



CENELEC GUIDE 26

Coordinated approach for the handling of proposals for the interpretation of CENELEC standards

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With a view to fulfilling one of its strategic targets, the CENELEC Conformity Assessment Forum developed a draft document defining the principles and procedures for the operation of an Interpretation Panel at the level of a CENELEC Technical Body, or at the level of the corresponding IEC/TC or SC. This document was approved by correspondence at CENELEC General Assembly level in May 2002 as a CENELEC Guide with the above-mentioned title.



European Committee for Electrotechnical Standardization

Avenue Marnix, 17

B – 1000 Brussels

Tel: +32 2 519 68 71

Fax: +32 2 519 69 19

www.cenelec.eu

Foreword

In principle, a CENELEC standard is written in such a way that there is no need for interpretations by the user. However, on the basis of an inquiry organized by the end of 2000, the CENELEC Conformity Assessment Forum recognized that the parties involved in the use of the standards, such as manufacturers, certifiers and legislators, read standards from their own perception. Hence the need, sometimes, for a common understanding on the intentions expressed by the standards through interpretations or clarifications.

This CENELEC Guide is intended to establish a coordinated approach for the handling of proposals for the interpretation of CENELEC standards in the framework of conformity assessment activities.

This Guide is based on the long experience, both at European and at international level, with regard to the development and the use of electrotechnical standards.

It has been developed by an ad hoc WG, set up by the CENELEC Conformity Assessment Forum, on the basis that the mechanism shall be transparent and available for all interested parties. The best practices for the handling of interpretations should provide for:

- *a short term solution*: in most cases an interpretation responds to an urgent need from a manufacturer or a test house; and
- *a long term solution*: procedures for the acceptance of the proposed interpretation by the CENELEC National Committees, for the public availability of the interpretation and for the resulting amendment of the relevant standards and withdrawal of the interpretation.

This CENELEC Guide is recommended for use in those areas where interpretations of CENELEC standards emerge frequently from the market place and hence the adoption of a coordinated approach seems appropriate. Proposals for interpretations should be regarded as valuable feedback from the users of the standards about their state of the art and related to the improvement of the standards making process. It is however left to the discretion of the relevant CENELEC technical body to decide whether an action needs to be taken on the basis of this Guide's principles, or whether it currently has its own efficient method of dealing with interpretation. In the latter case, the CENELEC technical body shall inform the CENELEC BT about the methods used.

This Guide takes into account the IEC-CENELEC Agreement on common planning of new work and parallel voting, as far as possible.

Coordinated approach for the handling of proposals for the interpretation of CENELEC standards

1. Introduction

- 1.1 There is a wide variety of sources of interpretation of a European or international standard. Examples are:
- manufacturers, installers, users;
 - CENELEC NCs (usually at the request of the above-mentioned);
 - European manufacturers associations;
 - test houses and certification bodies;
 - Operational Staff Meetings, or similar structures existing in certification schemes at European level or at international level, such as the Committee of Testing Laboratories (CTL) of the IECEE;
 - notified bodies groups (e.g. ExNB group);
 - CENELEC Technical Committees or Subcommittees, BTTFs and BTWGs;
 - National or European authorities;
 - consumer organizations.
- 1.2 In some circles, such as the Operational Staff Meetings (OSMs) or Technical Committees (TCs) of mutual recognition agreements in the framework of the certification schemes operating in the electrotechnical area, well established procedures exist defining the responsibilities of the different parties involved in the development and handling of interpretations of European standards, and in particular their relationship with the relevant CENELEC standardization committees. In many other cases, such as when interpretations arise from national and European authorities, the situation is less clear, in particular regarding the public availability of these interpretations and their feedback to the standardization process.
- 1.3 It is in the interest of all parties involved in the development and the use of standards, both at European and international level, to have guidelines for the uniform handling of interpretations of standards, to apply the correct method for making them publicly available and to safeguard their impact on the established standards making process.
- 1.4 Due consideration shall be given to the specific position of the bodies operating certification schemes. With regard to their agreements to accept each other's test results, many requirements, tests and compliance criteria need to be weighted for their uniform application. This action often results in proposals for interpretations and even more so in clarifications. Certification bodies shall be encouraged to feed in their proposals, according to the procedures described in this guide.

2. Objectives

- 2.1 This document aims at giving guidance regarding the procedures to be followed for the adoption and publication of interpretations of CENELEC standards and their feedback to the standardization process.
- 2.2 This guidance is intended to be used by each body referenced under 1.1 and by those technical bodies concerned with the preparation of CENELEC standards relating to electrotechnical equipment, for which the need may arise to agree on a common understanding of intentions expressed by the standards.

3. Definitions

3.1 interpretation of a standard

Argument expressed in written format by any body referenced under 1.1 concerning the meaning or intention of the contents of a standard, or a part thereof.

Note: The interpretation of a standard as described here has no official status as long as it has not been adopted as described under 3.2.

3.2 CENELEC interpretation sheet

Published sheet giving the interpretation of a CENELEC standard¹ adopted in accordance with the procedures defined in this Guide.

3.3 interpretation panel

Group of experts, set up at the level of a CENELEC technical body², the task of which is to examine and to decide on the follow-up to a proposal for the adoption of an interpretation to a standard.

3.4 clarification

Argument expressed in written format by any body referenced under 1.1 concerning the meaning or intention of the contents of a standard, or a part thereof, but which due to consideration by the interpretation panel is regarded of such content that there is no need for submitting it to the formal procedure for adoption as a CENELEC interpretation sheet, nor as input or initiative to modify the standard.

¹ A CENELEC standard includes also any other deliverable defined in the CEN/CENELEC IRs - Part 2.

² All standards making bodies within the framework of CENELEC, such as Technical Committees (TCs), Subcommittees (SCs), Technical Board Task Forces (BTTFs) and Technical Board Working Groups (BTWGs) may be involved in the issuing and publication of interpretation sheets.

4. Interpretation panel

4.1 Setting up

CENELEC BT invites the CENELEC technical bodies to consider the need for the creation of an “interpretation panel”.

In case a CENELEC technical body justifies the setting up of an interpretation panel, it will inform the relevant IEC Technical Committee accordingly and invite them to investigate the need for setting up this interpretation panel at IEC level. In the absence of any interest from the IEC TC, the CENELEC technical body will provide for the relevant interpretation panel.

Each CENELEC technical body informs CENELEC CS about the solution adopted, which creates an electronic accessible database with all useful information concerning the different interpretation panels and the interpretation sheets published. The database should be available on the CENELEC website.

4.2 Composition

An interpretation panel is composed of a restricted number of experts (preferably maximum number of 6 and a minimum of 3), to be appointed by the relevant CENELEC technical body, representing all interested parties as far as possible. As emphasized under item 1, due consideration shall be given to the specific position of the bodies operating certification schemes and the extensive work carried out by them in this context. The bodies concerned need a well-structured link to the interpretation panel. Where feasible, a direct communication line between representatives of both groups should be established.

The interpretation panel shall meet as often as needed, preferably in combination with the meetings of the corresponding IEC or CENELEC technical body, or otherwise via correspondence (through electronic communication means), as appropriate. For continuity reasons it appoints a Chairman and decides upon the allocation of the secretariat, where needed in consultation with the relevant parent technical body.

4.3 Tasks and responsibilities

An interpretation panel is responsible for the profound consideration of any proposal for a CENELEC standard’s interpretation in the area of competence of the corresponding CENELEC technical body. In case a CENELEC technical body receives a proposal for an interpretation of an IEC originated standard, it will invite the IEC Technical Committee to take over the request of the interpretation within the relevant interpretation panel of the IEC TC, if existing.

In the absence of an interpretation Panel at IEC level, or in case where the IEC panel cannot take over the task within the targeted period requested by CENELEC, the CENELEC technical body shall handle the proposal. The latter applies also to proposals relating to CENELEC homegrown standards and common modifications.

Three levels are recognized for the handling of proposals for the interpretation of CENELEC standards, as immediate actions by the interpretation panel. The panel has the duty to inform the proposer in each of the cases described below on the outcome of the deliberations, as appropriate.

Level 1: *The proposed interpretation necessitates an immediate change of the standard.*

In that case the interpretation panel shall transfer a proposal to change the standard to the technical body, taking into account the principles of the IEC-CENELEC Agreement.

Level 2: *The interpretation shall be proposed for publication as a CENELEC interpretation sheet, as an immediate action.*

In that case the proposed interpretation is submitted to vote by the CENELEC members through single combined inquiry and vote (UAP). In case the IEC TC accepts the handling of the proposal, the UAP will be based on the corresponding IEC CDV.

A CENELEC interpretation sheet shall by definition not incorporate any modification of the standard's requirements, nor introduce additional test procedures to those already defined in the standard. An important purpose is to also provide a quick solution to the correct use of the standard.

Once adopted, the interpretation is published in the format of a CENELEC interpretation sheet, which remains valid as long as the related standard. A published interpretation sheet remains valid in perpetuity in relation to the edition of the standard in question, unless subsequently covered by an amendment to the standard.

Level 3: *No immediate action of level 1 or 2 required.*

The interpretation panel may conclude that the actual text of the standard is fully adequate; i.e. the requirement is very clear and likewise how compliance is checked. In some cases an interpretation may be requested to define the type of instruments to perform the indicated measurements which tends to give guidance to the appropriate level of expertise of the test engineer.

In the latter case the interpretation panel provides a reply to the proposer with the necessary arguments, with the purpose to provide for a clarification. The interpretation panel may decide that the records in the minutes of the meeting may provide an appropriate reply. The clarification shall be clearly stated in the annex of the minutes, the copy of which is sent to CENELEC CS for including this information into the CENELEC database and, if relevant, uploaded to the database designated by IEC.

It should be recognized that proposers may themselves collect and publish the clarifications from the interpretation panels, be it that clarifications cannot substitute the actual text of any standard, nor can become of the same functional level. Publications of clarifications should clearly mention the status of them in the light of the actual and relevant IEC or CENELEC standard.

5. Validity, publication and feedback

5.1 Validity of interpretations

Any individual user of a CENELEC standard may submit proposals for interpretations of that standard to the interpretation panel, via CENELEC CS or a CENELEC NC or a CENELEC technical body. Any interpretation formulated by any user or group of users remains without formal validity, as long as it has not been duly considered by the interpretation panel or its parent technical body and adopted as a CENELEC interpretation sheet as a result of a positive CENELEC vote.

Taking into account the fact that an interpretation provides often a reply to an urgent request from a standard's user, an interpretation panel shall consider a proposal for interpretation of a CENELEC standard as quickly as possible. To resolve time constraints the outcome of the interpretation panel can be used on an informal basis until the interpretation sheet has officially been adopted or has been rejected. In that case, the interpretation shall have a note indicating its provisional status and that its contents may be changed after the voting procedure is completed.

5.2 Publication

Each CENELEC technical body is responsible for the issuing and keeping up-to-date of a compilation of CENELEC interpretation sheets related to the European Standards within the scope of the technical body. Since a loose leaflet format is most practicable each interpretation sheet shall be identified by a reference number following a unique numbering system developed by CENELEC CS which will also develop a common format for the publication of interpretation sheets. Interpretation sheets issued by the IEC TC, and which are applicable to the relevant CENELEC standard as well, are published and controlled according to the relevant IEC and CENELEC procedures.

Clarifications, after having been recognized as such by the interpretation panel, will keep their own specific numbering system as developed by the bodies by which they were generated. They are best collected in a specific folder of a database set up by these bodies for the purpose of keeping them up-to-date and making them publicly available. Moreover, for transparency reasons and to indicate that these clarifications have been recognized by the interpretation panel, information on existing clarifications and the relevant database(s) are given in the CENELEC database.

Note: A specific database for clarifications from members of OSM/CTL organizations is being set-up at www.IECEE.org/CTL/decisions.

5.3 Review

As soon as a CENELEC technical body is informed by the interpretation panel about

- either the need for an immediate change of a CENELEC standard (“level 1 interpretation”);
- or the adoption by the CENELEC members of a CENELEC interpretation sheet (“level 2 interpretation”);
- or the issuance of a clarification (“level 3 interpretation”);

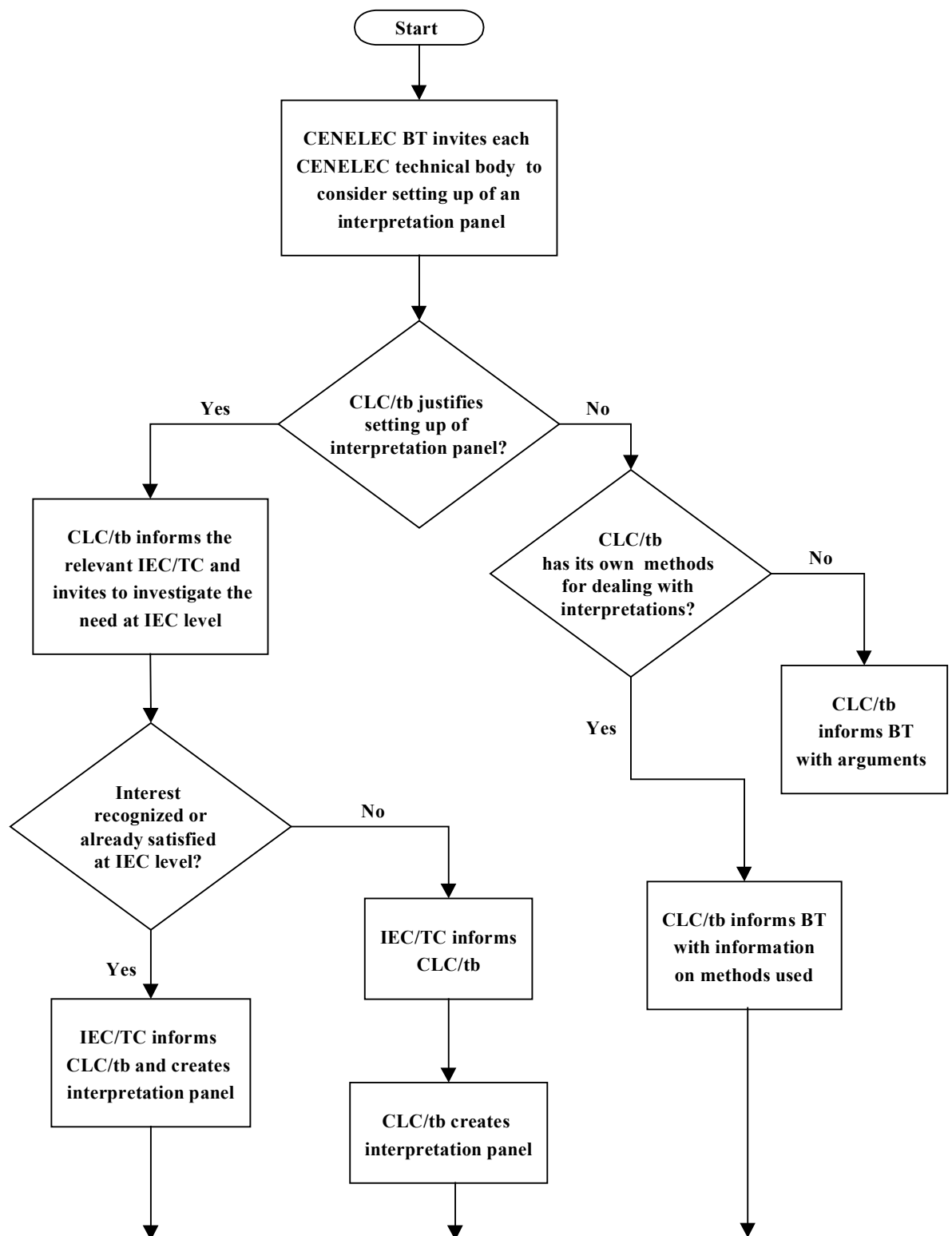
it shall undertake the necessary action for including the proposed interpretation in its work program, as appropriate, as a proposal for changing the existing CENELEC EN or HD, taking into account the IEC-CENELEC Agreement on common planning of new work and parallel voting.

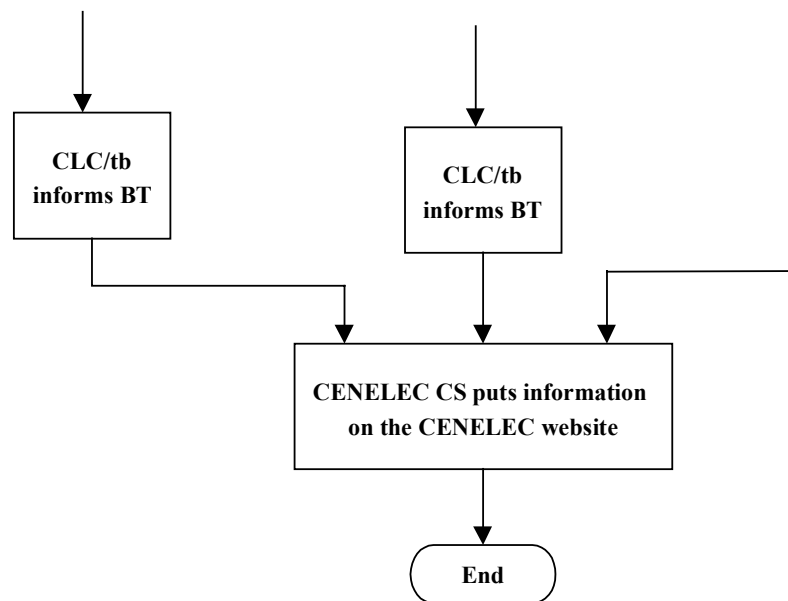
5.4 Withdrawal

As soon as a CENELEC standard has been revised, the responsible CENELEC technical body shall inform CENELEC CS about the need to withdraw the corresponding interpretation sheet(s) and to update the CENELEC database.

Annex A: Procedure for the setting up of an interpretation panel

Annex B: Procedure for the handing of proposals for the interpretation of a CENELEC standard

Annex A: Procedure for the setting up of an interpretation panel *



(*) **Abbreviations used:**

BT:	Technical Board
CLC/tb:	CENELEC technical body, i.e. any standards making body within the framework of CENELEC
IP:	interpretation panel
IEC/IP:	interpretation panel set up by an IEC/TC
CLC/IP:	interpretation panel set up by a CENELEC technical body

**Annex B: Procedure for the handling of proposals
for the interpretation of a CENELEC standard**

