



Advisory Note AN-014

Validation and verification of updates to product labels, manuals, and packaging

This advisory note provides important information regarding the validation and verification of updates made to product labels, manuals, and packaging of ActivFire® Certified Products.

Background

CSIRO's ActivFire® Scheme understand that updates to product labels, manuals, and packaging are inevitable both for marketing and product update purposes. After receiving feedback from our Registrants regarding the current process related to validation and verification of this type of product update, CSIRO's ActivFire® Scheme has updated its processes and approach regarding such updates. This advisory note describes the pathway for Registrants to update their product labels, manuals, and packaging of Certified Products and continue to fulfill their responsibilities of notifying CSIRO's ActivFire® Scheme. The process below does *not* include new private labelling of Certified Products.

New validation and verification process

Updates to product labels, manuals, and packaging shall be split into three different categories – minor, major, and significant.

Minor updates include the following, are subject to change, and are at the discretion of the Executive Officer:

- Changes to font type and size without any changes to the text and information.
- Changes to business entity address (not including change of the current business entity to a different/new business entity).
- Changes to trading name (where there are no changes to the business entity's legal name or business number).
- Changes to business entity logo(s).
- Changes to packaging colour(s).
- Changes to formatting.
- Typographical amendments.

Major updates include the following, are subject to change, and are the discretion of the Executive Officer:

- Changes to the layout of the label, manuals, packaging (not including changes to the data or any specifications relating to the product).
- Changes to include or vary additional third-party certification body logos or any another product certification logos.
- Changes to product designation, such as the model id of the Certified Product without changes to the Agent / Distributor, Registrant, Producer, Primary Manufacturing Unit.

Significant updates include the following, are subject to change, and are at discretion of the Executive Officer:

- Changes to data or any specifications relating to the product (This might require re-evaluation of the Certified Product).

In accordance with Clause 8.4.1 of CSIRO Verification Services Rules Governing ActivFire® Scheme (AF-D001), Registrants shall notify CSIRO's ActivFire® Scheme of all changes to the design and/or production which may necessitate re-verification to current evidence of conformity to reference criteria and specified requirements upon which the certification was based, which includes product labels, manuals, and packaging. To notify CSIRO's ActivFire® Scheme of the changes, Registrants are required to complete and return the ActivFire® Product Modification/Variation Registration and Processing Form (AF-F003) and return it to certification@csiro.au. Registrants shall also include attachments of the new logo, manual, and/or packaging as well as a comparison document highlighting the changes between the old logo, manual, and/or packaging with the new logo, manual, and/or packaging.

Upon receipt of the Product Modification/Variation Registration and Processing Form along with the attachments, the Executive Officer of CSIRO's ActivFire® Scheme will advise the Registrant of the update category. Incomplete forms and attachments will not be accepted and will be required to be re-submitted.

Where updates are deemed to be minor by ActivFire®, the Registrant will be issued with a Confirmation of Services Request (CoSR) and the cost of the updates will be charged according to the "Modifications or updates to a Certified Product" section of CSIRO Verification Services ActivFire® Scheme Schedule of Services and Fees (AF-D003) document.

Where updates are deemed to be major by ActivFire®, the Registrant will be required to have the labels, manuals, and /or packaging verified by a Recognised Agency for Conformity Evaluation (RACE). The RACE shall issue documentation confirming that the updates do not prejudice prior evidence of conformity to reference criteria and specified requirements upon which the certification was based. The Registrant will then be issued with a CoSR and charged as per the "Modifications or updates to a Certified Product" section of CSIRO Verification Services ActivFire® Scheme Schedule of Services and Fees (AF-D003) document in addition to any verification cost by a RACE.

Where updates are deemed to be significant by ActivFire®, the Registrant will be required to have the labels, manuals, and /or packaging fully evaluated by a Recognised Agency for Conformity Evaluation (RACE). The RACE shall issue a formal report that the revised labels, manual and packaging (as relevant) meet the reference criteria and specified requirements upon which the certification was based. The Registrant will be charged as per the "Modifications or updates to a Certified Product" section of CSIRO Verification Services ActivFire® Scheme Schedule of Services and Fees (AF-D003) document in addition to all evaluation costs by the RACE.

Issuing Authorities

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