European Fire and Security Group
The Secretary
Amsterdamer Strasse 172-174
D-50735 Köln, GERMANY

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)	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 (CB), which are members in the European Fire and Security Group (EFSG) and associated testing laboratories (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 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 manufacturers 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 to EN 1300.

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 laboratories and their testing capabilities.

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

4 APPLICATION FOR MULTIPLE CERTIFICATION

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

The manufacturer shall give permission to the CBs and ATLs to exchange information (e.g. test results and technical documentation) between the signatories of this agreement.

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.

The limitations of the testing laboratories are documented in the table 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 5, October 2016.

The agreement is intended to be used for multiple certification applications made after the date of publication. Tests 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 (CB) and their respective associated testing laboratory (ATL) named on the cover page.

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
- EN ISO 9001 Quality management system – Requirements

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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 ATLs which have signed this MRA.

On the basis, the CBs accept test results and test reports issued by LABs as described below. The basis of the testing and certification are the above-mentioned standards.

For the tests of EN 1300 the CB will accept the test results once the tests have been successfully performed by only one ATL. For the required manipulation resistance test and destructive burglary resistance test of EN 1300, (independently of the method of assessing those requirements), the CB can ask for the performing of the manipulation resistance test and destructive burglary resistance test of EN 1300 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.

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 apply to those CBs whose certificates are required, indicating a preference for where the product is to be tested (see flow charts in Annexes A and B).

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

- Examination of specimen(s) and documentation
- Performing the tests required in EN 1300
- Issue of the test report.

The CB studies 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 EN 1300 by a second ATL is needed.
- Check if the testing is performed on the basis of the standards defined in clause 11 of this Agreement. 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 laboratory of 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. If the applicant has applied for certification at several CBs, he shall inform the primary CB concerning the co-ordination of product audits (see clause 13).

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 CB1 (normally the Primary Certification Body (pCB)). Should a second CB certify the same product later on the "ending date" shall correspond to that of the certificate issued by the CB1 (see Annex A and B)

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 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 chosen by the applicant.

-2- “Second case”

The applicant already holds product certification 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 chosen by the applicant amongst the Certification Body(-ies) having already approved the applicant. The chosen CB will transfer the relevant information regarding the applicant to other CB(s).

-3- “Third case”

The applicant holds no product certification 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 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 manufacturer 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.

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 manufacturer 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.

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.

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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.

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

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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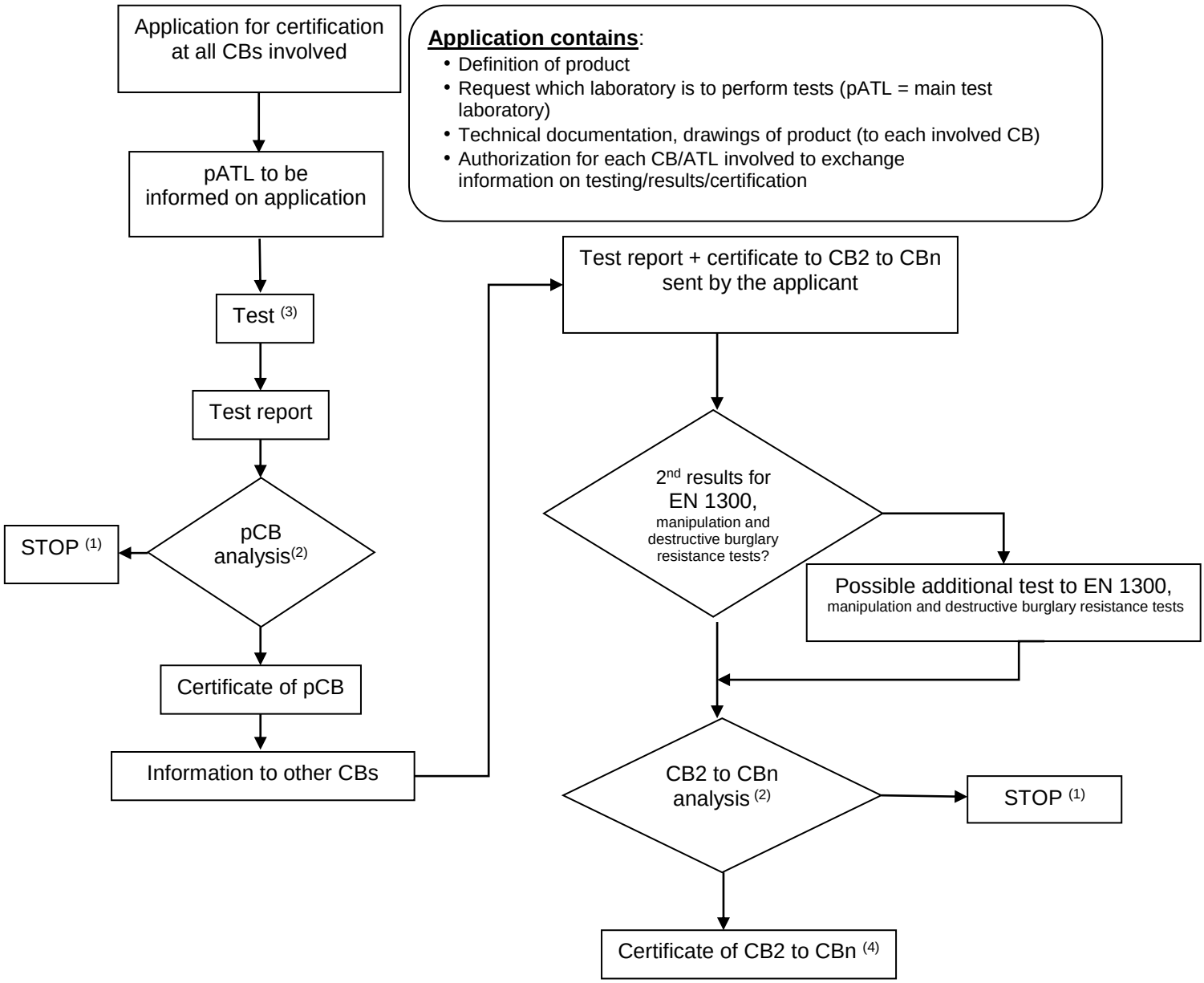
ANNEX A to MRA HSL
Initial certification of High Security Locks

Situation 1: The manufacturer asks for certification to all certification bodies before testing.



(1) *Note: If the test report shows that the product does not meet the requirements of the expected class and the manufacturer proposes modification to improve it, then the modification procedure applies.*

(2) *Note: If the certification rules or national requirements asks for other requirements than EN standard, additional tests can be carried out.*

(3) *Note: Test program shall be shared with other involved CB/ATL when variants are submitted.*

(4) *Note: All the certificates shall end at the same date.*

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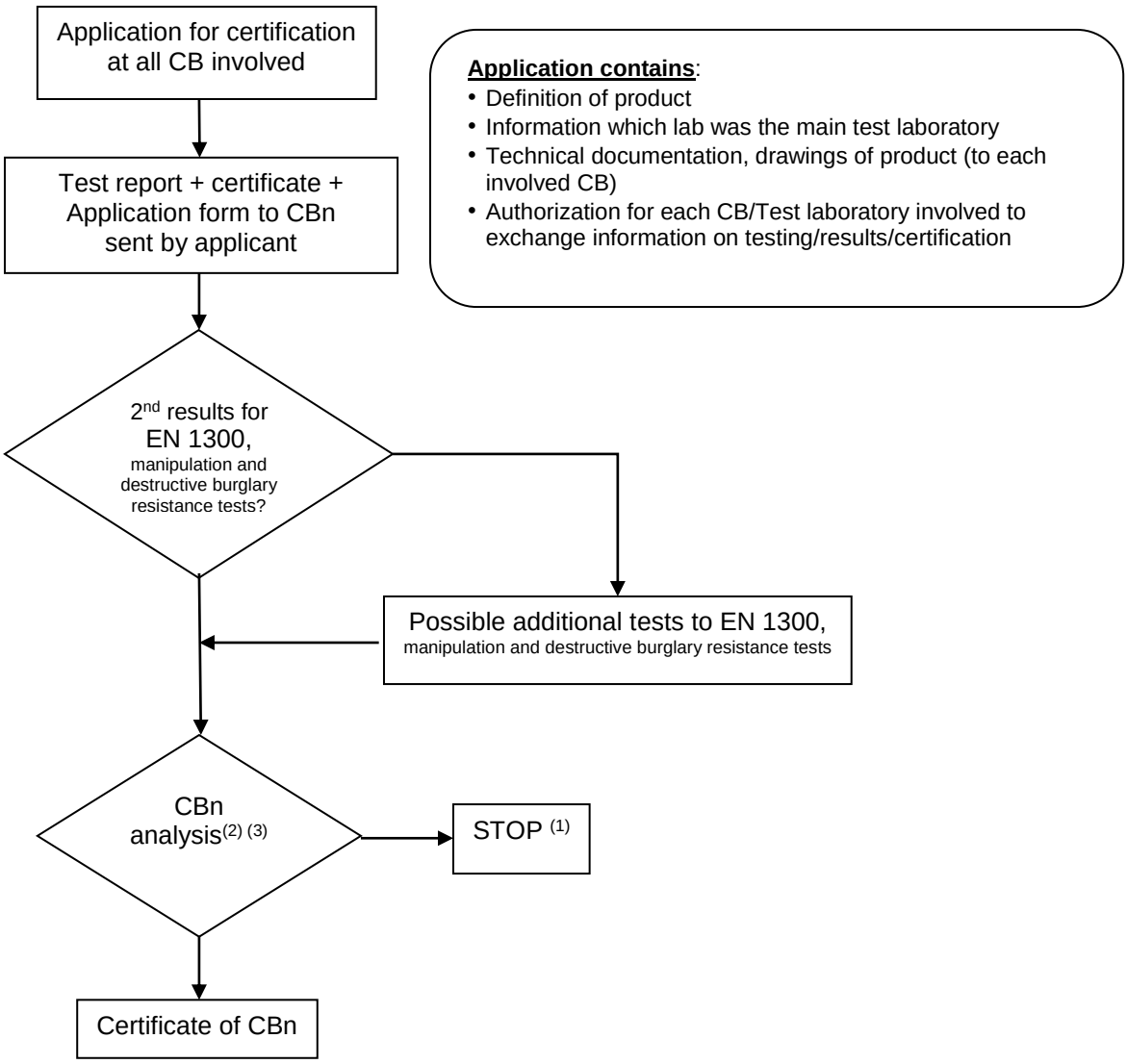
Situation 2: The applicant asks for certification to other certification bodies after having been awarded a certificate from a certification body (pCB)



(1) *Note:* *If the test report shows that the product does not meet the requirements of the expected class and the manufacturer proposes modification to improve it, then the modification procedure applies.*

(2) *Note:* *If the certification rules or national requirements asks for other requirements than EN standard, additional tests can be carried out.*

(3) *Note:* *Information about test program can be shared with other involved CB/ATL when variants are submitted*

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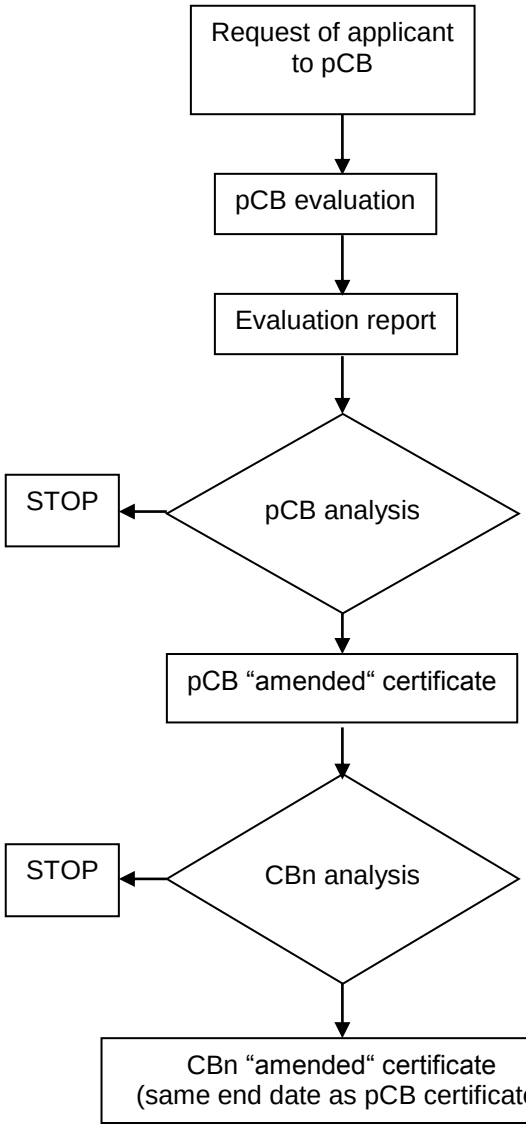
ANNEX B to EFSG Agreement HSL
Modification of products and/or prolongation of certificate



Step 1: The applicant shall declare that this request is valid also for CBn,

Step 2: 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*

Step 3: The evaluation report can be issued either by pCB or by the pATL having performed the initial test.

Step 4:

Step 5: It is the task of the applicant to send the "amended" certificate and the revised technical documentation (including if applicable – design assessment) to the other involved certification bodies

Step 6:

Step 7: 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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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

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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.

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

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Complete report

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

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Decision by the CB
Keep the certification, new audit, suspension, withdrawal, other decision [(1)]

[(1)]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 ⇒ non-compliance report and in the list of deviations.