



**TO ALL NATIONAL COMMITTEES
TO ALL TECHNICAL COMMITTEES AND SUBCOMMITTEES
TO ALL CONFORMITY ASSESSMENT TECHNICAL GROUPS**

Dear Sir/Madam,

New procedures for *Interpretation of standards*

At their June 2004 meetings, the SMB and the CAB agreed on new procedures for generating, distributing and using all manner of texts intended to allow standards to be understood, interpreted or applied. The purpose of all such texts is referred to generically as the “interpretation of standards”, even though they are by no means limited to official Interpretation Sheets.

The need for such procedures arises, among other situations, from the interface between TCs with their technical experts who write standards, on the one hand, and Conformity Assessment (CA) Schemes and their technical experts who use standards, on the other. A major goal of the procedures is to find the optimal compromise between a CA Scheme laboratory’s urgent need for a decision on how to apply a standard where there is doubt, and a TC’s need for more time to work out the correct technical answer. The communication of interpretations between these two large communities is vital, and for this reason the present procedures are particularly recommended to the attention of CA Scheme technical bodies, and to the attention of TCs whose standards are used by the CA Schemes.

The SMB and CAB decisions were as follows:

CAB Decision 15/5

With small changes ... , the CAB approves the recommendations of the *ad hoc* group on *Interpretation of standards* for implementation for a trial period of two years; they should be monitored for operational effectiveness. ...

SMB Decision 120/15

The SMB approved the recommendation from the joint SMB/CAB task force on interpretation of standards given in document SMB/2846/R with slight changes as proposed by CAB and SMB members and concurred with CAB to apply the proposal for a trial period of two years.

The SMB requested Central Office to implement the procedure and to develop a method for monitoring the implementation.

The new rules as approved by the CAB and the SMB are given in Annex 1. The procedure for Interpretation Sheets in the ISO/IEC Directives, IEC Supplement, will be revised at the next opportunity. The new text, as shown in Annex 2, applies immediately.



In the coming months, the Central Office will request your help in making these decisions and rules effective, starting with a census of existing interpretations and also providing checklists for those developing or using interpretations in the future. This implementation process is planned to be complete by April 2005.

Thank you in advance for your active involvement in the process.

Yours faithfully,

A. AMIT
General Secretary

GB

Annex 1: Rules approved by the CAB and the SMB, to enter into force straight away

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.
2. Scheme technical bodies should consult the relevant TC straight away on any Decisions under development. TC input or action is concretely expected.
3. On being presented with a scheme Decision, the TC should make one of the following choices:
 - 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.
 - 3.2 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 Generate and publish an Interpretation Sheet (according to the new procedure in Annex 5); 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.
 - 3.4 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.
4. The CAB and the SMB are hereby requesting the schemes and the TCs respectively to implement the processes described above thoroughly, openly and by using sufficient resources.
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. The SMB is hereby requesting IEC C.O., and the CAB is hereby requesting scheme secretariats, to implement this.
6. "Horizontal" decisions/interpretations, whether from a TC or a scheme technical body, will be communicated to all relevant product TCs. The process for this is being discussed by the Technical Department in IEC C.O.
7. Requests for maintenance (amendment) of standards may at any time be made by IEC CA schemes, to the TCs concerned with a copy to C.O.

Annex 2: New text for ISO/IEC Directives (IEC Supplement), to enter into force straight away and to be incorporated into the main text at the next revision

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:

1. the Secretariat of the technical committee or subcommittee which is responsible for the relevant standard;
2. a National Committee;
3. an IEC Committee of Testing Laboratories (e.g. IECEE-CTL);
4. 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 further 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 with the voting period being 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 shall be used to consider the inclusion of the contents of the interpretation sheets in the amendment or the revised text.

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