

Industrial and tertiary product Testing and Application of Standards 2nd Italian National Focal Point meeting

Analysis and report on other applicable regulations Graphical flow chart of the methodological process

Milano, 11 maggio 2018, Sala convegni ANIMA, 14:00



Co-funded by the Horizon 2020 programme of the European Union

Angelo Baggini 11–05–2018 Milan

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Outcome of WP3: deliverables

WP3 - Defining an effective compliance framework for MSAs and manufacturers

- D3.1 Report on information and additional requirements related to inspection of fans (Confidential)
- D3.2 Report on information and additional requirements related to inspection of transformers (Confidential)
- D3.3 Evaluation of products in each testing type and unit category (Confidential)
- D3.4 & D3.5 Analysis and report on other applicable regulations (Public)
- D3.6 & D3.7 Best practice and experiences of both MSAs and industry regarding testing of fans and transformers (**Public**)
- D3.8 Report about the screening techniques available for product/supplier targeting (Public)
- D3.9 Graphical flow chart of the methodological process, taking into account all tasks within WP3 (**Public**)



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Methodological process for verification of compliance by MSA

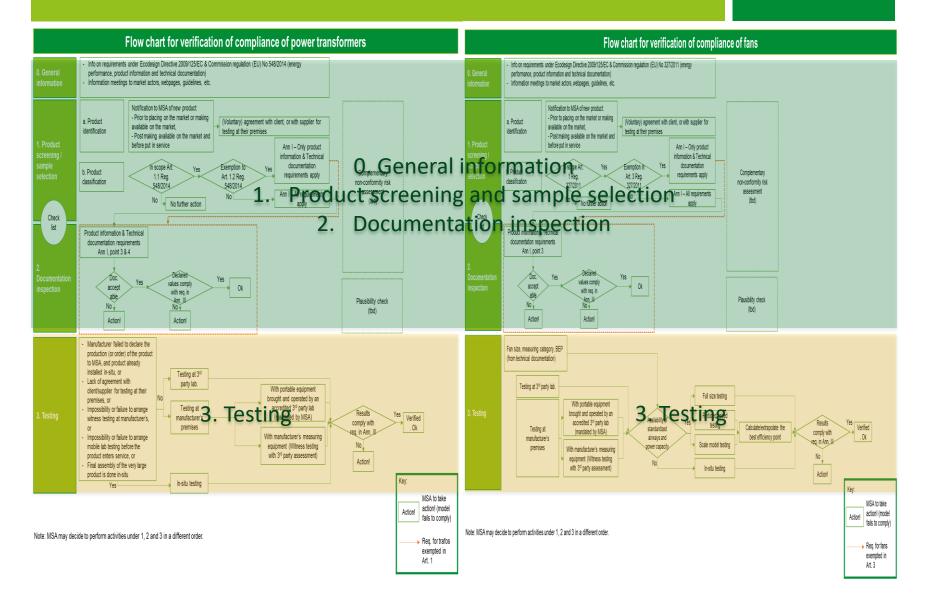


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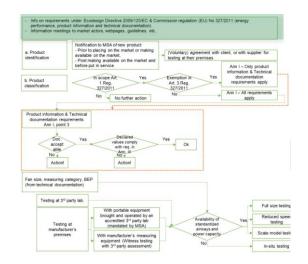


Flow chart



0. General information*

- Info on requirements under Ecodesign Directive 2009/125/EC & Commission regulation (EU) No 548/2014 (energy performance, product information and technical documentation)
- Information meetings to market actors, webpages, guidelines, etc.



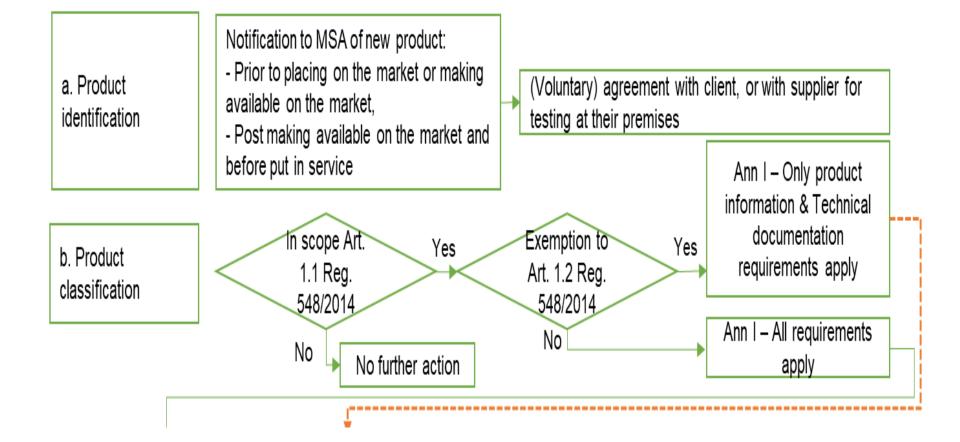


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1. Product screening and sample selection*



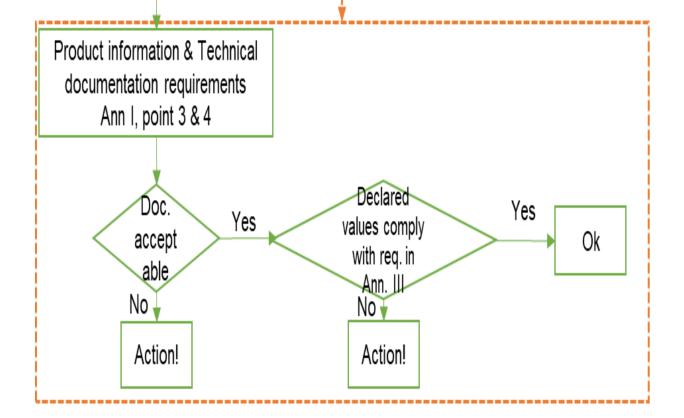


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2. Document inspection*





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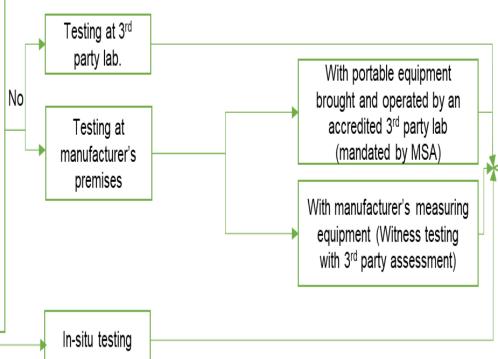


FANS

3. Transformer testing* (1)

- Manufacturer failed to declare the production (or order) of the product to MSA, and product already installed in-situ, or
- Lack of agreement with client/supplier for testing at their premises, or
- Impossibility or failure to arrange witness testing at manufacturer's, or
- Impossibility or failure to arrange mobile lab testing before the product enters service, or
- Final assembly of the very large product is done in-situ

Yes





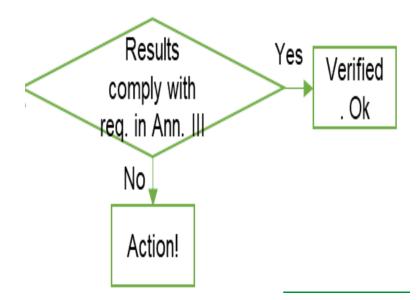
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3. Transformer testing* (2)





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3. FAN Testing* (1)

Fan size, measuring category, BEP (from technical documentation)

Testing at 3rd party lab.

Testing at

manufacturer's premises

With portable equipment brought and operated by an accredited 3rd party lab (mandated by MSA)

With manufacturer's measuring equipment (Witness testing with 3rd party assessment)

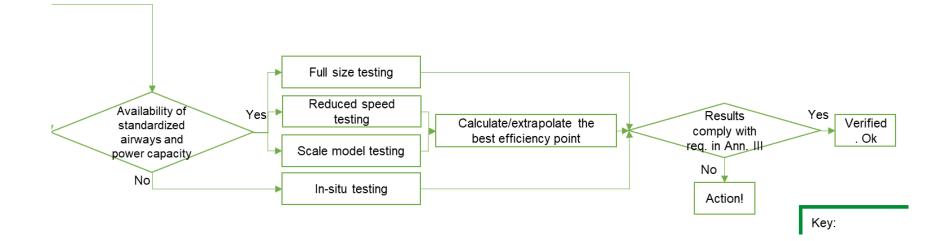


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3. FAN Testing* (2)





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* Disclaimer

- The methodologies presented in the flowcharts of D3.9 are at an intermediary stage, and are not to be considered final recommendations of the INTAS project.
- The methodologies will undergo a practical validation phase in WP4 during which MSAs participating in the INTAS project will assess their applicability.
- Market actors will also be informed and consulted on this topic at a number of National Focal Point meetings organized in Europe.
- The validation phase will allow for refinements of the methodologies until the end of July 2018.

Visit the INTAS project website for information about the way you can participate to this process.







Comments and suggestions











Other applicable regulations to be considered when undertaking inspection on Fans and Transformers by MSAs



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Phase 1 - Input collection

The main subjects considered potentially synergic have been:

- Energy
 - Ecodesign
 - EPBD
- Safety
 - Electrical
 - Fire

- Workplaces
- Environment
 - Noise
 - ROHS
 - PCB



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Phase 1 – Input collection

Power transformers

Type of Reg	#
EU Regulations	6
EU Directives	11
EU Dir. National legislations	3
Other National legislations	3
Voluntary Certification Schemes	4
TOTAL	27



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Phase 1 – Input collection

Large fans

Type of Reg	#
EU Regulations	6
EU Directives	8
EU Dir. National legislations	
Other National legislations	
Voluntary Certification Schemes	4
TOTAL	18

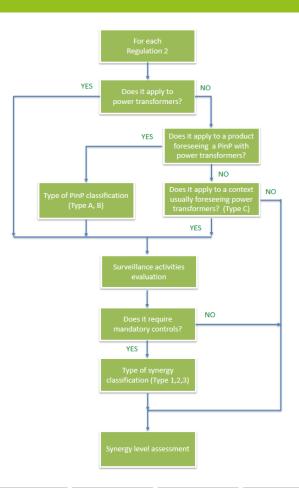


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Phase 2 – Analysis



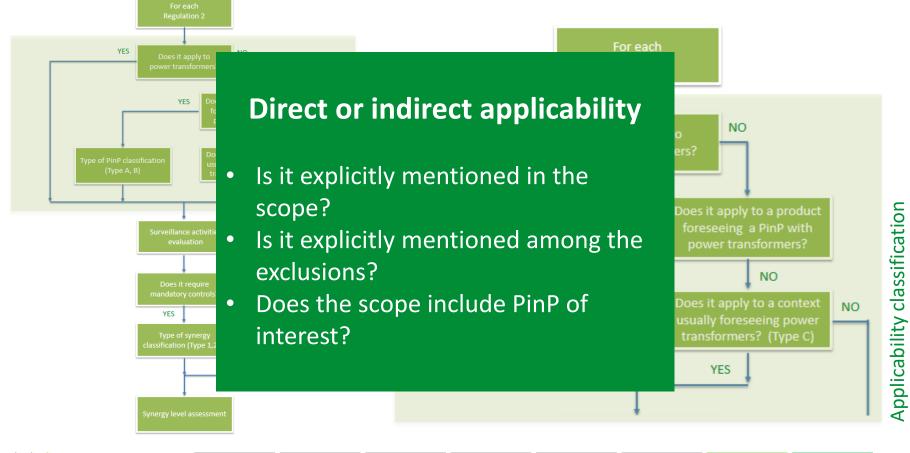


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Phase 2 – Analysis





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Phase 2 - Analisys

Product in product situation

- Type A: INTAS product is part of another product that falls under the scope of Regulation 2
- Type B: a product that falls under the scope of Regulation
 2 is part of one of INTAS products

PLUS:

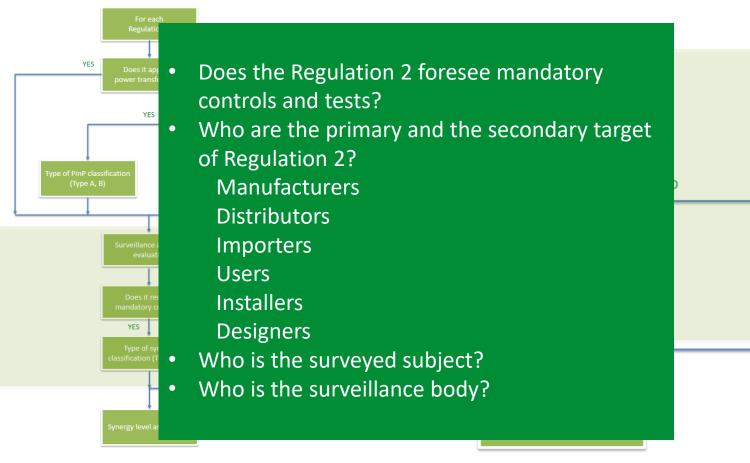
 Type C: INTAS product is frequently found in a given context/application/boundary that falls under the scope of Regulation 2







Phase 2 – Analysis





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Phase 2 - Analisys

Types of synergies

- **Type 1**: the same test once carried out as per R1, is automatically valid for R2, i.e. ensures that two identical tests or two identical properties (required by different pieces of regulation) are not tested twice.
- **Type 2**: two different tests (as per R1 and R2) could be carried out in "one single shot", i.e. to take the opportunity to carry out together the two different tests once the product is under investigation.

PLUS:

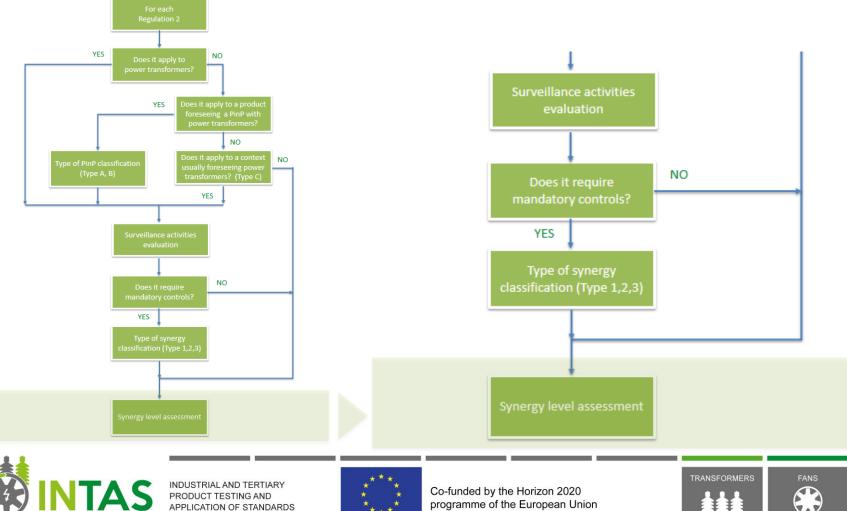
- **Type 3**: the opportunity to easily add to surveillance activities foreseen in the context of R2 surveillance activities of interest for R1 (for large products installed in a given context) like:
 - Basic checks (for example document inspection or collection)
 - Data collection.







Phase 3 – Synergy assessment



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Phase 2 - Synergy assessment

subjective judgement conventionally adopting 4 levels

- H High level
- M Medium level
- L Low level
- N No synergy







TAG	Ref.	Short Title	Coverage	Surveyed subject	Surveill. body	Mandatory control/test	PT into the scope	PinP Category	Synergy class	Synergy level
#1	2009/125/EC	Ecodesign	EU	Manufacturers, importers	MSA	Mandatory	YES	Туре А	Type 2	Н
#2	2014/35/EU	LVD	EU	Manufacturers, importers, distributors	MSA	Mandatory	NOT CLEAR	Туре А	Type 2	М
#11	2016 No. 1101	Electrical Equipment (Safety) Regulation	UK	Manufacturers, importers, distributors	Health and Safety Executive	Authority can intervene if they feel equipment presents a risk; hinges on CE marking and conformity assessment	NOT CLEAR	Туре А	Type 2	М
#13	The building regulations 2010	Building regulations	UK	"Places of special fire hazard" of which 'Oil-filled transformer and switch gear rooms' is first example.	Legal Authority	Mandatory	NO	Туре С	Туре 3	Н
#16	R.D.337/2014 ES	Regulation on technical conditions and safety warranty in high voltage installations and its complementary technical instructions ITC- RAT-01 to 23	ES	Users	Organismos de Control Habilitados Real Decreto 2200/1995	Mandatory	NO	Type C	Type 3	formers
#17	640/2009	Electrical motor Regulation	EU	Manufacturers, importers	MSA	Mandatory	NO	Туре А	Type 2	r tran
#20	89/391/EEC	Safety and health of workers at work	EU	Employers	Depending on countries	Depending on countries	NO	Туре С	Type 2	M M
#22	DM 15.7.2014 IT	Transformer Fire safety Italian Regulation	IT	Users	Fire brigades	Mandatory	YES	Туре С	Туре 3	 Ξ Ξ Ξ Ξ Ξ Ξ Ξ Ξ Ξ Ξ Ξ Ξ Ξ Ξ Ξ Ξ Ξ
#24	ISO EN 9001	Quality management	World	Manufacturers, Users, Organisations	Certification bodies	Voluntary	NO	Туре С	Type 3	H Omisir
#25	ISO EN 14001	Environmental management	World	Manufacturers, Users, Organisations	Certification bodies	Voluntary	NO	Туре С	Туре 3	H Ost pro
#26	ISO EN 50001	Energy management systems	World	Manufacturers, Users, Organisations	Certification bodies	Voluntary	NO	Туре С	Туре 3	«The m

TAG	Ref.	Short Title	Coverage	Surveilled subject	Surveill. body	Mandatory control/test	LF into the scope	PinP Category	Synergy class	Synergy level
#1	2009/125/EC	Ecodesign	EU	Manufacturers, importers	MSA	Mandatory	YES	Туре А	Type 2	Н
#2	2014/35/EU	LVD	EU	Manufacturers, importers, distributors	MSA	Mandatory	YES	Туре А	Type 2	М
#4	2006/42/EC	Machinery	EU	Manufacturers, importers, distributors	Notified bodies	Mandatory	YES	Type A	Type 2	Н
#11	2016 No. 1101	Electrical Equipment (Safety) Regulation	UK	Authority can intervene if they feel equipment presents a risk; hinges on CE marking and conformity assessment.	Health and Safety Executive	Mandatory	YES	Type A	Type 2	Μ
#13	The building regulations 2010	Building regulations	UK	Building	Legal Authority	Mandatory	NO	Туре С	Туре 3	Н
#17	640/2009	Electrical motor Regulation	EU	Manufacturer, importer	MSA	Mandatory	NO	Туре А	Type 2	М
#18	327/2011	Fan Regulation	EU	Manufacturer, importer	MSA	Mandatory	YES	Туре А, Туре В	Type 2	M
#20	89/391/EEC	Safety and health of workers at work	EU	Employers	Depending on countries	Depending on countries	NO	Туре С	Type 2	M or Large f
#23	1253/2014/EU	Ventilation unit	EU	Manufacturer	MSA	Mandatory	NO	Туре В	Type 2	2s f
#24	ISO EN 9001	Quality management	World	Manufacturers, Users, Organisations	Certification bodies	Voluntary	NO	Туре С	Type 2	с т т Zs for Large fans
#25	ISO EN 14001	Environmental management	World	Manufacturers, Users, Organisations	Certification bodies	Voluntary	NO	Туре С	Type 2	н «The most pro
#26	ISO EN 50001	Energy management systems	World	Manufacturers, Users, Organisations	Certification bodies	Voluntary	NO	Туре С	Type 2	кThe

Trying to summarize

NO real options to conduct combined multiple testing **NO** real differences in the conclusions for PTS and LFS

BUT 2 promising synergic effects:

- the **leverage** resulting from carrying out surveillance of two regulations together*
- the possibility to "delegate document inspections" to other official bodies in charge of controls in contexts typically having the large INTAS product installed**

Voluntary certification schemes*** seem to be the most promising

BUT this does not allow to implement in parallel the classical traditional testing activities by MSA as foreseen by each separated regulation.

* The synergy is realistically limited to the possibility to collect data and carry out document inspections. A side effect may also be the dissemination of the two regulations together ** even if the subject under surveillance is different *** not necessarily related to the subject in the scope of R1







Comments and suggestions











More information

about the INTAS project and its results:

www.INTAS-testing.eu

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