

Standardization Presumption of conformity

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[FAQ n°1.10 - Is it possible for a standard to be cited as a Harmonised standard in the OJEU before the implementing measure/supplementing measure itself has been published, even if there is a standardisation request or mandate?](#)

FAQ n°1.1 - Is Annex ZZ identical to Annex ZA

Yes

One has to distinguish the situation in CEN and that in CENELEC:

- 1) **In CEN:** the Annex ZA is meant to indicate clearly **which clauses** of the standard allow manufacturers to obtain presumption of conformity with **which requirements** of a Directive or Regulation. Ideally, that correspondence should be in the form of a three-column table: 1st column containing the requirement of the Directive or Regulation; 2nd column containing the standard's clause(s) covering the requirement; 3rd column is used to indicate whether the coverage is partial, and to what extent – it can also be used to give any clarification of the coverage as deemed necessary.
- 2) **In CENELEC:** the Annex ZZ has the same purpose as the Annex ZA in CEN. The Annex ZA (CENELEC) has nothing to do with regulatory aspects. This Annex ZA (which exists only in European Standards that are based on IEC standards) is meant to translate the normative references contained in the IEC standard into European normative references.

Information on the drafting of Annex ZA :

- link to CEN Business Operations Support System ([BOSS](#))

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FAQ n°1.2 - What are the conditions to have a harmonized standard?

Implementing and supplementing measures specify mandatory Ecodesign and Energy labelling requirements in the framework of Directive 2009/125/EC and 2010/30/EU.

Harmonized standards can be used to provide presumption of conformity with requirements set out in one or several Ecodesign implementing measures and Energy Labelling supplementing measures.

Harmonized standards, whose references are published by the EC in the OJEU (Official Journal of the European Union), provide :

- Methods to measure and test the environmental parameters of energy-related products
- Methods to adequately present and display environmental information on energy-related products
- Methodological guidance how to perform a life-cycle analysis and establish the product's eco-profile to assess alternative design options for energy-related products
- Methods to assess the environmental performance of energy-related products

Having a standardization request is the only way of being able of citing standards in the OJEU, without standardization request it is not possible to publish the references of the harmonized standards.

If harmonized standards are needed, a standardization request is also needed, even if the standards are ready at the time of publication of the implementing measure.

In addition, there are usually additional needs derived from the implementing measure that make it necessary to update the standards, standardization requests are the place for requesting these updates.

For more explanations on a standardization request, refer to the [Blue Guide](#) .

Note: in this FAQ, "standardization request" means a "mandate".

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FAQ n°1.3 - Considering that the transitional methods will be replaced by harmonized standards when the references are published in OJEU, shall all the points of the transitional methods be included in the draft standards under drafting?

No

The transitional methods are not considered as legal instrument for drafting the standards in the response of the mandate request.

The mandate requests standards for giving presumption of conformity to implementation measures. Before the standard is published in the JOUE, transitional methods could be used.

Once the standard [reference](#) is published in the JOUE, it supersedes transitional methods.

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FAQ n°1.4 - Is there any transitional period for applying harmonized standard when transitional methods exist?

No

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FAQ n°1.5 - Is it necessary to repeat the threshold/limit values set in regulation in the relevant harmonized standards?

No. Duplication of requirements from the regulation should be avoided.

Note: Annex ZA (CEN) and ZZ (CENELEC) provide the link between the threshold/limit values and the measurement methods.

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FAQ n°1.6 - What are the technical documentation and the declared value, both mentioned in the Annex "Verification procedure" of Ecodesign regulations?

The content of the technical documentation is listed in Annex IV of directive 2009/125/EC. The declared values are the values indicated by the manufacturers, included in the technical documentation, for the purpose of showing compliance to Ecodesign regulations.

Note: References to verification procedure should not be part of the standard, unless requested in the standardisation request

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FAQ n°1.7 - Shall an existing harmonized standard be revised when an amendment to regulation is published?

No, unless the amendment provides new or amended requirements compared to the original regulation which are not covered by the existing harmonized standard.

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FAQ n°1.8 - In Annex ZA (CEN) and ZZ (CENELEC) to which requirements should we refer - requirements given in the regulation or those described in the standardization request?

Annex ZA (CEN) and ZZ (CENELEC) should ensure that the required limit values are identified from the regulation (article references or in annexes).

Note: no reference to the standardization request shall be provided in Annex ZA (CEN) and ZZ (CENELEC).

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FAQ n°1.9 - For a Harmonised Standard that was previously developed under a Mandate or earlier Standardisation Request, if a revision of this standard is required (e.g. to maintain its 'state of the art'), is it necessary have a new Standardisation Request to maintain the status as a harmonised Standard or can the work proceed under the original Mandate / Standardisation Request?

Providing the updated standard does not affect compliance with the Regulation(s), the standard may be changed without a new mandate. The reference to this updated standard should be cited in the OJEU.

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FAQ n°1.10 - Is it possible for a standard to be cited as a Harmonised standard in the OJEU before the implementing measure/supplementing measure itself has been published, even if there is a standardisation request or mandate?

No.

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