



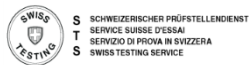
Non-Tariff Barriers affecting trade Experience of a Conformity Assessment Body

Hans Peter Leserf,
Product certification

Electrosuisse Equipment testing and certification

As an accredited and internationally recognised test laboratory, we conduct neutral and independent tests of electrical and electronic equipment and components in the field of electrical safety, EMC, environmental testing in accordance with IEC and EN standards.

Today manufacturer need global market access and ask for IECEE CB certificates, also serving as basis for mandatory required approval in many countries.

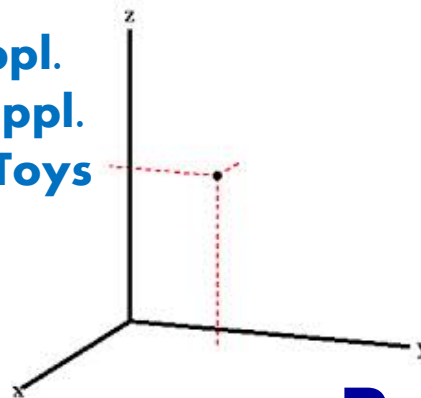


Lack of transparency: the point of view of producers

Product

IT, Telecom
Household appl.
Commercial appl.
Power tools, Toys
Machinery

...



Compliance is getting more and more difficult and complex. No structured compliance data per product is readily available!

Country

Language (manual, law)
Law (approval system)
Electrical Rating
Local standard

...

Requirement

Electromagnetic compatibility, electrical safety, telecom rules, Harmful substances, waste reduction regulations, Energy Efficiency, Food contact material

...



Cost for getting to know each requirement...
In each country, for each product

Sources on technical requirements

- WTO TBT notifications
- Standards and national deviations
- Various: Experience/ practices
- Own sources (our own database)


Sources give some input, but *no exact knowledge of what the authority will decide.*

NOTIFICATION

The following notification is being circulated in accordance with Article 2.9.2 [], 2.10.1 [], 5.6.2 [X], 5.7.1 [], other

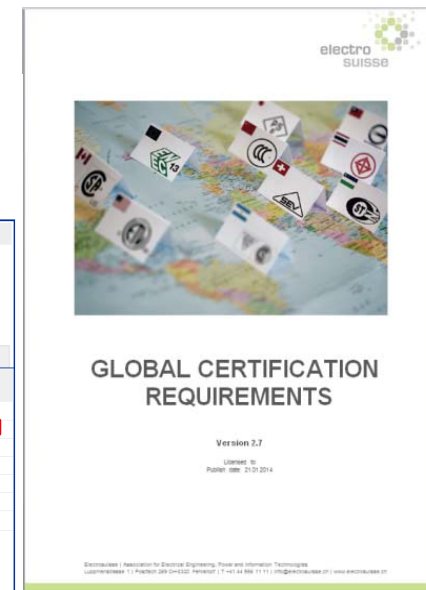
1. Select product category: HOUS 2. Select a standard: 60335-1(ed.2);am1-am3
60335-1(ed.4);am1
60335-1(ed.4);am2
60335-1(ed.4);am1;am2
60335-2-2(ed.4)

To print the entire HOUS standard list, please [click here](#)
To view all product categories and standards, please [click here](#)

1. Member to Agreement notifying: BRAZIL If applicable, name of local government involved (Article 3.2 and 7.2):	Standard: 60335-1(ed.4);am1;am2
3. Notified under Article 2.9.2 [], 2.10.1 [], 5.6.2 [X], 5.7.1 [], other	Product category: HOUS
4. Products covered (HS or CCCN where applicable, otherwise national ICS numbers may be provided in addition, where applicable): Household and similar electrical appliances.	Title: Household and similar electrical appliances - Safety - Part 1: General requirements
5. Title, number of pages and language(s) of the notified document: for Household and similar electrical appliances (2) pages, in Portuguese	Year: 2001-05-18
6. Description of content: Draft Ministerial Act on conformity assessment Household and similar electrical appliances.	Click on the icon to open the associated document 
7. Objective and rationale, including the nature of urgent problem Consumer safety.	

Country	National standard reference	Last modification*
Japan	J60335-1(4th+H20)	2009-02-17
Korea - Republic of	KSC 60335-1:2009-1	2009-06-09
Netherlands	not reported	2007-05-29
Norway	NEK EN 60335-1	2007-05-29
Switzerland	EN 60335-1:2002	2009-06-09
United Kingdom	BS EN 60335-1	2007-05-29

* The last modified date indicates the last time the standard reference / attachment for this standard was modified. The date 2007-05-29 is the date the information was imported into the online CB Bulletin from the previous non-database version.



➔ Requirements per product type are not all free available:
Risk of loss of current know-how & advantage

Transparency: Product definitions



Properties of the product determine applicable regulations / standards

Electrical tooth brush for EU

- Battery driven → EMC/ RoHS
- Mains driven → EMC/ LVD/ ErP/ RoHS

Definition options used in regulations:

- Description of product (legal definition)
- Customs tariff number 8509 8000
- Standards

WANTED: System for matching products with regulations



Description & HS code is not precise

- Brick: **10000781** - Oral Care - Aids (Powered)
Definition: Includes any products that
- Attribute: 20000045 - Consumer Lifestage
Definition: Indicates, with referer
Value: 30000147 - ADULT
Value: 30006665 - BABY/INFANT
Value: 30006666 - CHILD 1-2 YEARS
Value: 30006667 - CHILD 2 YEARS ONWA
Value: 30002515 - UNCLASSIFIED
Value: 30002518 - UNIDENTIFIED
- Attribute: 20001116 - Corded/Cordless
Definition: Indicates, with referer
Value: 30007714 - CORDED
Value: 30007715 - CORDLESS
Value: 30002518 - UNIDENTIFIED
- Attribute: 20000787 - **Power Source**
Definition: Indicates, with referer
Value: 30000289 - **BATTERY**
Value: 30009416 - **MAINS ELECTRICITY**
Value: 30002515 - UNCLASSIFIED

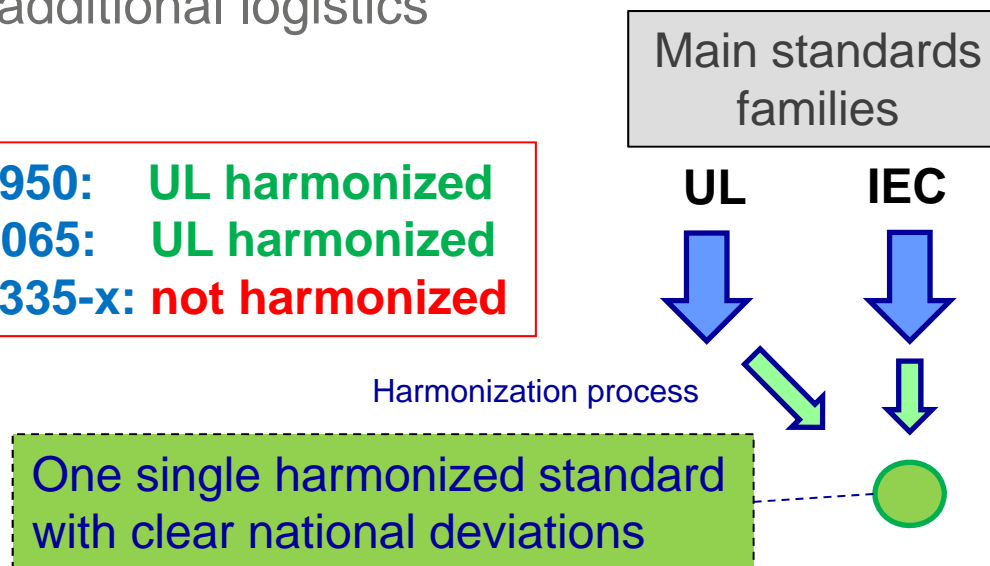


Standards

- Standards are used in regulations
- IEC (corresponding IECEE CB-Scheme) has a wide acceptance
- Conformity tested against standards UL or IEC means often different device construction
= multiple testing & additional logistics

Top IECEE CB categories [2012-2014](#)

36% IT product	IEC 60950:	UL harmonized
10% Audio/Video	IEC 60065:	UL harmonized
27% Household	IEC 60335-x:	not harmonized



Standards harmonization + recognition in legislation = no adaptations of the product required = saved costs

Conformity assessment procedures

- Massive variations in the level of bureaucracy
- Supplementary local requirements
- Foreign tests accepted versus testing in every country
- Who is allowed to test and take the responsibility?
- Marking jungle

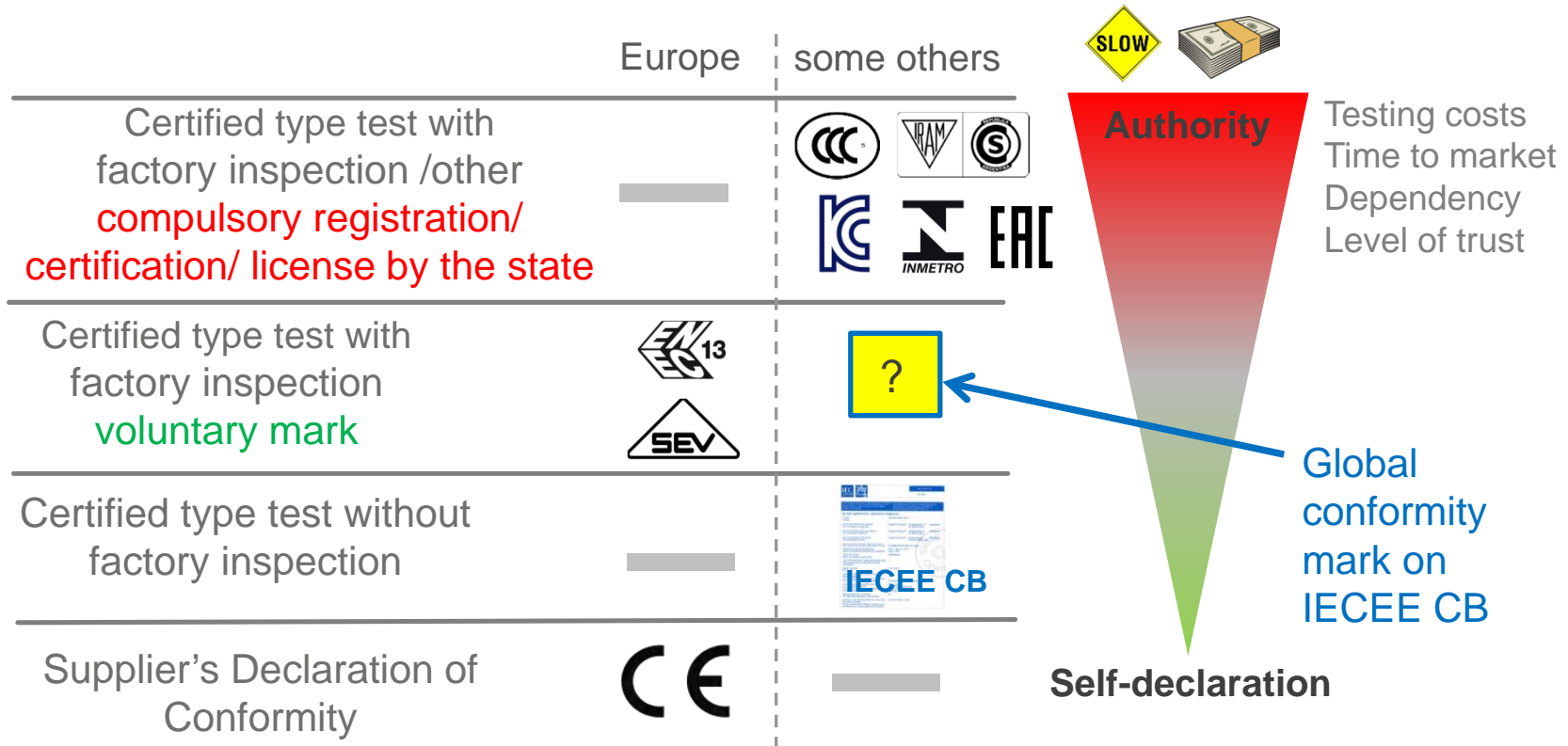
Benefit of procedures simplification

- ✓ More transparency and clarity to all
- ✓ Less cost and effort
- ✓ Shorter time to market



Big potential of improvement in compliance field

Conformity assessment procedures



➔ One global conformity assessment procedure based on harmonized standards could help (good news: IEC CB Scheme has a wide acceptance.)

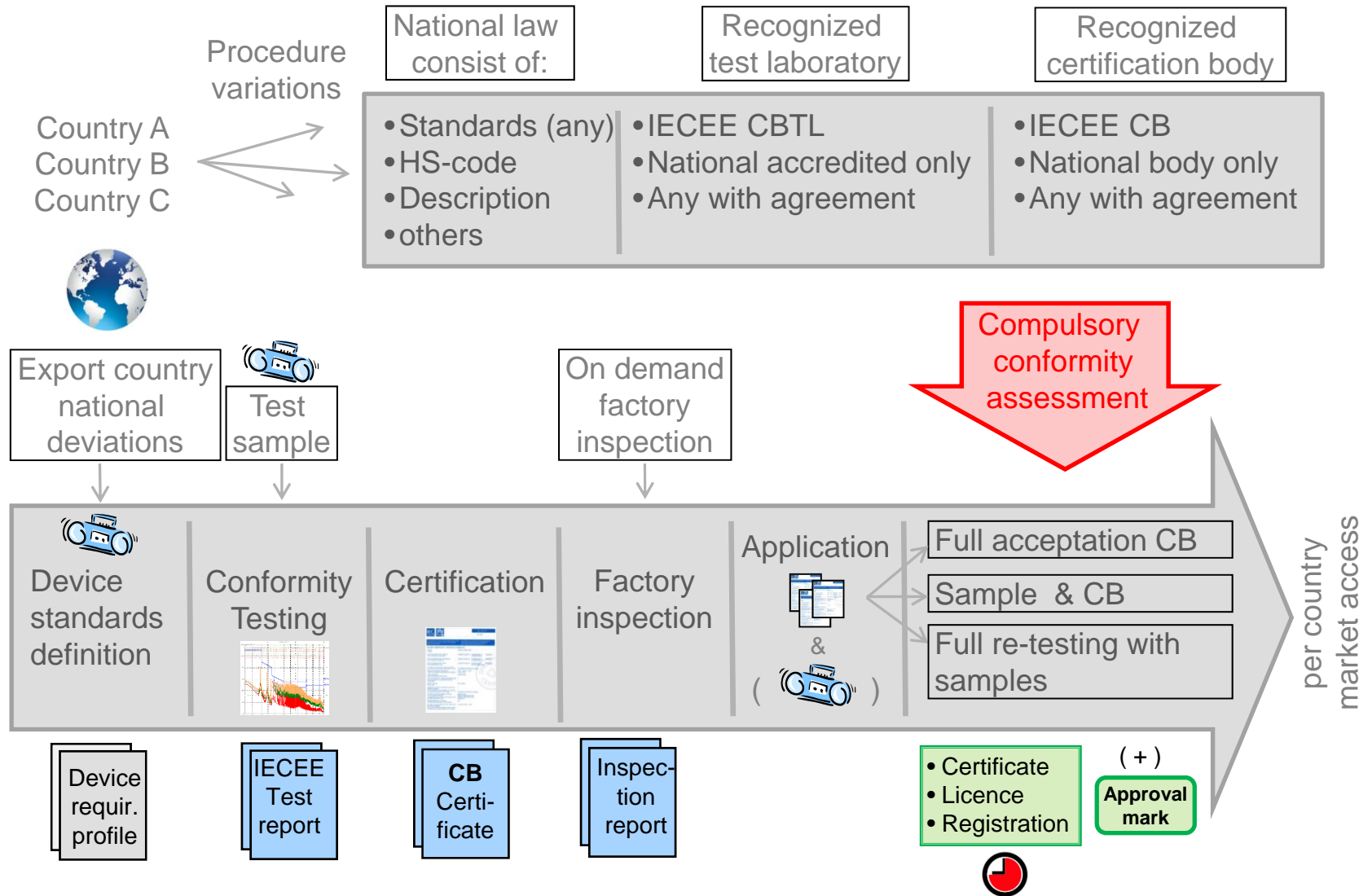
Experience on Non-Tariff Barriers

- Manufacturer/ local representative want to be compliant, but does not know requirements
- Product functions are getting more complex adding compliance work (e.g. RFID)
- Rising number of diverging regulations worldwide resulting in more effort & cost, but products not getting safer
- Country requirement impact product availability
- Not much harmonization between countries
- Technical changes (comp. shortage) result in updating approvals
- Uncertain market entry time, due to authority dependency
- Country approval process:
 - CB not always fully accepted
 - In practice difficult process with surprises for additional or new (non-notified) requirements

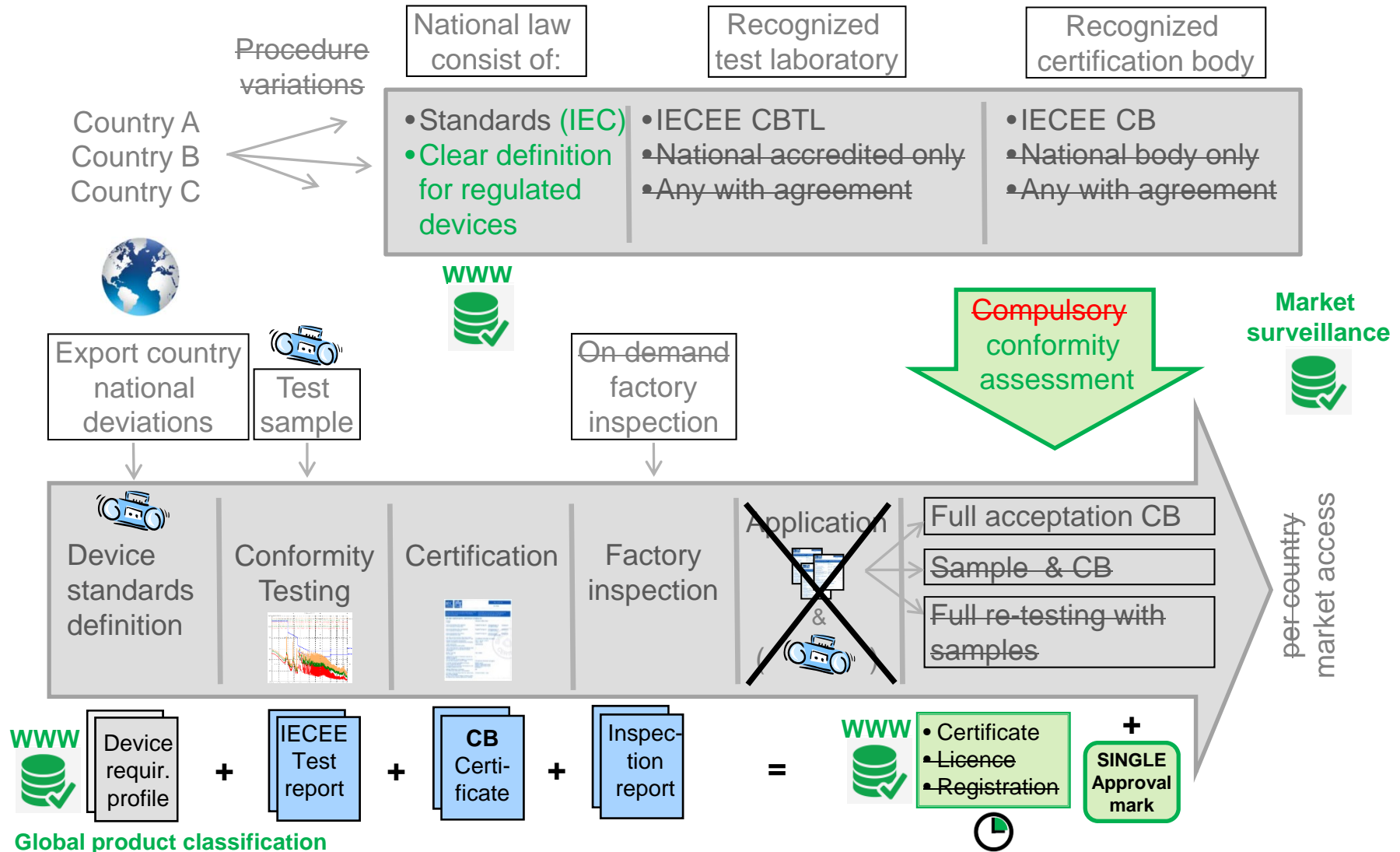


Dream of a single global test that fits all approval processes

Type approval procedures (today)



Type approval procedures (tomorrow?)



Possible fields of action

Technical barriers to trade (TBT) Agreement and beyond

- 1) WTO could emphasis more on regulators using IEC standards.
- 2) TBT notifications in the field are difficult to monitor (often not product defined). HS Code does not sufficiently define a product. Possible use of more precise global product classification.
- 3) Better transparency: a global product requirement profile or a registry of existing regulations could help to simplify.
Beyond transparency: linking regulations and products
- 4) Recognition of test results, IECEE CB certificates are a good basis for conformity assessment procedures and should be further promoted. Reducing procedural conformity assessment requirements by accepting test results.
- 5) A single conformity mark procedure? Would help avoiding growth of conformity procedures variation. Worldwide regulations for worldwide products?