CCE COORDINATION BULLETIN

BULLETIN NUMBER 2022-2

Methods for Conducting Third Party Verifications

Significant effort has been directed at determining where in the TPV program there can be allowances for the use of alternatives to on-site conformance evaluations for facilitating the work of the CCEs. Current CCE Bulletin Number 2022-1 provided for use of a "virtual" approach primarily because of COVID as an alternative to onsite conformance evaluation. Bulletin 2022-1 is scheduled to expire August 31, 2022.

After a lengthy review of recommendations by a special task group on this issue, the 3-A SSI Board of Directors (BOD) formally approved a series of revisions to the current TPV Manual to recognize alternatives to on-site conformance evaluations. The specific alternatives approved by the Board are shown on pages #2 and #3 of this Bulletin and are effective immediately upon receipt of this Bulletin.

3-A SSI staff is currently working to incorporate these new provisions in the TPV Manual; however, the details contained in this Bulletin are applicable immediately. A meeting of the CCEs will be scheduled in the very near future to provide a more detailed briefing and discussion of these important additions to the TPV manual.

One of the important provisions approved by the Board of Directors addresses the handling of TPVs in situations where a current travel restriction or advisory issued by any government agency prevents a CCE from traveling to a manufacturer's location for a TPV requiring on-site physical inspection of equipment and physical audit of facility, see **Special Considerations for Travel Restrictions.**

Another new provision addresses symbol holders that obtained a new 3-A Symbol or certificate by use of virtual methods during the "COVID" period. There was agreement among the 3-A SSI leadership that, barring any travel restrictions, all manufacturers requesting a new symbol authorization must have a physical onsite TPV conducted. With an allowance for use of virtual methods for five-year renewals, there is a potential for some new symbols granted during the "COVID" period to have not had a physical onsite TPV conducted of the equipment and manufacturing facility. This new provision requires such holders with no history of an on-site TPV, to obtain the necessary on-site physical inspection of equipment and physical audit of facility on or before the five-year renewal.

It is important to note that on-site TPVs are encouraged in all cases, but it is also important to incorporate the lessons learned during the "CODVID" period into the 3-A TPV program, which is the intent of this Bulletin. If you have questions, please contact TPV Coordinating Committee Chair Allen Sayler or 3-A SSI Director of Standards and Certification, Eric Schweitzer.

Recommended Changes to TPV Inspection Procedures
Approved by 3-A SSI Board of Directors - August 25, 2022

Definition of terms

On-site: At facility where equipment is manufactured.

Remote: At a location other than facility in which equipment is manufactured.

Physical: Tangible interaction with equipment, facility, persons, or process.

Virtual method: Using cameras, screens, projectors, or other technology to allow something that does not physically exist at a CCE's location to be made to appear so.

Audit of EDTCF: Conducting a systematic review of manufacture's Engineering Design and Technical Construction File to verify conformance with the 3-A standard or accepted practice. EDTCF may be electronic or paper hard copy.

Change of sanitary significance: Changes of design, fabrication methods, fabrication location, or materials of construction, that affect the hygienic or operational characteristics of the equipment, or changes to quality control processes that affect the manufacture's ability to verify consistent conformance to the 3-A Sanitary Standard or 3-A Accepted Practice

Methods of TPV Inspection & Audit

A.1 On-site physical inspection of equipment & physical audit of facility: CCE travels to manufacturing site for physical inspection of equipment to verify conformance with the 3-A Sanitary Standard or 3-A Accepted Practice. A complete audit of manufacturing facility and quality control process shall be performed to verify manufacturer's competence in maintaining compliance. An audit of EDTCF is included.

A.2 Remote physical inspection of equipment & Virtual audit of manufacturing facility: CCE performs physical inspection of equipment at remote location of manufacturer's & CCE agreement. An audit of the manufacturing facility and quality control process using virtual methods shall be performed to verify manufacturer's competence in maintaining compliance. An audit of EDTCF is included.

A.3 Remote or on-site physical inspection of equipment with no manufacturing facility audit: CCE inspects physical equipment at location of manufacturer's and CCE agreement. An audit of manufacturing facility and quality control process is not conducted. An audit of EDTCF is included.

A.4 Virtual Equipment inspection and audit of manufacturing facility: CCE performs inspection of equipment using virtual methods. An audit of the manufacturing facility and quality control process using virtual methods shall be performed if required. An audit of EDTCF is included.

A.5 Audit of EDTCF only: Audit of EDTCF is performed. No inspection of equipment or audit of manufacturing facility or quality control process is required.

Types of TPV inspection

B.1 *New Symbol from new applicant (including for rubber 18- and plastic 20-):* A manufacturer with no prior 3-A symbol authorizations requesting a new TPV for first time

Methods permitted:

- A.1

B.2 *New Symbol from existing license holder:* manufacturer with current symbol authorization requests TPV for a different product line to the same 3-A Sanitary Standard or 3-A Accepted Practice or a different standard or accepted practice.

Methods permitted:

- A.1
- A.2 Permitted when same facility and process is used on new equipment as existing authorized equipment
- A.3 Permitted when same facility and process is used on new equipment as existing authorized equipment
- A.5 for 18- rubber and 20- plastic only

B.3 *Change of sanitary significance, or addition of variation:* When a manufacturer with current symbol authorization makes a change of sanitary significance or adds additional model sizes or configurations to their authorization.

Methods permitted:

- A.1
- A.2
- A.3 Permitted when no change to manufacturing facility or process has taken place
- A.4 Permitted if CCE determines that change(s) can be effectively inspected in a virtual manner to ensure conformance to applicable 3-A SSI requirements. Manufacturing facility audit may not be required if the CCE determines change does not affect manufacturing or QC process.
- A.5 Permitted when change is minimal, such as a change in material of construction that will not affect hygienic attributes of equipment, or design change that is easily verified on drawings.

B.4 Five (5)-year renewal: A TPV re-inspection shall be performed at least every five years from the date of the previous inspection.

Methods permitted:

- A.1
- A.2
- A.4 Permitted, provided audit of the manufacturing and QC is conducted with the equipment inspection
- Note: For 18- rubber and 20- plastic renewals, no equipment inspection is required.

B.5 New 3-A standard revision: A TPV shall be performed prior to symbol holders renewing authorization to a new revision of a 3-A Sanitary Standard or 3-A Accepted Practice.

Methods permitted:

- A.1
- A.2
- A.3
- A.4
- A.5 Note: It is expected that A.1, A.2, A.3, A.4 would not be required unless A.5 shows possible non-conformance with revisions to standard.

Special Considerations for Travel Restrictions: In the case of a current travel restriction or advisory issued by any government agency that prevents a CCE from traveling to a manufacturer's location to conduct an on-site TPV requiring inspection method A.1 (see above), the CCE may submit a written request for use of inspection method A.4, to the TPV Coordinating Committee. The TPV Coordinating Committee shall review such requests in a timely manner and provide a decision in writing, on a case-by-case basis.

A.1 Requirement If No Record of On-site TPV: Any manufacturer who has received a 3-A Symbol authorization or a RPSCQC requiring use of inspection method A.1 and has no record of an on-site TPV, shall have a TPV conducted by method A.1 on or before the date of their five-year renewal TPV (see "Special Considerations" above if applicable).