



ADVISORY 3

Recognition and Authority of Management Representative and Use of Consultants

The API Monogram, API Repair and Remanufacture, and APIQR Programs must be able to evaluate an applicant or licensed/registered organization's implementation and maintenance of its quality management system. To do so, the program and its auditor(s) shall communicate directly with the personnel who are responsible for operating the organization's quality management system. This includes having access to the organization's "Management Representative" who, according to API Specification Q1, must be appointed by the organization's top management from within the organization's own management personnel.

For all API Monogram, API Repair and Remanufacture, and APIQR Program participants, the following conditions for the Management Representative apply:

- He or she shall be employed by the organization on a full-time basis.
- He or she can be responsible for more than one of an organization's locations.
- He or she cannot be a third-party representative (consultant) hired under a contract or on a temporary basis.

As to the use of a consultant, the API Program neither approves nor endorses the use of a consultant; a licensed/registered organization's choice to avail itself of a consultant's services will not affect the status of the license/registration; and an organization is not required to use a consultant. Additionally, API auditors, API's staff, or API's representatives shall not require or recommend that an organization hire a consultant as a condition for meeting program requirements. However, if an applicant or licensed/registered organization relies on a consultant to help it meet program requirements, the consultant is not permitted to do the following:

- Act as the organization's management representative;
- Act as the organization's point of contact in dealing with API staff or auditors;
- Provide translation services during an audit (note that this does not prevent the organization from using a translator during an audit that does not otherwise advise on program requirements);
- Interact with API staff or the API auditors before, during, or after the performance of an API audit, including asking questions of auditors, responding to inquiries on behalf of the organization, or providing evidence of conformity with program requirements on behalf of the organization;
- Interfere in any way with the progress of the API audit, including but not limited to, engaging in abusive or unprofessional behavior towards API staff or auditors; or
- Misrepresent to API that they are employees of the organization.

Licensed/registered organizations are responsible for ensuring third-party consultants' compliance with this Advisory. Violation of the stipulations in this advisory may lead to immediate suspension or cancellation. This Advisory supersedes any previous version. It is considered part of the API Program requirements and is compulsory.