



CROSS-SECTORAL COMMITTEES



PRODUCT CONFORMITY ASSESSMENT COMMITTEE

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ELECTROLUX**DEPUTY CHAIRMAN:**ALEXEY SOLDATOV,
BSH BYTOWIJE PRIBORY**FEATURES OF CONFORMITY ASSESSMENT OF
SERIALLY MANUFACTURED PRODUCTS IN THE
UNFAVORABLE EPIDEMIOLOGICAL SITUATION
CAUSED BY THE SPREAD OF COVID-19**

At the end of 2020, the Eurasian Economic Commission approved the Interim Measures applied during the certification of serially manufactured products in an unfavorable epidemiological situation caused by the spread of COVID-19 (hereinafter referred to as the "Interim Measures"), which, inter alia, provide for the possibility of analyzing manufacturing status by remote assessment using means of remote interaction (audio and video communication). The adoption of the Interim Measures has allowed the conformity assessment procedures to be conducted in the new conditions

when one cannot visit manufacturing locations. During the period in which the Interim Measures are in effect, the certification subjects, including manufacturers and accredited persons, have accumulated extensive experience facilitating the assessment not only of the benefits but also the difficulties in the implementation of the new approach.

During remote assessment, the requirement for continuous transmission of clear video images from the start till the end of the audit is the most challenging aspect. It turned out to be very difficult, and in some cases, even impossible to ensure the continuous transmission of video images when manufacturing sites are large and when it is necessary to visit several workshops or take samples in an open warehouse. In addition to that, it is quite problematic to ensure continuous



videoconferencing of participants located in different time zones (USA, Australia, China) as working hours do not overlap for the period conducive to conducting the audit. The COVID-19 pandemic also creates difficulties for the functioning of supply chains; due to which, additional inspection control mechanisms are required, e.g. in the form of remote assessment.

It is important, that the originally established period of Interim Measures expired on January 9, 2022. However, various pandemic-related bans and restrictions remain in effect in many countries worldwide. Moreover, the lack of a clear definition of the concept of “lifting restrictions” leads to divergence in the approaches to the conformity assessment procedure by different certification authorities. Taking into account the current situation and the uncertainty about the pandemic progress, we believe that these measures should not be limited in time. It is necessary to identify criteria that allow the decision on lifting of restrictions to be made for the purpose of carrying out the conformity assessment procedure.

RECOMMENDATIONS

- › Extend the effective period of the Interim Measures applied during the certification of serially manufactured products in the unfavorable epidemiological situation caused by the spread of COVID-19.
- › Provide for the possibility of conducting remote assessments over several days with breaks.
- › Provide for the possibility of identifying and selecting samples of products during the certification of products (including new ones) or scheduled periodic assessment of certified products both at the finished product warehouse of the manufacturer as part of the remote selection and at the finished product warehouse of an authorized representative of the manufacturer in accordance with the Typical Conformity Assessment Procedure Schemes.
- › Provide for the possibility of conducting periodic assessments (inspection control) of certified products in the form of the remote analysis of the manufacturing status.
- › Set clear criteria for determining when restrictions will cease to be effective for the purpose of applying the Interim Measures.
- › Provide transitional provisions for work in progress, if the analysis of the manufacturing status in relation to the selected and identified samples was conducted during the effective period of the current Interim Measures, but the certification procedure was not completed at their expiry.



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