

Webinar of 2023-05-16

Webinar 'The functioning of the HAS system, interactions with HAS consultants and best practices'

Questions & Answers

1	Will the HAS consultant automatically participate in WG meeting? Or do the WG demand it actively?	The participation of the HAS consultant is not automatic in WG meetings. In case of a lack of compliance assessment, the TC secretary can request a meeting with the HAS consultant so he/she can clarify the comments provided.
2	What are the plans to increase transparency of HAS assessment process and status of work in process?	We will provide information about the status today and intend to organise similar meetings in the future.
3	Is it possible to see the planned distribution of the budget among the different sectors?	Yes, as I mentioned in the Technical Specifications (link in my slide) you will find the table with the full overview of the allocation per sector.
4	Why did the consultant's name become anonymous? Normally, when an assessment by an expert technician is requested, it must be signed otherwise it has no legal value. Why is the privacy theme used to cover the name? How does the TC ask for the meeting with the consultant if he doesn't know who made the assessment?	This has to do with the General Data Protection Regulation (GDPR). However, once we will have agreed with CCMC on a privacy policy for the treatment of the personal information of the HAS Consultants, it will again be possible to disclose such information to the TCs.
5	How do you know when the assessments will arrive? The TC has no certain timing and there is no transparency as to when the assessments will arrive	Normally, the assessment reports should arrive in 35 days. The TC secretary will receive an email with the HAS assessment report, in attachment. Then it's the task of the TC secretary to inform the WG secretary/convenor who should then circulate the HAS assessment to the experts in the WG. There are some delays due to the interruption of the HAS system. However, EY is working to decrease the backlog as soon as possible.
6	If the timing problem is connected to the MD Consultant assessments, can the assessments be divided if the standard is	Yes, but it will depend on the timing of CCMC's submission for assessments also under these other Directives.

	also linked to other directives (LVD, RED,...)?	
7	Is there an expedited procedure for recovering all assessments that have not yet been performed for over a year?	The backlog has been significantly reduced - EY and the EC meet every two weeks with CCMC to take stock of the reduction of the pending backlog and discuss what to prioritise and how to solve some challenges.
8	How can a technical body get legal expertise if not from a HAS consultant?	From the ESOs central services: CCMC and ETSI Secretariat. In our understanding, CCMC is setting up an internal team which will support the TCs do this end.
9	With the increase in resources, is it intended that the backlog will be shortened?	This is certainly the intention and should be possible with the current resources - we will show some stats later on.
10	What to do if a certain point in the HAS's consultants assessment is obviously wrong (i.e. The HAS consultant made a mistake)? Can the TC somehow appeal?	Yes, like in the previous contract, this has not changed. In such a case, the TC must raise the issue with the relevant CCMC Project Manager, who will then contact EY and the Commission.
11	A higher success rate at assessment would be achieved if HAS consultants participated in some of the WG drafting sessions. Has the Commission considered allowing this?	You cannot be an independent assessor if you have co-drafted a standard. Assessment must be intellectually unbiased and independent. Not allowing co-drafting was a conscious decision, and it is explicitly forbidden in the Technical Specifications of the call for tenders for this contract.
12	Is it still justified to call them Consultant, when they basically "just" assess the document. As it read, they will not be allowed to consult on anything beyond the assessment. Why not HAS-Assessor?	Yes, because they are consultants to the Commission (they work for us). And their work is to advice the Commission mainly, which is however not bound by such assessments.
13	How to handle assessments in a later state setting a non-compliance on a topic which has been introduced by a proposal of the HAS consultant in an earlier stage?	This seems an abstract question. I cannot reply to such a question, other than say that HAS assessments are not binding on anybody (also not on ESOs, which can always disagree with the assessment outcome) - and in case, these situations can be raised by the TC to CCMC's Project Manager, who can then escalate the case to EY and to the Commission.

14	Is it possible to add a link to a Regulation after the creation of a NWI?	Yes, it is possible. You can contact the CCMC Project Manager responsible for the TC to help with this request.
15	How can the TB secretary supply the text of the CD?	Can you clarify your question? Do you mean a parallel project with IEC to have the assessment at First working draft?
16	I really like the new "LCA". However, in the past, we often received Assessments for FV after (!) the start of the FV. If the Assessment is then negative, it wouldn't be possible to request the "Last Conformity Assessment". How do you ensure, that FV assessments will be delivered in time? I hope in future the FV starts only if the Assessment is available.	In line with the new HAS process for homegrown and parallel projects with ISO this is the case and the FV will only start in case of a compliant assessment.
17	What is EY?	EY stands for Ernst & Young.
18	Can a standard be changed after a positive FV, without a new work item?	After a positive vote the document is ratified. Therefore, there are several possibilities which will require a Technical Board decision. Those are a 2nd FV, limited technical changes after FV and prior to the publication. We suggest to contact the Technical PM of your TC.
19	I think its essential that if a document fails assessment there should be a mandatory meeting between assessor and WG	Comment noted.
20	Will you correct the slide 21 graphics errors (assessment of standards, LCA before FV) before sharing the material?	Can you clarify what you meant?
21	"From the ESOs central services: CCMC and ETSI Secretariat. In our understanding, CCMC is setting up an internal team which will support the TCs do this end." @Federico. Good to know, we did not have this info.	Noted.
22	A new version of a harmonised standard already published by CEN but not yet published in the OJEU, where the old one still remains in place, which version should be taken for "official" compliance	This question has nothing to do with the HAS Consultants system, so it is ououtr of scope of today's webinar. However, I can briefly reply that the use of harmonised standard (regardless if they are cited or not in the OJEU) is voluntary, so

	assessment? The new version published by CEN or the old version that appears in the OJEU? Thank you.	the notified body is free to use any version of the harmonised standard (or even no harmonised standard at all) for the purpose of compliance assessment. But of course, only the use of the version cited in the OJEU (even in case it is an older version) provides presumption of conformity.
23	Please provide a list of the abbreviations.	Thanks for your suggestion. We will include a list of the abbreviations in the Q&A report.
24	At bottom "timeline 40.60. etc" is starting from middle of 2nd flex	Indeed, it is wrongly starting from middle of 2nd flex. Instead, it should start at the end of the Enquiry Stage. We apologise for the confusion created, as it was a ppt formatting problem. Thank you.
25	If a standard is published in the OJEU with a 'conditional compliance' status, what are the implications for the use of such a standard for compliance assessment with regulation?	<p>Hi, thanks for the question. The conditional compliance may not have an effect and the EC may decide to publish in the Official Journal the reference to the standard if all the normative references have been published at the time of offering the standard to the EC.</p> <hr/> <p>Of course, it is up to the EC to decide if the publication of the reference is a normal one or if a note is included, depending on the circumstances of the harmonised standard.</p>
26	In the slide 24 there is the information that the assessments are carried out in 35 days. We are in delay with assessments of years... this slide is not the truth. I have never received evaluations in 35 days.	Prior to the disruption of the HAS system most of the HAS assessments were delivered on time. Due to the disruption of the HAS system indeed there was a delay in the provision of the HAS assessments. All parties are making the best to return to the normal.
27	How can the TB secretary supply the text of the CD? Can you clarify your question? you mean the a parallel project with IEC to have the assessment at First working draft?"" @Goncalo: the sentence was mentioned in Frederic's slide. TB secretaries do not have access to the IEC CDs	Hi Beatriz, I suggest to have a short exchange bilaterally. This item is under discussion at BT level and access to documents is one of the items.
28	Who is in charge of compiling the checklist for hENs?	Normally, it should be the WG convenor/secretary to complete the checklist. The TC secretary shall ensure that the checklist

		has been filled before submitting the draft hEN and the filled checklist to CCMC for ENQ or FV
29	I would be good to see an explanation of the abbreviations and acronyms used, when a presenter starts his presentation.	Dear Ulf, thanks for your suggestion. We will share a list with the abbreviations with you.
30	Our consultant recently provided an indicative assessment which was listed as non-compliant (it has some undated references and ANNEX ZA issues we are aware of). However, the assessment also contained comments related to CEN rules and editorial issues. Whilst these are helpful, I wonder if they are in scope of the consultant's review. Can you confirm that the only "binding" comments from the HAS consultant are those related to conformity?	There is no such thing as an "indicative assessment", this might be a concept of the previous system of New Approach Consultants that was set up and managed by CCMC. To the question: the assessment report has a structure which clearly differentiates between "critical finding" and other findings/comments. For the purpose of compliance and OJEU-citation, only the critical findings are essential.
31	We received several technical comments which were actually editorial (especially for the Noise assessment) which caused negative assessments. Does anyone at the CCMC or EC check that the comments truly reflect the type of comment? This could reduce costs and time in standardization	Yes, normally the CCMC Project Manager checks the comments provided by the HAS consultants. If there are issues with the comments, CCMC will get back to EY/EC to clarify the issue and ask for corrective measures if needed.
32	Would it be possible to include the secretary of WG in the notification of HAS Consultant report?	From our side it is certainly possible, but it is of course an internal organisational matter of CCMC.
33	A new version of a harmonised standard already published by CEN but not yet published in the OJEU, where the old one still remains in place, which version should be taken for "official" compliance assessment? The new version published by CEN or the old version that appears in the OJEU? Thank you.	Hi Gerardo. If the new harmonized standards has been published by CEN, but not yet cited in the OJEU, then, it cannot be used to provide presumption of compliance. Further information is included in the reply from Federico Musso.
34	I received some feedback from HAS consultants indicating that they are struggling with communication with EY as they are not allocated with a single EY contact that provides them with the required information.	If some consultants have problems in communicating with EY, they should raise this with EY and the Commission, instead of discussing this with the technical experts in the TCs or whoever else.

35	How can it happen, that the HAS consultant has sent his assessment of a project back to EY on day X, and the assessment result is communicated X + four months later only??	The QR stage may take some time when there are issues detected and the Consultant needs to address those - but this should under normal circumstances certainly not take 4 months (can't comment on a specific case without knowing the details though).
36	When an EN standard is referenced only in a non-normative way, e.g. in an informative annex, does that reference then need to be dated?	If a standard is referenced in a clause that does not give presumption of conformity, then it is not a requirement to be dated.
37	'@Gerardo, put both in your DoC. So the harmonised one for presumption of conformity and additionally the new one to address risks not covered by the older standard.	Comment and reply noted.
38	When will current contract with EY end?	This contract, like the previous one, is a 2+2 years contract, meaning that it is signed for two years and that it can be tacitly renewed once (and only once) for two more years if none of the signatory parties objects to the renewal. This first two years period will expire at the end of July 2024.
39	We have some standards which have also a link to Directive 2006/42/EC on machinery which is addressed as Table ZA.3, Relevant Essential Health and Safety Requirements from Directive 2006/42/EC on machinery that are addressed by this Document (according to article 1, item 12, of Regulation (EU) 2017/745). This Table was not assessed by the HAS consultant now although it was done in the past. Is there a reason for this?	Our suggestion is that you contact the CCMC Project Manager to investigate this case. If there is an issue, CCMC will get back to EY/EC to clarify the issue.
40	Do we have these slides on requests by sector? For household appliances we are far below the shown completed request numbers.	Household appliances are part of the LVD sector. As explained, this sector (together with Machinery) has substantially more requests than any other sector which explains why we have a bit more delays there.
41	Where can we find the new HAS platform?	The HAS platform is not accessible to the Technical Bodies. The assessments are delivered to the Technical Body secretary.

42	How long takes the quality review? - we have been informed 3 weeks ago, that the assessment is under quality review	Normally, a quality review in itself takes a short time. But it may happen that as a result of the QI the assessment has to be improved (for instance, if a part of the assessment has to be clarified) and this may take longer. QR is the latest stage identified in the process, so some assessments being clarified may appear under this stage until the assessment is sent to the ESOs.
43	Please indicate why some standards are still not assessed although they are in Formal vote stage and were submitted one year ago.. EN ISO 15883-1!!!	Thanks for your question. The reference seems to have been assessed and is currently under Quality Review at EY.
44	What is causing several months delay from assessment being ready until outcome is available for TC?	The quality review will take some time, although under normal circumstances and when no issues are detected this should not take months (note that in the latter part of the former HAS contract which ended in early 2022, the majority of requests was completed in 35 days, including QR - and the setup and progress is similar now, except that we are dealing with a backlog)
45	The CLC/TC 61, during last week's plenary, discussed the new HAS system which is not functional for us considering that we are publishing the standards (more than 80 projects) without the link to the legislation after waiting months without assessments and receiving letters and emails clarifying the delay from various national states, associations and in two cases also from the EC. The CLC/TC61 plenary meeting decided to officially ask for the timing of each project also considering that our priorities have not been considered by E&Y.	When the system re-started in 2022, given that a backlog had accumulated, there was a need indeed to prioritise the assessments on the basis of some criteria (like e.g. stage of the request, sector, etc.). The prioritisation was however discussed and agreed with CCMC.
46	how is the consistency of assessments managed? - we recieved a LCA-assessment, that throws up totally new items which have not been commented in the previous assessments by the consultant	Apart from by giving guidance and training to the Consultants, we in principle allocate assessments of the same draft hEN at different stages (ENQ, FV etc.) to the same Consultant. However, due to the current workload and in order not to delay the process, this has not always been the case over the last couple of months.

47	The level of non compliance highlights the need for HAS consultants to be able to advise WG's	Comment noted.
48	The meetings with the HAS consultants are not confirmed to the TC officers as the tool does not allow to do so. They are confirming the meetings to E&Y, but the confirmations are not arriving to the TC officers.	For the data protection measures mentioned earlier, the HAS Consultants need to confirm to the TC they will attend the meeting after they have received the meeting request, either directly themselves or via EY (EY encourages Consultants to do this themselves, as this causes less room for miscommunication)
49	If the conformity level is so low 19%, on the first step , is there planned a guide to support the TC to improve significantly this KPI ?	EY (and ESOs) will organise more joint sessions for TCs under the new contract aiming to provide guidance to TCs on how to improve the rate of compliance. These will be focussed on specific topics based on the qualitative analysis of HAS findings.
50	I received questions from TC members about the content of the quality review. What is the reason behind for such new step? Why does it takes that long time in some cases? TCs are bound to target dates for delivering documents whilst this proces with EY takes unpredictable seemingly arbitrary time.	This quality review is not a new step. We introduced it in 2018, upon request by CCMC, to ensure correctness and consistency in the assessment work of the consultants.
51	Considering such a low average compliance rate (19%), what happens when failures happen? What is the implication on ESOs?	CEN and CENELEC are putting in place some measures to improve the compliance of hEN with EU legislation: e.g., new checklist, more training, CCMC compliance check
52	It seems that HAS consultants have serious difficulties to access the relevant IEC documentation. Without it, they cannot correctly perform their assessments. Anything can be done to improve this?	Can you be more specific? IEC documents are provided in line with copyright agreement with IEC.
53	For IEC adopted standards the proposed steps are normally not possible as there is the need to draft EN Common modifications in order to adopt the IEC text	

54	I received an email notification on an "Assessment report" and when I opened the document it was blank. Who will resolve this and how quickly after the email notification?	Normally, you will have gotten this e-mail from CCMC, not from EY. So, I would advise to raise this technical problem with CCMC.
55	From what I have seen, there is not a homogenous approach among consultants (EMC and LVD, but also among EMC). For example, the manufacturers name issue is neither claimed by LVD consultants only by few EMC consultants.	Ensuring a homogenous approach of the HAS Consultants is a key aim for the project - if you experience any issues please flag this to CCMC so we can discuss that with them and can provide additional guidance to the Consultants if needed
56	Are HAS consultants allowed to request changes in the normative text or only in the annex ZA. It is still not clear what it means that the HAS consultant should not take part in the development.	They can make comments on any part, exactly like the Commission. As long as it is relevant for compliance of the standard.
57	How is this complete system linked with the Frankfurt agreement. This has never been mentioned up to now. Standards are developed and drafted on the international level going to a voting process too. This seems not to be linked to the HAS process.	According to the Frankfurt Agreement, IEC is on the lead of the development process. All the CENELEC work is developed in parallel in order to provide all the European elements on the draft offered for citation. Therefore the HAS assessment shall be performed at the same stages as the homegrown and ISO parallel references. In the case of the LCA stage, as the development process cannot be delayed (due to the IEC lead under Frankfurt Agreement), it is usually performed after FV. On the modifications to be done to the hENS' draft, CCMC is planning to organize a webinar in the next couple of months
58	Question related to the pie diagram of requests from ESOs per sector since August 2022 --> does this data form the basis for time allocation per sector for current HAS contract? Follow-up question: CPR only accounts for 1% of requests. However, this does not mean that there is little need for harmonization under CPR. It merely means that during 2022, not many CEN/TC's have requested HAS assessments. Possibly(/probably) mainly due to 100% non-compliance after HAS assessment in	It will depend, we will do this also in consultation with the Commission Unit in charge of CPR and also possibly with CCMC. If the sectoral experts expects more work to be needed than in 2022, we will not touch the initial allocation of resources for CPR.

	recent years. Will this be taken into account, in other words: will the sector under CPR be allocated more working days/year from HAS consultants than the percentage of requests in 2022?	
59	How is EY/CEN informing the TC that the assessment results are available?	The TC secretary receives an email notification, with the assessment report attached
60	It is surprising that the HAS consultants names anonymous, but their names are stated in the LT document circulated to all NCs...	<p>We were not aware, and we would like to know more on this - so we can check if this is GDPR-compliant.</p> <hr/> <p>This has been corrected and should not happen since the re-start of the contract.</p>
61	Could you please provide a confirmation for the submitted request for HAS-attendance at a meeting?	That's a valid point, we will work on this to try to make it possible in an automated manner.
62	For the distributed documents could you ensure that we could use the links. within the running presentation this not possible for me. thanks	Hello Martin, sure. Within the presentation that you will receive, the hyperlinks will be active for you.
63	Does this mean a TC needs to schedule a meeting for every assessment, since the HAS consultant cannot be invited to a TC meeting?	<p>Yes, this is correct. For each assessment with lack of compliance, a meeting request is needed.</p> <hr/> <p>TCs are also allowed to request 1 meeting to discuss multiple items with LOC outcome (only after a first assessment was performed). However, you are not allowed to request a meeting with a HAS consultant before submitting a formal request for assessment.</p>
64	@Goncalo, is this recent? Two consultants reported about this issue when meeting with them.	Since the re-start of the contract. Unless you are talking about normative references as we are aware there some delays in the handling of normative references.
65	What can the HAS consultant do when he, in a meeting with the TC, realises that a point int he assessment was indeed incorrect?	If there will be a successive assessment at a different stage, he/she can correct his previous comment on this point. Otherwise, he/she can inform the Commission so that we can take an informed decision on the OJ-citation.

66	<p>we have a standard was drafted in response to a mandate from 2001 (old system), and harmonised, and is now under revision. this new draft has led to lack of compliance . Do the experts have to accept the HAS comments where the consultant has not understood the technical aspects of the topic or product. are the experts obligated to accept the HAS comments?</p>	<p>The comments of the HAS Consultants are not binding, not for the TC nor for the Commission.</p>
67	<p>No, I am talking about the IEC standard when they are assessing the Common Mods</p>	<p>In principle they are provided. We do have some times issues with the relevant version to be used. This is usually coordinated by CCMC and EY and the HAS consultant should raise it to EY.</p>
68	<p>In general, the situation is slowly improving. But at the same time, it is very difficult from the individual TC perspective. In particular, if you take into account how long the TCs wait for the assessments, the delays it causes on development of hENs, the impact on relationship with ISO. In machinery, there are still about 18 assessments which had been requested in August 2022 (backlog from previous HAS system) but not received. It is very important to progress the oldest requests please.</p>	<p>It is possible for us to prioritise certain requests, on request of the ESOs. Please get in touch with the CCMC team to check if this should apply to certain of the requests you mentioned (it may also be that some requests are no longer needed, which could free up resources).</p> <hr/> <p>Hi Joanna, it is correct that we had some reshuffling of requests in the MD sector and we are ensuring that requests submitted in August are prioritised!</p>
69	<p>Please define " legal certainty"?</p>	<p>We can also say "legal clarity" - the reason for which the Annex Z was agreed with the ESOs and introduced in the mid-nineties of the past century. It means that there must be no ambiguity (hence, full clarity) on which specific legislative requirements are covered by the harmonised standard, and by which specific clauses or sub-clauses.</p>
70	<p>European or International. Does this mean EN or ISO only ? Many ASTM Standards are very common and used, without any EN or ISO equivalent</p>	<p>Those are considered National standards.</p>
71	<p>Undated references always mean the latest version. Where is the confusion in that?</p>	<p>Then you have not read yet CCMC's internal guidance on the correct use of normative references in harmonised standards, adopted in</p>

		June 2022 and of mandatory use by the TCs in CEN and CENELEC.
72	Moreover, some assessments are for about 11 weeks in quality review (WIs 00150130 and 00150150). what is exactly the reason? Can we meet to discuss? Many thanks for your attention	Noted.
73	Question regarding to the maximum of 25% of time spent by HAS consultants in meetings: why was a maximum of 25% chosen? What were the considerations behind the choice of this percentage? Why not relatively more time allowed in meetings? Asking mainly to understand a bit better the background of relevant factors for this choice.	Because their main task, their core task is to assess the standards. This is what they must focus on. In the end, as they do not have to co-draft or negotiate the content of standards, their meeting participation is proportionate to the task of simply providing clarifications on the outcome and content of their assessments.
74	Why Annex Z is not ALWAYS present in every single standard?	It is used only in harmonised standards, as it relates exclusively to presumption of conformity.
75	As far as I have understood, references in informative clauses of the standard shall go in the Bibliography. Is that right?	Normative references (including requirements) go to clause 2. Informative references if needed go to the Bibliography.
76	I disagree with the suggestion that legal certainty is provided by use of dated references. Use of dated references causes confusion when the referenced standard is superseded. Having a presumption of conformity related to a withdrawn standard and the state of the art indicated by a later edition doe NOT provide legal certainty.	Comment noted.
77	So, just to confirm. It is possible to make the Table with the dated references in the Annex ZA for EN ISO standards (also for Machinery standards?)	Yes, absolutely. Like for EN IEC standards already since some years.
78	We have had a comment from the HAS consultant that indicated the standards we reference do not contain fully dated references. How can one TC control the undated references in a document published by another TC or SO?	If the reference is coming from ISO or IEC, then you can use the table ZA.2 (EN ISO) or Annex ZA (EN IEC) to date the normative references.

	Standards developed with old style mandates do not have Annex Z.	Then they will not be cited in the OJEU. The Commission is in any case in the process of replacing all old mandates with new standardisation requests.
79	For the data protection measures mentioned earlier, the HAS Consultants need to confirm to the TC they will attend the meeting after they have received the meeting request, either directly themselves or via EY (EY encourages Consultants to do this themselves, as this causes less room for miscommunication). @Daan: they are not doing it, please remind them. It is really an issue for TC experts to have their agendas blocked for weeks without any feedback.	
80	When a series of documents (EN xxxx Part 1 to Part n) is developed at the same time and has normative reference between each other, but they follow a normative process not exactly the same (few weeks, few months difference), how can we deal with the normative references that have to dated AND published?	This is then CCMC's task to ensure that time of adoption is coordinated, as well as the submission to the Commission for OJ-citation.
81	How to separate between "state of the art" EN part and legal hEN for Products under the scope an CPR. Is it possible to develop a Part 1 and Part 2 to clarify they cover the same product? thanks martin	Hello Martin. The standard under CPR needs to comply with the original mandate or the standardization request (if there is one). A Part 2 can be drafted as long as it is not linked with the CPR and does not deal with matters covered by CPR. The two standards need to have different scopes and deal with different matters. Normally Part 1 and Part 2 should not make reference to each other.
82	Example ETSI EN 301 489-52 v1.2.1 included in current version of the OJEU, this HS it doesn't include annex Z, correct?	I have to check this specific standard, but in the case of ETSI standards the annex is called annex A
83	Is it correct that Annex ZA.2 is only used when creating an EN adopted ISO?	It is correct that this possibility can only be used in projects under the Vienna Agreement in CEN. In CENELEC there is a similar approach in the Annex ZA for parallel projects under the Frankfurt Agreement.

84	The consequence of dating normative references is to allow easy update of standards in standardisation requests	Comment noted.
85	I disagree some consumables do change over time- see EN ISO 105 F series	Good comment - this is the reason why consumable is made as an example of possibly acceptable undated reference, but in any case it is always a case-by-case consideration.
86	Are normative references possible to common criteria protection profiles under de EUCC or other schemes developed under the Cyber Security Act?	
87	Thank you Federico. If your EY request them confirmation of meeting, clarify that they are guaranteed with access to the IEC standards and and solve the reference point in EY, we would really appreciate it. I would also like that you and EY take on board my point about inhomogeneous approach among HAS consultants. Thank you in advance.	<p>Point taken. As for inconsistencies among HAS Consultants' views, this is the human factor which can never be fully eliminated. However, we provide regular trainings to all consultants on specific topics where we see a need to improve clarity and consistency. If you have suggestions for some such topics, we would be happy to look into them.</p> <hr/> <p>Dear Beatriz, a pleasure to hear from you. Please feel free to contact me to discuss the issues and then we can learn how to avoid such situations.</p>
88	Are references to CEN/TS possible?	As clarified in CCMC's internal guidance of June 2022, references to TS are not accepted (in clauses which are listed in the Annex Z, so meant to provide presumption of conformity).
89	I can see EN/ASTM existing. What would be the process to have the ASTM-only Standard becoming an EN/ASTM?	You mean EN ISO/ASTM? this needs to be done through the ISO route.
90	All the good examples you gave were unamended standards. Do we need to refer to amendments? And how so?	Internal Regulations part 3 include examples on how to refer to those cases of non-consolidated amendments.
91	When one ER is not applicable (example 1.5.8 for Noise) in annex ZZ, the line shall be removed or marked "not applicable"	The preferred option is to clearly indicate "not applicable".
92	What's the reason not to have the reference in annex Z?	There are several reasons. First of all, Annex Z is an informative annex, and the references shall be included in the standard. Secondly, there are

		different cycles of revision of the standard and if the reference is directly in the Annex Z, manufacturers might be requested to test according to different versions, so creating additional burden. In order to avoid unclarities and difficulties to the user of the standard the reference shall be made in the standard and not in the annex Z. Why doing something that can be easily avoided and can create issues to the users or lead to a non-citation?
93	what do you mean by last version of standards? It shall be clear that a TC cannot change a date after formal vote because this modification may have an impact of the technical content of my standard. It shall be written that the TC shall refer the last version of the standard at the time of formal vote	
94	if my standard has no Normative refences, does this mean it cannot be harmonised?	Normative references are not mandatory. It can happen that a hEN does not include any normative reference and in this case the Clause 2 will be empty. the standard must include an Annex Z and can be offered to the EC for citation.
95	Can you please comment on the excellent practical proposal to make a reference to a dated standard but also allow for a later revision to be used IF it is reference or required by other harmonised standards of horizontal regulations?	It is not possible.
96	Do normative references need to have an annex ZA and be published in the OJ?	No, not necessarily. Normative references do not have per se to be to other harmonised standards.
97	It is not correct that in Part 2 of 60335 we have normative reference in annex Z. The part 1 version is in the clause 1 "information" of the standard and approved by BT. Correct the slide	Thanks for the clarification. We will check. But unfortunately, we see some cases of references to part 1 in parts 2-x.
98	How do we do when there is no EN or ISO equivalent to an ASTM Standard?	You can then exclude the clause (or sub-clause) using the reference to the ASTM standard from the Annex Z (so, excluding it from the presumption of conformity).

99	Where we can assess a list of all CEN BT decision within CEN Boss. today I can only search on special with known Numbers. I assume I would not find all.	You can use the quick search function: https://quicksearch.cencenelec.eu/ . In addition, you can also contact the CCMC PM can also assist you with the BT decisions.
100	I got a lack of compliance due that a referenced EN did not have an up-to-date annex ZA.	This is strict, but formally correct.
101	If a standard (or pseudo standard) cannot be used as a NR, can it still be referred to in an informative way?	We should assess the need to refer to a normative reference in an informative way. A standard as a principle includes requirements and informative references should be an exception.
102	Thanks, I can conclude from this that, as long as the ASTM Standard is not mentioned in the clauses related to annex Z, they can be used.	Yes, that is right.
103	I think we need a webinar or Q&A just on addressing the assessment of the references. How do we address when there is non-compliance in a reference or a string of references. Maybe CCMC could help all of the TCs with this?	I think that the guidance document adopted by CCMC in June 2022 on normative references provides an excellent set of information on this topic.
104	I meant support for what to be considered in detail when answering the questions in the future hEN checklist. Sometimes questions in the recent checklist have not been completely clear -- so to avoid interpretation room.	OK noted.
105	Good morning! What may the experts of a TC do if they want to make sure that different versions (former and current version) of a test standard for a essential characteristic may be applied in clause 6 ACVP.	Hi, only the AVCP clauses of the cited standard can apply.
106	In the past we faced situations where new comments of the consultant were submitted at a very late stage, which led to a rejection, but which could have been submitted at an earlier stage. This	We recognise this may happen, for several reasons. We are doing our best to introduce measures to avoid this unwanted situation

	<p>complicates the process a lot. how should we deal with this and is this allowed?</p>	
<p>107</p>	<p>Shall the normative reference be to the latest version of a standard, or to the version that is published in the OJEU?</p>	<p>It can be to the latest version, normally it is actually preferable.</p>