



The Certification Mark for Onsite Sustainable Energy Technologies

MCS 010 – November 2018

1. Introduction

MCS 010 has been reviewed by the MCS 010 and MCS 011 Working Group and a number of changes have been proposed. The objectives of these changes are:

1. To provide clarity on the responsibilities of the MCS Product Certificate Holder or applicant, regardless of whether they are the manufacturer or other participant in the product supply chain/path to market;
2. To frame the elements of the Factory Production Control (FPC) system as a set of requirements and to ensure clarity in their presentation; and
3. To affirm that the expectation of MCS is for annual FPC assessments.

Industry stakeholders are invited to review and comment on the proposed updates to MCS 010. The consultation will be open for a period of one month closing on **Friday 21st December 2018**.

2. Summary of Changes

The proposed changes arising from the MCS 010 review are shown as **red text** within the draft document.

These are summarised below:

Section	Change
Document Title	Amendment to document title
Foreword	New section
Clause 1 - Introduction	Reword
Clause 2 - Scope	New section
Clause 3 - Definitions	New section including the responsibilities of the MCS Product Certification Holder
Clause 4.1 Initial assessment	Reword and addition of text with reference to table 1
Clause 4.2 Maintenance of certification/ Surveillance	Reword and addition of surveillance visit periodicity
Table 1, Clause 1 - Review of details of contacts, locations and responsibility	Removal of text and new text added on the authority and responsibility at each manufacturing location
Table 1, Clause 2 - Review of Quality Management System/Quality Plan	Reword



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Table 1, Clause 3 - Resolutions of non-conformities	Reword
Table 1, Clause 4 - Internal Review	Reword
Table 1, Clause 5 - Document Control	Reword and refined document contract systems
Table 1, Clause 6 - Customer requirements and contracts	Removal of text and new text added on contract review systems
Table 1, Clause 7 - Purchasing	Reword and clarification of purchasing records
Table 1, Clause 8 - Review of Product Specification	Removal of text and new text added regarding documented mechanisms
Table 1, Clause 9 - Production Control	Removal of text and new text added on the information and identifying factors of a product
Table 1, Clause 10 - Inspection and in process testing	Reword
Table 1, Clause 11 - Action on Non-conforming material	Reword
Table 1, Clause 12 - Equipment	Reword
Table 1, Clause 13 - Storage, handling, packaging and transportation	Reword
Table 1, Clause 14 - Certification Marks	Removal of text and new text added to clarify brand guidelines
Table 1, Clause 15 - Records	Reword
Table 1, Clause 16 - Complaints	Reword
Table 1, Clause 17 - Corrective/Preventive action	Reword
Table 1, Clause 18 - Training and competence	Reword
Table 1, Clause 19 - Audit testing	Reword

3. Consultation Questions

In addition to comment on the proposed changes to MCS 010, the Working Group is seeking responses to the following specific questions. Please respond to these questions within the comment boxes available in the Consultation Comment Form:

- 1) Do you believe that the proposed updates to MCS 010 achieve the first objective set out in the introduction, “To provide clarity on the responsibilities of the MCS Product Certificate Holder or applicant, regardless of whether they are the manufacturer or other participant in the product supply chain/path to market”?
 - a. Yes
 - b. No

Please explain why you have chosen this response.



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- 2) No changes have been proposed to the maximum periods permitted for resolution of non-conformities (MCS 010 Clause 4.1, Clause 4.2 and Appendix A – Clause 3). Certification Bodies may have set time limits for resolution of non-conformities within their procedures, which are the basis of their accreditation under EN17065. Do you believe that the requirements within MCS 010 align with Certification Bodies accreditation?
- a. Yes
 - b. No

Please explain why you have chosen this response and include any relevant examples or experiences which provide further reasoning.

- 3) Currently, manufacturers are required to retain records of production and inspection for a period of two years. The MCS Complaints Process can accept complaints for up to six years after product installation and, in exceptional circumstances, beyond this. Some aspects of record keeping may also be subject to other retention requirements, particularly where they relate to finance and accounting.

Which of the following minimum periods for retention of records do you believe to be appropriate for the records covered by MCS 010?

- a. Two years
- b. Six years
- c. An alternative timeframe – please specify

Please explain why you have chosen this response.

4. Responding to the Consultation

The draft version of MCS 010 is available online via this [link](#). All comments must be submitted to mcsconsultations@gemserv.com by 5pm Friday 21st December 2018. Responses must be submitted using the Consultation Comment Form provided. Please note that we are unable to accept feedback which has not been submitted via the Comment Form.

When submitting your feedback, please be specific and cite any clauses that you refer to. If you would like the wording to be changed, please include the suggested wording and supporting evidence for these changes. Your response will be shared with members of the MCS Technical Working Group.