

Report of the Strategic Review Panel of EMC Harmonised Standards

Management Summary

The Strategic Review Panel (SRP) of EMC harmonised standards had been set up following a request from the Commission dated 1999-04-19, resulting from Recommendation 16 of the SLIM EMC exercise.

Its purpose and task were to examine the EMC standardisation system and to prepare recommendations for its improvement in respect of coherence, consistency, simplification and avoidance of proliferation.

All parties involved in the broad spectrum of standardisation participated to the SRP activities: Commission, Member States, Industry, Competent Bodies, EMC Consultant and Standardisation Institutes.

The SRP held five meetings from October 1999 to November 2000 and set up 3 ad hoc groups to elaborate proposals for specific topics.

The outcome of its work is twofold:

- On the one hand it shows that the standardisation activities, which had to base themselves on an existing, pretriggered situation of disharmony has made the best out of it in order to ensure coherence and consistency. The initial apparent proliferation of standards has come to a point of saturation. The hierarchical structure of standards is consistent.
- On the other hand there is space for improvement. The standardisation system requires transparency and openness, especially in terms of use of the standards and their link to products. It should also be envisaged to prepare a future single generic emission standard.

The SRP has translated the result of their activities into the following recommendations:

Recommendation 1 (transparency and openness):

CENELEC Reports R210-001 "Guide on EMC standardisation for Product Committees" and R210-007 "Report on the use of standards for the implementation of the EMC Directive" should be made available, free of charge, on the CENELEC Website.

Recommendation 2 (future single generic standard):

It should be envisaged to prepare a future single generic emission standard in accordance with the framework as set out under clause 5.3 of the SRP report.

This task should have a high priority.

Recommendation 3 (hierarchical structure of standards):

The principle of product (family) standards taking precedence over generic standards is to be kept.

Recommendation 4 (phenomena):

Phenomena and their selection belong to the standardisation field and should not form part of the EMC Directive.

Recommendation 5 (immunity standards):

There is a definite need for immunity standards.

Recommendation 6 (immunity approach):

There is no incentive for modifying the approach towards immunity.

Recommendation 7 (proliferation):

Noting that

- the number of harmonised standards is stabilising
 - only a limited number of Product Committees has prepared multiple product standards
 - there are at present only 7 basic standards used in the legal framework
- the SRP concluded that there is no real proliferation of standards and that hence no specific action other than possible regrouping of product requirements is to be undertaken.**

Recommendation 8 (management and inconsistencies):

The advice as expressed by CLC/TC 210/SOG and by the EMC Consultant on the suitability of product (family) standards as harmonised standards under the EMC Directive should be more closely followed.

Recommendation 9 (link product-standard):

The cross-reference list of products and their related harmonised standards is to be kept regularly updated.

Recommendation 10 ("under consideration" clauses):

CENELEC should apply the principle that "under consideration" clauses in EMC draft standards can only be allowed up to the CENELEC enquiry stage and should hence be removed before the voting stage. IEC should be invited to apply the same principle, this in view of parallel procedures on IEC drafts.

1 Purpose and task

The Strategic Review Panel (SRP) of EMC harmonised standards had been set up following a request from the Commission as a result of Recommendation 16 of the SLIM EMC exercise. Its purpose and task are clearly set out in the letter dated 1999-04-19 from the Commission to the CENELEC President (see annex A).

2 Participation

All parties identified by Recommendation 16 actively participated to the SRP.

It was chaired by Mr Kaiser (ORGALIME) with Mr Vetsuypens (CENELEC Central Secretariat) as Secretary.

Its members were:

Mr Anselmann (European Commission), Mr Bartak (CENELEC), Mrs Baumier-Duphil (CENELEC), Mr Coenraads (Member States), Mr Cumps (CENELEC), Mr De Vré (EMC Consultant), Mr Farrell (CENELEC), Mr Garvert (Member States), Mr Gemma (ETSI), Mr Groot Boerle (CENELEC), Mr Gutierrez Iglesias (CENELEC), Mr Imeson (Member States), Mr Isnard (CENELEC), Mr Kerry (CENELEC), Mr Kohling (CENELEC), Mr Kontolatos (Member States), Mr Lanne (CENELEC), Mr Leferink (Industry - ORGALIME), Mr Lightfoot (ETSI), Mr Linnert (Competent Bodies), Mr O'Dwyer (CENELEC), Mr Pandini (CENELEC), Mr Rahmes (Member States), Mr Sanhet (CENELEC), Mr Scott (Industry - EICTA), Mr Sepka (Member States), Mr Sisolefsky (ETSI), Mr Start (Industry - EURELECTRIC), Mr Storrs (ETSI), Mr Stratigoulakos (Member States), Mr Ulzurrun (European Commission), Mr Van der Giessen (Industry - CELMA), Mr Verholt (CENELEC), Mr Vivero (Member States), Mr Vrolijk (CENELEC) and Mr Wolf (CENELEC).

3 Terms of reference

The SRP Terms of Reference were in line with the objectives as set out by the Commission in their initial request. The group however decided to delete "To identify needs regarding transitional regimes and ensuring required changes" as this aspect is already duly covered by the transitional arrangements linked to the publication method of the harmonised standards in the OJEC (date of cessation of the superseded harmonised standard).

4 Ad hoc groups

In order to prepare the SRP report, three ad hoc groups were set up, with the following terms of reference and membership. The outcome of the work of these groups formed the basis for the SRP work.

4.1 SRP AHG 1

"To address the problem of diverging environments and classes of emission, and to prepare a proposal which will improve the coherence of environments and classes of emission, in particular between CISPR 11 and 22 and the generic standards. To look at the required number of environments and assess the pros and cons of foreseeing possibly only 1 environment in the future."

Members: Mr Kerry (Convenor), Mrs Baumier, Mr De Vré, Mr Kohling, Mr O'Dwyer, Mr Sisolefsky and Mr Vrolijk.

4.2 SRP AHG 2

"To prepare a paper describing the current status of the generic standards and their relationship to product standards. This in the context of a situation where it would be up to the manufacturer to decide to use the generic standards as an alternative to the dedicated product standards (duly noting however that the generic standards are more or less complete/sufficient but that there is a gap above 1 GHz)."

Members: Mr Linnert (Convenor), Mr Coenraads, Mr De Vré, Mr Leferink, Mr Verholt and Mr Vrolijk.

4.3 SRP AHG 3 (Framework of generic standards)

"To prepare a framework proposal regarding a possible future single generic emission standard, bearing in mind in particular following principles:

- how can this generic standard be more complete/universal?
- what formalities are necessary to offer more freedom to the user when selecting different options and related limits from this generic standard?
- what limits are foreseen?
- what (kind of) phenomena are to be included?

and with the understanding that this generic standard contains all emission requirements (radiated and conducted)."

Members: Mrs Baumier (Convenor), Mr Bartak, Mr Coenraads, Mr De Vré, Mr Farrell, Mr Gemma, Mr Groot Boerle, Mr Kaiser, Mr Kohling, Mr Leferink, Mr Lightfoot, Mr Ochel, Mr O'Dwyer, Mr Scott, Mr Sepka and Mr Vrolijk.

5 Recommendations and their rationale

5.1 Transparency and openness

5.1.1 Some criticism had been expressed regarding transparency and openness of the EMC standardisation system, particularly in respect of the types of electromagnetic disturbance covered by the standards, in terms of electromagnetic environments and compatibility levels, types of standards, tables of standards by type, ...

It was confirmed that nearly all of these topics are already covered in different publications:

- R210-001 "Guide on EMC standardisation for Product Committees"
This document explains the EMC standardisation structure i.e. basic, generic and product (family) standards and the involved precedence over each other.
- R210-007 "Report on the use of standards for the implementation of the EMC Directive".
- EG 201450 "Guidance on the identification of Harmonised Standards and/or other technical specifications for R&TTE covering requirements under Article 3.1 of Directive 1999/5/EC" which contains useful information on EMC standardisation.

ETSI offers free access to EG 201450 on their Website.

The SRP made a plea for having both R210-001 and R210-007 on the CENELEC Website with free access.

5.1.2 The Commission is requested to possibly look into the matter of either introducing a note to the consolidated list of harmonised standards explaining that these guides are available or putting a hint on their homepage.

5.1.3 It was reconfirmed that these guides should not have an EN status.

5.1.4 Further on it was proposed that any deviation in product (family) standards from the future generic standard(s) will have the justification for the deviation documented in a technical report.

Recommendation 1 (transparency and openness):

CENELEC Reports R210-001 "Guide on EMC standardisation for Product Committees" and R210-007 "Report on the use of standards for the implementation of the EMC Directive" should be made available, free of charge, on the CENELEC Website.

5.2 Emission environments and classes

The definitions of classes A and B as referred to in CISPR documents (see CISPR 11/EN 55011 and CISPR 22/EN 55022) are different from those of the generic standards. Whilst for EN 55011 the difference is minimal, EN 55022 is deviating in the sense that use of Class A equipment is not forbidden in a domestic environment.

Whilst, in theory, this situation may cause problems to national authorities for the enforcement of the EMC Directive, the SRP noted that there are no complaints from the market regarding classes and that therefore a careful approach when possibly revising the environment/class approach should be borne in mind.

5.3 Single generic emission standard

5.3.1 History of generic standards

The essential requirements of the EMC directive imply that in a given environment, the emission of disturbances is limited in order to achieve electromagnetic compatibility in this environment. For this reason and because of the short delay given to the manufacturers before the application of the EMC directive, the generic standards were created rapidly to define the levels of disturbances for immunity and emission, phenomenon by phenomenon, so that manufacturers could use in practically all cases the conformity assessment according to article 10.1, using only harmonised standards.

Historically the generic emission standards were developed rapidly to fill a gap in the European standardisation in view of the application of the EMC directive and they have fulfilled and continue to fulfil successfully this function.

It is time now to review fundamentally these existing generic emission standards, with the aim of defining a more universal single generic emission standard covering the complete frequency range and all the concerned parts of equipment.

5.3.2 Are generic emission standards needed?

The essential requirements of the EMC directive imply that in one given environment, the limiting of emissions for each piece of equipment, having the same type of operating characteristics and intended for the same environment, is defined equitably. Therefore a generic emission standard should specify equal limits for all equipment having similar operating characteristics and intended for the same environment, particularly with respect to its contribution to the cumulative disturbance level in low-frequencies (below 9kHz).

It is the view of the SRP that the availability of a more complete and more universal single generic emission standard would constitute an important progress for future EMC standardisation, as it would enhance the role and practical use of this generic standard and help to improve the co-ordination of the EMC standardisation. It follows that different sets of limits may be defined for equipment according to the characteristics and operating environment without compromising the essential requirement necessary to protect the radio spectrum and telecommunications and power networks.

In this fundamental revision, the following important factors of the technical evolution should be taken into consideration:

- rapid evolution and expansion of radio and telecommunications services and need to protect them, considering also future spectrum use for radio and telecommunication services,
- increasing use of electronic converter devices to energise equipment from public supply networks,
- evolution of equipment towards multifunction and multimedia, making the use of product oriented standards sometimes problematic and ambiguous. The «sectoral» product family orientated approach, which needs clear and unambiguous scopes, may be in reality outdated due to the evolution of these new categories of products,
- evolution towards less differentiation of equipment used in different electromagnetic environments, due to the extensive use of communication services everywhere.

5.3.3 Relationship of generic emission standards with other EMC standards - Present situation

The following explanation is based on the present procedures used in CENELEC, ETSI and IEC, and defined in CENELEC report R210-001 and IEC Guide 107. This is completed by proposals of the SRP for the future given in the next part 5.3.4.

The basic EMC standards describe the measurement methods for each phenomenon or set down compatibility levels as the reference values for co-ordinating emission and immunity limits. Since harmonised standards specify the limits corresponding to the protection requirements, the basic standards are not harmonised standards for the purpose of the EMC directive. Instead, they are considered as standardisation tools and are used as normative references in the harmonised standards, i.e. in the generic, product and product family standards.

The generic emission standards are applicable to products not covered by specific product or product family standards. In addition, they have a horizontal role in defining the necessary protection level for the given environment, and take into account the cumulative effects of emissions. Therefore they provide reference levels against which product standards are verified.

The Strategic Review Panel has confirmed (see 5.4) that as long as the generic emission standards are not revised fundamentally, the precedence principle of product standards over generic standards (see CLC reports R210-001 and 007) will not be modified.

It is not advisable to propose a framework for a future generic emission standard without carefully considering the entire structure of EMC standardisation, in particular the relationship between generic and product (family) EMC standards.

This is the purpose of the following part 5.3.4.

5.3.4 How should the limits defined in a future single generic emission standard be used in the future EMC Product standards ?

The following considerations will apply after a new generic emission standard is published in accordance with the proposals and framework presented in the present document.

5.3.4.1 Generic standard as the reference for the product standards

The future generic standard shall give the emission limits which achieve the minimum protection of the environment. The general rule is that all product standards for emission shall not include more relaxed limits, for all phenomena covered by the generic standard, than the limits defined in the generic standard. However in particular cases, exceptions may exist (see 5.3.4.2) where more relaxed limits or more stringent limits are necessary. A future generic emission standard will be essential to guarantee the equity between standards created by Product committees.

Product emission standards should not be developed unless deviating requirements are necessary and/or specific test conditions are required.

For emission, the EMC product standards (or product family standards) shall normally make reference to the generic standards for the values of the limits for all phenomena relevant to the product, and shall describe the operating conditions for the equipment and give references of the test methods.

5.3.4.2 Collection of justification of exceptions

Product Committees may propose more relaxed limits or more stringent limits according to the strict co-ordination rules for EMC fixed in the various standardisation bodies.

Any deviation from a future generic emission standard should be justified and reported at least for the purpose of approval and voting by the National Committees. The rationale for the deviation should be given in an informative annex to inform the users and the National Committees.

To give background information, it will be necessary to create a guide or technical report where all the exceptions will be referenced with the reasons justifying the exception (CISPR H has an approved NWIP on this subject, proposing to publish a technical report). This guide will record both types of exceptions:

- less stringent limits with the justifications
- more stringent limits with the justifications.

Proposed action:

CLC, CEN and ETSI to contribute in IEC to the elaboration of this technical report compiling all the exceptions and the justifications.

5.3.4.3 Evolution of the product standards

The scope of the EMC product standards shall be clear and without ambiguities.

The product standards should be amended so that they cover, where necessary, the same frequency ranges as the generic standards.

NOTE For European standards this will avoid the problem of the meaning of the "date of cessation of presumption of conformity of superseded standards" which would arise if limits in a new frequency range were to be published in a new standard, which did not supersede any other standard. The generic and product standards would simply be amended to include the new limits or make reference to the new standard in which they are specified.

Since only one complete emission standard would need to be applied to any given product, it would then be very straightforward for the manufacturer to identify the applicable standard according to the order of precedence: at present, product, product family, generic.

5.3.5 Proposition of structure for a single generic emission standard

5.3.5.1 Scope

A new generic emission standard should cover all the emission requirements for electromagnetic disturbances in the whole frequency band (0 to 400 GHz), including low-frequency (0 to 9kHz) and high frequency (9kHz to 400GHz), conducted as well as radiated. Clicks should also be covered when appropriate.

The requirements of the generic standard are intended to be used as reference for development and modification of product family standards or of product standards.

The requirements of the generic standard are applicable to each equipment not covered by a product family standard, or a product standard.

5.3.5.2 Ports

The standard should be based on a port approach with, for each case, one (or sometimes several) measurement method and corresponding limits.

All foreseeable ports liable to generate disturbances should be included for conducted emission (mains supply input and output, DC power supply and output, load terminals, telecommunication terminals, other signal or terminal ports...) and for radiated emission (enclosure...). The emission from the antenna port and the radio enclosure of radio equipment are not included, as these are used for radio frequency spectrum management purposes and are the responsibility of ETSI.

The standard should give information on the applicability of limits/requirements at the ports (for example on the basis of length of cabling indicated in manufacturer's instructions and /or on the basis of type of cables required in the manufacturer's instructions, etc.).

5.3.5.3 Type and numbers of environments to be considered

The generic standard shall keep the number of classes of limits to a minimum. The relationship between these classes of limits and the application of equipment in a particular environment shall be clearly defined with the view of being adopted later in a co-ordinated manner by product-family standards and product standards in a uniform way.

All EMC product standards should normally refer to this relationship without introducing their own rules.

Regarding radiated emissions, as the differentiation of environments is becoming less clear with the evolution of new technologies, the possibility to have only one type of environment and a corresponding set of limits (with very few exceptions) should be seriously considered in this case. Industrial applications shall also be seriously considered for the possibility of adapted solutions.

For radiated disturbances at frequencies between 30 MHz and 1 GHz, present inconsistencies arise from the differences in the ways in which the limits (classes) are associated with different environments in the various standards. Since the harmonised immunity standards require immunity to field strengths, which are orders of magnitude higher than the emission limits, the controlling factor is the proximity of radio-communications receivers.

For conducted phenomena, the environments should be determined by the network to which the equipment is connected (electricity supply network, telecommunication network). The definition of the environment ought to be different whether LF phenomena are concerned or HF phenomena are concerned.

5.3.5.4 Which phenomena should be covered by a future generic emission standard ?

The phenomena covered should at least be the same as in the present generic emission standards.

With the use of new technologies, «new» disturbances (e.g. in different parts of the spectrum) could appear. Limits for «new » disturbances should be included only if necessary, when an increasing risk of interference or disturbance could appear.

5.3.5.5 Factors having an influence on the limits

Limits should cover the required frequency range and take into account the probability of the disturbances. The limits may vary at higher frequencies depending on the radio service and on the frequency ranges involved. Depending on the phenomena, the limit may be power dependent and/or frequency dependent.

The specification of the limits should take into account the type of operating characteristics of the equipment, especially when the addition of disturbances of equipment influences the electromagnetic environment. The cumulative effect can be of large importance when considering mass produced equipment for conducted low frequency phenomena; it should then be taken into account.

In specifying limits (e.g. for conducted low frequency emissions (below 9 kHz) or for digital telecommunication services), it is necessary to ensure that the restriction applicable to equipment groups is in proportion to their contribution to the cumulative disturbance level.

For some limits, indications should be given, limiting the application area to certain categories of products. Therefore equipment groups could be defined and a matrix could indicate which limits apply to which equipment group.

There is no reason for the emission limits to be different, for equipment having the same type of operating characteristics and intended for use in the same environment.

5.3.5.6 Test conditions and test report

A new generic emission standard should include also a clause defining the conditions during measurement (present clause 6 of 61000-6-3). The generic standard should give if necessary additional information in a general way, such as cable layout, maximising the emission, etc.

The content required in the test report should be described

5.3.5.7 Basic Measurement methods to be used

The measurement and test methods need only be indicated by reference to a basic or another reference standard when such standards are available.

It is only in the case where such a reference standard would not be available that a detailed normative annex describing the measurement and test method could be included in the generic standard. The better way will be to publish a new basic standard for this method.

The product should be regarded, as far as possible, as a black box where only the external aspects (such as existence of mains cable, signal cable, telecom port, construction of the enclosure, etc.) are essentially relevant.

The standard should allow in some cases the choice of alternative measurement methods with corresponding limits to facilitate the surveillance of their own products by the manufacturers.

Example for radiation measurements above 30MHz:

- standardised open test site,
- semi-anechoic room,
- fully anechoic room (3m distance),
- power clamp,
- mode stirred chambers,
- TEM cells ...

It is not required to have a strict equivalence and correlation between the different methods (including their corresponding limits), as long as these various methods (and associated limits) are shown to give satisfactory results in practice.

Restrictions for use of the different alternative methods should be indicated in the standard (for example size of tested equipment, external cabling used etc.)

5.3.6 Responsibilities for preparing the new generic emission standard

In order to avoid technical barriers to trade, it is not proposed to develop this new generic emission standard at the European level but to give preference to international standardisation. It is therefore thought that the recommendations contained in this document should be forwarded by CENELEC to IEC /CISPR, with the aim that CISPR develops the needed standard with input from TC 77 (SC77A) for the low-frequency part to be included, for which CISPR is not responsible.

Recommendation 2 (future single generic standard):

It should be envisaged to prepare a future single generic emission standard in accordance with the framework as set out under clause 5.3 of the SRP report.

This task should have a high priority.

5.4 Precedence of product (family) standards over generic standards

The SRP looked into a proposal for removing the precedence of product (family) standards over generic standards, leaving the choice of using the generic standards as an alternative to the product (family) standards.

It was pointed out that the principle of product (family) standards taking precedence over generic standards should be kept at all cost because this has been one of the fundamental principles relating to the EMC standardisation structure. Moreover, requirements in product (family) standards are not always relaxations from the generic standards but may contain more stringent requirements.

It is also to be borne in mind that the importance of product (family) standards is that they facilitate ensuring compliance with the essential requirements of the EMC Directive for the manufacturers. Otherwise manufacturers might approach the essential requirements in a different way. On the other hand it was remarked that for certain equipment the "product approach" will (have to) disappear in the near future due to convergence of technologies.

The majority of the SRP members was not in favour of removing the precedence of product (family) standards over generic standards, at least not for the moment being.

Recommendation 3 (hierarchical structure of standards):

The principle of product (family) standards taking precedence over generic standards is to be kept.

5.5 EMC and phenomena

5.5.1 Reference was made to the ever growing number of basic standards, addressing continuously new phenomena. It was stressed that R210-001 identifies 18 phenomena which Product Committees should consider and from which only those relevant for the product should be translated in the standard (see also 5.6 on this issue).

It was also pointed out that no stable selection of phenomena, which would be indefinitely valid, can be envisaged. However, the EMC Directive is sufficiently specific with respect to the phenomena to be covered, since its protection requirements relate to electromagnetic disturbance, which it defines as any phenomenon that can degrade the performance of equipment.

Recommendation 4 (phenomena):

Phenomena and their selection belong to the standardisation field and should not form part of the EMC Directive.

5.5.2 The fundamental issue whether immunity standards should continue to be associated with the EMC Directive was put forward.

The SRP position was clear: as the EMC Directive covers emission and immunity and one of the means of proving compliance is the application of harmonised standards in which there is a definite need for immunity standards.

Recommendation 5 (immunity standards):

There is a definite need for immunity standards.

5.5.3 The SRP also discussed the possibility whether a single limit for immunity standards could be envisaged but since the immunity level should be appropriate to the intended operating environment the SRP came to the conclusion that this is not possible.

It was reiterated that, in case of a single limit/environment, immunity would refer to the protection of the consumer and that in all other cases immunity would then be a service and quality factor.

Recommendation 6 (immunity approach):

There is no incentive for modifying the approach towards immunity.

5.6 Proliferation of standards

5.6.1 As a general principle, the SRP stressed that harmonised standards are a tool for the manufacturer to use as they lead to presumption of conformity to the essential requirements of the EMC Directive. Therefore, on the one hand, product standards are very useful even if, in the extreme case, they would only collate the relevant EMC requirements laid down in other standards (e.g. generic standards). On the other hand it was recognised that there are (too) many harmonised standards for certain products but it was noted that only a very limited number of Product Committees are involved (CLC/TC 17B, CLC/TC 72).

5.6.2 It was stressed that the number of harmonised standards is stabilising, mainly as a result of the ongoing co-ordination between CENELEC and IEC and the co-ordination activities within IEC (ACEC) and CENELEC (TC 210), which led to better monitoring and prevention of possible proliferation.

Reference was made to the proposals for regrouping as far as possible product requirements in product family standards.

5.6.3 It was also stressed that a clear distinction should be made between regular EN's and harmonised standards. Moreover, out of the considerable quantity of basic standards, only 7 are being referred in the generic and most product standards (i.e. EN 61000-4-2, -4-3, -4-4, -4-5, -4-6, -4-8 and -4-11).

Recommendation 7 (proliferation):

Noting that

- **the number of harmonised standards is stabilising**
 - **only a limited number of Product Committees has prepared multiple product standards**
 - **there are at present only 7 basic standards used in the legal framework**
- the SRP concluded that there is no real proliferation of standards and that hence no specific action other than possible regrouping of product requirements is to be undertaken.**

5.7 Management and inconsistencies

5.7.1 The SRP recognised that the existing inconsistency between standards was mainly due to the management of standardisation. As a matter of fact, the situation stems from a horse trading situation where requirements are set without a real general guideline/policy.

5.7.2 The SRP regretted the lack of authority of CLC/TC 210/SOG (Standards Overview Group) and the EMC Consultant over product standards: their advice had in different cases been overlooked/neglected by CLC/BT. On the one hand, it was recognised that it is the ultimate prerogative of CLC/BT to decide (for what concerns CENELEC standards), on basis of the available positions from all concerned parties, whether a standard is suitable to be offered to the Commission for listing in the OJEC. On the other hand the SRP concluded that it would be advisable to address a statement to CLC/BT, asking that the advice from CLC/TC 210/SOG and the EMC Consultant should be more closely followed provided that all necessary consultation has been undertaken. If this principle is duly respected, it should ensure coherent standards.

5.7.3 As the majority of the EMC standards stems from IEC, the possibility of influencing the IEC standardisation activities was also considered. It was however noted that IEC/ACEC is presently looking into the system and is making proposals for better monitoring of drafts and CDV's, introducing a new check list and a short guide for Product Committees.

5.7.4 The SRP also debated a proposal from CLC/TC 210 to grant this Committee the overall responsibility over EMC standardisation, which would include, in particular, a vote "in CLC/TC 210" on CDV's and FDIS's or at least an approval vote within CLC/TC 210 on all EMC drafts prior to their submission to vote within CENELEC.

This suggestion was not followed bearing in mind that the CENELEC principles prescribe that Product Committees have the responsibility over their standards, that votes within technical bodies as such do not exist and that the present system (check of drafts by CLC/TC 210/SOG and the EMC Consultant) should fulfil the need.

Recommendation 8 (management and inconsistencies):

The advice as expressed by CLC/TC 210/SOG and by the EMC Consultant on the suitability of product (family) standards as harmonised standards under the EMC Directive should be more closely followed.

Note: Through D102/174, CLC/BT noted this SRP recommendation.

5.8 Miscellaneous topics

5.8.1 Informative annex

5.8.1.1 The SRP debated a proposal, defended among others by the EMC Consultant, for possible identification, in an informative annex, of the link between the clauses of the harmonised standards and the essential requirements of the EMC Directive.

ETSI and CEN have adopted this procedure.

After discussion, in view of the opposition to this procedure in CLC/BT, in order to maintain the separation between legislation and harmonised standards and considering that standards give a global solution, this proposal of informative annex was not retained.

5.8.1.2 Many CENELEC standards include safety, EMC and performance requirements. It is recognised that these "mixed" standards may sometimes be confusing.

The EMC guide R210-001 gives therefore the preference to completely separate EMC product standards, avoiding the mixture with other requirements. It is however recognised that this preferred option cannot be imposed strictly to all Product Committees, who may prefer to keep the longstanding principle of "one product, one standard" especially for traditional products.

In the case of mixed standards, the EMC chapter should be clearly separated and identified; any confusion with safety requirements should be avoided.

5.8.2 Availability of harmonised standards

A plea was made for the availability, free of charge, of harmonised standards (i.e. a similar system as the one existing in ETSI). It was also remarked that in order to find requirements for a specific product, it may occur that different standards have to be bought.

This issue relates to a policy set out by the CENELEC membership and is outside the SRP competence.

The SRP concluded that it would be useful and helpful to have the cross-reference list of products and their related harmonised standards regularly updated.

Recommendation 9 (link product-standard):

The cross-reference list of products and their related harmonised standards is to be kept regularly updated.

5.8.3 Items "under consideration"

"Under consideration" means that no consensus could be achieved and that therefore no requirement is available.

It was pointed out that, in ETSI, items "under consideration" are allowed up to the ETSI Public Enquiry and are then to be taken out of the draft standard.

The SRP concluded that CENELEC should apply the same principle as ETSI.

Recommendation 10 ("under consideration" clauses):

CENELEC should apply the principle that "under consideration" clauses in EMC draft standards can only be allowed up to the CENELEC enquiry stage and should hence be removed before the voting stage. IEC should be invited to apply the same principle, this in view of parallel procedures on IEC drafts.



EUROPEAN COMMISSION
DIRECTORATE-GENERAL III
INDUSTRY

The Acting Director General

Annex A

Brussels, 19.04.99 ■ 03445
DG III D/1/NA/ej/146 (99)

Subject: EMC SLIM Report – Recommendation on EMC standardisation.

Dear Mr. Kelly,

I would like to draw your attention to the EMC Directive which was subject to the Simpler Legislation for the Internal Market (SLIM) exercise during 1998.

As an outcome of this process, an independent group of experts issued a report that was made publicly available in September 1998. I enclose a copy of the SLIM report.

This report contains a first analysis of different topics and identifies subjects for further investigation. Based on this analysis the team formulates the relevant recommendations in order to improve and clarify the application of the EMC Directive.

One of the topics, which according to the report needs further investigation and improvement refers to harmonised standards within the framework of the EMC Directive. The discussions in this area led to Recommendation 16, following which :

The Commission should request from European standardisation bodies the setting up of a strategic review panel of the EMC standards within the framework of the EMC Directive. Such a panel should consist of a representative of the Commission, standardisation experts from Member States, Industry, CENELEC and ETSI. The task of the panel should be to take a critical look at all EMC standards, their relevance and their applicability. Regarding preparation of future standards the panel should further discuss the necessity of a new mandate from the Commission to CENELEC and ETSI in order to produce fewer and more usable standards.

Mr. M. Kelly
President
CENELEC
Rue de Stassart, 35
B-1050 Brussels

European harmonised standards represent an essential part of the functioning of the European regulatory system in this sector. We therefore recognize the considerable efforts undertaken so far by CENELEC in cooperation with ETSI and CEN and we would like you to convey this appreciation to all the experts involved in the technical work. As the necessary set of harmonized standards has to a large extent been put into place and the system is basically operational, we have now reached the stage where a review of the system as proposed by the SLIM panel is indicated in order to reconsider compliance with needs and means to improve efficiency.

The recommendation 16 was further considered and discussed by the EMC Directive Working Party during its last meeting on the 24-25 February 1999, where it was concluded to endorse and implement this recommendation.

Therefore I would like to request from CENELEC, in coordination with ETSI, and CEN, to set up within the shortest possible time a panel to strategically review the EMC standards system in the framework of the EMC Directive.

Standardisation experts from Member States, Industry, CENELEC, ETSI, CEN and a representative of the Commission's services should constitute the panel following the relevant recommendation 16.

The strategic review should be performed in order to achieve the following objectives:

To ensure coherence and consistency:

- between harmonised standards and protection requirements of the EMC Directive.
- in the definition and classification of environments for the whole set of EMC harmonised standards.
- between the number of tests and severity of the limits and the protection requirements of the EMC Directive.
- between the horizontal and the vertical standards.

To avoid:

- unnecessary proliferation of EMC harmonised standards.

To identify:

- EMC phenomena to be considered in the EMC harmonised standards by taking account of protection requirements.
- means of simplifying the testing procedures.
- needs regarding transitional regimes and ensuing required changes.

To consider and improve, as necessary, the procedure of coordination between various EMC related standardisation activities.

All necessary actions to be undertaken following the strategic review should be clearly identified.

The strategic review should start within the shortest possible delay, with the final contributions expected for **autumn 2000**.

The outcome and further follow-up of the strategic review will be discussed with Member States in the framework of the Committee set up by Directive 98/34/EC and of the EMC Working Party. A copy of this letter has been sent to the aforementioned groups as well as to ETSI and CEN.

I look forward to a fruitful discussion and outcome, and thank CENELEC in advance for its co-operation.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Magnus Lemmel', with a stylized, cursive script.

Magnus Lemmel