



CAB/740/DC
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2008-05-07

INTERNATIONAL ELECTROTECHNICAL COMMISSION

CONFORMITY ASSESSMENT BOARD (CAB) **Meeting 23, Geneva, 2008-06-02**

SUBJECT **Agenda Item 8.4**
Proposal for an IEC Register of Suppliers' Declarations of Conformity (SDoC)

BACKGROUND

At its Feb. 2008 meeting, the Executive Committee approved a preliminary outline proposal for an IEC Register of SDoC, and charged IEC Central Office with developing the next stage of the proposal for submission to the Council Board. The proposal prepared for the Council Board is enclosed at annex (CB/488/DC).

CAB members' comments will be reported to the Council Board for its 2008-06-05 meeting.

ACTION

The CAB is invited to discuss the proposal for an SDoC Register.

Annex



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CB/488/DC

2008-05-07

INTERNATIONAL ELECTROTECHNICAL COMMISSION

COUNCIL BOARD (CB)

RESTRICTED CIRCULATION

SUBJECT

Agenda item 8.2

Proposal for an IEC Register of Suppliers' Declarations of Conformity (SDoC)

BACKGROUND

It is recalled that, following its 13 February 2008 meeting, the Executive Committee (ExCo) reported to the CB (document **CB/467/R**) that it had supported in principle an outline proposal from the General Secretary for an IEC Register of Suppliers' Declarations of Conformity (SDoC).

Recognizing that such an electronic Register (database) would fully respond to Masterplan 2006 goals to develop and improve IT-based services to the market for the benefit of users and IEC members, the ExCo requested the Central Office to prepare a more detailed proposal for consideration by the CB at its 5 June 2008 meeting. **That proposal, also being considered by the Conformity Assessment Board (CAB) at its 2 June meeting, is in Annex.**

SDoC is the first-party form of conformity assessment that is increasingly accepted in the context of the World Trade Organization's Agreement on Technical Barriers to Trade (the TBT Agreement). With its substantial experience of IT-based services in the international standardization arena, the IEC is well placed to implement and manage a freely accessible, Web-based SDoC Register, promoting international trade in electrotechnical goods and services that are self-declared by the supplier as conforming to certain standards.

It is emphasized that the Register would not be an additional IEC conformity assessment Scheme but **an information service**, supervised by the CAB but operationally quite separate from the existing third-party Schemes.

CB members may also recall that already in 2001 a proposed IEC system for manufacturers' declarations was extensively discussed in the CAB and CB. At that time an IEC Mark of conformity was seen as an integral part of the system, and lack of support for such a universal IEC Mark ultimately played an important role in the registration system also failing to find support. It is therefore emphasized that the new proposal is considerably less complex and the system would not be linked with any mark.

While development of a set of rules and procedures would certainly be required to ensure that the obligations of manufacturers/suppliers were met and that customers as well as the IEC itself were protected, it is felt that the scheme would demand little more from the supplier than the data he already possesses. It would furthermore encourage contact between NCs and local industries that would be to the benefit of both.

ACTION

Document **CB/488/DC** is submitted to the Council Board for **consideration and endorsement** at its 5 June 2008 meeting, with a view to Central Office developing a more detailed plan for the proposed SDoC Register.

Annex

The IEC Register of Suppliers' Declarations of Conformity (SDoC)

Introduction

1. What

The IEC will make available a world-wide register of Suppliers' Declarations of Conformity to standards (SDoCs), entered by the manufacturers and distributors themselves using a Web-based platform provided and operated by the IEC and its National Committees. These Declarations will show all potential customers the International Standards, the national/industry standards and specifications, and the regulations to which the suppliers declare that their products conform.

2. Benefits

- **Suppliers** can publicize all their declarations widely at low cost under the ægis of the IEC.
- **End-users (customers)** have convenient access to information on a wide range of products declared as conforming to standards.
- **IEC National Committees (NCs)**, taking advantage of their familiarity with the market and knowledge of standardization and conformity assessment matters, have an attractive service to offer to industry and will earn revenue.
- **IEC Conformity Assessment Schemes** benefit from the existence of a low-threshold facility which can serve as a prelude to their services and generate new customers.
- **The IEC** further promotes the universality of its standards and enhances its conformity assessment offer with a first-party service that complements its third-party schemes.

3. Why

More and more products are traded on the basis of suppliers' declarations to standards, in the communications and computing industries for example. On the one hand, this contrasts with third-party certifications which have a cost in time and money that is not always necessary; on the other, it is a significant improvement over having no information at all, a situation which is less and less acceptable in most parts of the world. Since it is conformity to International Standards that is mostly desirable, the IEC is best positioned to provide the essential service of a central register in which all potential customers can check the status of products of interest.

4. Responsibilities

All the data entered into the Register is entirely the responsibility of the suppliers, and each Register page states this clearly – the IEC and its NCs assume no liability. NCs are responsible for verifying the identity of suppliers. IEC Central Office provides the infrastructure and the database facility, issues bills, collects revenue and transfers a major part of it to NCs.

5. Information in the register

Each entry will contain:

- 5.1 Company, product name, product description, model number;
- 5.2 A statement that this Declaration is in conformity with ISO/IEC 17050-1: *Conformity Assessment – Supplier’s declaration of conformity – General requirements*, and ISO/IEC 17050-2: *Conformity assessment – Supplier’s declaration of conformity – Supporting documentation*;
- 5.3 International Standards to which conformity is declared, including options, clauses, ...;
- 5.4 Regional, national, industry standards and specifications to which conformity is declared, including options, clauses, ...;
- 5.5 Regional and national regulations with which there is a “presumption of conformity”;
- 5.6 Links to further information (see 6. below).

6. Links to further information

The entries in the Register may be linked to a range of useful information, all of which is optional at the choice of the supplier:

- 6.1 The full set of information constituting the Declaration of Conformity, beyond what is contained in 5.1-5.6 above, according to ISO/IEC 17050-1;
- 6.2 Supporting information, including detailed product descriptions or specifications, data sheets etc. Guidance for this may be found in ISO/IEC 17050-2;
- 6.3 Link to supplier’s web site;
- 6.4 Reference to any relevant management system certification(s) of the supplier;
- 6.5 Other companies linked to this supplier (subsidiaries etc.), and their entries in the Register;
- 6.6 Link to IEC Webstore for ordering the International Standards referenced;
- 6.7 Link to other international organizations for access to their referenced International Standards. [Possible links to other, non-International Standards bodies might only be investigated at a later date.]
- 6.8 IEC Scheme certificates for same or similar products and other Scheme entries for the same company.

7. Services to suppliers

- 7.1 Write access to the Register, for making supplier’s declaration entries (by registration with IEC Central Office, payment of a setup fee and receipt of a password).
- 7.2 Promotion to customers of the declaration that its products conform to standards.
- 7.3 Worldwide publicity for the supplier’s declarations, web site, etc, under the IEC umbrella.
- 7.4 Notification service for changes to the International Standards referenced.
- 7.5 Permission to make public reference to being present in the Register, under conditions to be defined.

8. Services to NCs

NCs receive approximately three-quarters of the revenue generated. They may use the availability of the Register to extend their services to their industrial community.

Implementation

9. Population of the Register

- Roles:
 - IEC CB: decides strategy and implementation of the Register.
 - IEC CAB: supervises operation in function of IEC's conformity assessment policy.
 - Company: obtains authorization from IEC and enters information into Register.
 - NC: validates company by verifying that it is a legal entity and checking its identity and contact details in the Register of Commerce; informs IEC Central Office (CO).
 - IEC CO: issues password to validated companies; develops & maintains Register; issues bills and receives payments; initiates annual revalidation by NCs.
- Promotional activities:
 - NCs obtain lists of potential suppliers who may be customers for the Register from IEC CO, Officers, Management Committee members, experts.
 - NCs propose service to communities of manufacturers and suppliers and individual potential customers.
 - A full marketing programme, including wide promotion to end-users, will be the subject of more detailed study.
- Sequence of events:
 - Company expresses interest to IEC CO or an NC.
 - NC validates company and informs IEC CO.
 - IEC CO issues bill for the registration/set-up fee (see 11. below); on payment, it sends password to company for entry of data.
 - Company enters information into Register.
 - Depending on number of entries used, and each year thereafter, IEC CO issues further bills and receives payments.

10. Organization of the information

- The Register will be fully cross-linked and sortable on all fields.
- The categories of the products, one of the principal routes of access for end-users, will be self-organizing:
 - the choices given to suppliers will be flexible and change according to the population of the Register;
 - some reorganization and cross-linking will be accomplished automatically by software, depending on experience with entries and usage;
 - suppliers' and users' opinions and experiences will be canvassed to identify improvements to be made.
- The start-up list of categories will be taken partly from the World Customs Organisation (www.wcoomd.org: the Harmonized Commodity Description and Coding System, e.g. Chapters 85, *Electrical Machinery and Equipment*, and 90, *Instruments and Apparatus*) and partly from IECEE data and experience.
- IEC will provide a service to suppliers to inform them of any revision or amendment to IEC standards they refer to in their Register entries.

NOTE – The supplier must himself take the initiative of changing or adding entries to correspond to the new edition or amendment, if desired.

11. Price

- There is a registration and set-up fee (e.g. CHF 100), which must be paid before issue of the password allowing the company to make entries.
- The company pays per entry per year; the price per entry is low (e.g. CHF 10 p.a.).
- A separate entry is needed for each pair of product-standard, and each model counts as a distinct product; i.e. if a product is declared as conforming to 14 standards, that's 14 entries; if there are two closely related models, that's 28 entries.
- IEC CO issues the invoices and receives payment.
- Approximately 75 % paid to National Committee, 25 % retained by IEC CO to cover costs.

12. Liability, integrity, security and validation

- Each Register page states prominently that full responsibility is assumed by the declaring company (supplier), and no liability attaches to the IEC or its National Committees.
- These pages, and all communications and messages both to suppliers and to end-users of the Register (e.g. application form, written offers, text on invoices regarding consequences of non-payment), are drafted in advance and checked by legal staff.
- A security interlock is imposed by the software which guarantees that only the company responsible for any piece of information may change that information, and that its name is recorded with the change.
- A full, searchable change history is kept of all changes to the Register, for internal use only, so that any complaint regarding the contents may be followed up immediately.
- Entries are validated to the fullest extent possible:
 - References to IEC International Standards are entered from a pick list.
 - [References to other standards, regulations and specifications are validated according to criteria yet to be developed.]
- Having an entry in the Register confers no right to the use of the IEC logo.

13. Market viability

Following an endorsement by the Council Board of this basic proposal, Central Office will validate the market viability of the proposed SDoC Register in consultation with a variety of key players involved in the IEC's work, for example multinationals. In parallel with that validation, Central Office will also seek further legal and insurance advice to ensure full protection for the IEC and its NC Members as a condition for implementation of the Register.

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