



A Public Call for Extension of Transition Deadline for ISO 9001:2015 and AS9100 Rev D Certifications

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PREAMBLE

Oxebridge is calling on ISO, IAF and IAQG to extend the deadline for transition of third-party certifications of ISO 9001:2015 and AS9100 D for a period of two additional years, to September 2020. The argument is based on three key points: that the deadline is arbitrary and not based on any practical industry need; that the deadline hurts standards users and increases the risk of poorly-implemented quality systems; and that data proves such deadlines routinely result in massive, worldwide defections of users from the certification scheme.

POINT 1: CURRENT DEADLINE IMPOSITION IS ARBITRARY

The internal procedures of the International Organization for Standardization (ISO) require that its publications (standards) be reviewed every five years to see if they require updating in order to address current trends or technological advances. At that five-year review, ISO may elect to proceed with an update, or not; if an update is deemed necessary, the revised standard is then published a number of years after.

Historically, ISO then issues a joint communique with the International Accreditation Forum (IAF) announcing a three-year deadline for companies to certify to the updated version of the standard. As you may know, the IAF oversees the accreditation and auditing work done by the world's accredited Certification Bodies (CBs, or "registrars") who eventually issue ISO 9001 certifications.

Throughout its history, ISO has repeatedly declared that it has no role in third-party certifications, and yet this arrangement with the IAF clearly contradicts these claims. The arrangement shows that ISO benefits directly from colluding with the IAF to mandate certification deadlines, which then force companies to purchase its updated publication or lose their hard-won third party certification. Whether this is a violation of free trade regulations is the subject of worthwhile discussion, but out of scope for this Public Call document. It is sufficient to say that ISO should have no say whatsoever in any certification deadlines, as it is a dramatic conflict of interest and abuse of its global monopoly power.

How ISO and the IAF determine that "three" years is sufficient is unknown, and neither party has revealed the logic behind the calculation. Worse, ISO and IAF imposes this "sunset rule" even when a standard remains unchanged. The ISO 9001:2008 standard featured **no** new requirements from the previous 2000 version, and both ISO and IAF announced that companies who had implemented ISO 9001:2000 were automatically compliant to the ISO 9001:2008. Nevertheless, ISO and IAF announced a three-year transition deadline, forcing companies to purchase the 2008 version and undergo upgrade audits anyway.

It is clear that the three-year sunset rule has no basis in any industry need, nor is it the product of user feedback; the only beneficiaries are ISO and the IAF schemed Accreditation Bodies and Certification Bodies. By result of the mandate, ISO forces it's 1 million+ users of ISO 9001 to purchase a copy of the latest draft, instantly boosting its annual revenue. IAF matrixed registrars boost sales by selling update training, gap analysis audits, seminars and "transition audits."

None of this benefits the end users of ISO 9001, who are forced to pay for these costs. Oxbridge has estimated that in the United States alone, ISO 9001 certification represents an annual \$1.5 billion¹ industry in normal years, not accounting for the spikes seen during artificially-created deadlines. In a "spike year," this could impose as much as a \$4 billion impact on standards users, consumers and the taxpaying public.

ISO defends the update of its standards with the argument that they are updated to address "latest technologies," but even a cursory review of the ISO 9001:2015 standard finds that no new technologies or approaches were added. The inclusion of "risk-based thinking" is the major change, and was the product of an imposition to include risk mandated by the ISO Technical Management Board (TMB) and not the product

¹ This figure is calculated by totaling the estimated annual costs for standards, certification audits, training and related consulting services, based on the ISO Survey data on the number of certified companies within the US.

A Public Call for Temporary Cessation of Work on the Development of ISO 9001:2015

of any industry design study or user outcry. Furthermore, “risk-based thinking” does not exist as a known approach in the risk management field, never mind the quality management field. ISO itself has claimed, repeatedly, that “risk was always implicit in the standard,” revealing the fact that it is *not* a new concept. Meanwhile, industry-accepted “modern” practices such as Lean, 5S or capability maturity models remain ignored by ISO 9001, exposing the lie.

“Deadlining” earlier versions is also entirely unnecessary. Allowing older editions to exist side-by-side with newer ones creates no demonstrable problems for industry, and in fact solves many of them. Registrars could easily continue to offer certifications to older editions, allowing the supply chain and user base to decide which is best. If a large OEM elected that it was happy having its suppliers certified to, say, ISO 9001:2000, then it could impose that on its supply chain and registrars could certify the companies accordingly. The registrars already have the necessary procedures in place, and their auditors are already trained on the earlier editions. The various parties literally need do *nothing*, and they would satisfy the needs of industry.

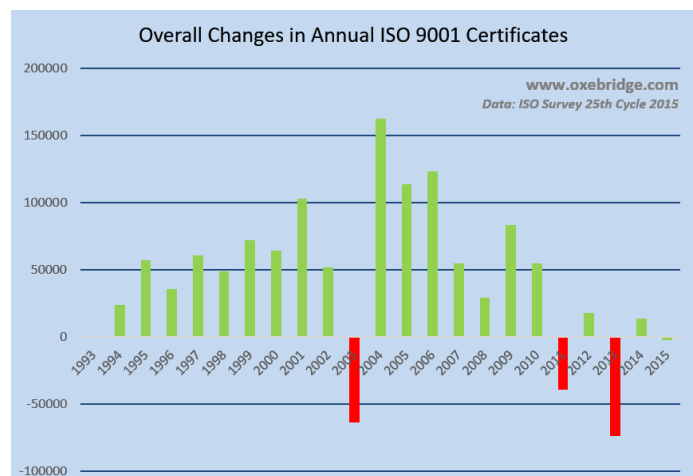
The arbitrary deadline places unnecessary and costly burdens on user companies, who are forced to rewrite documentation, engage in training and alter processes to comply with a mandate issued by ISO and IAF, not by their customers. Often, these mandates run counter to the will of the customers, who are equally frustrated by ISO’s ever-shifting landscape.

Finally, the rushed timeline ensure that the resulting quality systems are updated only to meet an externally-imposed deadline, and not to improve the quality systems themselves, thereby injecting additional risk and mistrust in the resulting certifications, as well as the quality of the end users’ products and services.

POINT 2: HISTORICAL DATA SHOWS WORLD REJECTION OF THREE-YEAR DEADLINES

The arbitrary sunset rule furthermore results in global antipathy towards ISO 9001 certification, as companies either find the deadline impossible to meet, or drop the certification altogether out of frustration. Data provided by the annual ISO Survey shows this clearly. At the three-year deadline after the publication of ISO 9001:2000, in the year 2003, we see ISO 9001 faced its first year wherein the total number of certificates was less than the previous year.² At the three-year deadline after the publication of ISO 9001:2008 (in 2011) the phenomenon occurred again, only the second time ISO 9001 faced world losses.

Many have defended these trends, without evidence, with the argument that after the loss of certificates in the deadline year, there is a noticeable uptick in the subsequent years. What is unknown, however, is if this uptick reflects companies re-certifying after losing the certificate in the deadline year, of if these are new adoptees and the companies that lost certificates



²The losses experienced in 2013 are not discussed as part of the scope of this Public Call document, as the data from 2013 to present is suspect due to unconfirmed reports that it was falsified by IAF registrars.

abandoned it entirely. Furthermore, the uptick after the 2008 deadline year (2011) showed that the losses were *maintained*, and that very few companies returned to ISO 9001 certification after the imposed ISO/IAF mandate.

Either way, the loss in certificates is troubling. Either this means that companies abandon their certification out of frustration, robbing ISO 9001 of its user base and infecting the scheme with doubt and ill will, or (at best) it means that thousands of companies lost their certificates and had to undergo entirely new, and expensive, “initial certification audits” all because they could not complete the task in the short time allotted. In both scenarios the impact on the reputation of ISO 9001, as well as ISO and the IAF registrars, is negative: companies have either dropped the certification in anger, or were forced to spend money unnecessarily. This injects frustration, distrust, and contempt upon the ISO 9001 certification scheme, even as both ISO and IAF should be working to achieve the opposite effects.

POINT 3: AS9100 MUST NOT FOLLOW SUIT

The aerospace certification scheme, operated by the International Aerospace Quality Group (IAQG) in liaison with both ISO and the IAF, typically adopts the deadlines imposed by ISO and IAF. This impacts on certifications to its three flagship standards, AS9100 (for aerospace manufacturers), AS9110 (for aerospace repair stations) and AS9120 (for aerospace stockist distributors.) (For brevity, this paper refers to the standards simply as “AS9100.”)

In some ways, these AS certifications are protected from the drop-offs seen by ISO 9001 during “deadline years,” since AS9100 is largely driven by government or OEM mandate. Users simply have no choice but to adopt and maintain the certifications, lest they lose access to aerospace contracts and go out of business entirely. However, this reality only worsens the resentment and anger of AS9100 users, who must absorb the costs of the forced upgrades, while IAQG views itself – and not its paying customers – as the “true user” of AS certifications.

Ironically, complaints have been raised by representatives within both Lockheed and Boeing, who have told Oxebridge they can’t update in the allotted time themselves, even though they have their own people at the helm of IAQG creating this artificial obstacle.

Inexplicably, the IAQG worsened matters in this latest update cycle by not only adopting the ISO/IAF three-year deadline, but keeping it in effect even after taking an additional year to publish AS9100 revision D, in 2016. This means that users of AS9100 have only two years to implement the standard, whereas ISO 9001 users have three. ***Aerospace companies have less time to implement a more complex standard.***

This decision defies all logic, and increases risk within the quality of updated aerospace systems, which are responsible for the design and manufacture of safety-critical products such as airplanes, spacecraft and related work. It further dilutes the value and trust in the resulting AS9100 certifications as well.

OXEBRIDGE RECOMMENDATION

While Oxebriidge argues that there is no rational reason to have an update deadline at all, and that registrars could easily continue to offer certification to older editions of the standards, it is willing to concede this point as a fight for another day. At this time, Oxebriidge instead urges ISO, IAF and IAQG to withdraw the current 2018 deadline, and to extend it for both ISO 9001 and AS9100 certifications until September 2020, to give users adequate time to update their quality systems and prepare for third party audits.

Doing so will still ensure the revenue expected to flow to the various players, and might even enhance it as less companies drop ISO and AS certifications altogether.

Furthermore, doing so will show an effort towards maintaining good will with standards users, and will increase trust and confidence in the work done by ISO, IAF and IAQG, while going far in undoing the current climate that views the standards and certifications as a mere scheme to generate revenue for standards publishers and auditing bodies.

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Oxebriidge is seeking individuals or organizations as co-sponsors of this initiative. If you would like to support the deadline extension for ISO 9001:2015 and AS9100 Rev D certifications, contact Oxebriidge at OQR@oxebriidge.com.

Christopher Paris is a former member of the US TAG to TC 176, and the world's leading advocate for ISO and AS standards users. Oxebriidge has provided implementation services for hundreds of companies worldwide since 1999, and is the industry's de facto watchdog organization.