



RUSSIAN TECHNICAL REGULATION ANNOUNCEMENT

Title	Important changes in technical regulation procedure
Date	2018.12.20
Application scope	EAC marking, LVD and EMC regulation, CU TR 004/2013 and CU TR 020/2013
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Summary

Lately there were several changes here that significantly affected for EAC certification procedure. The most important of them are as following.

1. The registration of CoC and DoC applications in federal register signed with e-signature provided by certification body. Any other certification procedures are possible only after the step of the application registration.
2. Precise compliance to EAC certification schemes concerning sampling and testing by EAC test labs.
3. Federal registration of all documents which are used as base for EAC certification (EAC test reports, etc).
4. The tracking all stages how the sample issued by foreign factories is cleared by custom and enters to EAC test lab
5. Fewer possibilities to simplify procedure based on foreign test reports.

Basic requirements

First of all, it's important to remember some basic facts. In accordance with general EAC LVD and EMC technical regulation for certification procedure of serially produced equipment:

- the samples must be obligatory tested locally by EAC laboratory, no legal procedure to recognize any foreign test reports because;
- the lab must be listed in the [EAC register](#) (you can check your test lab on-line to follow the link at EAC web-site above);
- each test must be executed in accordance with national standards — GOSTs listed by EAC commission, any other standards as EN/IEC/ISO is not allowed.

If someone someday told you that your foreign test report could be directly used without any local retesting by EAC lab to issue EAC CoC — it's the greatest falsehood because it's absolutely illegal. Each your test report has been reissued by EAC lab for EAC certification purposes.

Absolutely the same requirements for factory inspection is used for EAC certification. No legal procedure to recognize directly CIG023 FI report.

What's changed

About year ago in January 2018 Federal accreditation and Federal custom agencies issued the *recommendation* how to control and trace the samples going to test into EAC labs. We already published our translation of that in our [announcement of sampling and testing](#) at our web site.

One year has gone since that moment. In November — December 2018 the Federal accreditation agency checked a few EAC test labs how they keep the documentary file to clear customs the samples entering to test.

Unfortunately no docs, no samples, no EAC tests had been found that is why they lost their accreditation. All other labs stopped their reissuing test reports based on foreign ones.

We'd like to pay your attention that's only recommendation. EAC regulation absolutely still stays the same as was enforced in 2013. No changes, no updates of regulation at all but in December 2018 the Federal agency of accreditation improved the registration procedure for all document including test reports for all stages of EAC certification. The most important updates are as following.

1. Any application must be registered by EAC certification body in the federal register, any other documents as test report or factory inspection report should be dated after that date.
2. Any information, which applied and then changed, is traceable after the moment when the application is registered.
3. When a test report used as a base to register EAC CoC the scan copy must be attached in the federal register before. So it takes some extra time about 2-4 weeks while EAC test lab prepares, issues and registers their test reports.
4. Taking in account that all labs have stopped their reissuing of test reports based on foreign ones (it's just fear to lose their accreditation) the CoC process is practically frozen.

Recommendation

1. Apply EAC declaration procedure instead of certification one if it's possible, the best way to register DoC on-line in accordance with 1d scheme because in this case it's outside of federal accreditation agency control.
2. Apply EAC application for EAC CoC as sooner as better to register it in federal register even it's in draft.
3. Get authorization for your company as a subcontractor of an accredited EAC organization to provide legally some EAC procedure as outsourced orders.
4. If you are going to send a sample to test don't do it directly into EAC lab or certification body because it's impossible to clear customs for samples in most cases. Let importer of manufacturer to deliver the sample into EAC lab or certification body. The sample for testing should be accompanied by supporting documents from customs.

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