	OPERATIONAL DOCUMENT	**ENEC 324**

Product surveillance

Draft

Modification:
BoD Decision 6-III-2023
The secretariat of ETICS should prepare a proposal rule describing the consequences for factories that fail to send the required sample for product surveillance tests. The regulation must be added to the operational documents OD ENEC 304 and OD ENEC 324.

Approved by:	ENEC members on MCCB	No. of pages: 4
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PRODUCT SURVEILLANCE

1. PURPOSE

As a part of the requirements associated with the ENEC licence, product surveillance shall be carried out on a regular basis by the Certification Body which has issued the licence (PD ENEC 301, Article 12, 13 and Article 14).
The product surveillance procedure shall give sufficient evidence that the electrical product continues to comply with the Standard and to be in conformity with the approved design. Refer also to PD ENEC 304.
The purpose of this OD is to give instructions for the product surveillance procedure.

2. OPERATIONAL PROCEDURE

2.1 Product surveillance shall include the following elements:

2.1.1 Determining whether the electrical equipment conforms to the approved type, taking any approved changes into account. This is done by a comparison with the approved design. For this evaluation, descriptions, components lists, drawings and/or photographs, etc. are to be used.

2.1.2 Verifying whether the ENEC mark, d~~pr~~escribed in annex C of PD ENEC 301, is present and has been correctly applied.

2.1.3 Performing the checks, measurements and tests set out in Annex A of this OD.

2.1.4 Supplementary samples for checks, measurements and tests may be necessary given the outcome of:

- the comparison with the approved design;
- the results of the tests;
- the results of earlier product surveillance;
- market information.

2.2 Non-certified components, included in the product and accepted on the basis of an additional examination, shall be separately re-examined, unless such an examination has been made within the last three years.

2.3 All verifications, checks, measurements, and tests carried out shall be documented and kept on the certification file.

3. SAMPLING CRITERIA

In principle, samples representative of all products licensed to use the ENEC Mark shall be checked annually and in accordance with Article 2 of this OD.
The surveillance programme shall ensure that at least one sample of an ENEC certified product is taken annually from each factory, for each category of product manufactured therein and for each license-holder listed in the various certificates.

The Certification Body may decide to increase the number of samples to be taken due to non-conformities resulting from the previous surveillance test.

4. SELECTION OF SAMPLES

4.1 Samples for product surveillance are selected by the Certification Body, typically ~~normally~~ during ~~at~~ the time of factory inspection.

4.2 For each manufacturer holding ENEC licences, the number of samples is taken randomly across all its products. The minimum sample size is 1 and a sample can be composed of several pieces depending ~~of~~ on the standard.

4.3 In case of failure, further investigation is required by the C~~c~~ertification B~~b~~ody. Action(s) must ~~is (are) to~~ be taken by the C~~c~~ertification B~~b~~ody to resolve the matter.

4.4 If the required sample is not available at the time of the visit, the inspector may leave instructions that a sample from the next production run is to be sent to, or collected by, the Certification Body.

4.5 Samples for the product surveillance programme may also be obtained from the marketplace.

4.6 Instructions for factory inspectors for selecting and picking up samples for surveillance purposes are provided in OD ENEC 324 Annex C.

4.7 ~~—~~Failure to send samples to the Certification Body makes it impossible to maintain the validity of licences. The consequences are described in paragraph 14 of the ENEC Agreement.

5. TESTING LOCATION

5.1 Product surveillance testing shall be carried out in suitably qualified test laboratories, including manufacturers' laboratories.
Manufacturers' laboratories shall be registered in the document AD ECS 039 "Registered Manufacturers' Laboratories for the purposes of product surveillance testing".

5.2 If a manufacturer's laboratory is used, the examination and testing shall be carried out or supervised by Certification Body personnel. These personnel shall be qualified to perform or supervise tests on products selected for surveillance purposes.

5.3 Laboratories whose facilities are to be used by the CB for testing the sampled product(s) for surveillance purposes shall:

- demonstrate that the facilities are in compliance with the relevant requirements of ISO/IEC 17025 fulfilling at least one of the following provisions:
  - be covered by appropriate valid accreditation.
  - E-CTF laboratories registered in the document AD ECS 036.
  - be evaluated by the personal of the CB before the tests.
- appoint an appropriate person to be responsible for the facilities and/or services provided to the CB.

6. CONTINUOUS CONFORMITY WITH THE APPROVED DESIGN

The inspector shall verify that the product continues to be in conformity with the approved design by using the PD CIG 023 – Section 15 “Certified Products and Changes to Certified Products”.