

The Secretary Route de la Chapelle Réanville F-27950 Saint-Marcel, FRANCE

## MUTUAL RECOGNITION AGREEMENT HIGH SECURITY LOCKS (HSL)

Participants:

Certification Body	Signatory		
CNPP Cert.	CNPP Cert. Route de la Chapelle Réanville F-27950 La Chapelle-Longueville		
VdS Schadenverhütung GmbH (CERT)	VdS Schadenverhütung GmbH Amsterdamer Str. 174 D-50735 Köln		
Svensk Brand- och Säkerhetscertifiering AB (SBSC)	SVensk Brand- och Säkerhetscertifiering AB S-11587 Stockholm		
Associated Testing Laboratories	Signatory		
CNPP Entreprise (LAB)	CNPP Entreprise Route de la Chapelle Réanville F-27950 Saint-Marcel		
VdS Schadenverhütung GmbH (LAB)	VdS Schadenverhütung GmbH Amsterdamer Str. 174 D-50735 Köln		

The certification bodies (CBs), which are members in the European Fire and Security Group (EFSG) and their associated testing laboratory (ATL) signing this EFSG mutual recognition agreement (MRA), agree to accept the following terms and conditions. They agree to communicate the conditions of this agreement to the market.

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#### 1 GENERAL

This agreement specifies the conditions for the mutual recognition of test results used for the certification of high security locks according to the standards listed in this agreement, for the purposes of granting permission to use the certification marks of the certification body signatories.

The agreement has been made on the understanding that the participating certification bodies are accredited in accordance with EN ISO/IEC17065 by a member of EA (European co-operation for Accreditation) with a scope covering the relevant equipment.

This MRA agreement is based on the current Terms of Reference of EFSG.

#### 2 OBJECT

It is the object of this agreement for the mutual recognition of test results to make it easier for applicants to obtain authorisation to use the mark of each Certification Body (CB).

#### 3 SCOPE

This MRA applies to high security locks and describes the co-operation on testing, certification (including prolongation, modification and duration), quality assurance and product surveillance for high security locks according the standards mentioned in clause 11 (NORMATIVE REFERENCES) and in the table below.

This MRA covers type testing of high security locks for multiple certifications.

Each new ATL will have been successfully audited (initial and technical assessment) before signing the MRA.

The table below identifies the certification bodies, their nominated associated testing laboratory and their testing capabilities.

Table 1: Certification bodies and their associated testing laboratory.

			Certification bodies		
Certification bodies and their associated testing laboratory			CNPP Cert	VdS Schaden- verhütung (CERT)	SBSC
Associated Testing laboratory	Standards	Remarks / Limitations to tests			
CNPP Entreprise (LAB)	EN 1300	None	•		
	prEN 17646		•		
VdS	EN 1300	None		•	•
Schadenverhütung (LAB)	prEN 17646			•	•



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#### **4 APPLICATION FOR MULTIPLE CERTIFICATION**

If an applicant wants to be licensed for the use of the certification mark of another party of this MRA, the applicant shall apply to that certification body and shall agree to abide by its rules.

Important - The acceptance of test results relies on the defined processes within this MRA being followed. Applicants are advised that deviations from the defined process can lead to the refusal to accept results and subsequently repeat testing. The applicant shall give permission to the CBs and ATLs to exchange information (e.g. test results and technical documentation) between the signatories of this agreement by using form sheet FS-145-EFSG.

The CB signatories agree to accept the results of tests carried out within the scope and the procedure of chapter 12 of this MRA, from any one of the nominated ATLs.

#### 5 ASSOCIATED TESTING LABORATORY (ATL) REQUIREMENTS

To become a signatory to this MRA a new ATL shall be nominated on the request of a CB. The new ATL shall have met the requirements of the EFSG initial assessment and of the procedure for technical assessment of a new ATL for the standard covered by this MRA and as validated by the relevant Product Division Group (PDG).

The ATL shall be accredited in accordance with EN ISO/IEC 17025 by a member of the European co-operation for Accreditation (EA) for the relevant testing standards.

The ATL shall participate in the on-going inter-laboratory comparison programmes operated by EFSG and agree to the regular exchange of technical experience and knowhow.

Where applicable, the limitations of each testing laboratory are documented in the table 1 above.

#### 6 COMMON COMMITTEES

At least, once a year or at the request of one signatory of the agreement, the CBs and ATLs will meet for a review regarding the implementation of this MRA.

The review will consider but need not be limited to, the suitability of the MRA to meet the needs of the market, changes to standards and/or testing practices.

Unless otherwise agreed, one representative respectively for each signatory of this MRA will participate at the review. This representative can participate with consultative participants. The resolutions of the meetings shall be recorded.

The place and date of the review shall be determined by the relevant PDG and agreed by the signatories of this MRA.

#### 7 DISPUTES

In case of a breach of the EFSG agreement, the signatories are obliged to attempt to resolve the problem in a fair discussion before terminating this MRA.



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#### 8 TERMINATION OF OR WITHDRAWAL FROM THE MRA

Termination of this MRA will occur when a simple majority of the signatories give 12 months notice, to all the signatories, of their request to terminate this MRA.

Withdrawal from the MRA by one signatory will occur when that organisation gives 12 months notice to all the signatories of its intention to withdraw from this MRA. Upon receipt of the notification by one ATL or one CB signatory to withdraw from the MRA the PDG must conduct a review of the impact upon existing product certifications. If/when requested, the ATL and/or CB shall provide any additional information necessary in order that the product certifications can continue.

A termination of, or withdrawal from, this MRA does not invalidate certifications, based on mutually accepted results, that have been granted before the date of termination or withdrawal.

#### 9 IMPLEMENTATION

This MRA is valid for a period of **3 years** commencing from the date of publication. It supersedes the MRA on high security locks, version 6, February 2019.

The agreement is intended to be used for multiple certification applications made after the date of publication. Test results issued before the date of publication shall be scrutinised and acceptance of the test results is solely at the discretion of each CB member individually.

After this period, this MRA will be renewed automatically for a further 3 years unless the signatories decide otherwise (see chapter 6 COMMON COMMITTEES).

#### **10 PARTICIPANTS**

The participants of this MRA are the certification bodies (CBs) and their respective associated testing laboratory (ATL) named on the cover page.



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#### **11 NORMATIVE REFERENCES**

This MRA was signed based on the references below. If not dated, the latest versions will apply, out of transition period if exists.

- EFSG terms of reference
- EN 1300:2013 Secure storage units Classification for high security locks according to their resistance against unauthorized opening, without distributed Systems (means: excluding chapter 5.1.7, where prEN 17646:2021 is used instead)
- EN 1300:2018 Secure storage units Classification for high security locks according to their resistance against unauthorized opening, without distributed systems (means: excluding chapter 5.1.8, where prEN 17646:2021 is used instead) and without manipulation tests on electronic locks according table 4, clause 8.2.2 (=> Manipulation tests on electronic locks are going to be conducted according to prEN 1300:2021).
- prEN 17646:2021 Secure storage units Classification for high security locks according to their resistance against unauthorized opening, distributed systems
- EN ISO 9001:2015 Quality management system Requirements

Note: For restrictions regarding duration of certificates see clause 12.3.

For special applications of high security locks that are not covered by the high security locks defined in the above mentioned standards, it is up to the individual certification bodies to decide whether to take into account work carried out by other EFSG certification bodies.

An applicant can obtain information about additional requirements by contacting the individual CBs.



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#### **12 TESTING AND CERTIFICATION**

#### 12.1 General

Each certification body (CB) participating in this MRA remains responsible for its decisions and autonomous in its decisions. The CBs issue the certificate related to their own certification mark.

The CBs participating in this agreement agree to certify the products described in the scope (§ 3) of this MRA, on the basis of tests performed by the ATL which have signed this MRA.

On the basis, the CBs accept test results and test reports issued by ATL as described below. The basis of the testing and certification are standards mentioned in clause 11.

For the tests according the standards mentioned in clause 11 (NORMATIVE REFERENCES) the CBs will accept the test results once the tests have been successfully performed by only one ATL. For the required manipulation resistance tests and destructive burglary resistance tests according to the standards mentioned in clause 11, (independently of the method of assessing those requirements), the other CBs can ask for the manipulation resistance test and destructive burglary resistance test to be performed according to the standards mentioned in clause 11 by a second ATL.

If after the testing a new edition of the standard has been published, those results of the test report may be taken for a certification for which the requirements resp. test methods did not suffer a severe change.

CBs certification rules may have additional requirements which are not covered by this MRA.

The signatories agree to exchange experience at least once a year, in case of extraordinary circumstances additional meetings can take place.

Test reports and additional documentation necessary for certification, within the frame of this MRA, shall be issued in English.

#### **12.2 Procedure for testing and certification**

An applicant (manufacturer) requiring multiple certification shall indicate the pCB and has to apply, (by using the appropriate application forms of the CBs and form sheet FS-145-EFSG), to all CBs whose certificates are required. Furthermore, the applicant has to indicate a preference for where the product is to be tested (see Table 1 and flow charts in Annexes A and B).

It is very important for traceability and to have good overview of the situation that a lock has exactly the same design and specification for all CBs. So, if a modification is valid for one certification body only, it shall not be possible to find it on the certificates issued in the frame of EFSG Agreement. A separate certificate must be issued and the lock shall have a different "name" or reference.



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Taking the product specifications and the test specimen as a basis, the laboratory (pATL) proceeds as follows:

- Examination of specimen(s) and documentation
- Performing the tests required in the appropriate standards mentioned in clause 11
- Issue of the test report.

The CBs study the test report(s) with the associated documentation and checks the following items:

- Check if additional testing of the manipulation resistance and destructive burglary resistance according to the appropriate standards mentioned in clause 11 by a second ATL is needed (see clause 12.1).
- Check if the testing is performed on the basis of the standards defined in clause 11 of this MRA. If the standard has been changed in the meantime, those results of the testing may be taken for a certification for which the requirements resp. test methods did not suffer a severe change.
- Check if the tests were performed before publication of the MRA. If the tests were performed earlier, additional tests may be performed at any associated testing laboratory signatory to this MRA. The reasons for these additional tests shall be justified in writing to the applicant. The other involved CBs will be informed by the CB who asks for additional tests.

The CB studies the test report to determine the associated security class and to decide if a certificate can be issued.

#### **12.3 Duration of certificates**

The maximum duration of certificates will be 4 years for all CBs.

The initial date of a certificate is the date of issue by pCB (Primary Certification Body). Should a second CB certify the same product later, the "expiry date" shall correspond to that of the certificate issued by the pCB (see Annex A and B).

If vulnerabilities arise with regard to the manipulation resistance during the certificate period of a HSL certified in accordance with the applicable standard listed in clause 11 'Normative References', the applicant shall eliminate these vulnerabilities within a reasonable period of time.

If vulnerabilities arise with regard to the resistance to unauthorized opening during the certificate period of a Distributed System certified in accordance with the applicable standard listed in clause 11 'Normative References', the applicant shall eliminate these vulnerabilities within a reasonable period of time.

In such a case of vulnerabilities the certification bodies are free to suspend or revoke the certificate depending on the severity of the vulnerability. In case of suspension or withdrawal the decision must be agreed by all involved CBs.



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#### 12.4 Prolongation and/or modification of certificates

The prolongation and/or modification of a certificate (e. g. design modifications or updating of standards) can be made either by a study of the product specifications and drawings or by retesting (or partial retesting) according to the updated standard.

It is the task of the applicant to initiate the prolongation and/or modification of its certificates with each of the CBs which has certified the product.

If a modification of a certificate is valid for one CB only, it shall not be possible to find it on the certificates issued in the frame of this EFSG MRA. A separate certificate must be issued and the product shall have another reference.

#### 13 PRODUCT SURVEILLANCE AND QUALITY ASSURANCE

CB signatories of this MRA agree to offer a common standardized procedure of audits for product surveillance to those applicants who meet the conditions expressed in clause 13.1, so that each certification body will be able to take its decision based on that common audit.

#### 13.1 Conditions to benefit from the harmonized audit procedure

In order to benefit from the common audit procedure, an applicant shall respect the following conditions:

- The quality management system for the manufacturing site(s) related to the scope of the agreement is certified according to ISO 9001 by a certification body accredited by an accreditation body recognized by EA (European Co-operation for Accreditation formerly EAC) and having signed the Multilateral Agreement under EA.
- At least one of its products has been (or will be) certified after its testing according to the mutual recognition test procedure stated in this MRA and the test sample was produced in exclusively that factory which will benefit from the harmonized audit procedure.

#### 13.2 Initial audit

After the request of an applicant for the benefit of common audit procedure the certification body who will perform the initial audit is given by the following cases:

The three following cases may occur as described:

#### -1- "First case"

The applicant already holds product certification for HSL by several Certification Bodies and wants to benefit from the common audit procedure without increasing the number of certification marks on his products. In such a case, an initial audit is not required and the CB is requested by the applicant.

#### -2- "Second case"

The applicant already holds product certification for HSL by one or several Certification Bodies and wants to benefit from the common audit procedure and by the same way wants to increase the number of certification marks on his products. In such a case, an initial audit is not required and the CB is requested by the applicant amongst the Certification Body(-ies)

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having already approved the applicant. The requested CB will transfer the relevant information regarding the applicant to other CB(s).

#### -3- "Third case"

The applicant holds no product certification for HSL by any of the Certification Bodies and wants to get certification directly by several certification bodies and benefit from the common audit procedure by the same way. In such a case the CB who will conduct an initial audit (before certifying the product) is the Certification Body whom the applicant has asked for the first type test.

#### 13.3 Validity of the harmonized audit

The harmonized audit will be valid for:

- Products which are certified by the involved certification bodies in the frame of this MRA.
- Other products covered by the scope (clause 3) but certified outside the MRA by any of the agreement members.

#### 13.4 Conditions of the harmonized audit practice

**13.4.1** The applicant shall make a formal request by using form sheet FS-102-EFSG at each CB from which he holds (or asks for) a certificate in order to benefit from this common audit procedure and allows the members of the MRA to exchange the appropriate information concerning the audit.

**13.4.2** The successive audits will be performed by one of the involved CB signatories to the MRA on a one year rotation basis (January to December).

The first audit is performed by the primary Certification Body (pCB) within 6 months after the applicant requested to benefit from the Agreement.

**13.4.3** The audit schedule for regular audits is organized once a year by the involved CBs.

**13.4.4** The normal frequency of the audit is once in a period of a year; an additional audit could be planned by the same CB depending on the audit results. Each year one certification body is in charge of auditing the manufacturing site for the current year by rotation of the involved CB.

**13.4.5** The audits will be normally announced but at the initiative of the certification body may be performed unexpectedly.

When preparing the audit, the auditor in charge of the audit can ask the certification bodies the complete list of certified products covered by this MRA.

**13.4.6** In order to be able to perform the audit for each product, a file of drawings approved by the appropriate certification bodies shall be kept at the manufacturing plant.



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**13.4.7** For the performance of audits under this audit procedure the following documentation shall be used

- Additional audit records
- Non-compliance report
- List of deviations
- Generic product assessment report
- Specific product assessment report

The CBs agree to use the English language for the audit report.

#### 13.5 Requirements for qualification of auditors

Auditors shall be competent in all quality assurance techniques covered by ISO 19011. These competencies cover the understanding and practical application of disciplines througout the life-cycle of product or service delivery.

Specific techniques namely include: quality system principles, quality control, product verification and the control of measuring and test equipment; non-conformity and corrective action.

Auditors must have a minimum of three years experience in the field of auditing, and/or of testing and/or construction/production in the mechanical industry.

Auditors who meet the above requirements shall perform satisfactorily three audits in the lock area under supervision. In case the experience has been acquired in the lock industry the minimum number of satisfactory audits may be reduced to one.

A list of auditors who fulfil the qualifications shall be kept by each CB and made available upon request to other EFSG CBs involved in this field.

#### 13.6 Evaluation of the audit report (see Annex C)

For a given year a certification body is responsible for the evaluation of the surveillance of all products in question manufactured at one site.

It is up to the responsibility of this certification body which has performed the audit to monitor the decision whether a follow-up audit will be necessary.

This will be done within 3 weeks after the audit report has been issued and the answers by the applicant to the non-compliances have been received.

Where necessary the follow-up audit for a given year will be performed by the same certification body.

#### 14. COMMUNICATION RULES BETWEEN APPLICANTS AND CB

In respect of the information of the CB (such as modification of products, introduction of new manufacturing plant, etc.) the requirements of information between applicants and CB remain as regulated by CB for its own certifications.



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#### **15. LIAISON GROUP**

A Liaison Group can be established at the discretion of the PDGs and comprise the PDG and invited representatives of industry and other stakeholders.

The Liaison Group is the mechanism by which the EFSG engages with industry and other relevant stakeholders to ensure that the technical contents of the EFSG agreement and applicable documents are appropriate to the needs of the market.

Important - The acceptance of test results relies on the defined processes within this MRA being followed. Applicants are advised that deviations from the defined process can lead to the refusal to accept results and subsequently repeat testing.

In the following Annexes, "CB" is understood to be a participating certification body which has signed this MRA.

The Primary certification body (pCB) is that certification body having signed the EFSG MRA for HSL and where the customer applicant has first applied for certification, or which was chosen by the applicant by FS-145-EFSG.

The additional CB (aCB) is a certification body having signed the EFSG MRA HSL to which the customer applied for multiple certification.

pATL is the main testing laboratory under EFSG which has performed initial testing.

aATL is the associated laboratory of the aCB under EFSG

Annex A: Initial certification of High Security Locks

Annex B: Modification of products and /or prolongation of certificate

Annex C: Non-compliance definition and follow-up of audits

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## ANNEX A to MRA HSL Initial certification of High Security Locks

**Situation 1:** The applicant asks for certification from all certification bodies before testing.



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**Situation 2**: The applicant asks for certification from other certification bodies after having been awarded a certificate from a certification body (pCB)



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#### ANNEX B to EFSG Agreement HSL Modification of products and/or prolongation of certificates

Note:

It is very important for traceability and to have good overview of the situation that a lock has exactly the same design and specification for all CBs. So, if a modification is valid for one certification body only, it shall not be possible to find it on the certificates issued in the frame of EFSG Agreement. A separate certificate must be issued and the locks hall have a different "name" or reference.



<sup>(2)</sup> Note:

pCB evaluation is made in relation with the pATL having performed the initial test (paper work, design assessment or retesting). If retesting, test program shall be shared with other involved CB/ATL The evaluation report can be issued either by pCB or by the pATL having performed the initial test.

<sup>(3)</sup> Note: If the analysis shows that the product does not meet the requirements of the expected class and the applicant proposes modification to improve it, then an exchange of extra information between the involved CBs shall be required.

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## ANNEX C to EFSG Agreement HSL Non-compliance definitions and follow up of audits

## AUDIT

Deviation, non-compliances stated by the auditor at the end of the audit (\*A) during the closing meeting, with a list of deviations - given to the holder of certificate at the end of the audit) and the non-compliance report(s) in case of non-compliance quoted 3 or 4.

(initial) Proposals can be done during the audit and immediate actions taken when required.

In every case the non-compliances have to be reported and the initial proposal added as remark if applicable

Final proposal for corrective actions in response to non-compliances after the audit to be sent by the holder of certificate to the Auditor within 4 weeks, (an extension of time can be asked by the holder of certificate if necessary). This does not relieve the holder of certificate for implementing immediate actions taken when required.

#### Analysis of the answers (to be done by the auditor) (Assessment whether the proposals clear the non-compliances or not) and recommendations to the CB (to be done by auditor)

Complete report

Information to other CB(s) (< 3 weeks after the audit is closed)

## Decision by the CB

Keep the certification, new audit, suspension, withdrawal, other decision (1)

<sup>(1)</sup>Note: In case of suspension or withdrawal the decision must be in agreement by all involved CBs.

(\*A):

1 = compliance

2 = suggestion for improvement

3 = minor non-compliance

4 =major non-compliance

For 3 and 4 actions have to be taken by the holder of certificate, such actions have to be reported to the auditor within 4 weeks following the incoming of the audit report.

2 in the list of deviations (audit summary); 3 and 4  $\Rightarrow$  non-compliance report and in the list of deviations.