

European Commission

ENTERPRISE DIRECTORATE GENERAL

# Supplier's Declaration of Conformity (SDoC)

Experience with respect to electrical and mechanical sectors

TBT WORKSHOP  
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# Free movement of products in Europe

## Free movement of products in the European internal market

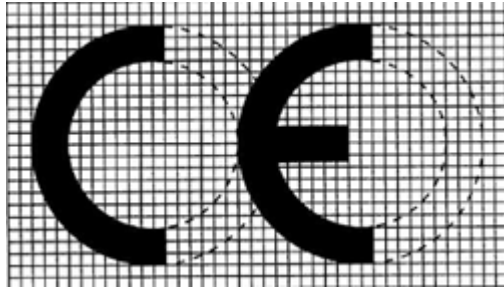
- Article 28 of the EC treaty  
“**Quantitative restrictions** on imports and all measures having equivalent effect shall be **prohibited** between Member States.”
- Article 95 of the EC treaty  
„**Technical harmonisation** of European legislation taking into account a **high level of** health, safety, environmental and consumer **protection**“



**New Approach Directives** (e.g. LVD, Machinery)



# Elements of the New Approach Directives

1. Conformity assessment and technical documentation
2. Declaration of conformity (**SDoC**)
3. CE marking ==> 
4. Market surveillance



# Safety of electrical products

## The Low Voltage Directive (LVD) 73/23/EEC (adopted on 19th February 1973)


1



Based on article 95 of the EC treaty; purpose is to permit *free movement* of electrical equipment in Europe



“**Total harmonisation**” and “**Total Safety**” Directive



Applies to **electrical equipment** designed for use with a voltage rating of **[50, 1000] V** (AC) **[75, 1500] V** (DC)



# Safety of electrical products

## The Low Voltage Directive (LVD) 73/23/EEC

2



Guidelines on the application of the Low Voltage Directive  
- LVD



Large system of European electro technical standards  
based on international standards (~700);



Decreasing number of fatal accidents in the last 20 years  
by electrocution;



# Conformity assessment

## How to comply with the safety requirements?

- Manufacturers can apply their own technical specifications
- *or*
- apply harmonised standards

**PRESUMPTION  
OF CONFORMITY**

**HARMONISED STANDARDS  
ARE NOT MANDATORY**



# Conformity assessment

## Internal production control

- **Technical documentation**
  - to be kept of 10 years
  - to enable the assessment of the conformity of the electrical equipment to the requirements to the Directive
- **Manufacturing process shall ensure compliance of the manufactured products with the technical documentation**



# Conformity assessment

## Internal production control

Procedure whereby the manufacturer ensures and declares that the electrical equipment satisfies the requirements of the Directive

**=> EC declaration of conformity + CE marking**





## Supplier's Declaration of Conformity (SDoC)

The manufacturer or his authorised representative established within the Community must **draw up an EC declaration of conformity** as a part of a **conformity assessment procedure** provided for in the relevant New Approach directives.

=> Manufacturer or his authorised representative ensures and declares that his product satisfies the requirements of relevant Directives that apply to it.



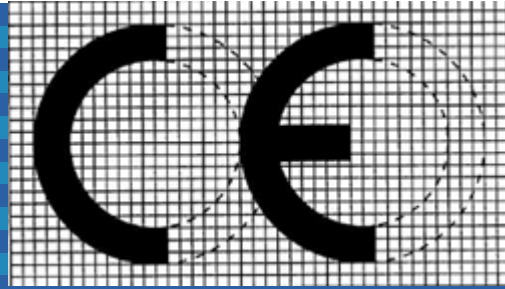
# Supplier's Declaration of Conformity (SDoC)

The **EC declaration of conformity** contains **all relevant information** :

- Reference to relevant directives;
- Identification of manufacturer or his authorised representative;
- Product identification;
- Notified body, if applicable;
- Reference to harmonised standards or other normative documents;
- Date of issue of the declaration.



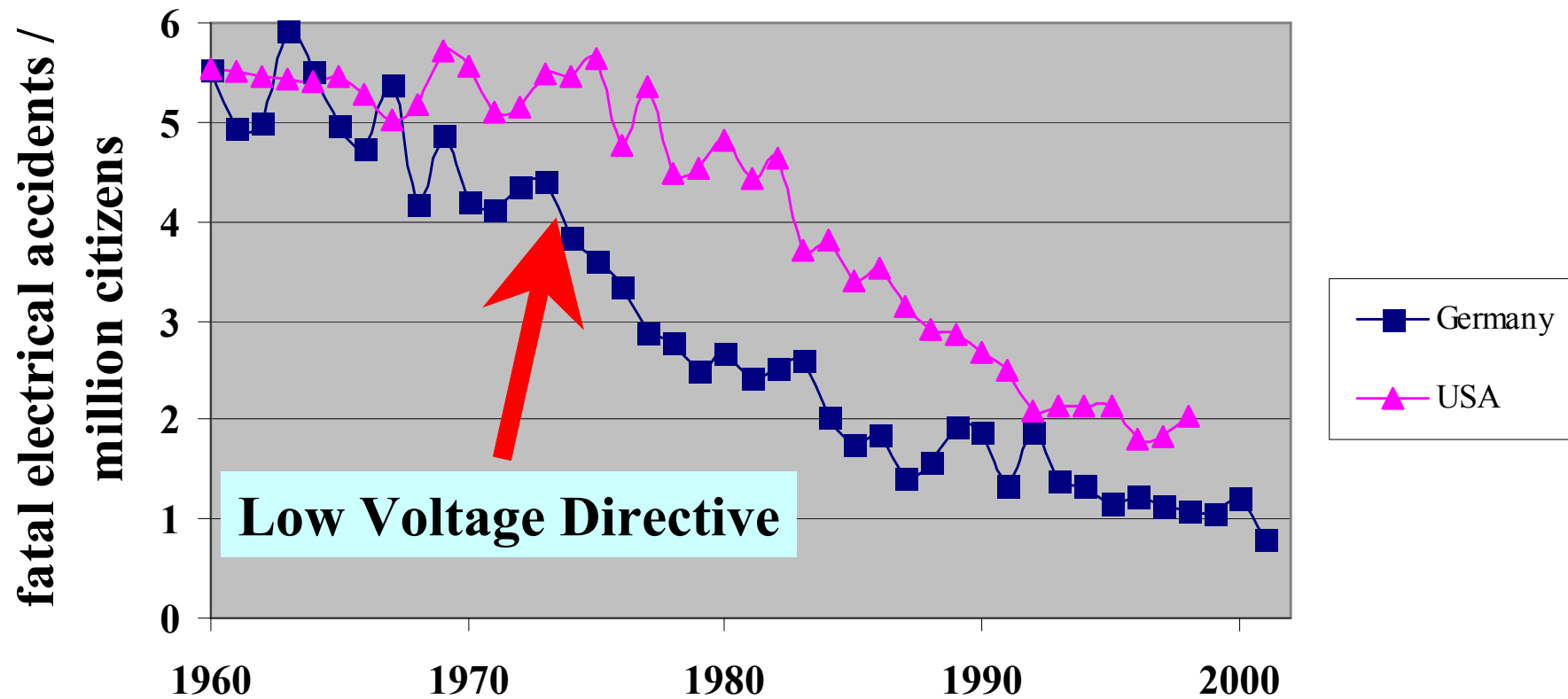
# CE marking



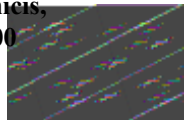
- The CE marking symbolises the **conformity of the product** with the applicable European Community requirements imposed on the manufacturer.
- The **CE marking is mandatory** and must be affixed before any product subject to it is placed on the market.
- CE marking must be affixed **visibly, legibly and indelibly** to the product or to its data plate or where not possible on the packaging.



# Electrical fatal accidents in the USA and Germany



Sources: National Center for Health Statistics (USA), VDE (Germany),  
Biegelmeier, Gottfried, Liber Amicorum - Liber Inimicis,  
Nowak, Kurt, 81 tödliche Stromunfälle 1998, de 8/2000



# Conformity procedure

## **Electrical products (Low Voltage Directive 73/23/EEC)**

**=> High risk products but only **Manufacturer's declaration** (self declaration), **no mandatory third party testing****

## **Machinery products (Machinery Directive 98/37/EC)**

**=> Medium and high risk products:**

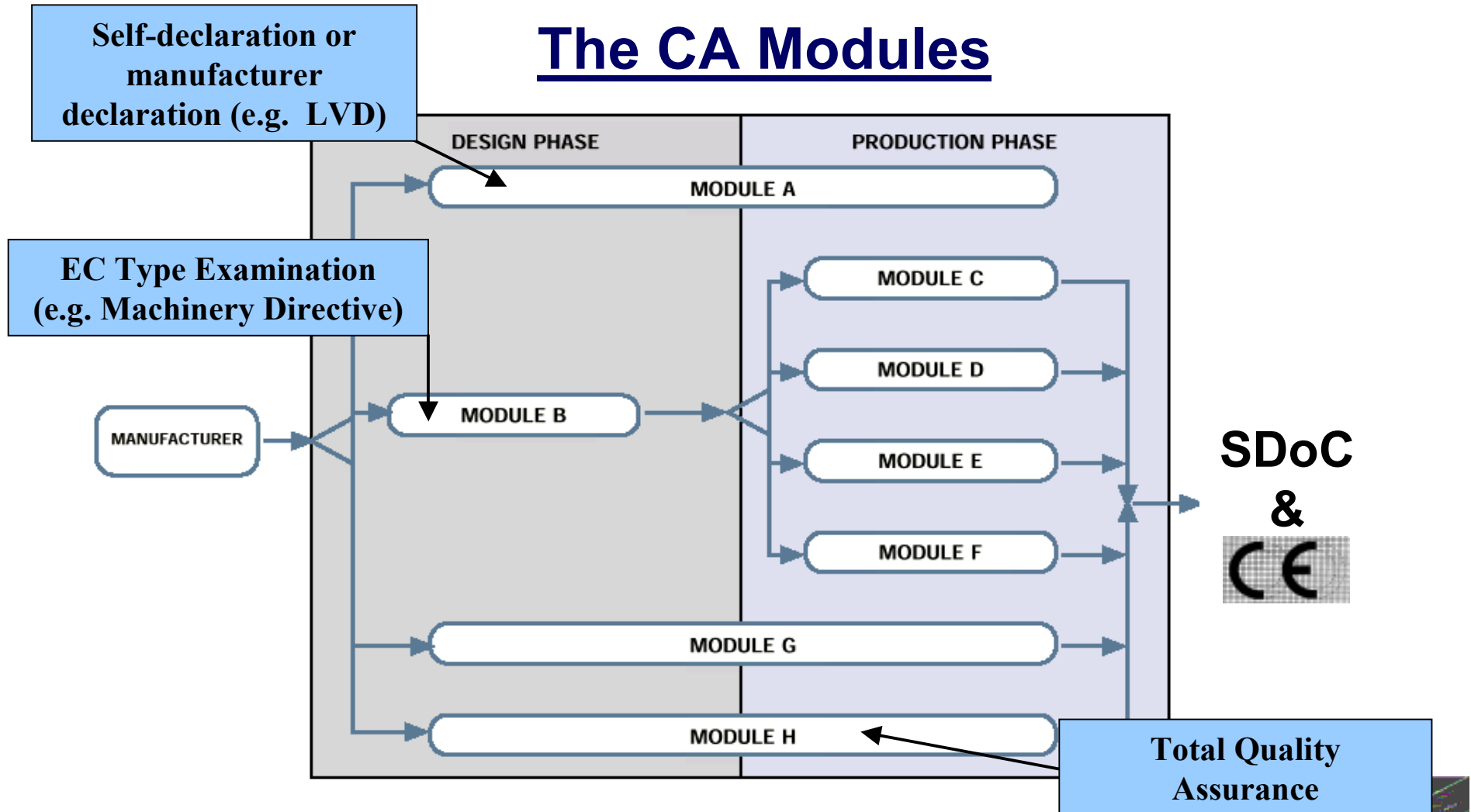
a) **Manufacturer's declaration** (self declaration), no mandatory third party testing

b) **Mandatory third party intervention** for Machines listed in Annex IV of the Machinery Directive.



# Conformity Assessment

## The CA Modules



# Market surveillance

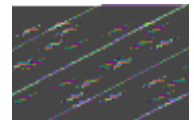
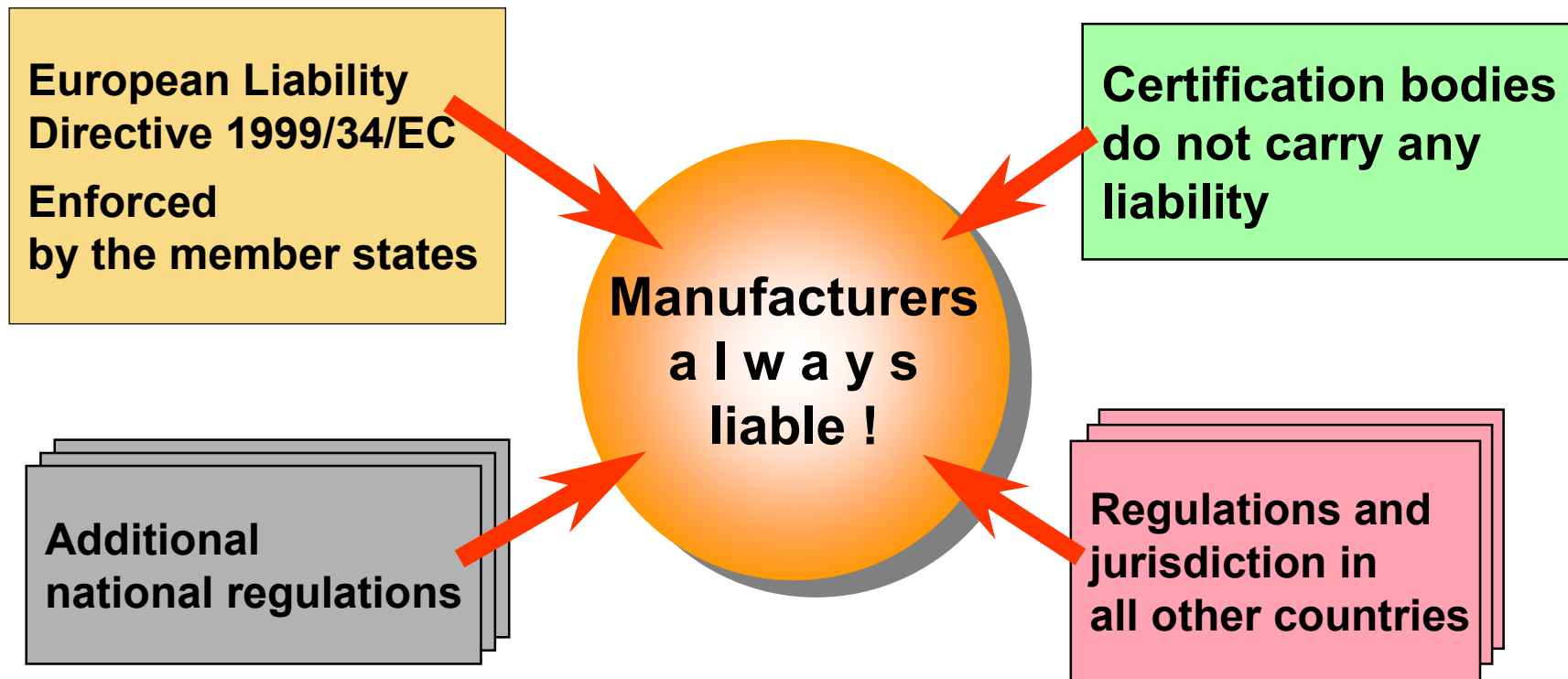
- Member States are responsible for Market Surveillance
- If restrictions to free movement:



Safeguard clause notification



# Manufacturer's Liability





# Comparison of Conformity Assessment procedures

Criteria	CA with self certification	CA with third party involvement
<b>Conformity Assessment</b>	First Party	Third Party Certification
<b>Market access</b>	faster	slower
<b>Price</b>	lower	higher
<b>Market-surveillance</b>	necessary	necessary
<b>Ultimate Responsibility</b>	Manufacturer or Supplier	Manufacturer or Supplier





Thank you for attention



# Where to find more information

- **Electrical safety:**

[http://europa.eu.int/comm/enterprise/electr\\_equipment/lv/index.htm](http://europa.eu.int/comm/enterprise/electr_equipment/lv/index.htm)

- **Email:**

[lvd@cec.eu.int](mailto:lvd@cec.eu.int), [georg.hilpert@cec.eu.int](mailto:georg.hilpert@cec.eu.int)

- **Blue Guide:**

<http://europa.eu.int/comm/enterprise/newapproach/legislation/guide/legislation.htm>

- **Euro Info Centres**

<http://europa.eu.int/comm/enterprise/networks/eic/eic.html>

