

Conformity Assessment: An Industry Perspective

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The Global Voice of the Tech Sector

- ITI advocates for public policies that advance innovation, open markets, and enable the transformational economic, societal, and commercial opportunities that our companies are creating.
- Our members represent the entire spectrum of technology: from internet companies, to hardware and networking equipment manufacturers, to software developers.

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Conformity Assessment: The Impact on Trade in ICT

Trade of ICT products is especially affected by standards and conformity assessment requirements, because ICT products typically-

- Are designed for the global market
- Have a large number of components and rely on global supply chains
- Are constantly evolving in response to user demands and technological advances
- Are deployed in a wide and varied array of scenarios and sectors
- Are highly configurable. (One product family can have hundreds of different configurations.)

The Goal: A Simple Equation

Manufacture a single product for the global market.

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Test one time to a globally recognized standard.

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Meet conformity assessment requirements that are risk-based and least trade restrictive to meet legitimate regulatory objectives.

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The Reality: A Complex Challenge

- Over 80 countries have product regulations for safety, electromagnetic compatibility (interference), telecom, and environmental approvals
 - Most countries reference international standards/specifications. Some have national standards with significant deviations.
 - Many accept test results from any competent (e.g. accredited) lab. Others require testing be performed by local designated labs.
 - Many accept Supplier's Declaration of Conformity. Others require third-party certification by designated bodies.
 - Some require factory audits and accept results from other certification bodies. Others require that they conduct the audits themselves.
 - Many conduct market surveillances. Many others do not.
- The result: A patchwork of regulations (duplicating, conflicting, diverging) that work counter to having an efficient and effective program that maximizes worldwide leverage and minimizes cost.

The ITI Model

- Work directly with all stakeholders, including regulators, trade officials, et al.
- Public consultations (national and international)
- Work within and across industries, when appropriate
- Leverage regional and technical expertise with global oversight and consistency

Approaches to CA

- Multilateral
 - Public (Trade agreements, NAFTA, TPP, Pacific Alliance, MRAs)
 - Private (IECEE CB Scheme, ILAC)
- Bilateral
 - Similar to above, but must be repeated to create economies of scale and global consistency
- Unilateral
 - (Unique requirements OR accept established CA from elsewhere)

Recommendations

- Determine need for voluntary or mandatory requirements
- Seek alignment of requirements worldwide
- Seek input from industry and other stakeholders
- Understand and take into account the global nature of the ICT industry and its products
- Consider timelines for adoption, implementation, and transitions
- Follow a risk-based conformity assessment model
- Leverage existing international resources and agreements
- Set minimal marking/labeling requirements

Bottom Line: Both industry and economies have much to gain or lose.

Where we go from here...

- Keeping CA relevant and up-to-date
- Emerging technologies (IoT, cyber...)
- Product testing and certification???

Thank You

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