

## CRR-G-053-E

### Guidance for CRR Designation/Recognition of Designated Bodies in Ireland (IE-DeBos)

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# 1 Introduction

This document gives guidance and explanation on the CRR process for designation of Designated Bodies (DeBos) in Ireland – IE-DeBo. It cannot replace additional self-study of the applicable background documentation.

According to the Interoperability Directive (EU) 2016/797 and S.I 477 2020 Article 16(3), the CRR is the organisation responsible for Designation of DeBos in the Republic of Ireland (IE-DeBo). The CRR uses the recognition process when designating such bodies.

Where an applicant is not a registered company with at least one critical location in the EU or in EFTA, the applicant should be prepared and able to demonstrate through the assessment that, in the event of any non-conformity to the IE-DeBo requirements and/or any resulting accident/incident, affected parties will have equivalently effective access to a legal remedy as against them, where so entitled.

The criteria against which DeBos are assessed is based on good industry practice as defined in ISO 17065 and ERA document 000MRA1044.

The process for recognition of DeBos as described in this guidance is based on good industry practice as defined in ISO 17011.

*Note: While the CRR use ISO 17011 as good industry practice for recognition, the recognition of IE-DeBos is not and should not be confused with accreditation.*

The language for IE-DeBo recognition shall be English. All interviews, meetings, application documents, Applicant processes within the scope of recognition and all evidence for recognition purposes shall use the English language.

At any point in the application, initial assessment process, or after recognition if there is evidence of fraudulent behaviour, if the Applicant intentionally provides falsified information or if the Applicant conceals relevant information, the CRR may reject the application, terminate the assessment process, or withdraw the recognition.

## 2 Abbreviations and Definitions

Term / Abbreviation	Meaning
Activities	The conformity assessment Activities of the DeBo. These are listed as options in the Application form CRR-F-058. In addition, the Activities for which a DeBo is recognised are listed on the Recognition Programme, on the Recognition Certificate and also on the CRR website via the published Recognition Certificate.
Activity Categories	Railway subsystems as defined in IOD Annex II
Applicant	The organisation applying for or already granted recognition from the CRR in accordance with this guidance.
Consultancy	participation in a) the designing, manufacturing, installing, maintaining, or distributing of a certified product or a product to be certified, or b) the designing, implementing, operating, or maintaining of a certified process or a process to be certified, or c) the designing, implementing, providing, or maintaining of a certified service or a service to be certified [ISO 17065]
Critical Locations	Locations where Key Activities are conducted
CRR	Commission for Railway Regulation, formerly the Railway Safety Commission (Irish NSA). Within this guidance document the CRR are the recognition body.
DeBo	Designated Body
EA	European Accreditation
EFTA	European Free Trade Association
ERA	The European Union Agency for Railways
EU	European Union
Extending recognition	A decision made by the recognition committee to extend the scope of a recognition (locations and/or Activities)
FOI	Freedom of Information
Granting recognition	A decision made by the recognition committee to grant an initial recognition or a re-recognition
IAF	International Accreditation Forum <a href="https://iaf.nu/en/iaf-documents-categories/">https://iaf.nu/en/iaf-documents-categories/</a>
IE-DeBo	Designated Body in the Republic of Ireland
ILAC	International Laboratory Accreditation Cooperation <a href="https://ilac.org/publications-and-resources/">https://ilac.org/publications-and-resources/</a>
Impartiality	Objectivity with regard to the outcome of a conformity assessment activity. Note: Objectivity can be understood as freedom from bias or freedom from conflicts of interest. [ISO17000] The presence of objectivity. Objectivity is understood to mean that conflicts of interest do not exist or are resolved so as not to adversely influence the Activities of the body. [ISO 17065]
Independence	Freedom of a person or organization from the control or authority of another person or organization. e.g., A conformity assessment body can be independent from the person who is the object of conformity assessment or from the organization providing the object of conformity assessment. [ISO17000]
Initial Recognition	The first Recognition of an Applicant as IE-DeBo, or the recognition as IE-DeBo after the lapse of a previous Recognition as IE-DeBo

<b>Term / Abbreviation</b>	<b>Meaning</b>
Key Activities	<p>A subset of Activities as defined in IAF/ILAC-A5:11/2013</p> <p>For certification bodies seeking IE-DeBo Recognition Key Activities include:</p> <ul style="list-style-type: none"> <li>• policy formulation and approval;</li> <li>• process and/or procedure development and approval;</li> <li>• initial assessment of competence, and approval of technical personnel and subcontractors;</li> <li>• control of the monitoring process of competence of personnel and subcontractors and its outcomes;</li> <li>• contract review including technical review of applications and determining the technical requirements for certification activity in new technical areas or areas of limited sporadic activity;</li> <li>• decision on certification including technical review of evaluation tasks.</li> </ul>
Locations	Critical Locations and Other Locations.
Maintaining recognition	A decision made by the recognition committee to maintain the validity of a recognition, usually after a surveillance assessment
Major Non-Conformity	A non-conformity resulting from a systemic issue. A group of Minor Non-Conformities may also be considered as a Major Non-Conformity.
Management System	Set of interrelated or interacting elements of an organization to establish policies and objectives and processes to achieve those objectives
Minor Non-Conformity	A non-conformity resulting from a sporadic lapse
NB-Rail	NB-RAIL – Recommendation For Use (RFU) <a href="http://nb-rail.eu/co/co_en.html">http://nb-rail.eu/co/co_en.html</a>
NoBo	Notified Body
NR	National Rule
NSA	National Safety Authority
RDD	Reference Document Database ( <a href="https://rdd.era.europa.eu/rdd/">https://rdd.era.europa.eu/rdd/</a> )
Recognition Committee	The Committee established by the CRR for DeBo Recognition decisions. See section 5.6
Opportunity for Improvement	an area highlighted where, in the opinion of the Assessor/Assessment Team, system or business improvement can be achieved by the company. Typically, this is phrased as a recommendation, the merits and implementation of which should be decided by the IE-DeBo organisation.
Reduction of Scope of Recognition	Changes to the scope of Recognition either at the request of the Applicant or through a decision by the CRR Recognition Committee (locations and/or Activities)
Restoring recognition	A decision made by the recognition committee to restore the validity of a recognition after a previous suspension
SMS	Safety Management System
Subsystem	Legally defined sub-element of the Rail System, see IOD, Annex II
Suspension of Recognition	An immediate ceasing of the validity of a Recognition through a decision by the CRR Recognition Committee. This may be temporary or permanent. It may be reversed by the recognition committee through a decision to restore the recognition
TAF	Telematic Applications Freight
TAP	Telematic Applications Passengers
Third-party conformity assessment activity	<p>conformity assessment activity that is performed by a person or organization that is independent of the provider of the object of conformity assessment and has no user interest in the object.</p> <p>Note: to entry: The first-, second- and third-party descriptors used to characterize conformity assessment activities in relation to a given object are not to be confused with the legal identification of the relevant parties to a contract.</p> <p>[ISO17000]</p>

<b>Term / Abbreviation</b>	<b>Meaning</b>
Withdrawal of Recognition	Retrospective ceasing of the validity of a Recognition through a decision by the CRR Recognition Committee. This is for the life of the Recognition and would invalidate all certification activities of the Applicant made under that Recognition
Witnessing	Observation by the recognition body of a conformity assessment body while it is carrying out conformity assessment activities within its scope of recognition

### 3 References

<b>IOD</b>	DIRECTIVE (EU) 2016/797 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 11 May 2016 on the interoperability of the rail system within the European Union (recast)
<b>RSD</b>	DIRECTIVE (EU) 2016/798 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 11 May 2016 on railway safety (recast)
<b>S.I. No. 477/2020</b>	Statutory Instrument - European Union (Interoperability of the Rail System) Regulations 2020
<b>S.I. No. 176/2021</b>	Statutory Instrument - European Union (Interoperability of the Rail System) (Designated Bodies) (Fees) Regulations 2021
<b>EA-2/20 G:2020</b>	Consultancy, and the Independence of Conformity Assessment Bodies
<b>ERA Doc /000MRA1044/</b>	Requirements for Conformity Assessment Bodies Seeking Notification
<b>/S.I. No. 30 of 2014/</b>	Freedom of Information Act 2014
<b>/IAF/ILAC-A5:11/2013/</b>	IAF/ILAC Multi-Lateral Mutual Recognition Arrangements (Arrangements): Application of ISO/IEC 17011:2004
<b>/IAFMD4:2018/</b>	IAF Mandatory Document for the use of Information and Communication Technology (ICT) for Auditing/Assessment Purposes
<b>/IAFMD12:2016/</b>	Accreditation Assessment of Conformity Assessment Bodies with Activities in Multiple Countries
<b>/ILAC-P15/</b>	Application of ISO/IEC 17020:2012 for the Accreditation of Inspection Bodies
<b>/ISO 9000/</b>	Quality management systems — Fundamentals and vocabulary
<b>/ISO 9001/</b>	Quality management systems - Requirements
<b>/ISO 17000/</b>	Conformity assessment - Vocabulary and general principles
<b>/ISO 17011/</b>	Conformity assessment — Requirements for accreditation bodies accrediting conformity assessment bodies
<b>/ISO 17020/</b>	Conformity assessment — Requirements for the operation of various types of bodies performing inspection
<b>/ISO 17021/</b>	Conformity assessment - Requirements for bodies providing audit and certification of management systems
<b>/ISO 17025/</b>	General requirements for the competence of testing and calibration laboratories
<b>/ISO 17065/</b>	Conformity assessment —Requirements for bodies certifying products, processes, and services

## 4 Requirements for Recognition as IE-DeBo

The criteria against which DeBos are assessed is based on good industry practice as defined in ISO 17065 and ERA document 000MRA1044. Both documents refer to ISO 17020 (Type A) for Inspection, to ISO 17021-1 for Audit and to ISO 17025 for Laboratory Testing. In addition, associated guidance from CRR, ERA, EA, IAF, ILAC and NB-Rail are also included.

In this respect, the Applicant must demonstrate that they have:

- A suitable management system;
- A sufficient number of competent staff;
- The necessary level of independence and impartiality.

The criteria are listed in the CRR Checklist CRR-CL-007 which the Applicant must complete as part of the application.

From 01/01/2025 onwards the CRR will apply the requirements of 000MRA1044 ver. 2.0. to all IE-DeBos including for new applicants and for surveillance activities.

The Applicant is expected to demonstrate within their application and during the CRR assessment that they have in advance of the CRR assessment performed a full internal audit of the conformity of their management system with the IE-DeBo requirements.

For the initial assessment the Applicant must be able to demonstrate the effectiveness of their management system in the context of IE-DeBo requirements for the full scope of

- locations and
- activities

for which IE-DeBo recognition is sought.

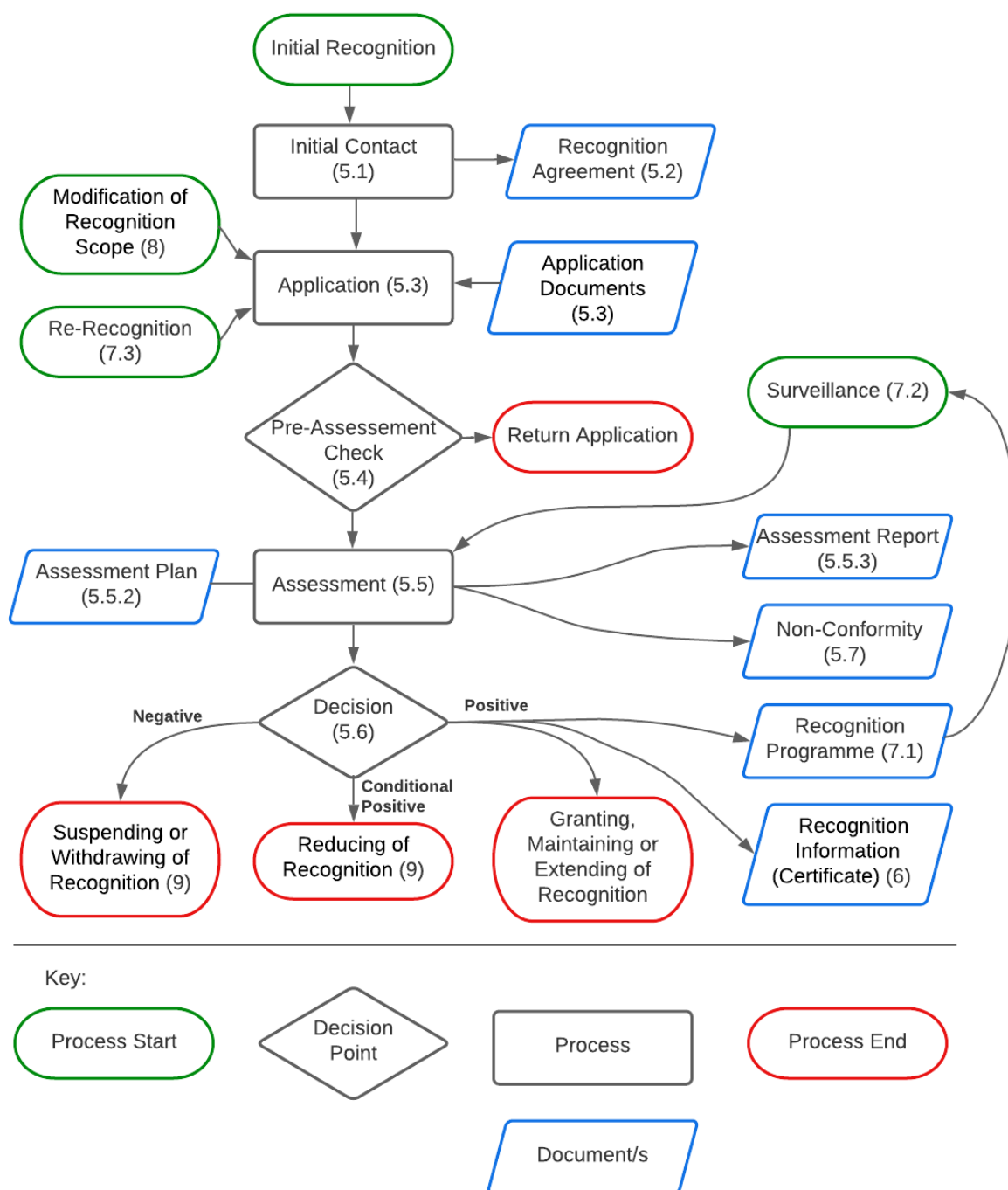
This demonstration may be either through examples from similar schemes undertaken by the organisation, or through fabricated project records which demonstrate the proposed approach the organisation would use for their IE-DeBo scheme. Similar schemes would be NoBo or DeBo and include inspection, audit and certification. The projects presented, whether they are actual or fabricated, must cover all the IE-DeBo scopes applied for and must include a full set of project records, i.e., if ENE scope is applied for, suitable ENE project(s) must be presented which demonstrate the full process. It is also noted any records presented from actual projects may have any confidential content redacted so long as the effectiveness of the management system can be demonstrated.

In accordance with IOD and the ERA assessment scheme (ERA document 000MRA1044) Applicants for IE-DeBo must be a Third-Party Conformity Assessment Body. Applicants shall not be engaged in consultancy on the Technical Scope for which they will be/are recognised as IE-DeBo. Further guidance on independence and impartiality may be found in EA-2/20 G:2020.

Full details on the recognition requirements are provided in CRR Checklist (CRR-CL-007) which may be obtained upon request to the CRR.

## 5 Process for Recognition as DeBo

The overview of the CRR's recognition of DeBos scheme is shown in the process flow chart in Figure 1 below. Elements of the process flow chart are numbered with a reference to a section of this document which describes that element.



**Figure 1** Process Flowchart for IE-DeBo Recognition

## 5.1 Initial Contact

The Applicant should make initial contact with the recognition body (CRR) to inform them of the intention to make an application. Contact details may be found on the CRR website ([www.crr.ie](http://www.crr.ie)). The CRR will provide the Applicant with the application form (CRR-F-058), the application checklist (CRR-CL-007) and the evidence form (CRR-F-057).

## 5.2 Recognition-Agreement

The CRR will establish a legally enforceable recognition-agreement with each Applicant. This agreement must be signed before the commencement of any recognition. The agreement requires the Applicant to conform to at least the following:

- a) to commit to continually fulfil the requirements for IE-DeBos for the scope of the recognition;
- b) to commit to provide evidence of fulfilment of these requirements upon request from the CRR;
- c) agreement to adapt to any changes to the recognition requirements;
- d) to cooperate as is necessary to enable the CRR to verify fulfilment of requirements for recognition;
- e) to provide access to the Applicant's personnel, locations, equipment, information, documents, and records as necessary to verify fulfilment of requirements for recognition;
- f) to arrange the witnessing of conformity assessment activities when requested by the CRR;
- g) to have, where applicable, legally enforceable arrangements with their clients that commit the clients to provide, on request, access to CRR assessment teams to assess the Applicant's performance when carrying out conformity assessment activities at the client's site;
- h) to claim recognition only with respect to the scope for which it has been granted;
- i) to commit to follow the CRR policy for the use of the recognition symbol where such a symbol is provided to the Applicant;
- j) not to use its recognition in such a manner as to bring the CRR into disrepute;
- k) to inform the CRR without delay of significant changes relevant to its recognition;
  - Such changes include but are not limited to:
    - a. its legal, commercial, ownership or organisational status;
    - b. the organisation, top management, and key personnel;
    - c. resources and location(s);
    - d. scope of recognition;
    - e. other matters that can affect the ability of the Applicant to fulfil requirements for recognition.
- l) to pay fees as determined by the CRR (see section 11);
- m) to assist in the investigation and resolution of any complaints.

*Note: A failure to comply with the recognition agreement may invalidate the recognition from the date of the failure.*

*Note: Changes under item (k) above may require a new recognition agreement.*

## 5.3 Application

An authorised representative of the Applicant must make a formal application and shall use the application form (CRR-F-058), the application checklist (CRR-CL-007) and the evidence form (CRR-F-057).

The Applicant shall demonstrate, using evidence, that the recognition requirements are fulfilled using the CRR templates provided.

## **5.4 Pre-Assessment**

This is an administrative activity and does not constitute as an assessment. Prior to the assessment, the CRR must:

- perform a high-level check of the viability of the application;
- determine the resources required to perform the assessment;
- and prepare for the assessment.

### **5.4.1 CRR Pre-Assessment Checks**

The CRR will review the application and supporting documents to determine the suitability of the application. This will typically be performed by spot checking of the submitted documentation. If this does not permit a conclusive judgement, the CRR may require additional activities to support this check, which may include; meetings with staff and/or requests for additional documentation.

If it is not possible for the CRR by these activities, to reach the understanding that the Applicant has provided a complete and valid application, the CRR must render the submitted application inadequate and hand back the application documents to the Applicant.

If the application is found to be suitable the CRR will communicate this to the Applicant.

### **5.4.2 Preparation for Recognition Assessment**

The CRR will appoint an assessment team consisting of a lead assessor and, where required, a suitable number of assessors and/or technical experts for the scope to be assessed. When selecting the assessment team, the CRR will ensure that the expertise brought to each assignment is appropriate. In particular, the team as a whole:

- a) shall have appropriate knowledge of the specific scope of recognition;
- b) shall have understanding sufficient to make a reliable assessment of the management system, competence, and independence and impartiality of the Applicant to operate within its scope of recognition.

The CRR will inform the Applicant of the names of the members of the assessment team and any observers, and the organization(s) they belong to, sufficiently in advance to provide the opportunity to lodge an objection to the appointment of any particular team members or observers with supporting justification.

The recognition programme will then be developed based on the scope of the recognition as requested in the application, including locations, personnel, assessment techniques and requirements for witnessing. The CRR will confirm with the Applicant, the details of the recognition programme. At this time, the recognition programme will detail the information required by the assessment team for the initial assessment. Later the recognition programme will be developed to include the ongoing activities for the recognition cycle. This will be completed after the assessment and before the issuing of a recognition certificate, see section 7.1.

## 5.5 Recognition Assessment

The CRR scheme for assessment consists of two stages which results in a structured report outlining the results and recommendations from the assessment team.

### 5.5.1 Recognition Assessment Stage 1

The CRR having performed the pre-assessment (section 5.4) and found the application to be suitable can then begin assessment stage 1.

This is a document assessment of the application against the applicable criteria (see section 4) including review of all relevant documented information supplied by the Applicant. This assessment is to determine conformity of the Applicant's management system, including management of competence, and of independence and impartiality. The CRR may require additional activities to support this assessment, which may include; site visits, interviews with staff, meetings with staff and/or requests for additional documentation.

As before if it is not possible for the CRR by these activities, to reach the understanding that the Applicant conforms to the requirements for IE-DeBo, the CRR must render the submitted application inadequate, stop the recognition assessment and provide a report to the certification committee.

If the findings permit, the assessment will continue to assessment stage 2. The results of assessment stage 1 will be reported in writing within the Assessment Report, see Section 5.5.4.

### 5.5.2 Assessment Stage 2

Assessment Stage 2 is typically performed on site consisting of site inspection, interviews with staff, observations, meetings with staff and/or requests for additional documentation as required. Assessment stage 2 may in extraordinary circumstances be performed remotely if the objectives of the assessment can be achieved and at the discretion of the assessment team. In this context the CRR will employ the principles of IAF MD 4. This assessment is to check that the organisation is compliant with its management system including the requirements for competence and independence and impartiality within the scope of the recognition.

The CRR will develop in cooperation with the Applicant an assessment plan for the assessment stage 2. In producing this assessment plan the CRR will attempt to facilitate the availability of the Applicant's staff and facilities. The agreed assessment plan will be provided to the Applicant and will be the basis of the assessment activities.

The assessment plan will include: the purpose of the assessment, recognition requirements, personnel involved, and assessment schedule and activities including witnessing where applicable.

*Note: During the validity of the recognition all Activity Categories within the scope of recognition must be witnessed unless justified otherwise. Consideration will be given as to which Activities are sampled during the first assessment.*

An opening meeting will be performed as the first step of the stage 2 assessment in accordance with the assessment plan. At the opening meeting, the purpose of the assessment, recognition requirements, personnel involved, and assessment schedule and activities will be clearly defined in agreement with the assessment plan. In addition, requirements for site access and health and safety

(e.g., Personal protective equipment, safety briefing and any other safety requirements for the locations) must be agreed.

If the Applicant fails to provide sufficient access to relevant documentation, staff and facilities, the assessment team may need to defer or stop the assessment activities.

The assessment team will analyse all relevant information gathered prior to and during the assessment to determine the Applicant's ability to conform to the recognition requirements within its scope of recognition.

At the end of the assessment a closing meeting will be performed. The assessment team will present the findings identified during the assessment and detail in writing any nonconformities. An opportunity will be provided for the Applicant to seek clarification on the findings including the nonconformities, if any, and their basis. The Applicant should accept these non-conformities in writing.

In exceptional circumstances, the assessment team may agree in coordination with the Applicant to alter the assessment plan to extend the timeline. This may be allowed to facilitate additional assessment activities, such as additional interviews, collection of and/or analysis of evidence. In this case a summary meeting will be held in lieu of the original closing meeting. At the summary meeting the new time and date will be set for the closing meeting.

### **5.5.3 Witnessing**

During the validity of the recognition all Activity Categories must be witnessed unless justified otherwise. The planned schedule for witnessing over the recognition schedule will be recorded in the recognition programme.

*Note: As witnessing is only possible for a recognised DeBo, the first witnessing activities can only be performed after initial recognition.*

Witnessing activities will be conducted in the same way as stage 2 assessment (see section 7). For each witnessing activity there will be an assessment plan, an assessment report, and non-conformity forms as applicable, these will be separate to those produced for stage 2 assessments.

Witnessing assessment activities must be scheduled to coordinate with the Applicant's Activities. The Applicant will be informed of the intent to perform the Witnessing and the preferred Activities and must cooperate in this regard. Where witnessing activities are scheduled, the Applicant must inform the CRR of any changes to the activity schedule in good time.

### **5.5.4 Report/s**

Subsequent to the completion of the assessment stage 2 or witnessing activities the assessment team will produce a draft assessment report and provide this to the Applicant. The Applicant shall provide an improvement plan for any identified non-conformities and may provide comments for correction of the draft report. See section 5.7 for guidance on non-conformities.

The CRR will then insert the improvement plan into the report or add it to the report as an appendix and will issue the report to the Applicant and to the recognition committee. The report will include the assessment findings and a recommendation to the recognition committee on whether to grant recognition, its validity, and any conditions recommended.

## 5.6 Recognition Decision

All decisions are made by a CRR recognition committee which is independent of the assessment team. The assessment team will provide a report including a recommendation on the recognition scope, recognition validity and any conditions. The committee, prior to making a decision, must be satisfied that the reported information is adequate to demonstrate that the requirements for IE-DeBo within the scope of recognition sought are fulfilled by the Applicant. If needed, the committee may seek further clarification from the assessment team. If the committee by these activities cannot determine that the requirements for IE-DeBo within the scope of recognition sought are fulfilled by the Applicant then they may refuse the application for recognition, reduce the scope of recognition, suspend recognition, or withdraw a recognition.

Failure of the applicant to pay any fees for IE-DeBo recognition as determined by the CRR would also result in a decision by the recognition committee to refuse the application for recognition, suspend recognition or withdraw a recognition.

The recognition Decision will be one of the following:

- Refuse Application for Recognition;
- Grant Initial Recognition;
- Maintain the Recognition;
- Expand the scope of Recognition;
- Reducing the scope of Recognition;
- Suspend the Recognition;
- Restore the Recognition;
- Grant Re-Recognition; or,
- Withdraw Recognition.

For each of these cases the decision will be communicated to the Applicant in writing including justification where required.

If the recognition committee grants an initial recognition, expands the scope of recognition, reduces the scope of recognition, restores the recognition or grants a re-recognition, a recognition certificate (see Section 6) shall be issued to the Applicant and a copy shall be uploaded or updated on the Reference Document Database (RDD) (<https://rdd.era.europa.eu/rdd/>) website and to the CRR website ([www.crr.ie](http://www.crr.ie)) as applicable.

If the recognition committee suspends or withdraws a recognition, the recognition certificate status will be updated as such on the Reference Document Database (RDD) (<https://rdd.era.europa.eu/rdd/>) website and to the CRR website ([www.crr.ie](http://www.crr.ie)) as applicable.

Where a reduction, suspension or withdrawal of a recognition is requested by the Applicant, this may be performed without the need of a committee decision.

For the initial assessment, a major non-conformity or a large number of minor non-conformities would cause the recognition committee to refuse an application for recognition.

For information on the CRR appeals process see Section 11.

## 5.7 Non-Conformity

Whenever a non-conformity is identified it is issued to the Applicant via a non-conformity form using the CRR template CRR-F-059. When a non-conformity form is issued it will include:

- a reference to the application;
- the specific activity through which the non-conformity was identified;
- the assessment team members involved;
- the specific requirement (clause) and location concerned;
- a description of the non-conformity; and
- time limits for corrective action and effectiveness check.

### 5.7.1 Non-Conformity Action Plan

After a non-conformity is issued the Applicant must confirm their agreement with the finding via the non-conformity form to the assessment team.

Once the wording of the non-conformity is agreed by the Applicant, they must take the necessary actions to analyse and correct the non-conformity. The Applicant must:

- analyse the scope of the non-conformity (extent) including:
  - the scope as identified during the assessment and any other areas that may have be affected by the same or a similar issue;
  - what is affected: procedures, processes, other documents, implementation, etc.;
  - who and where: affected locations, departments and activities (including similar activities that may be affected);
- analyse the cause of the non-conformity including identification of the root cause/s;
- describe the correction which:
  - fully explains how the non-conformity was rectified;
  - provides a completion date;
- describe the corrective action which:
  - fully explains how re-occurrence will be avoided;
  - makes reference to any documents which were changed or developed in order to close the non-conformity;
  - provides a completion date.

*Note: the issue may be caused by and/or may affect:*

- *Documentation/Processes/Procedures:*
  - *E.g. lack of documented process;*
  - *E.g. ambiguity in process;*
  - *E.g. incomplete process;*
  - *E.g. process impossible/impractical to comply with;*
- *Implementation:*
  - *E.g. process exists but staff did not know about process;*
  - *E.g. process exists but staff did / could not follow process.*

### 5.7.2 Non-Conformity Close Out

From the time of issue of the Non-Conformity, the maximum time limits for analysis, correction and implementation of corrective action are 2 months for a major non-conformity and 4 months for a minor non-conformity.

The Applicant must provide evidence to the CRR by the stated time limit to demonstrate that the non-conformity has been resolved.

This evidence must be sent as a complete package against each non-conformity, clearly referencing the related non-conformity. These packages of evidence may be provided via hard or soft copy and must include:

- The non-conformity sheet with all Applicant sections complete and all evidence referenced;
- Copies of all relevant documented evidence of new / revised QMS documents (e.g. updated procedures);
- Copies of all other relevant documented evidence (e.g. updated project conformity assessment checklists or reports).

When this evidence is provided to the CRR, the CRR will perform a review and determine if the evidence is considered sufficient. If the non-conformity is found to be unresolved and the time limit for the non-conformity close out has passed, this may result in a new non-conformity, or may require conditions to be placed upon a certificate, or the suspension or the withdrawal of a certificate or no recognition granted.

*Note, decisions on additional conditions, on suspension or on withdrawal or on no recognition granted are at the discretion of the decision committee, see section 5.6.*

## 5.8 Opportunity for Improvement

During an initial assessment, surveillance or witnessing activity the assessment team, in addition to non-conformities, may identify areas where there is an 'opportunity for improvement'. An 'opportunity for improvement' (OFI) may be defined as follows;

*an area highlighted where, in the opinion of the Assessor/Assessment Team, system or business improvement can be achieved by the company. Typically, this is phrased as a recommendation, the merits and implementation of which should be decided by the IE-DeBo organisation.*

Such 'recommendations' will be advised to the IE-DeBo at the activity closing meeting and/or in any supporting report. They will not be formally monitored by recognition body (CRR).

## **6 Recognition Information (Certificate)**

Where the committee make a decision to grant a recognition, the CRR will provide an IE-DeBo Recognition Certificate and Statement of Designation as IE-DeBo to the Applicant.

The effective date of recognition will be the date of or a date after the decision. The certificate will be based on and linked to the recognition programme, see section 7.1. The certificate validity will be based on the ongoing activities of the recognition programme.

See section 12 for information on IE-DeBo identifier numbers.

## **7 Recognition cycle**

The CRR provide recognition with a validity of up to 5 years. During this time, the CRR will perform Surveillance assessments. While a maximum validity of 5 years can be provided this is usually only available for mature organisations and re-recognition. For this purpose, a mature organisation is one where there is evidence of ongoing compliance with the management system relevant to the scope of application.

The start and end date for the validity will be stated on the recognition certificate.

At the end of the validity of a recognition the Applicant may apply for re-recognition. Re-recognition follows the same process as an initial recognition with the benefit that the CRR is already familiar with the Applicant. As such and pending changes to the Applicant's management system and scope of recognition, the time taken for re-recognition may be less than that of an initial recognition.

### **7.1 Recognition Programme**

After the decision (for an initial assessment or re-recognition) and before the issuing of a recognition certificate a recognition programme will be finalised and issued, including locations, activities, personnel, assessment techniques and requirements for witnessing. During the validity of the recognition all 'Activity Categories' must be witnessed unless justified otherwise. The recognition programme is applicable throughout the recognition cycle and the certificate validity will be based on the ongoing activities of the recognition programme.

The recognition programme will lay out the activities for assessing the Applicant during the recognition cycle to ensure that the Applicant's Activities (representative of the scope of recognition at the relevant locations) are assessed during the recognition cycle. Factors such as knowledge obtained by the CRR about the Applicant's management system and Activities and the performance of the Applicant shall be considered by the CRR when establishing the recognition programme.

The recognition programme will ensure that the requirements within the scope of recognition are assessed with prioritisation based on identified risk of non-compliance with recognition requirements. A sample of the scope of recognition will be assessed annually through surveillance assessments.

Any changes to the scope of recognition throughout the recognition cycle may require updates to the recognition programme.

## **7.2 Surveillance**

Surveillance requires stage 1 and stage 2 assessment, however where the Applicant has not changed its management system the stage 1 assessment may be reduced. The CRR will determine the extent of stage 1 assessment and will communicate this to the Applicant.

The CRR, will approach a surveillance assessments and decision in the same way as for an initial recognition, see sections 5.5 and 5.6.

The CRR may conduct extraordinary assessments as a result of complaints or changes, or other matters that may affect the ability of the Applicant to fulfil requirements for recognition. These may be through scheduled surveillance assessment or may require additional assessment activities.

## **7.3 Re-Recognition**

If the Applicant wishes to renew the recognition cycle, they should apply to the CRR at least 16 weeks before the end of the current recognition cycle. The Applicant should apply in the same way as for an initial assessment application, as described in section 5. It is recommended that the Applicant reuse the checklist with updates for any changes to the organisation and management systems. Typically, the Applicant will have transferred the initial checklist into a live compliance matrix after the initial assessment, in this case the compliance matrix may be used to update the application.

The CRR, will approach a re-recognition in the same way as for an initial recognition but will also take into consideration the information gathered from assessments previously performed over the recognition cycle. See sections 5.5 and 5.6.

## **8 Modification of Recognition Scope (extension and/or reduction)**

If an Applicant requests the extension or reduction of the scope of a recognition this may be performed as part of a surveillance assessment, as part of a re-recognition, or as a separate assessment between assessments at the request of the Applicant. Extension and/or reduction of scope may include changes to Activities or locations.

Based on the scope of the extension, the CRR will determine the extent of assessment required.

The application should be made in accordance with section 5.3. The CRR will approach assessments and decisions related to modification of scope in the same way as for an initial recognition, see sections 5.5 and 5.6.

Changes to the scope of recognition throughout the recognition cycle may require updates to the recognition programme reissue of the recognition certificate.

Additionally, if there is a change to the legal name or status of the applicant the following may be required in order to update the recognition certificate:

- Updated recognition agreement
- Confirmation of the location and scope of activities
- A marked up/updated version of the original checklist submitted for review, including an updated organisational chart.

## **9 Suspending, Withdrawing or Reducing Recognition**

The CRR recognition committee will make all decisions related to the suspension, withdrawal, reduction of a recognition or refusal of a recognition. Grounds for such action include circumstances where:

- an Applicant has failed to meet the requirements of recognition;
- an Applicant has failed to abide by the rules for recognition (recognition agreement);
- there is evidence of fraudulent behaviour, or the Applicant intentionally provides falsified information or conceals information.

The Applicant may at any time request the suspension, withdrawal, or reduction of their recognition. Where a reduction, suspension or withdrawal of a recognition is requested by the Applicant, then this may be performed without the need of a committee decision.

The CRR recognition committee may lift the suspension of a recognition. Justification for such action would require evidence demonstrating that the Applicant has reversed the circumstances which originally led to the suspension and that the Applicant is conforming to the recognition requirements with all recognition programme activities up to date. Assessment activities may be required to verify this.

## **10 Confidentiality and Freedom of Information**

The CRR will, subject to its obligations under law, including the Freedom of Information Act 2014, take all reasonable steps to seek to maintain the confidentiality of any information considered by an Applicant to be confidential or commercially sensitive (sensitive information) within the application/recognition process.

The Applicant must clearly identify such sensitive information and specify the reasons for its sensitivity.

The CRR will consult with any Applicant who supplies such sensitive information in the event that a Freedom of Information request is received that relates to it. In the event that the CRR decides to release particular information relating to an Applicant, that Applicant will have an opportunity to appeal the CRR's decision to the Office of the Information Commissioner.

For more information see the CRR website (<https://www.crr.ie/corporate-governance/>)

## **11 Fees**

The CRR charges the Applicant applying to be designated as IE-DeBo, in respect of assessing such an application a basic fee of €15,000 covering the first 10 days of assessment and, thereafter, a daily fee of not more than €1,650 for each subsequent day or part thereof of assessment [S.I. No. 552/2025].

The CRR charges a recognised IE-DeBo a fee of not more than €1,650 for each day of assessment in respect of any surveillance activity it undertakes on that IE-DeBo [S.I. No. 552/2025].

## **12 IE-DeBo Identifier**

Where recognition is granted, IE-DeBos will be provided with a unique identifier of the format:

IEXX

where XX represents the unique IE-Debo number issued to that organisation. The unique IE-DeBo number is contained in the recognition certificate and statement of designation as IE-DeBo. See section 13.

IE-DeBos shall subsequently use the RFU-STR-001 (NoBo) numbering method for their IE-DeBo certification documents with the 'NNNN' section replaced by their IE-DeBo unique identifier 'IEXX'.

## **13 IE-DeBo Recognition Certificate and Statement of Designation as IE-DeBo Numbering**

IE-DeBo recognition certificates and statement of designation as IE-DeBo issued by the CRR shall use the following numbering format:

IE-DeBo-XX-YYYY-NN

where XX represents the unique IE-Debo number issued to that organisation,

YYYY is the year of issue,

and NN is the consecutive number of the recognition certificate issued by the CRR in the year indicated.

## **14 Complaints and Appeals**

Complaints and appeals may be made to the CRR via the CRR process available on the CRR website:

<https://www.crr.ie/publications/complaints-appeals/>

## **15 Further Clarification**

Further clarification on these Guidelines can be sought from the CRR.