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ICAR Sub-Committee for Animal Identification. Meeting 30/06/2016

Re-testing/validation of animal ID devices for national Competent Authorities - DRAFT protocols

(Proposal by Kaivo Ilves. English review by HenryR & queries marked in blue)

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Concept:

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ID device re-testing and validation is a voluntary service for authorities or other service users.

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The aim of re-testing is to ensure that devices available in the relevant market(s) remain compliant with the appropriate ISO and ICAR test protocols.

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Principles:

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1. The device re-testing or validation service request should document for ICAR:
 - a. Identity of the requester or contact within the organisation making the request.
 - b. Name of Device Manufacturer.
 - c. Type of product (e.g. bolus, injectable, visual eartag, RFID eartag, etc.).
 - d. Product code (if exists, as originally granted by ICAR & published on ICAR website).
 - e. Commercial name of the product (as assigned by manufacturer, e.g. in sales catalogue, etc.).
 - f. Country and/or Region this product is being used/obtained.
 - g. The plant or factory in which the product was produced (if known).
 - h. Method of selling to market:
 - i) "Direct" from manufacturer to farmer
 - ii) Via "Local Authority" to farmer
 - iii) Via "Local Dealer" (who is not an appointed representative of the manufacturer)
 For methods (ii) and (iii) local contacts should obtain the samples of the product(s) to be tested (see 'Sampling Protocols' below).

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2. ICAR will maintain a database of at least these items:

Manufacturer	Product	Product code	Name of the product	country	region	plant	Selling method	Last test

3. Sampling Protocols

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- a. Products should be collected by the service user, organisation or body making the request. It is a basic requirement that the product samples are obtained by the service user from the market not from the manufacturer.

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- b. The number of product examples or units required to be submitted for testing can be determined by referece to the appropriate test protocol documents.

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- c. The service user or national authority making each request is responsible for the intervals at which they require re-testing to be carried out.

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- d. Joint Requests. If the service is used by more than one country, the countries may jointly apply for the product re-testing. In such cases the samples should be collected from the relevant countries by an arrangement that gathers examples from the different geographical regions as agreed between the authorities making such a joint request. ICAR will bill its costs to one of the nominated countries. Cost sharing

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between the joint applicants should be by mutual agreement between those applicants.

- e. Before the test ICAR may seek confirmation from the manufacturer that the product obtained for re-testing / validation from the specific country or market, is indeed a product that the manufacturer recognises as being or has been marketed in that country. (N.B. Silence or no reply would be considered as confirmation!).

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4. Testing

- a. Product(s) will be tested and the results compared with original or earlier results for the same product(s) by a certified laboratory designated by ICAR.
- b. Basic Tests. A basic device re-test or validation test will be carried out by using the Limited Test protocol for the RFID conformance tested devices and/or the Preliminary Assessment protocol for the material performance of the tested devices.
- c. Additional Testing. The service user may also request or specify additional validation test protocols, beyond those specified in the limited Test protocol or Preliminary Assessment protocol, provided those additional test(s) are defined in other existing ISO or ICAR higher level test protocols. The designated test laboratory will then quote the additional cost(s) in the test plan they submit to Service-ICAR. Service-ICAR may then pass on those additional costs to the service user making the request.
- d. Bar Code testing. ????mentioned during last tele-conf.?

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5. Publication and Reporting of results

- a. The test results will be compiled into a confidential report. A copy of which will then be transmitted to the service user(s) who signed the application. The service user or applicant then becomes the owner of that report. Service-ICAR will retain a confidential copy of the report for reference and comparison purposes.
- b. Test results relating to the same product(s), but submitted in requests from different applicants may be compared by Service ICAR or its designated laboratories acting on its behalf. In cases where the test results reveal differences between samples for the same product(s) between tests from different applicants or service users the test report will detail those differences and their implications. It will then become the responsibility of respective authority who submitted the request(s) to take any initiative they require to resolve or explain those differences with the relevant manufacturer, to the mutual satisfaction of those parties. If the case reveals a misuse of ICAR device certification protocols, then the case must be reported to Service-ICAR. ICAR has an existing established procedure for the handling of misuse cases. HR comment – I'm not sure how the above comparison principle works? Subcommittee to please review if my words convey the meaning intended? How does comparison between tests requested by different authorities reconcile with the confidentiality clauses?

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6. Costs

- a. Service-ICAR is the responsible body for the contracting of tests under the various ICAR standards for ID devices. Service-ICAR will bill each device re-test or validation test, including the cost of any additional test protocols mentioned above on the

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principle that the service user pays. Based on the laboratory test fee plus any applicable Service-ICAR administrative fee.

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7. Confidentiality

- Neither ICAR nor Service-ICAR will publish the names of the authorities using their ID device re-testing or validation services. Nor share the results of tests requested by independent authorities directly with the relevant device manufacturers.
- Specific information about which products have been submitted for testing from individual market(s) or countries from where those tests are requested shall be kept confidential. (Meaning ICAR will not publish information concerning which product(s) are used in which market(s)).
- All test results shall be kept confidential between ICAR and the authority making the request with the exception of comparisons between tests of the same products mentioned under 'Publication and Reporting of Results'. Specific test results are returned only to the authority making the request(s) and providing the specific samples]

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