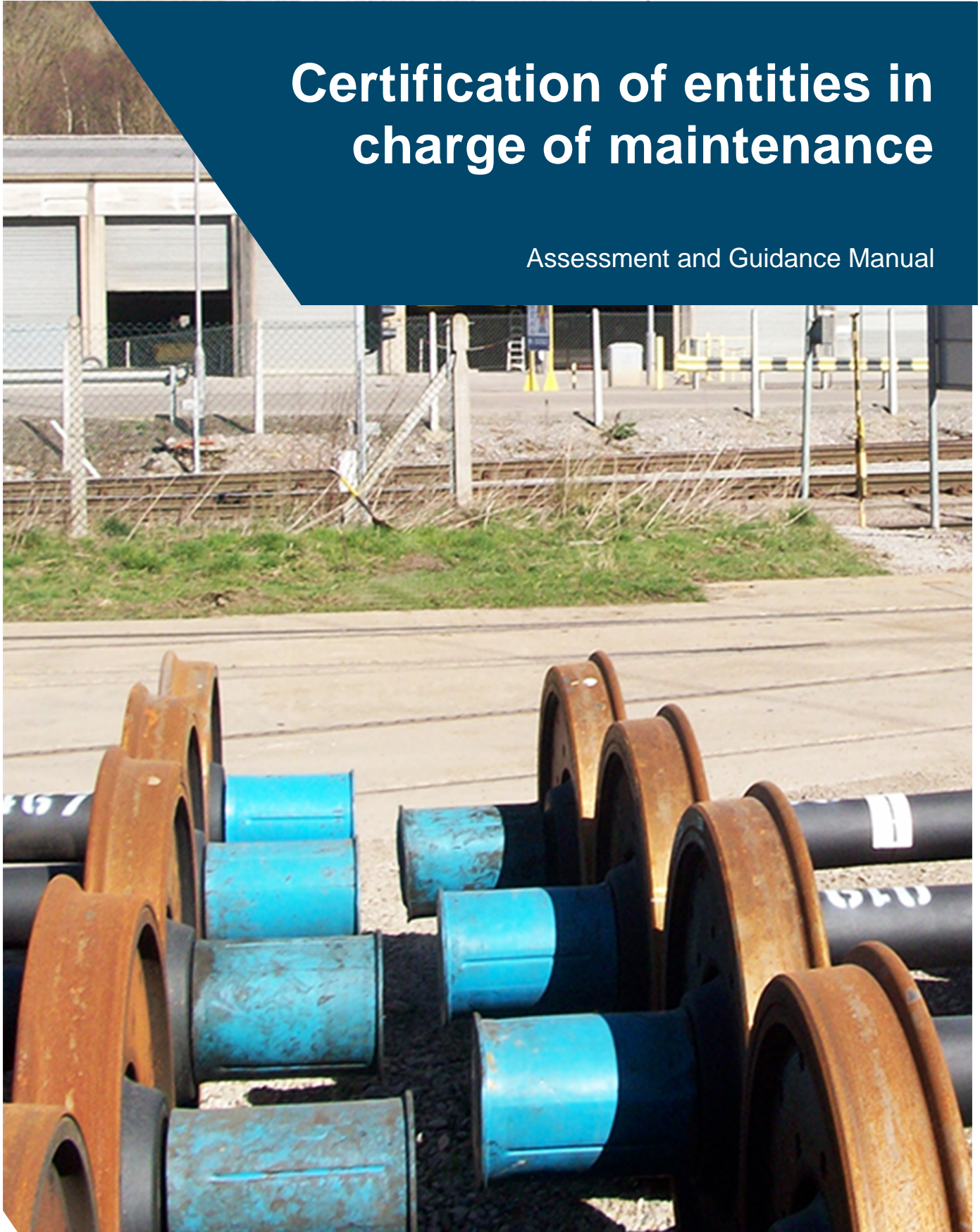


Certification of entities in charge of maintenance

Assessment and Guidance Manual



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This guidance is issued by the Office of Rail Regulation. Following the guidance is not compulsory and you are free to take other action. But if you do follow the guidance you will normally be doing enough to comply with the law. Railway inspectors seek to secure compliance with the law and may refer to this guidance as illustrating good practice.

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1. ECM certification process

1.1 This manual provides inspectors with advice and guidance on how to assess applications for an entity in charge of maintenance (ECM) certificate for freight wagons as per European Commission Regulation 445/2011 (the ECM Regulation).

1.2 All ECM certificates issued will be for five years unless the certificate holder is informed otherwise (usually if they are newly taking on the duties associated with being an ECM, when the certificate may be valid for one year only).

1.3 If any issues with the maintenance management system are found during the period of validity, ORR can suspend, limit the scope or revoke a certificate. Further details on this are provided in the section dealing with issues found during the assessment.

1.4 The manual explains the procedures for handling and assessing applications. Assessment criteria in the form of Engineering Inspection Plans (EIPs) are published separately on ORR's website and apply to the content of Annex III of the ECM Regulation.

1.5 The manual explains the roles and responsibilities of those involved with the process and the procedures they must follow. The procedures ensure quality of assessment records and include an "assurance process" which is an independent check of the integrity of the assessment.

1.6 ORR will participate in any initiatives to review procedures through proposals by the European Rail Agency or other relevant bodies.

2. Submitting the application

2.1 In accordance with Article 7(2) of the ECM Regulation, the applicant should complete the application form available on ORR's website (<http://www.rail-reg.gov.uk/server/show/nav.2628>). The applicant must submit all relevant documents and any company-wide audits carried out that provide information on the management system.

2.2 The application should provide information on:

- wagons for which the ECM is in charge or intends/plans to maintain over the forthcoming years;
- organisational structure;
- relationships with external entities; and
- details on company operations.

2.3 The application can be sent either as an electronic or hard copy. If hard copy, it should be sent to or electronic, to the e-mail address provided below:

Directorate Support Unit
Railway Safety Directorate
ORR
1 Kemble Street
London, WC2B 4AN

E-mail: rsdadmin@orr.gsi.gov.uk

2.4 On receiving the application, the details on the form relating to the certification body should be completed by ORR's Directorate Support Unit (DSU).

2.5 The Grade G in DSU creates a case on Mosaic, requests a registered file and forwards papers for the application and file to the lead assessor. Copies of the application should also go to the relevant rail vehicles engineer in ORR who will undertake the engineering aspects of the assessment.

3. Assessment team arrangements

3.1 An inspector from ORR's freight team will be lead assessor & concentrate on management functions, with an ORR rail vehicles engineer looking at engineering aspects - although there may be areas where a joint approach is needed. Applications will be assessed against the criteria set out in Annex III of the ECM Regulation.

4. Roles and responsibilities

Head of Inspection (Railway Operators)

4.1 Role:

- (a) Manage resources to ensure completion of applications within the specified timescales and agreed process.
- (b) Manage resources to ensure the process is reviewed, maintained & developed as appropriate.
- (c) Manage resources to ensure effective, timely, and technically sound assessments are undertaken and that the whole process is properly undertaken.
- (d) Provide final authority on behalf of the ORR over decisions on acceptance or refusal of certificate/authorisation applications.

4.2 Responsibilities:

- (a) Supervise the development, implementation and continuous development of ECM certification process for ORR.
- (b) Ensure effective communication is maintained between all parties involved in the ECM certificate process.
- (c) Ensure effective review of the process is undertaken.
- (d) Manage compliance with the requirements of the ECM certificate process, including control of documentation, records and adherence to defined performance standards.
- (e) Make the final decision on acceptance or refusal of certificate/ authorisations applications.
- (f) Make decisions on revocation recommendations and convene revocation panels.
- (g) Assist in the resolution of disputes and liaise with other ORR managers and industry practitioners as necessary.

Lead Assessor

4.3 Role:

Manage inputs to assessments of ECM certificate applications to ensure identification and resolution of issues found during assessment, and the delivery of clear, comprehensive and soundly based close-out reports in the required timescale.

4.4 Responsibilities:

- (a) Plan assessments assigned to them
- (b) Manage information flow with other members of the assessment team
- (c) Participate in the assessment process
- (d) Determine in conjunction with other assessors, points of non-conformity with the assessment criteria, and any further information required from the applicant
- (e) Conduct assessment of the maintenance management system & participate in any on-site inspection
- (f) Prepare any necessary reports and submit to applicant prior to award of the certificate
- (g) Review action plans prepared by the applicant in relation to solving issues raised during assessments
- (h) Prepare final assessment report for approval by the Head of Inspection
- (i) Prepare items to cover during surveillance and produce any necessary reports

Rail Vehicles Engineer

4.5 Role:

Provide technical and professional engineering advice & opinion to the lead assessor within the agreed scope of assessment for applications.

4.6 Responsibilities:

- (a) Assess the areas relevant to Annex III Parts II – IV of the application
- (b) Discuss with the lead assessor, areas which require further examination during inspection
- (c) Participate in any on-site inspection
- (d) Review action plans prepared by the applicant in relation to resolving issues raised during inspections
- (e) Contribute to final report produced by lead assessor
- (f) Prepare items to cover during surveillance period and produce any necessary reports

Assurors

4.7 Role:

The assessor will review the file and ensure all relevant forms provide evidence the application has been assessed in a suitable and sufficient manner. The assessor will not examine the application but if additional information or clarification is required on any part of the assessment, they should contact the lead assessor.

4.8 Responsibilities:

The assessor should verify the following:

- (a) An initial review of the application was carried out by the lead assessor and any further information from the applicant has been received.
- (b) At least one assessor has duly assessed the relevant aspects of the application.
- (c) The assessment plan produced by the assessors is clear and justifies the reasons as to why certain aspects of the application have been chosen for further assessment.
- (d) Where issues are found following the assessment, these are documented accordingly.
- (e) The assessment reports are produced in accordance with the guidance and are written in a clear and concise manner within the timescales specified.
- (f) The ECM certificate has been completed correctly.

Directorate Support Unit

4.9 Role:

Provide administrative functions as part of the process.

4.10 Responsibilities:

- (a) Create registered files and maintain the internal database of applications
- (b) Issue European Identification Numbers (EINs) for each application
- (c) Notify European Rail Agency (ERA) as per Article 10 (3) of the ECM Regulation of all issued, amended, renewed or revoked ECM certificates according to Article 4 (1) of the ECM Regulation within 1 week of the decision.
- (d) Maintain information on all certificates issued, amended, renewed or revoked.

Permissioning and Divisional Support Manager

4.11 Role:

Maintain, develop & improve the processes and procedures associated with ECM certification based upon any required changes from ERA or other body.

4.12 Responsibilities:

- (a) Review the process associated with ECM certification and implement changes according to legislative and political factors or to improve performance and design.
- (b) Maintain a list of assessors and provide training on the certification process.

5. Application review

5.1 The applicant should provide ORR in advance an indication of what type of certificate(s) they will be applying for; i.e. an ECM certificate covering all four functions or an application for specific functions. ORR will only assess an application for **all** functions.

5.2 When an application is received, the lead assessor should check it to ensure the correct certificate has been applied for and all basic information is included. The lead assessor should complete form, Application Review.

5.3 The next stage is to review the application document. The purpose of this is to check that the application has sufficient information and is presented in a suitable way to enable assessment. The lead assessor does not need to assess against the criteria at this stage but should identify any significant errors or omissions.

5.4 If any major deficiencies are found at this stage, a decision should be made as to how to continue with the assessment. In the event of the document containing errors or omissions that hinder effective assessment the applicant may be required to resubmit. However, if this is required, the applicant should be informed in writing why they are having the application returned and what steps they need to take to rectify the situation. It may be necessary to postpone the assessment phase and restart when the revised application arrives. A note should be made on Mosaic to reflect the situation.

6. Assessment overview

6.1 Once the application review is complete, the assessment can commence. All assessments should be carried out within four months of receipt of all the necessary information (including any supplementary information requested).

6.2 Annex B provides an overview of the process associated with the assessment stage.

6.3 The assessment will be carried out by a member of the freight team (maintenance management system) and specialist rail vehicles engineer (engineering).

6.4 The assessors meet to discuss and decide which elements of the application they want to focus on in more detail and to devise an inspection plan accordingly.

6.5 It is important at this stage to take into account: prior knowledge of the applicant's activities; intelligence gained through previous inspection work / complaints / investigations and any enforcement action taken; and industry / PWRA audits of an applicant (See Annex A). Assessors should ensure they can justify why issues have been raised or not, in case of challenges from applicants. A note of the meeting should be recorded on Mosaic. The lead assessor should also complete the Assessment Planning Form which is signed off by both assessors and Head of Inspection.

6.6 The assessment is potentially in two parts; assessment of the maintenance system (documentary review) and inspections of selected processes of the maintenance system (on-site inspections). Assessors need to have access to the ECM documents that are necessary for the assessment and may also interview ECM staff.

6.7 Inspections will focus on:

- the setting up and continuous update of the maintenance file (maintenance development);
- the issue of maintenance orders, removals from operation and return to operation (fleet maintenance management); and
- the adherence to maintenance orders and the release to service (maintenance delivery).

6.8 The inspections aim to assess existing competences related to selected processes and whether they achieve the intended outputs

6.9 The assessors should contact the applicant once the assessment programme has been decided to let them know whether on-site inspections will take place, and which staff may need to be involved.

6.10 Once the lead assessor has notified the applicant that all the necessary documents to perform the assessment have been provided, the four month period in which to deliver the certificate commences.

7. Railway Undertaking and Infrastructure Manager applying for an ECM certificate as part of its safety certificate or safety authorisation

7.1 A Railway Undertaking (RU) or an Infrastructure Manager (IM) may apply for ECM certification as part of its application for a safety certificate or safety authorisation concerning the freight wagons it uses/maintains. However, they are not required to apply until their existing safety certificate or safety authorisation.

7.2 Assessment should follow the normal processes that are in place for safety certificates or safety authorisations, although evidence to show capacity to act as an ECM will be needed. The assessment as part of a safety certificate or safety authorisation application is a documentary review of the management system to demonstrate capability to manage safety by the RU or IM. On-site inspections may be necessary for the ECM element. These may be carried out as part of safety certificate or safety authorisation supervisory activities. If this is the case they will occur a short time after the certificate has been awarded.

7.3 An ECM certificate can be awarded providing the applicant has demonstrated compliance with the criteria. The surveillance activities post certificate award will be based on the key safety risks for the certificate holder. Applicants can, if they wish, apply separately for an ECM certificate when they submit their application for a renewed safety certificate or safety authorisation.

8. Assessment Stage 1: Maintenance system – documentary review

8.1 This stage is the documentary review of the maintenance system. The lead assessor will undertake this review. The lead assessor and applicant should agree how the documents requested will be provided; they will either be hard copy or electronic.

8.2 In some cases, the examination of documentation may be deferred until on-site inspections begin although if this is the case, this should be communicated to the applicant at the start of the assessment.

8.3 The review is an examination of the documents and their relevance to the requirements for certification. The assessors should check that the procedures put in place by the ECM in its maintenance system are in conformity to Annex III in the ECM Regulation; and are established, documented and reviewed regularly.

8.4 Relevant supporting documents include working instructions, forms, templates etc. The applicant may also provide any other documentation that they believe is relevant to demonstrating compliance with criteria such as audits from the PWRA or other industry bodies etc. The size, complexity and nature of the organisation should be taken into account along with the objectives and scope of the documentary review when carrying out the task.

8.5 If the documentation provided is found to be inadequate, the lead assessor should notify the applicant immediately and decide on whether to postpone the documentary review until the concerns have been addressed.

8.6 The Engineering Inspection Plans (EIPs) guide for assessors should be used to determine if the evidence provided meets the criteria.

8.7 A requirement of annex III may be covered in more than one document presented by the applicant and this should be assessed accordingly using the EIPs as guidance.

8.8 The assessor may request additional documents if they have concerns about compliance with requirements of annex III.

8.9 The assessors should record all information on Mosaic. The Documentary Review form should also be completed and issued as an appendix to the assessment report.

9. Assessment Stage 2: On-site Inspection

9.1 An on-site inspection checks that the applicant can demonstrate how its procedures work in practice and that they are suitable to meet requirements of the criteria. It applies particularly to maintenance development, fleet maintenance management and maintenance delivery. In the cases of third party maintenance, the inspection checks that the applicant is able to manage the activities the third party undertakes which includes evaluating the policies and procedures in place to ensure they can demonstrate compliance with relevant criteria of Annex III.

9.2 In some cases, an inspection at more than one site may be necessary to satisfy the assessors in relation to the maintenance functions.

9.3 An agreement should be reached between the assessors and applicant as to how many days will be appropriate to carry out this stage of the assessment. This is often dependent on the size and complexity of the organisation.

9.4 An on-site inspection may involve interviewing selected members of staff on a site to ensure the documentation is in place and used correctly; (for example, working instructions, templates, check lists etc).

9.5 An on-site inspection should also provide an indication that the documents in place by the applicant are appropriate to the size and extent of activities undertaken.

9.6 The assessor carrying out the inspection should ensure appropriate notes are taken; photographs may also assist with compiling the inspection report.

9.7 For maintenance delivery, considerations will include the size of the site and complexity of the maintenance tasks being performed. Size equates to the number of persons performing maintenance on the site and number of wagons maintained each year. Complexity relates to the levels of maintenance being performed; light being less complex than heavy but a site performing both light & heavy maintenance would be more complex than solely heavy maintenance.

9.8 Some maintenance activities may be contracted out by an applicant to an external organisation.

9.9 When an applicant contracts out certain functions, these may have been inspected as part of an application from a different applicant. If a different assessment team has examined a function as part of a previous application, and were satisfied that compliance was being demonstrated, a revisit should only be made if the assessment team has specific concerns or issues they want to address. However, areas such

as contract management or document control could vary from application to application so inspections of these particular functions may be required.

9.10 Where an external site is to be inspected, arrangements should be made with the applicant & the external site in advance. The inspection of an external site should focus on how it meets the requirements of Annex III of the ECM Regulation. The assessors may accompany staff from the applicant when they carry out visits.

10. Enforcement

10.1 The assessors may, whilst on the site for ECM certification purposes, also carry out a general inspection of the premises to ensure requirements of Health and Safety at Work etc Act 1974 (HSWA) are being complied with.

10.2 If issues found on site require immediate or prompt action, the inspection team may choose to abandon the inspection associated with the ECM certificate application and concentrate on the issues of concern.

10.3 Depending upon the severity of the issues found, appropriate enforcement action may be necessary.

10.4 If the original planned inspection has to be stopped to concentrate on other issues, the assessors will make arrangements to revisit the site to carry out the inspection and also check that the issues found originally have been dealt with appropriately.

11. Assessment report

11.1 Following the assessment (both on-site & documentary), the assessors shall issue the applicant with an assessment report that will form the basis of a decision as to whether or not a certificate is issued.

11.2 A meeting may be needed to discuss the content of this report and should be held shortly after the report is issued.

11.3 The report should contain at least:

- sampling methodology used;
- documents used in the documentary review (Appendix 1 of the report);
- site(s) visited;
- findings and results;
- issues found during the assessment requiring resolution either prior to award of certificate or as part of the surveillance programme & timescales for implementation;
- points where clarification is necessary;
- assessors' recommendation on to issuing an ECM certificate

12. Issues identified during the assessment requiring resolution

12.1 Assessors will discuss any issues found that require resolution with the applicant and agree timescales for rectifying these. In some cases, the issues may need resolving before a certificate can be issued.

13. Preparation of certificate

13.1 The Permissioning & Divisional Support team manager will draft a certificate once the assessor has informed the lead assessor that the application should progress towards sign off and issuing of a certificate.

13.2 The certificate “valid from” date will be from when it is signed off by the Head of Inspection or Director of Railway Safety. In the case of a renewal; the “valid from” date will be when the existing certificate expires. The validity of the certificate in most cases will be for a five year period.

13.3 The next section provides details on how to allocate the correct European Identification Numbers for the certificate.

14. Allocation of European Identification Numbers

14.1 Similar to safety certificates & authorisations, ECM certificates will contain European Identification Numbers (EINs).

14.2 Structure of the EIN is as follows – XY/ab/cdef/ghij, where

XY = country code of certification body

ab = type of documents:

31 – ECM certification

32 – Certification of maintenance workshops

33 - Certification of separate maintenance functions

cd = counter identifying accredited certification body; ranging from 01 to 99

ef = year when the decision on certification is taken by the certification body e.g 2012 would be 12

ghij = counter system

14.3 An example of an EIN is UK/31/0012/0001. As ORR is not an accredited body and cd=00 indicates the certificate has been issued by the NSA.

NOTE: ORR will not be issuing certificates for separate maintenance functions

15. Assurance process

15.1. The assessor has the role of ensuring that the assessment process has been followed correctly. They should not have had any prior involvement either with the applicant or assessment.

15.2. Providing the assessor is satisfied with the assessment file and that the relevant steps in the assessment process have been followed, they should document this in the assessment report and make any supporting comments that are relevant. A hard copy of the form should then be placed onto the assessment file and scanned into Mosaic to act as the electronic version.

16. Certificate decision and issue

16.1 Once the assessor is satisfied that the assessment process has been followed then they should make arrangements to have the file sent to the Head of Inspection to have the certificate signed.

16.2 The decision to issue is based on the reports put forward by the assessors.

16.3 Certificates are normally valid for five years. In some cases, organisations newly taking on ECM duties may be issued with a certificate valid for a lesser period.

16.4 In the event of the Head of Inspection being unavailable to sign off the certificate, the Director of Railway Safety will sign it.

17. Surveillance

17.1 Annex C of this manual provides an overview of the process associated with surveillance assessments.

17.2 Surveillance activities are carried out on an annual basis during the period of validity of the certificate. The annual maintenance report provided by the ECM feeds into the surveillance process.

17.3 As far as practicable, the assessors carrying out surveillance should be the persons who were involved in the initial award of the ECM certificate.

17.4 The scope, depth and extent of the surveillance assessment is based upon:

- (a) issues identified in previous assessments; and
- (b) the annual maintenance report provided by the ECM

17.5 The surveillance will consist of on-site inspections/examination of documents provided by the ECM. A supplementary assessment of the maintenance system documentation should be undertaken if audit findings highlight processes put in place are not effective or not consistent with Annex III of the ECM Regulation.

17.6 More information regarding the annual maintenance report is available in Chapter 23 of this document and Chapter 3 of the [guidance to surveillance assessments](#).

17.7 Additional guidance relating to surveillance assessments is available at www.rail-reg.gov.uk/upload/pdf/surveillance-guidance-web.pdf.

18. Surveillance report

18.1 Following surveillance activities by the assessment team, a report should be issued to the certificate holder which is based on both the documentary reviews and inspections carried out.

18.2 As for the report issued prior to awarding the ECM certificate (see 11.3), the assessors should list any issues identified and indicate origin, detailed causes and risks associated with the issues. The ECM has 15 days (in line with ERA guidance) after receiving the draft surveillance report to produce an action plan that addresses those issues raised and how they will they will close these out & provide timescales for doing so.

19. Surveillance decision

19.1 Any issues found during surveillance activities shall be notified to the certificate holder and they will agree with the assessors as to the timescales they will resolve it.

19.2 If there are proposals to revoke, limit the scope of the certificate or suspend; a decision shall be made by the Head of Inspection within a 2 week period from receipt of the report from the assessors.

20. Certificate conditions (revocation, limitation of scope and suspension)

20.1 The factors listed below should be taken into account if considering any of the above conditions.

Recurrent improper maintenance output

20.2 Major incidents due to improper maintenance

20.3 Recurrent bad / low quality work and complaints to ORR, keepers etc

Poor compliance & lack of development

20.4 Recurrent examinations of documents and inspections / list of corrective measures do not improve or solve situations relating to issues found during assessments.

20.5 Repeated failure to apply corrective measures as advised / determined by ORR.

20.6 Insufficient competencies or coherence in the system

Economic Aspects

20.7 ORR must be informed if an ECM goes is made bankrupt or goes into liquidation. The certificate will be suspended once this is known & will be subject to reassessment.

Decision Making Principle

20.8 The Head of Inspection makes the decision as to whether certificates are revoked, limited or suspended based on what is presented to him by the assessment team. In the event of the Head of Inspection being unavailable, the Director of Railway Safety will make the decision.

21. Making an appeal

21.1 An applicant that wants to appeal an ORR decision to:

- refuse its application for a certificate;
- refuse its application to amend or renew a certificate;
- revoke, renew or amend its certificate;
- limit the scope of application of its certificate; or
- suspend its certificate

should write, within 42 days of receipt of the decision, to the Secretary of State at:

Department for Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR

21.2 Before the determination of an appeal, the Secretary of State will ask the appellant whether he or she wants to appear and be heard on the appeal. The appeal may be determined without a hearing if both parties (ORR and the appellant) do not wish to appear and be heard. However, if either party wishes to appear and be heard, they will have the opportunity to do so.

22. Recertification

22.1 Recertification will in most cases be every 5 years for an ECM certificate holder.

22.2 Assuming this is to be carried out by ORR, the lead assessor, as part of their general contact, will remind the applicant that their certificate is coming up for renewal to enable them to start preparing their renewal application.

22.3 The renewal certificate will be subject to full re-assessment as per the process outlined for the initial documentary review & inspection. The reports produced as part of the surveillance activity of the previous certificate shall be taken into account when planning what elements of the application to look at in detail for the renewal.

23. Annual Maintenance Report

23.1. Point I 7.4 (k) of Annex III of the ECM Regulation mentions the submission of an annual maintenance report to the Certification Body, which is based upon activities of the management function. This report may also be requested by the National Safety Authority (NSA). The Annex does not specify the contents of the report but suggested contents have been established through collaboration between industry and the UK Certification Body and with reference to ERA guidance. The checklist and table below can be used as a template for the report if desired. However, if the information is already covered in another format then this may be provided to the Certification Body.

23.2. The Annual Maintenance Report should be submitted close to the anniversary of the date the ECM Certificate was issued.

23.3 The annual maintenance report that is submitted by the ECM certificate holder should contain information on the following

- progress towards closure of any issues outstanding from the certification process;
- summary of any non-conformities identified by the ECM's own internal review and audits;
- summary of information exchanged regarding defects and failures with other stake holders, e.g. NIRs;
- summary of NSA or other authorities' enforcement actions;
- summary of any formal investigations in which ECM activity has featured, e.g. RAIB;
- information on the ECM's experience of using European common safety methods (see Chapter 3 of [guidance to surveillance assessments](#)); and
- significant changes during the year related to the following as identified in the table below in paragraph 23.4.

23.4 The table below summarises the areas which the ECM should inform the certification body of if significant changes have occurred.

Legal ownership of the company	Changed? Y/N	Details:
Organisational changes affecting ECM activity	Changed? Y/N	Details:
Volume of maintenance activity	Changed? Y/N	Details:
Types of vehicles and quantities	Changed? Y/N	Details:

Types of facilities used for maintenance, e.g. now using mobile fitters, or now using workshops only	Changed? Y/N	Details:
Contractors now being used, or now not being used	Changed? Y/N	Details:
Competence systems, processes and equipment	Changed? Y/N	Details:
Maintenance and Maintenance Planning systems, e.g. changes in maintenance practises and documentation	Changed? Y/N	Details:

23.5 An agreement should be reached as to when the ECM should submit the report to the assessment team taking into account the planned surveillance assessment. 4 weeks before surveillance is to be carried out for submitting the report is considered reasonable. See Chapter 3 of [guidance to surveillance assessments](#)).

24. Changes in the Maintenance System

24.1 If the change is to have a significant impact on the certificate, the ECM should notify ORR immediately. The impact should be assessed and the assessment team decide whether immediate surveillance activity is required.

24.2 If a change to the maintenance system has a significant impact on the maintenance processes, the ECM should notify ORR immediately. The assessment team will consider the impact and decide whether immediate surveillance activity is required.

24.3 Inspections may be carried out to gain an assurance that the staff are able to perform the activities in a competent manner following changes.

25. Newcomer ECMs

25.1 Newcomer ECM's are those who have not been registered as an ECM on a National Vehicle Register (NVR) prior to 31 May 2013.

25.2 Assessment will be limited to the documentary review prior to decision on whether certificate is issued.

25.3 The assessments carried out during the validity period of the certificate will be taken into account when assessing for a full ECM certificate to prevent duplication.

25.4 Any certificate issued under the newcomer ECM process will need to be clearly marked "newcomer ECM".

26. Access to reports

26.1 The reports produced will include those related to the assessment prior to awarding the ECM certificate and surveillance activities associated with ECM certification.

26.2 The reports should be retained for at least six years by both the ECM and ORR as the certification body. This allows the reports to form part of the recertification process and provide ORR with a full history of the ECM.

26.3 Reports should be produced in a language agreed between ORR and the ECM. If the ECM requires reports to be in any other language, this should be agreed upfront along with associated fees for translation.



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