

ISCE

The Institute of Sound and
Communications Engineers

Engineering Note 15.2 **CE-marking terms**

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Introduction

The CE marking scheme involves a number of 'technical' terms whose meaning is specific to the scheme or is not necessarily obvious. Some of these are explained in the official Guidelines, but the explanations are not always practically-oriented and do not reflect the current situation.

Declaration of Conformity

This is the document that the manufacturer has to sign as a token of legal responsibility for the conformity of the product with EMC and safety requirements. The Directives do not insist that any testing is undertaken; the **ONLY** legal requirement is that the Declaration is true.

It must give the name and address of the manufacturer and, if the manufacturer is outside the EU, the agent or importer within the EU. It must list the standards with which conformity is claimed, but **NOT** standards that those standards refer to (such as the EN 61000-4 series).

NOTE – It may be necessary to cite EN 60529 if the relevant product standard calls it up, because it has been 'notified' in its own right.

The person who signs should have enough technical knowledge to know whether to sign or not, based on the available evidence of conformity, and be senior enough to refuse to sign if he/she is not satisfied.

System

If a manufacturer puts together a set of complementary products and markets the package at a single inclusive price, it is a 'system' according to the former EMC Directive 89/336, and is required to meet relevant requirements **as a whole, even if the individual products meet relevant requirements individually**. This is hardly unreasonable; the manufacturer can obviously carry out any necessary tests on the package.

Installation

On the other hand, a set of complementary products, marketed and priced separately, whether by one manufacturer or several and put together at one site by a contractor or the end-user, is an 'installation', and, according to the current Directive 2004/108/EC, the individual products do not need to meet any additional requirements above those applying to them when marketed separately, *but* the installation as a whole must satisfy the 'Annex I' requirements that:

- no interference with other electromagnetic services is caused;
- no unreasonable sensitivity to electromagnetic disturbances is exhibited;
- and (to that end) that good engineering practices are used, which shall be documented.

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The European Commission decides which ENs can give 'presumption of conformity' with a Directive. It does this by 'notifying' the standard in the 'Official Journal of the European Community' (OJEC). This can be viewed on the Web without charge.

When it notifies a standard, it also says when it comes into effect, by giving the date beyond which the application of any previous standard becomes unacceptable. This date is the 'date of cessation of presumption of conformity of the superseded standard' - the 'docopocoss'.

After this date, the manufacturer must not ship any products conforming only to the old standard, but distributors (and retailers) have about a year to dispose of stocks.