

Guidance on sub-contracting analysis

SEPA understands that an operator may need to sub-contract the analysis of some samples to a third party laboratory which is not certified under MACS.

This MACS technical guide outlines the minimum criteria that an appointed sub-contractor must meet in order to be approved by SEPA; and also details what is required of an operator intending to submit sub-contracted data to SEPA.

What are SEPA's approval criteria?

The MACS performance standards state:

5.2 Sub-contracting

5.2.1 An operator may sub-contract the sampling and/or chemical testing to another organisation. It is the responsibility of the operator to ensure that the sub-contracted organisation is certified under MACS for the scope of work sub-contracted. Sub-contracting to an organisation not certified under MACS is only permitted where an operator has obtained the prior written approval of SEPA.

NOTE 1: The organisation may or may not be aware that the data it generates will be submitted to SEPA. However, the organisation's customer or procurer of the sampling and analytical service should be aware that if it wishes to submit the data to SEPA, then the requirements of this performance standard need to be satisfied.

NOTE 2: An annual review of the suitability of existing sub-contracting arrangements must be performed by an operator whilst establishing their survey schedule for the following sampling year. In practice, this will require the operator to re-submit all sub-contracting request(s) to SEPA for assessment and approval by 1 December in the year preceding commencement of the designated sampling year.

Where an operator's intended sub-contractor is not MACS certified, SEPA requires that the following criteria **must** be met:

For the matrix and determinand(s) being sub-contracted, the sub-contractor **must**:

- hold accreditation to ISO/IEC 17025;
- meet the required target MDL specified to the operator by SEPA;
- meet the minimum performance characteristics specified in Annex A of performance standard MACS-WAT-01;
- participate in an appropriate external (inter-laboratory) PT programme.

NOTE: If sampling is also to be sub-contracted, then all sampling activities must be accredited to ISO/IEC 17025.

Should the proposed sub-contractor not meet all of the criteria listed above then SEPA will not permit the analysis in question to be sub-contracted.

What are the operator's responsibilities?

Requesting to sub-contract analysis:

When requesting to sub-contract analysis, the operator **must** provide the following information to SEPA:

- Determinands and matrix that the operator wishes to sub-contract.
- Name and address of proposed sub-contractor.
- Sub-contractor's UKAS laboratory number.

Changing existing sub-contracting arrangements:

Where there are any changes to an existing sub-contracting arrangement; or method performance changes at the sub-contractor's laboratory, then the operator **must** inform SEPA in writing.

In addition, the operator is **at all times** responsible for ensuring:

- The ongoing suitability of existing sub-contracting arrangements.
- The quality of data supplied to SEPA under self-monitoring arrangements.
- That data is reported within the time targets detailed in performance standard MACS-WAT-02.
- That data submitted to SEPA clearly identifies determinands analysed by a sub-contractor.
- That in the event of a non-conformance, the processes detailed in technical guide MACS-TG-03 are followed.

All communication to SEPA relating to a sub-contracted analysis (e.g. reporting of analytical results, concession requests, etc.) **must** be made by the operator, and not come directly from the sub-contractor.

How to make a sub-contracting request

- Operators may request to sub-contract analysis by completing and submitting Section A of the 'Operator sub-contracting request form' (MACS-TG-02F). An example can be found in [Annex A](#).
- Completed request forms must be sent to the specified SEPA email address.
- SEPA will assess completed requests and notify the operator by email within 10 working days of the date of receipt as to whether a request has been approved.
- Failure to supply SEPA with all of the requested information will result in a sub-contracting request being returned to the operator for revision prior to any assessment being undertaken.

Glossary

MACS – Measurement Assurance and Certification Scotland

MDL – method detection limit

PT – proficiency testing

SEPA – Scottish Environment Protection Agency

UKAS – United Kingdom Accreditation Service

About this MACS technical guide

This guide is one of a series produced by SEPA to support self-monitoring operators certified under MACS. Each guidance document is intended to either: provide operators with assistance on how best to meet a specific requirement of MACS; or give clarity on how SEPA will manage a MACS governance process.

Where any discrepancy exists between a MACS performance standard and this technical guide, then the MACS performance standard provides the definitive guidance.

All MACS documentation is subject to review and amendment. For the latest versions of all MACS technical guides, please refer to the [SEPA website](#).

Annex A Operator sub-contracting request form

Section A: Request (to be completed by the operator and communicated to SEPA)

Operator details			
Name		Date of request	

Sub-contractor details			
NOTE: Individual request forms will be required for each separate sub-contractor an operator wishes to use.			
Name		Address	
UKAS laboratory number			

List of determinands intended to be subcontracted (extra lines may be added)

Determinand	Matrix	UKAS accredited	MDL required (including units)	Reporting MDL (including units)	PT provider	PT product code	Approved (FOR SEPA INTERNAL USE)
		Y / N					
		Y / N					
		Y / N					
		Y / N					
		Y / N					
		Y / N					
		Y / N					
		Y / N					
		Y / N					
		Y / N					
		Y / N					

Please email completed forms to: operator.monitoring@sepa.org.uk; with the subject line "MACS Operator Sub-contracting Request".

Section B: Admin. details (FOR SEPA INTERNAL USE ONLY)

Request information	Date of receipt	Date assessment completed	Operator notified	Notification date
			Y / N	

Q-Pulse information	Request logged	Date	By	Ref. no.
	Y / N			

Please note that:

When submitting a sub-contracting request the standalone version of this form **must** be used, not this sample copy. Failure to do so will result in the request being immediately returned to the operator for revision and re-submission. Form MACS-TG-02F is available to download from the [SEPA website](#).