4.2 Management of impartiality

a) Impartiality – BMH-BMI’s clients are treated fairly and without bias. An emphasis is placed on integrity while working with clients. Certification process and decisions - BMH-BMI shall not provide any other products or services which could compromise the confidentiality, objectivity or impartiality of its certification process and decisions. 
1) BMH-BMI shall not supply or design products of the type it certifies.
2) BMH-BMI shall not provide advice or consulting services to the applicant as to methods of dealing with matters, which are barriers to the certification requested.
3) BMH-BMI shall not provide any other products or services, which could compromise the confidentiality, objectivity or impartiality of its certification process and decisions.

b) Granting, Maintaining and Withdrawing Certification Summary – BMH-BMI makes its services accessible to all applicants, whose activities fall within its declared field of operation. Furthermore, application is not conditional to the size of the supplier or membership of any association or group, nor is certification conditional upon the number of certificates already issued. Granting certification consists of an initial detailed inspection of the facilities and the manufacturer’s quality system. This is in conjunction with the applicable contractual agreements. The products submitted for certification must be successfully qualified to the respective Product Standard. Upon a successful completion of this process, certification will be granted. Maintenance of Certification consists of ongoing inspection and quality assurance with conformance to the applicable Product Standards, and other governing agencies. Conditions, Procedures and Policies regarding these are included in the BMH Quality System with specific procedures applied to the following:
   o Complaints Process & Resolution Procedures
   o Appeals Process & Procedure
c) The structure of BMH-BMI/PTL shall foster confidence in its certifications. In particular, the certification body shall identify the management (committee, group or person) which shall have overall responsibility for all of the following BMH-BMI:

1) performance of testing, inspection, evaluation and certification as defined in this Guide,
2) formulation of policy matters relating to the operation of the certification body,
3) decisions on certification,
4) supervision of the implementation of its policies,
5) supervision of the finances of the body,
6) delegation of authority to committees or individuals as required to undertake defined activities on its behalf,
7) technical basis for granting certification;

The Supervision and implementation of the Certification Programs are as follows:
Refer to CDP 0009 for detailed information pertaining to BMH-BMI Personnel Requirements.

Chief Operating Officer (COO) – The COO is responsible for the overall operation of and the administration duties to the BMH-BMI office. The General Manager is responsible for conducting yearly reviews of each employee. The BMH-BMI COO, Western Region is responsible for the performance review of the Program Director.

Chief Technical Officer (CTO) for support services including the Certification Programs.

Quality Control: Responsible for implementation of the Certification Programs as it applies to the Quality System. The COO through Technical, Quality Control and Supervisory staff delegates defined activity decisions made by the Management Staff Committee.
Local staff ranges from the Chief Operating Officer to the Laboratory and Field Technicians. Staff at the local level devotes virtually 100% of their time to certification programs in one capacity or another.

Certification is granted to subscribers based on qualification of their facility and type of product as it relates to the applicable standard. These are evaluated by the CTO, COO and Laboratory Manager and presented in the Management Staff Committee. The COO evaluates the evidence presented and grants certification to the subscriber.

- Travis Snapp - Manager - COO Deputy Quality Control Manager
BMH-BMI level: The administrative facilities for the operation of certification programs at BMH-BMI include a management staff, secretarial staff, a staff computer programmer, designated-trained technicians, specialized software, computers and other clerical equipment. This combination allows the ability to maintain and process records and reports in varying formats that meet differing standard reporting requirements. The records are stored for a minimum of five years. The testing conducted is viewed as proprietary and is only released to the client and those parties the client designates.

Chief Financial Officer (CFO): The CFO is responsible for overall finances of BMH-BMI. The implementation of this is carried out by Certified Professional Accountants provide expertise in all aspects of financial transactions with BMH-BMI. They assure that AR & AP are conducted appropriately with modern tracking systems. They are also responsible for accreditation program payments.

d) Legal Entity and Section 4.5.3 b) of this guide. BMH-BMI provides a documented structure to safeguard impartiality including provisions to ensure the impartiality of the operations of the certification body. To accomplish this Benchmark International is active in a number of organizations that represents a wide cross section of outside interests and certified manufacturers. These include and are not limited to the International Wood Products Association (IWPA), California Air Resources Board (CARB), Task Force for the Lacey Act, PS-1 and PS-2 Standing Committee and US Environmental Protection Agency (US EPA). This provides a comprehensive participation of all parties significantly concerned in the development of policies and principles regarding the content and functioning of the certification system. Refer to “Outside Interests Procedures” and ISO 17025 QM 4.1.3. Safeguards also include judgment on whether all parties significantly concerned in the system are able to participate. All identifiable major interests are given opportunity to participate, such that a balance of interests, where no single interest predominates, is achieved. These parties are among group to include but are not limited to manufacturers or suppliers, users, conformity assessment experts in which a reasonable representative cross section is included.

e) In addition BMH-BCI is presently developing a system through the BMH Website and other activities to involve outside interests to fulfill ISO/IEC 17025 (Guide 65) requirements. The objective provides another means to safeguarded impartiality. BMH-BCI will provide the opportunity for parties significantly concerned in the development of policies and principles regarding the content and functioning of the certification system. This process will be open to identifiable major interests provided
given the opportunity to participate, and that a balance of interests, where no single interest predominates. Participants may include but are not limited to manufacturers or suppliers, users, consumers, conformity assessment experts, etc. BMH-BMI presently maintains its structure to safeguard impartiality including provisions to ensure the impartiality of its operations; this structure enables the participation of all parties significantly concerned in the development of policies and principles regarding the content and functioning of the certification system; Decisions of Certification are made after evaluation of manufacturer facilities and qualification test data by the CTO. Such certification is based on the separation of Evaluation process from that of the Testing and Inspection process.

4.2.1 Certification activities by BMH will be undertaken to evaluate all processes and activities to protect impartially.

4.2.2 BMH will be responsible for the impartiality of our certification activities and will not allow commercial, financial or other pressures to compromise impartiality.

4.2.3 BMH identifies risks to its impartiality on an ongoing basis. This includes those risks that arise from our activities, from its relationships, or from the relationships of our personnel; however, such relationships do not necessarily present a certification body with a risk to impartiality.

It is understood that a relationship that threatens the impartiality of the certification body can be based on ownership, governance, management, personnel, shared resources, finances, contracts, marketing (including branding), and payment of a sales commission or other inducement for the referral of new clients, etc.

4.2.4 If a risk to impartiality is identified, BMH will demonstrate how it eliminates or minimizes such risk. This information shall be made available to the mechanism specified in 5.2.

4.2.5 BMH top management is commitment to impartiality.

4.2.6 BMH and any part of the same legal entity and entities under its organizational control (7.6.4) will not

a) be the designer, manufacturer, installer, distributor or maintainer of the certified product (for process or service, see the particular requirements in b) and c));

b) be the designer, implementer, provider or maintainer of the certified service;

c) be the designer, implementer, operator or maintainer of the certified process;
d) offer or provide consultancy for Evaluation to its clients related to the certified products, services or processes.

e) offer or provide management system consultancy or internal auditing to its clients where the certification scheme requires the evaluation of the client’s management system.

This does not preclude:

- the possibility of exchange of information (e.g. explanations of findings or clarifying requirements) between the certification body and its clients and
- the use, installing and maintaining of certified products which are necessary for the operations of the certification body.

Furthermore BMH-BMI ensures that each decision on certification is taken by a person(s) different from those who carried out the evaluation **BMH-BMI is the primary decision-maker** within Benchmark Holdings-Benchmark International, Inc. for all Certification Activities.

- The BMH-BMI Eugene operation is fully covered for liability by BMH-BMI.

- BMH-BMI has sufficient **financial stability and resources** required to operate a product certification system. BMH-BMI, formerly PSI - Pittsburgh Testing Laboratory, has been in business since 1881 and remains one of the largest testing laboratories in the US.

- The Eugene operation has been certifying wood products since 1956 and maintains a fully equipped wood products laboratory and staff. BMH-BMI is fully **staffed with personnel** having the necessary education, training, technical knowledge and experience for performing certification functions relating to the type, range and volume of work performed.

- BMH-BMI employs a sufficient number of personnel having the necessary education, training, technical knowledge and experience for performing certification, inspection and testing functions. These functions are sufficient to properly incorporate type of services required, to include a full range and volume of work performed included within these programs.

- **BMH-BMI has an integrated Quality System incorporated into the QM.** This comprehensive document assures confidence in its ability to operate a product certification. BMH-BMI operates under ISO/IEC Guide 65, ISO/IEC 17020 and ISO/IEC 17025 covering various elements of the quality system. Specifically under Guide 65, BMH-BMI is accredited by the Standards Council of Canada. Additional Accreditations include Accreditations with the International Accreditation Service (IAS) Report No.
BMH-BMI follows policies and procedures that distinguish between product certification and other activities in which BMH-BMI is engaged. BMH-BMI Distinguishes Certified and Non Certified Services. Refer to CDP 0027

BMH-BMI Senior Executives and Staff are free from any commercial, financial and other pressures which might influence the results of the certification process. This is detailed under Certification Program Policies with a specific requirements under CDP 0023 and CDP 0024; Section 7 of ISO 17025 Conflict of Interest.

BMH-BMI maintains a managerial review for the certification process. As such, no committees are formed for this process. The managerial review is comprised of the COO and the CTO. The managerial review of personnel comes under the requirements of item “m” noted above in which there are no commercial, financial or other pressures that influence decisions. As a true Third Party Certification and Testing Organization BMH-BMI and their employees are forbidden to engage in any activity that would result in biased decisions.

BMH-BMI insures that activities of related bodies do not affect the confidentiality, objectivity and impartiality of its certifications, and it shall not
1) supply or design products of the type it certifies,
2) give advice or provide consultancy services to the applicant as to methods of dealing with matters which are barriers to the certification requested,
3) provide any other products or services which could compromise the confidentiality, objectivity or impartiality of its certification process and decisions;

BMH-BMI as a Certification Body ensures that all activities related to the certification process are confidential in nature. Refer to CDP 0024 A. Confidentiality, Procedure and Agreement ISO 17025 QM Confidential Information.
As a third party Certification Body, BMH-BMI maintains full objectivity and impartiality of Certifications.

BMH-BMI maintains policies and procedures for the resolution of complaints, appeals and disputes received from suppliers or other parties regarding the handling of certification or other related matters. These Policies and Procedures are detailed in the Complaint Procedures, Appeals & Disputes.
4.2.7 BMH ensures that activities of separate legal entities with which BMH or the legal entity of which it forms relationships do not compromise the impartiality of its certification activities.

4.2.8 When the separate legal entity in 4.2.7 offers or produces the certified product or offers or provides consultancy related to the certified product BMH management personnel and personnel in the review and certification decision making process shall not be involved in the activities of the separate legal entity. The personnel of the separate legal entity shall not be involved in the management of the BMH, the review, nor certification decision.

4.2.9 BMH's activities will not be marketed or offered as linked with the activities of an organization that provides consultancy. A certification body shall not state or imply that certification would be simpler, easier, faster or less expensive if a specified consultancy organization were used.

4.2.10 Within a period of two years BMH, personnel will not be used to review or make a certification decisions for a product for which they have provided consultancy. This period of time is considered sufficient so that the review or decision does not compromise impartiality.

4.2.11 BMH will take action to respond to any risks to its impartiality arising from the actions of other persons, bodies or organizations of which it becomes aware.

4.2.12 All BMH personnel, either internal or external, or committees, who could influence the certification activities, shall act impartially.

   a. Certification process and decisions - BMH-BMI shall not provide any other products or services which could compromise the confidentiality, objectivity, or impartiality of its certification process and decisions.
   b. BMH-BMI shall not supply or design products of the type it certifies.
   c. BMH-BMI shall not provide advice or consulting services to the applicant as to methods of dealing with matters, which are barriers to the certification requested.
   d. BMH-BMI shall not provide any other products or services, which could compromise the confidentiality, objectivity or impartiality of its certification process and decisions.