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CAB/469/DC

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INTERNATIONAL ELECTROTECHNICAL COMMISSION

CONFORMITY ASSESSMENT BOARD (CAB)

Meeting 15, Geneva, 2004-06-08

SUBJECT

Agenda item 5.2

Report and recommendations of the CAB/SMB *ad hoc* group on *Interpretation of standards after its 2004-04 meeting*

ACTION

Members of the CAB are invited to comment on, discuss and if relevant accept this report and its recommendations at the 2004-06-08 CAB meeting. Comments should be made on the IEC Technical Server by **2004-05-28** at the latest.

Report and recommendations of the CAB/SMB *ad hoc* group on *Interpretation of standards*

1. Introduction

The group has met once again, and presents its final report and recommendations to the SMB and the CAB. In summary, new structures are not recommended, since the resources to implement them are not available and—with minor changes—current arrangements meet the needs of TCs and the schemes' laboratory committees/technical bodies. Recommendations are therefore made for adjustments in current rules and procedures, and for enhanced communication between the CA schemes' technical bodies and the TCs. These improvements have been derived by the group from the contents of CENELEC Guide 26, as suggested by the CENELEC Secretariat and CCAF in 2003, and in the group's opinion will improve the quality of both IEC standards and their application to conformity assessment by the IEC schemes.

2. Background

The group based its work on the following items and assumptions:

- The classification defined in CENELEC Guide 26 of how essential or urgent a proposed technical decision, interpretation or change in a standard was to the TC:
 - a change in a standard was urgent and necessary (level 1);
 - the proposal should be published as an Interpretation Sheet straight away (level 2);
 - or
 - the proposal required no immediate action by the TC (level 3).
- It is recognized as essential that “provisional” decisions should be able to be made by the schemes' technical bodies (e.g. IECEE-CTL, exTAG) quickly, and allowed to be applied immediately, while recognizing their provisional nature until the TC concerned has considered the matter in the standardization context.
- The situation in Europe is different from the international one, in particular because the European schemes have an agreement with CENELEC but do not form a part of it, whereas the IEC CA schemes are a part of IEC with their Basic Rules being approved by the CAB, an IEC management committee. As part of the same organization the schemes are in a position to establish efficient communications with TCs. This has certain implications on the possible relevance of Guide 26 provisions in IEC.
- It is quite unfeasible to introduce a requirement to set up new, permanent bodies to provide interpretation, for lack of resources and because the equivalent bodies already exist and function in the way the schemes require. The TCs retain the currently existing possibility of setting up an interpretation panel if they see the need.

3. Recommendations

- 3.1 TCs should consult the relevant scheme on any Interpretation Sheets under development, at the latest by the enquiry stage. Scheme technical body input or action is concretely expected.
- 3.2 Scheme technical bodies should consult the relevant TC straight away on any Decisions under development. TC input or action is concretely expected.
- 3.3 On being presented with a scheme Decision, the TC should make one of the following choices:

- 3.3.1 Acknowledge the Decision but take no action: it has no influence on the standard, and the TC has no opinion on its consistency with the standard. This implies that the Decision is judged not to be relevant to standardization at all, but to concern only laboratory procedure beyond the scope of the standard.
- 3.3.2 Evaluate the Decision, whether superficially or thoroughly, for consistency with the standard; communicate the result of the evaluation as a recommendation to the scheme, which may choose to publish a reference to this result in the Decision itself (e.g. "Approved/endorsed by the TC"). This implies that the Decision touches the matter of the standard itself, but is not an interpretation, need not be known to other (non-laboratory) users of the standard, and need not influence future revision of the standard.
- 3.3.3 Generate and publish an Interpretation Sheet (according to the modified procedure being proposed); optionally, also place the subject on the list to be considered for the next revision of the standard. This implies that the Decision influences understanding, interpretation or correct use of the standard, and should be known to all users of the standard. If it is planned to consider the matter in the revision of the standard, this may be urgent (implying a request to the SMB to bring forward the maintenance result date of the standard), or not urgent. Once the Interpretation Sheet is published, the scheme may withdraw its Decision and provide references to the Interpretation Sheet so that it may be used directly.
- 3.3.4 Place the subject on the list to be considered for the next revision of the standard: this may be urgent (implying a request to the SMB to bring forward the maintenance result date of the standard), or not urgent. This choice implies that the subject of the Decision will allow the standard to be improved for its next revision (in clarity, unambiguity, etc.), but would not be appropriate, relevant or useful in the form of an Interpretation Sheet.
- 3.4 The CAB and the SMB should request the schemes and the TCs respectively to implement the processes described above thoroughly, openly and by using sufficient resources.
- 3.5 It is very important that Interpretation Sheets should be automatically available whenever/wherever the standard itself is, so that they effectively form an integral part of it. It is recommended that the SMB request IEC C.O., and the CAB request scheme secretariats, to implement this.
- 3.6 "Horizontal" decisions/interpretations, whether from a TC or a scheme technical body, should be communicated to all relevant product TCs (the process to be discussed by the Technical Department).
- 3.7 Requests for maintenance (amendment) of standards should be explicitly allowed to emanate from IEC CA schemes.
- 3.8 The procedure for Interpretation Sheets should be revised as shown in the Annex to the present report.

4. End of report

7. Interpretation sheets

7.1 Introduction

An interpretation sheet provides a quick formal explanation to an urgent request by a user of a standard (testing laboratory, certification body, manufacturer, etc.). The request may come directly or via an IEC conformity assessment scheme.

It is recognized that it is sometimes difficult to define what is a “matter of interpretation” for a given standard.

7.2 Proposal stage

A proposal for an interpretation sheet, including the draft text, may be submitted by:

- the Secretariat of the technical committee or subcommittee which is responsible for the relevant standard;
- a National Committee;
- an IEC Committee of Testing Laboratories (e.g. IECEE-CTL);
- any other body of the IEC.

Proposals emanating from the IEC schemes’ technical bodies, e.g. IECEE-CTL or ExTAG, or from “any other body of the IEC” shall be sent via the office of the CEO to the secretary of the technical committee or subcommittee which is responsible for the relevant standard.

The chairman and secretary of the technical committee or subcommittee shall consider whether the subject is really a matter of interpretation within the sense of 7.1. If this is considered not to be the case, the subject shall be dealt with as a proposal for an amendment of the standard, or if it originated as a “Decision” in a scheme it may remain as a procedural clarification for use in the scheme. The technical committee or subcommittee shall inform the secretariat of the scheme of its conclusions, including whether the committee endorses the Decision as being compatible with the standard.

7.3 Preparatory stage

The secretary of the technical committee or subcommittee that is responsible for the relevant standard shall within one month circulate the draft for the interpretation sheet to all National Committees, with a request for comments on the draft within a period of one month.

The proposal and the comments received shall be assessed by the chairman and secretary of the technical committee or subcommittee and be immediately communicated to the secretariat of the appropriate scheme. If deemed necessary, it may be discussed at the next meeting of the technical committee or subcommittee.

The final wording of the interpretation sheet shall then be agreed upon.

7.4 Approval stage

The draft shall be distributed in bilingual version to the National Committees for approval within two months. It shall be referenced as a final draft International Standard, the title being “Interpretation of Clause x, y, z of IEC: ...”

The draft will be considered to have been approved for publication if:

- a) a two-thirds majority of the votes cast by P-members of the committee are in favour, and

b) not more than one-quarter of the total number of votes cast are negative.

Abstentions are excluded when the votes are counted.

7.5 Issue of interpretation sheets

The draft, when approved, shall be issued by the Central Office with the heading "Interpretation sheet".

The interpretation sheet shall be sent to the National Committees and shall be included with the relevant IEC Publication at the time of sale. It shall also be sent to the Secretariats of the appropriate IEC Conformity Assessment Bodies for publication in the CB Bulletin. The issue of interpretation sheets shall be announced by the IEC. The reference numbers of applicable interpretation sheets shall also be given in the IEC catalogue under the publication number.

For a given IEC publication, each interpretation sheet shall be numbered as follows:

TC .../	Publication .../ Date, Edition	I-SH .../
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EXAMPLE: TC 61/Publication 60335-2-9(1986) Third edition/I-SH 01.

7.6 Review

Every 3 years, the Technical Committee shall review the interpretation sheets in order to check their applicability.

When an amendment to the publication or a revised publication is issued, the opportunity should be used to consider the inclusion of the contents of the interpretation sheets in the amendment or the revised text.

If the contents are included in the amendment or in the revised text, the relevant interpretation sheets shall be withdrawn.