

JBCE preliminary comments for the Roadmap for the evaluation of the Electromagnetic Compatibility Directive

Introduction

JBCE appreciates the opportunity of commenting the roadmap for the evaluation of the EMC directive. JBCE supports the proposed roadmap but would like to submit the following comment.

JBCE would like to suggest couple of points as follows;

JBCE believes that the EMC directive is one of the key directives for compliance of electronic product in the EEA, Switzerland, UK and some other non-EU countries. This directive is well known and understood by the industry.

JBCE sincerely believes that the provisions and the essential requirements of the EMCD are more than ever topical and corresponding to market needs and the well-being of electronic equipment users.

The principle of presumption of conformity based on harmonised standard aligned with international standard is a key factor for facilitating the trades of products. Harmonised standards define an acknowledge common understanding about how the compliance with essential requirements shall be demonstrated. Harmonised standards support efficiently the essential requirements of the directive. JBCE notices that no EMC standard has been formally objected, demonstrating the relevance of internationally developed standards supporting the European legislation.

Nevertheless, JBCE has noticed that the list of harmonised standards published in the official journal is no more updated properly by the European Commission. Some versions of standards in the Official journal are up to 3 versions behind the international version and some of those obsolete versions are already withdrawn by the national standardisation offices. JBCE encourages the European Commission to revise the list of harmonized standards in a more regular manner to better reflect the state-of-the-art standards as agreed internationally, but with keeping the principle of a reasonable transition period. The regular update of such list is essential for the support and effectiveness of the directive.

About certification of cables, JBCE understands that will be part of the evaluation of the EMC directive. Nevertheless, JBCE kindly reminds that cables are not source or victim of disturbances. Therefore, including cables in the EMC directive would affect seriously the principle of the directive, including its essential requirements. JBCE recommends a voluntary based cable certification scheme allowing an easier application by apparatus' manufacturer of the Article 18 of the directive, rather than a compulsory certification scheme of cables within a revised EMC directive.

Based on above elements, JBCE doesn't see the need for a revision of the directive. JBCE will take future opportunities during the public consultation phase for communicating in more details its position.

About JBCE

The Japan Business Council in Europe was established in 1999 and is a leading European organization representing the interests of more than 88 multinational companies of Japanese parentage operating in the European Union. Our members operate across a wide range of sectors, including electronics, wholesale trade, precision instruments, pharmaceutical, railway, textiles, glass, automotive, financial service and chemical manufacturing. Building a new era of cooperation between the EU and Japan is the core of our activities. The key goal of JBCE is to contribute to EU public policy in a positive and constructive way by drawing on the expertise and experience of our member companies.