Implementing International Standards in Europe – The Frankfurt Agreement

Gilles Thonet (IEC)  IEC Academy Webinar
Geert Maes (CENELEC)  2019-11-26
Your speakers

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Outline

• Overview of Frankfurt Agreement (FA)
• Benefits of IEC-CENELEC relationship
• How do IEC and CENELEC work together
• European Standardization System and EU legislation
• Specific European elements
Overview of Frankfurt Agreement
Who is CENELEC?

• 3 recognized European Standardization Organizations
  
  CENELEC – CEN – ETSI

• CENELEC
  
  – 34 National Committees (NCs)
    ▪ European Economic Area
    ▪ All IEC members
  – Committed to working first at IEC level
  – Implementing IEC Standards as CENELEC Standards (EN IEC)
Who is CENELEC?
Historical background

Lugano Agreement (1991)


Frankfurt Agreement (2016)

30 years partnership

CENELEC 80% aligned on IEC
Purpose of FA

• Primacy of international standardization over regional and national standardization (WTO Code of Conduct)
• Harmonization of national standards and technical regulations to reduce non-tariff technical barriers to trade
Objectives of FA

- Commit to primarily undertake the work at IEC level
- Expedite publication and common adoption of International Standards
- Ensure rational use of available resources to avoid duplication of work
- Accelerate standards preparation process in response to market demands
- Recognize particular European needs
Scope of FA

- FA applies to standards only
- European adoption of IEC TR or TS approved by CENELEC Technical Board (BT) on case by case basis
- IEC adoption of CENELEC TR or TS decided by TC/SC
- ISO/IEC JTC 1 work permanently exempted from parallel development
- Possible adoption of JTC 1 Standards by CEN and CENELEC under mode 5 of cooperation
Benefits of IEC-CENELEC relationship
Added value of CENELEC to IEC

One region = One standard instead of 34
- Status of EN
- Standstill – no competing/conflicting work
- Obligation to implement

Presumption of Conformity (PoC)

Access to European Market of 600 million consumers using global standards
Implementing IEC Standards

- > 75% IEC Standards follow parallel CENELEC procedure for adoption
- 80% IEC Standards are adopted as CENELEC Standards
- > 80% CENELEC Standards are identical to or based on IEC
- 30% CENELEC Standards are Harmonized Standards, 73% of which are identical to or based on IEC
How do IEC and CENELEC work together
Pillars of FA

4 main provisions

• Common planning of work
• Parallel voting on draft International Standards
• Publication requirements
• Conversion of European Standards into International Standards
Common planning of work

Work initiated in IEC (NP or RR)

• Normal procedure (no exemption)
  – Assigned to mirroring CENELEC TC or Reporting Secretariat
  – Further information (e.g. legislative aspects) provided to IEC
  – Parallel adoption process starts in CENELEC

• Exemption procedure
  – No “European adoption” but national adoption possible
  – Can be “used as such” in Europe
Common planning of work

Work initiated in CENELEC (NWI)

• Before initiating
  Assess situation at IEC on overlaps and possibility that IEC TC starts the work

• On approval of NWI for European Standard
  – By default NWI is offered to IEC
  – In some cases CENELEC BT may decide not to offer
  – CENELEC TC starts the work – IEC initiates NWIP
  – If IEC NWIP is approved, CENELEC hands over the work to IEC
Parallel voting on draft IS

Important to start parallel work from earliest stage!

**IEC**
- Start work (NP – RR)
- CD
- CDV
- (FDIS)
- International Standard

**CENELEC**
- Start parallel work
- Consult TC on CD
- Parallel vote on CDV
- (Parallel vote on FDIS)
- EN IEC & EN IEC A1x

- COMMON MODIFICATIONS
Parallel voting on draft IS

More than 80% of all CENELEC Standards are identical to or based on IEC Standards

Why not 100%?

By CENELEC BT decision some IEC Standards are

- Permanently exempted
- Temporarily exempted from parallel procedures (for a specific version or for adoption after IEC publication)
- Exempted to be “used as such” in Europe with standstill (e.g. databases, standards referred to in international legislation)
Publication requirements

Application of ISO/IEC Guide 21
EN IEC Referencing (from 2018 on)

- Identical to IEC publications → EN IEC 6XXXX
- Based on IEC publications → EN 6XXXX
- No relation to IEC publications → EN 5XXXX
Conversion of EN into IS

• **What?**
  - Published CENELEC deliverables ("homegrown standards") offered to IEC
  - European Common Modifications to IEC based standards

• **If IEC TC takes them on board**
  - IEC text identical to CENELEC text → *'Boomerang case'*
    - No parallel voting
    - Just a correction of the numbering by corrigendum to reflect IEC number
  - IEC text different from CENELEC text → Parallel vote
European Standardization System and EU legislation
European Standardization System

- **WHAT**
  - Public authority
  - Compulsory
  - Setting *what* goals to reach
  - Revised when policy requires

- **HOW**
  - Private independent organizations
  - Voluntary
  - *How* to reach goals
  - State of the art; minimum 5-year review cycle

- **EU legislation**

- **Harmonized European Standards**

- **Essential Requirements/Safety Objectives**
Relation to EU legislation

European Commission (EC)

STANDARDIZATION REQUESTS

HARMONIZED STANDARDS

Assessment

ISO IEC

CEN CENELEC
HAS Consultants

- Independent experts contracted by EC (through E&Y)
- Assess compliance of documents drafted by ESOs with EC’s standardization requests
- HAS Consultant comments
  - No veto on consensus
  - Input for compliance to EU legislation on Harmonized Standards
- IEC TCs decide whether to pick up their comments or not

Opportunity to maximize number of Harmonized EN IEC Standards without Common Modifications
Harmonization process
Specific European elements
Monitoring of work programmes

80% alignment

- Close mirroring by CENELEC Technical Bodies
- Timely commenting to avoid Common Modifications
- Evaluate links to relevant European legislation: *Is a Harmonized Standard needed?*
- Ensure work item reflects all aspects at IEC and CENELEC levels
Typical “European elements”

• Annex ZA
  Substitution of normative references of IEC Standards with equivalent European normative references

• Common Modifications (amendment type – A1x)
  – When no alignment possible with specific European needs
  – Offer to IEC for later uptake

• Annex ZZ
  – Only for European Standards developed under EC standardization requests
  – Identify which clauses cover which legal requirements
Justifications in Harmonized EN

Sufficient coverage of legal requirements?

➢ Rely on IEC Guidance and Practice

ISO/IEC Guide 51 – Safety aspects – Guidelines for their inclusion in standards
Supported by e.g. IEC Guides 104, 110, 116, 117
Normative references

- ISO/IEC Directives Part 2: Dated vs. Undated references
- Undated references may lead to different outcomes at IEC and CENELEC
- EC position
  - Standards are part of legal system
  - “Presumption of Conformity” (PoC) = legal effect
  - Need for certainty as to extent/scope and beginning/ending of PoC
  - Limited and controlled reference chains
  - Need to evaluate suitability of each normative reference
Conclusions
Main takeaways

• Longstanding partnership – 80% alignment
• CENELEC value to IEC – Implement IS as one single EN IEC for European Market
• Close and timely mirroring key to maximize identical adoption
• Harmonized Standards – Access to European Single Market using global standards
Useful links

- Frankfurt Agreement
- CENELEC Business Operations Support System
Thank you!

Contact us for further questions

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IEC ACADEMY WEBINAR Q&A

Harmonizing International and European Standards –
The Frankfurt Agreement

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<th>Questions</th>
<th>Answers</th>
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<td>Overview of the FA</td>
<td>Indeed, unless exempted so by CENELEC BT on justification by the proposer, any proposal for new work in CENELEC is offered to IEC for possible uptake. The process is detailed in §3.2 of the Frankfurt Agreement – Day to Day Management.</td>
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<td>The fact that it is committed to first developing standards at IEC level is new to me. How can I imagine that? If an NC applies for a NWIP at CENELEC, is it passed directly to IEC or is it obliged to apply for the project first at IEC?</td>
<td>It shall be noted that NWIPs at CENELEC level generally do not come out of the blue. The proposer first needs to assess whether there is already published international work in the field and whether that international work would be acceptable as a European Standard; alternatively, whether the work could be developed within the framework of the FA. In practice, these considerations lead NCs to propose work that can be addressed directly at international level at IEC first, knowing the work will be mirrored in Europe through the FA.</td>
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<td>What can be the motivation of a European expert to write two different texts while writing a requirement for a single technical concern?</td>
<td>While as a matter of principle standards should offer unique solutions, there can be different legal requirements (outside the control and influence of IEC and CENELEC) on a single technical concern that could translate into different solutions as well as into specific national or regional solutions. This is acknowledged in the drafting rules of the ISO/IEC Directives Part 2 §5.2: <em>Characteristics that are suitable for international acceptance shall be chosen. Where necessary, several options may be indicated (e.g. owing to differences in legislation, climate, environment, economies, social conditions, trade patterns). The content of a document shall be written so that it can be applied and adopted without change as a regional or national standard.</em></td>
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<td>IEC ISHs are no more published by CENELEC for a long time. What has been the rationale for this decision?</td>
<td>CENELEC BT decided that ISHs are not to be issued anymore and if there would be a need for interpretation of a standard issuing an amendment should be considered (CENELEC BT decision D148/021). As a side note, SMB confirmed that the interpretation of standards by TC/SCs using ISHs, which comes from an urgent request by a user of a standard (e.g. testing laboratory, certification body, manufacturer), must be undertaken through a formal process (IEC SMB decision 157/5).</td>
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<td>I would like to know whether IEC/IEEE dual logo standards can be adopted as European standards? Are there already rules on how to do this? Are CENELEC and IEC working on establishing rules for this?</td>
<td>IEC/IEEE dual logo standards are exempted from the FA (CENELEC BT decision D135/122). Any request for adoption by CENELEC of an IEC/IEEE dual logo standard needs to come from an NC and be submitted to CENELEC BT. Requests emanating from a CENELEC Technical Body are to be justified by the NC holding the Secretariat (CENELEC BT decision D135/123).</td>
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### How do IEC and CENELEC work together

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<td>How is CENELEC informed about new projects (NWIP or start of maintenance of an existing standard)? Who initiates this information, when and using which tools? Who decides under which SReq of the EC and under which European Directives the standards shall be harmonized? When and how this information is handed over to CENELEC?</td>
<td>As described in the Frankfurt Agreement – Day to Day Management, CO informs CCMC on a weekly basis of newly initiated work. This information is given electronically for registration of the appropriate work items and timescales in the CENELEC database by CCMC. CCMC then asks the CENELEC Technical Body (TC or SR) to which the work is assigned to complete (and maintain) the information needed, in particular on starting parallel work or exemption and on aspects of harmonization under European Directives. The result of the registration and completion of the work item is then communicated back to CO by CCMC using electronic means. This also applies to revisions of an existing standard and to amendments (already made available to the NCs under the FA or adopted by one organization). Usually, in a first stage for those existing and evolving projects, the information on harmonization under European Directives is copied into the new project, until further notice by the CENELEC Technical Body. In principle, communication to CENELEC Technical Bodies is done via PROJEX-ONLINE, were the CENELEC TC Officers or SR Project Manager can monitor the work programme and take appropriate actions to support the process, including harmonization aspects.</td>
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<td>Can the EC ask for work to be done in IEC, similarly to SReqs?</td>
<td>In IEC, a NWIP may originate from an NC, the Secretariat of a TC/SC, another TC/SC, an organization in liaison, the SMB or one of its advisory groups, or the Office of the CEO. The EC can approach any of those channels with a need for work that will then be evaluated through the usual process, with a feedback to CENELEC.</td>
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<td>What are the criteria for CENELEC BT to decide the exemption of a standard?</td>
<td>IEC proposals for work are, on input of the CENELEC Technical Body mirroring that work, evaluated on their interest for CENELEC. When they are outside the interest of CENELEC members for adoption as a European Standard (e.g. European work already exists, potential conflict with other standards or legislation), they are exempted from parallel procedures and shall in principle not be adopted as European Standards. They can also be exempted because it has been identified that the IEC Standards can be used as such in Europe, without obligation to implement but with standstill. Exemptions may be permanent or temporary. For most exemptions, the rationale is mentioned in the exemption list available on the CENELEC BOSS website.</td>
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<td>Where can I find the list of permanently exempted standards?</td>
<td>The exemption list is available on the <a href="https://boss.cenelec.eu">CENELEC BOSS website</a>.</td>
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<td>How do you handle the case when no mirroring committee exists on CENELEC side?</td>
<td>CENELEC mirrors IEC technical work either by establishing a TC (which is a full-blown committee structure), or through a Reporting Secretariat (SR) for cases where such a full committee is not necessary. How an SR operates is explained in the <a href="https://boss.cenelec.eu">CENELEC BOSS website</a>.</td>
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<td>What is the average time delay for an IEC Standard to become a European Standard and mentioned in the OJEU?</td>
<td>An IEC Standard becomes a European Standard under parallel procedures with a delay of maximum 2-3 months (due to some implementation steps to be taken). In principle, this is irrespective of whether it is a plain EN IEC or a Harmonized EN IEC (modified or not). The developments to make the standard harmonized are done in parallel. Citation in the OJEU is subject to a consecutive timeframe. In principle, a standard found to be compliant is offered for citation in the OJEU at the end of the quarter in which the standard has been made available. From that point on, the timing is in the hands of the EC. A target timeframe is 6-12 weeks after offering. However, for the time being, this timeframe is not met due to procedural changes at EC level.</td>
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<td>Does EN IEC 6XXXX mean that EN is 100% identical to IEC?</td>
<td>The detailed scheme for referencing is provided in the CENELEC BOSS website. Basically, EN IEC 6XXXX means identical, EN IEC 6XXXX + A11 means modified. In principle there should be less and less EN 6XXXX in the future.</td>
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<td>Does EN 6XXXX mean that it is based on IEC but with Common Modifications?</td>
<td>The process for creating Common Modifications is described in detail in the CENELEC BOSS website. Common Modifications include indeed only the modifications, but it is clear that those need to be read together with the standard that is being modified. Common Modifications if identified in time can be run in parallel and they will have an independent CENELEC work item.</td>
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<td>In case of required Common Modifications to an IEC Standard, only the “delta” document EN XXXX is voted in CENELEC. This requires handling both documents, the base IEC Standard plus the modifications to fulfil the European requirements.</td>
<td>As a matter of principle decided by CENELEC BT, the consolidation between IEC text and CENELEC text is done at the national level by members. CENELEC does not publish the equivalent of IEC RLV and CSV. This would be helpful. Any intention on CENELEC side? As a matter of exception, CENELEC BT may decide to issue consolidated versions of homegrown standards. It has to be noted that in Q4/2019 and Q1/2020 a BT working group (BTWG 128-3) will be looking into potential improvements of the ‘amendment system’. Input on this from the standardization community is welcomed, please contact your Permanent Delegate for this. Finally, it should be noted as well that in IEC LRVs and CSVs are not systematic but are considered as &quot;value-added products&quot;. The decision to produce such versions is made by the CO Sales Department and usually based on statistics of previous sales of the standard.</td>
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<td>Why is it not possible to have a complete consolidated document IEC + CENELEC modifications? Such a document is only available if NCs are doing this work.</td>
<td>How is the handover procedure if the CENELEC Standard is already published? All published CENELEC “homegrown” standards and EWIs for Common Modifications are offered to CO by CCMC for possible conversion into an IEC Standard. CO submits these to the relevant IEC TC/SC for consideration and decision, and subsequently informs CCMC. To this purpose CCMC sends a monthly list of CENELEC “homegrown” publications to CO, with the aim of informing IEC TC/SCs about possible adoption of EWIs into the IEC TC/SC work programmes. If the IEC TC/SC decides to take the work over, a NWIP or fast-track process is initiated. Depending on the outcome of the process at IEC, CENELEC may just change its standard referencing to reflect the new IEC numbering or start a parallel adoption procedure.</td>
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<td>European Standardization System and EU legislation</td>
<td>There have been a series of court cases leading to interpretations by the EC of the place of standards in relation to legislation. The EC position is that Harmonized Standards in the sense of Regulation 102/2012/EU are voluntary documents made by private organizations. They are not laws but are part of a legal system whereby the EC through a legal act gives a legal effect to those standards: Presumption of Conformity. Hence, the EC seeks that these standards provide a stable legal effect in scope and time. As a conclusion, the EC has taken the position that they need to be more hands-on in the assessment and acceptance of the standards before conferring them any legal effect.</td>
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In terms of how the work in CENELEC and/or IEC is affected, it is recognized that when IEC and CENELEC stick close to, respectively, their Directives Part 2 and Internal Regulations Part 3, as well as horizontal guidance, most issues should be covered.

### How will the new strict format for SReqs impact the endorsement of IEC Standards in Europe?

CENELEC will always abide to the principle of primacy of International Standards and define its work programme accordingly. Where appropriate, the work can then be linked to legislation under a SReq.

What is needed is an accurate view on the IEC work programme in terms of envisaged work, planning or respect for timelines, in order to ensure this is reflected in the SReq and standards can be linked to the related work programme and timeframe.

### Does it mean that if there is no SReq from the EC there cannot be any Harmonized Standard?

The European Regulation 1025/2012/EU on European Standardization defines a Harmonized Standard as a European Standard adopted on the basis of a request made by the EC for the application of European harmonization legislation.

A European Standard can therefore only be a Harmonized Standard (in the sense of European Regulation 1025/2012/EU) if the standard is included in a work programme under such a SReq.

### What happens if CEN, CENELEC and ETSI do not accept a SReq given by the EC? Or are they obliged to do so?

There is no obligation for the ESOs to accept a SReq from the EC. However, when such a request is rejected by all ESOs to which it was addressed, it no longer constitutes a basis for the drafting of requested deliverables. In case of rejection, the EC should then consider either restarting the process for a new SReq – Regulation 1025/2012/EU Article 10(2) –, but with shorter deadlines or establishing the required technical specifications by other means provided for in the relevant sectoral legislation. The later could mean the use of other types of standards or technical specifications.

### Experts have to work proactively to prepare the standard without knowing the SReq. How to overcome this time gap?

SReqs do not come out of the blue; they are intended to support legislation or policies in place (or still under consideration). In that sense, concerned stakeholders should participate at the earliest stages in the law-making process through the various channels available and evaluate whether their products and services would be affected by a given legislation or policy. They should also assess whether a Harmonized Standard (if the legislation allows this) could be useful. Furthermore, the requirements of the legislation are known quite before the SReq is issued. Usually, SReqs are announced at least a year upfront in the so-called Annual Union Work Programme on Standardization.

Moreover, SReqs should only be issued by the EC after a long consultation process involving, among others, the ESOs (CENELEC, CEN, ETSI). This overall process should allow the stakeholders to timely position themselves to foresee inputs to IEC and CENELEC for the establishment of a work programme that anticipates the needs of the SReq. It is that work programme that usually ends up in the SReq.

### The EC gives the timeframe. It deviates very often from the IEC schedule.

IEC and CENELEC are fully in charge of their own time schedules, where for parallel work under the FA IEC has the lead. IEC has different possible timelines that TC/SCs can chose from and a policy where TC/SCs set their ‘target dates within foreseen time limits’.

When the EC gives a timeframe in a SReq, this should be the result of a consultation process where CENELEC (and IEC) have provided their inputs. Therefore, it is extremely important that CENELEC and IEC proactively establish work programmes that may be proposed for SReqs. This is addressed in §3.3 of the Frankfurt Agreement – Day to Day Management.

### Are HAS Consultant interactions intended to be future state or aspirational?

The HAS Consultant system is operational. It is closely monitored by CENELEC BT and continuously improved.
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<th>And should we expect better alignment regarding topic expertise as well as standards development expertise?</th>
<th>The expertise in the pool of HAS Consultants is subject to the availability and willingness of experts to work with the HAS Contractor (Ernst &amp; Young). The latter has a ‘permanent’ open call for consultants.</th>
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<td>Since work should preferably take place at IEC level, can HAS Consultants interact at IEC level?</td>
<td>HAS Consultants can interact at IEC level. However, it is advisable that the European Technical Bodies mirroring the IEC activities take the lead in communicating with HAS Consultants. At the end it is the European Standard that needs to comply with the SReq, and it is CENELEC that needs to demonstrate how this compliance has been achieved.</td>
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<td>In the HAS comments it means that if the product is complying with European Standards it is necessarily complying with IEC. But not the opposite?</td>
<td>HAS comments relate to the compliance of the standard with the requirements set in the legislation and SReq. Some comments may require changes to the standards in order to comply with those requirements. These changes can either be introduced directly at IEC level, or if this is not possible in a Common Modification at CENELEC level. When products are put to the European market, they need to comply with European product legislation. One means of demonstrating this compliance is to follow the relevant Harmonized European Standard. The latter can be an identical or modified adoption of an IEC Standard.</td>
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| HAS Consultants are involved at CD stage. However, they do not have enough time allocated to be involved at this stage, hence they only make comments after CDV. How can we get HAS Consultants involved earlier? | During the standard development, the HAS Consultant can be asked to perform an assessment at three stages:  
- CENELEC ‘Working Draft – 20.60’, corresponding to the IEC CD – triggered by the CENELEC Technical Body  
- CENELEC Enquiry stage, corresponding to the IEC CDV  
- CENELEC Formal Vote stage, corresponding to the IEC FDIS  
The role of the CENELEC Technical Bodies is important to facilitate this as they have access to the IEC TC/SC documents through the NCs. The NC holding the Secretariat of the CENELEC Technical Body is responsible for maintaining a due communication stream, i.e. making available and circulating international documents such as CD, CDV and FDIS to the CENELEC Technical Body through the Collaboration Platform as a basis for the work to be done on specific European elements and for requesting relevant assessments. |
| Who will provide HAS Consultants with IEC documents at CD level? | According to the Frankfurt Agreement – Day to Day Management, at IEC CD stage the CD text is made available to CCMC by CO. On request of the CENELEC Technical Body that needs to provide supporting elements, CCMC will ensure the HAS Consultants are involved (assessment request).  
It has to be noted that CENELEC Technical Bodies have access to the IEC TC/SC documents through the NCs. The NC holding the Secretariat of the CENELEC Technical Body is responsible for maintaining a due communication stream, i.e. making available and circulating international documents such as CD, CDV and FDIS to the CENELEC Technical Body through the Collaboration Platform as a basis for the work to be done on specific European elements. |
| How can an NC "defend" the HAS Consultant comments in IEC? It could be very controversial to have European comments which might not be aligned with IEC objectives. | An NC is not supposed to defend HAS Consultant comments. It is only responsible for its national position.  
However, the NC holding the Secretariat of the CENELEC Technical Body is asked to convey a separate set of comments (related to the European legislative context) to the IEC level. It is then entirely up to the members of the IEC TC/SC to decide whether they want to take these comments on board, knowing that not addressing them may trigger a Common Modification at CENELEC level. |
| Does IEC require its TC/SCs to produce "documentation" needed for harmonization? | There is no obligation, however there is sound guidance, for instance in relation to safety:  
- IEC Guide 104:2019 on the preparation of safety publications and the use of basic safety publications and group safety publication |
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<td>The processes described there may be documented and serve as a basis in CENELEC. In a number of cases, an associated TR can exist.</td>
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<th>How do you deal with issues where the European legislation introduces a technical error that would then not be accepted at IEC?</th>
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<td>If the legislation really contains a technical error, standards cannot correct that error. In such a case it would be impossible to produce a Harmonized Standard until the legislation is corrected.</td>
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<th>Specific European elements</th>
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<td><strong>If CENELEC Common Modifications are prepared in time (i.e. available for the parallel enquiry and final vote stages), are they published in the CENELEC EN IEC XXXXX implementation or do the Common Modifications still have to be published by an A11, A12 … series European amendment?</strong></td>
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<td>The Common Modifications will be made available as EN IEC XXXXX/A1X (e.g. A11, A12, A13 – see Referencing of CENELEC Standards under FA in the CENELEC BOSS website).</td>
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<th>Regarding consulting CENELEC TCs on Common Modifications at CD stage, you actually do not know whether IEC TC/SCs will accept European technical requirements until after the CDV comments have been processed.</th>
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<td>An IEC TC/SC is composed of NCs, some of which can be European NCs. They have their say in consensus building and shall be aware of the context. If and when European requirements are specifically needed but do not meet consensus in the rest of the world, it could be anticipated that Common Modifications may be needed. Hence, the CENELEC Technical Body Secretariat will undertake from the earliest stages the necessary steps for drafting the requirements that could possibly end up as Common Modifications, while promoting their acceptance at international level. This is why proactive mirroring of international work at European level is essential.</td>
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<th>If a single standard part cannot ever give Presumption of Conformity, but a combination of standard parts can give Presumption of Conformity, are then all these parts listed or not?</th>
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<td>If the parts can be used independently to cover (a selection of) Essential Requirements, each of them needs to be cited. They are then used in parallel to each other (or complementing for specific applications). If a part in standalone cannot be used to cover (a selection of) Essential Requirements (e.g. it covers only test methods or contains definitions) that part shall be used as a normative reference and shall not be offered for citation. Rule of thumb: if it is not possible to identify in the standard technical requirements that can be linked to legal “Essential Requirements” or “Safety Objectives”, the standard will not be able to provide Presumption of Conformity, so it will not have to be listed.</td>
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<th>What are the criteria differences between IEC and CENELEC to determine the possibility of undated references?</th>
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<tr>
<td><strong>At the European level we have discussed the need for dated references in Harmonized Standards a lot. The rules in IEC and CENELEC are the same.</strong></td>
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<table>
<thead>
<tr>
<th>§10.4 of ISO/IEC Directives Part 2 and CEN/CENELEC Internal Regulations Part 3 set three conditions to use undated normative references:</th>
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<tr>
<td>• only to a complete document; • if it will be possible to use all future changes of the referenced document for the purposes of the referring document; • when it is understood that the reference will include all amendments to and revisions of the referenced document. While the first and last condition are always fulfilled in the same way, the second one may lead to different conclusions in IEC and CENELEC: IEC may wish to not consider certain legal European requirements, leaving it to CENELEC to adapt to these regional specificities.</td>
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<tr>
<td><strong>Do you foresee an increased use of dated references in IEC?</strong></td>
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<td><strong>How to evaluate the impact of undated references, as you cannot predict the future?</strong></td>
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<td><strong>How to keep a publication updated to the latest edition of the references?</strong></td>
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<td><strong>Does CENELEC have administrative support to screen IEC documents in relation to the drafting rules as NC might not have adequate resources or knowledge?</strong></td>
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<td><strong>What is the recommendation we can have with regards to the dated and undated references from a legal requirement perspective?</strong></td>
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<td><strong>Others</strong></td>
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