as it would reduce confusion. Five stated they felt a new mark was unnecessary and/or would add to the confusion that already exists in the marketplace.

Two respondents noted that a transparent registry would effectively help address confusion and one respondent noted that the mark needs to be on the standard and not a product certified under the standard.

Question #8: Should such a mark be optional – at the discretion of the SCC-accredited SDO – or should it be made mandatory?

Response	Chart	Percentage	Count
Optional		35%	53
Mandatory		65%	97
Total Responses			150

A total of 65% of respondents felt that a mark should be mandatory for SCC-accredited SDOs. Respondents who felt it should be mandatory were primarily industry, SDOs and regulators. Respondents that felt it should be optional were also primarily industry, SDOs and those identified as “other”.



There were 85 additional comments received relating to this question. The comments were largely positive with respondents supporting the development of a mark. Demonstrating confidence and legitimacy of the standard, as well as, ease of identification, were key themes stated by respondents in support of the mark.

Respondents with negative comments regarding the mark noted concerns such as, additional cost to businesses that may impact competitiveness, potential confusion that could lead to a hierarchy of standards, and limited value of the mark in achieving the desired result.

Respondents who opposed an optional mark felt that having it optional would hinder its usefulness and may create more confusion in the marketplace.

Several respondents provided recommendations for identifying standards including continuing the practice of the CAN/ prefix or a SCC/ prefix rather than instituting a new mark. As well, respondents also suggested limiting the use to one universal mark for identification, as multiple marks may add confusion.

Question #9: Do you believe that the four recommendations identified in the June 2013 Report to SDOAC on Duplication of Standards and Effort in Canada's Standardization Network are comprehensive enough to address the concerns that duplication of standards poses? The four recommendations are: Redefine the principles and definition of subject area responsibility, and clarify their application. CAN-P-1006C:2005 Granting and Maintenance of Primary Responsibility for Subject Areas should be updated. Develop a centralized, transparent reporting system that includes: notification process for new work, work in progress, and a list of current standards that are covered under SCC accreditation. Develop a dispute settlement mechanism to facilitate resolution of conflicts. Develop a mark for differentiating standards development organizations (SDOs) standards that are covered under SCC's accreditation (as a SDO under CAN-P-1:2012, Part 1), from standards used in the Canadian marketplace that were developed outside the scope of the SCC accreditation program.

Response	Chart	Percentage	Count
Yes		81%	123
No		19%	28
Total Responses			151

Question #10: If not, what would be your recommendation(s) to strengthen the process to avoid duplication of standards and duplicative work effort from among all stakeholders involved in standards development activities?

There were 38 responses to question number 10. The most common responses followed two key themes:

- Stakeholders disagreed with recommendation #4 on the creation of a new mark, but agreed with recommendations one through three.
- Stakeholders emphasized the importance of developing ways to harmonize standards development in North America, whether through bi-national standards, or through the accreditation of other organizations.

Annex B

Feedback from SDOAC on the Public Consultation

On September 5, 2013, SCC met the six accredited SDOs at a regularly scheduled SDOAC meeting. At this meeting, SCC presented a preliminary report on the survey results from the public consultation on the SDOAC TF report. It was noted at the meeting that the survey results were not final, and that stakeholders had until September 6, 2013 to complete the survey.

The following outlines key elements for each recommendation, as presented by SCC, and the comments resulting from SDOAC members:

Recommendation #1: *Redefine the principles and definition of SAR in terms of where it applies. The TF recommends that future SAR principles apply to both NSCs and SDO standards compliant to an SDO's SCC-accreditation, whereby duplication of standards and effort should be discouraged unless there is a justified need. [CAN-P-1006C - Granting and Maintenance of Primary Responsibility for Subject Areas - November 2005](#) should be updated to reflect this concept.*

SDOAC members were presented with a proposed approach to address recommendation #1. This structure included:

- update of the description of the process, as described in *CAN-P-1006C:2005*, to recognize expertise rather than primary responsibility for standards development in an area;
- recognition that expertise for any particular topic, may lie in more than one SCC-accredited SDO;
- any future process to apply to both the NSCs and standards an SDO publishes that are compliant to SCC's accreditation requirements ([CAN-P-1:2012 - Program Requirements for the accreditation of Standards Development Organizations and for the Approval of National Standards of Canada – Part 1](#)).

Response: The notice of intent requirement in CAN-P-1, Part 1 clause 6.6.1, and the notification requirement under SAR in CAN-P-1, Part 2 clause 5.2, both aim to mitigate the possibility of duplication of standards and effort. The installation of a Centralized Notification System, as recommended by the SDOAC TF recommendation #2, and of a sound Dispute Resolution Mechanism, as per recommendation #3, are expected to meet both of the CAN-P-1 requirements. Based on this response, some SDOAC members questioned the value of moving ahead simultaneously with a revised CAN-P-1006C with a new focus on expertise.

Recommendation #2: *To address the possible duplication of standards and effort, develop a centralized, transparent reporting system that includes: notification process for new work, work in progress through inclusion of the SDOs' work programs, and a list of current standards that are subject to SCC accreditation.*

SDOAC members were presented with a proposed concept for a Centralized Notification System to address recommendation #2. The proposed concept included:

- centralized availability of the SDO's notices of intent, once they decide to proceed with the development of a standard;

- inclusion of the SDO's work programs;
- a library of the SDO's published and current standards.

Response: SDOAC members noted support for the concept, however, they expressed concern over additional work that the implementation of these elements may generate, and proposed that SCC consider a phased approach of these elements.

Based on this feedback, SCC proposed to include only the notices of intent and library of standards in the initial Centralized Notification System, which would be expected to be launched in November 2013.

Recommendation #3: *Develop a dispute mechanism to facilitate resolution of conflicts.*

SDOAC members were presented with a proposed approach to address recommendation #3 involving 2 phases to process possible disputes. The proposed two phases are:

- **The Collaborative Phase:** the initial phase will be managed by SCC's Standards and International Relations branch. SDOs that are involved would be provided with the opportunity to resolve the dispute on their own, and would be required to develop a mutually satisfactory arrangement that ensures Canadian stakeholders are provided with the standards they need.
- **The Directive Phase:** should the collaborative phase be unsuccessful, the matter would then be turned over to SCC's Accreditation Services Branch to be processed under the existing accreditation complaint resolution process in compliance with CAN-P-15.

Response: SDOAC members noted their support for this new two-phase approach.

Recommendation #4: *Develop a mark for differentiating SDO standards that are subject to SCC's accreditation as an SDO under CAN-P-1:2012, Part 1 from standards used in the Canadian marketplace that were developed outside the scope of the SCC accreditation program.*

SDOAC members were presented with proposed marks to address recommendation #4 involving:

- a voluntary mark related to the accreditation status of the SDO that can be used for promotional purposes and to broadcast the SDO's good standing;
- a mandatory mark to identify National Standards of Canada (NSCs); and
- a mandatory mark to identify SDO standards that meet CAN-P-1 Part 1 requirements without being NSCs.

SDOAC members cautioned on the proposed use of the mandatory marks for the standards of the SDOs (NSCs and SDO standards) as users could mistakenly infer that these proposed marks are part of an accompanying certification scheme.

Following the SDOAC meeting, SCC staff consulted with experts from within SCC's Accreditation Services branch, who confirmed SDOAC's concerns.