

Declaration of Conformity Review



We review Declarations of Conformity (DoCs), more recently renamed Declarations of Performance (DoPs).

Your 'duty of care' in proving the safety of your product continues through the life of the product. As directives and standards change, so potentially does the proof you may need to provide to a prospective client, a customs official or enforcement agency.

This service is for manufacturers and importers/distributors of appliances falling under the Gas Appliance Regulation (GAR) (until recently the Gas Appliance Directive (GAD)) or the Boiler Efficiency Directive (BED), and/or other Directives (LVD, EMC etc).

As valued clients and manufacturers of CE marked products, you will have been through the process of ensuring that you can prove the safety of the products you place on the market. This 'duty of care' continues through the life of the product and manufacturers should be aware that, as directives and standards change, so potentially does the proof you may need to provide to a prospective client, a customs official or enforcement agency.

Purchasers are increasingly checking Declarations of Conformity (DoC) for accuracy, as it means they can discharge their own compliance obligations more efficiently. An accurate DoC gives confidence to the purchaser. An out-dated or inaccurate DoC gives quite the opposite impression.

We recommend that a manufacturer performs a regular check of any DoCs issued by the company. When documented, this brief check demonstrates that the company is keeping an eye on its regulatory obligations.

Checking a DoC may tell you that no directive or standard has changed and that your Compliance remains unaffected. This is good news; simply note this fact down in your technical file, date it and sign it, demonstrating additional due diligence.

If, during the review you discover an applicable directive or standard has changed, then further investigation becomes necessary.

The legal obligation of placing a product on the market is that it must meet the essential requirements (ERs) of all applicable directives. Any change to the directive(s) may alter the ERs and may also alter the status of the standards you have used to declare conformity against. A change to a standard you have quoted on your DoC may mean a little, or possibly a lot of work to continue to

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demonstrate compliance. If this is the case, we would recommend that you review the directive(s) and/or standard(s) to understand how they have changed and whether they have changed significantly enough to warrant any further action on your part. Once again, this review is best documented, dated and signed and added to your technical file.

The review may leave you with a list of differences / changes. These differences should then be addressed; maybe by seeing where the new standard differs from the old and using that as a template to maintain conformity. Minor differences could be dealt with within the review itself. If any major differences are found you may need to provide some further evidence for inclusion in your technical file. Altering the product would lead to a similar compliance review.

Manufacturers of products covered by the Gas Appliance Regulation (GAR) that contain electrical products and electronics will probably need to meet both the Low Voltage (50V-1000V AC or 75V-1500V DC) and EMC directives. In 2009 both the LV and EMC directives changed. While the LVD had no substantive changes (it was only a re-codification), the EMC ERs did change.

This information has been on our website for a while, but it is now time we provided a formal statement to aid our customers.

Under the GAR, we, as a Notified Body, certify that your product meets the Essential Requirements of that directive. Electromagnetic Compatibility and Electrical Safety (LV) are tested as they are required under the GAR, ie only the essential elements are tested.

The EMC directive and LVD must still be met in full and it is the manufacturers' responsibility to state that this is the case with an appropriate declaration.

To comply with the GAR, the products' EMC and LV supporting data must also be up to date. Some manufacturers may not have updated their EMC/LV compliance in line with recent developments. It is for this reason that we are offering this free DoC checking service.

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