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EU-Russia Workshop

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Presentation overview

- Characterisation of ICT Industry;
- Conformity assessment of ICT Equipment in Russia (Telco reg./GOST);
- Industry's experience with Russian Conformity assessment;
- Industry's Recommendations

Characterisation of ICT Industry

- Global, competitive and dynamic Industry;
- permanent state of evolution;
- product life cycles are getting shorter and shorter;
- economy of scale

A common, International regulatory regime is a must in order to facilitate technology diffusion, promote production efficiency, product compatibility, create value, aggregate markets, drive down costs for consumers

Global regulatory regime

- Lack of coherence in the way legislation is implemented;
- there still remain both technical and administrative barriers;
- the need for such differences can be questioned since the regulatory authorities in these markets all share the same aim – to safeguard public interest objectives by ensuring that:
  - **Products are safe for consumers;**
  - **Essential services are adequately protected;**
  - **Scarce resources are used efficiently.**

Conformity assessment of ICT Equipment in Russia

- **Application scope**
  - Mandatory verification of conformity for telecommunication equipment
  - Products are listed either under Declaration or Certification procedures, the two however are not alternative options
- **Legal framework**
  - set by the Russian Federation Law
  - Required Telecom Conformity Certificate or Declaration of Conformity additional permissive documents may be required (e.g. mobile terminals)
  - Telecom Conformity Certificate or Declaration of Conformity first checked by Russian customs authorities at the point of customs clearance.
  - Additionally document may be required either at the moment of project's commissioning for commercial exploitation (by Rossvyaznadzor inspectors) or when the goods have been placed on retail shelves (by trade inspectors).

Conformity assessment of ICT Equipment in Russia (cont)

Procedure

- The Certification Bodies issue Certificates based on evidence provided by local accredited test houses (mandatory local 3rd party testing)
- Evaluation procedure may include: evaluation of technical documentation, surveillance visits, sampling, analysis, type testing in accredited laboratories, factory audits and in certain cases certification of quality management system
- Declaration of Conformity is issued by the company supplying products to the Russian market. Based on test protocols produced by accredited Laboratory, approved and registered by the Russian Federal Communications Agency.
- Declaration of Conformity only issued by a legal entity or entrepreneur registered in the Russian Federation.

Typology

- four types of certificates depending on the applicant type (manufacturer or seller), validity period (1 or 3 years) and product scope (specific batch or serial production):

GOST Certification

- **Legal framework: mandatory vs. voluntary certification**
  - Certificate of Conformity required for customs clearance as well as for sale and / or marketing within the country.
  - voluntary certification scheme may be applied. Exporters or importers initiate voluntary certification to prove the conformity of their products to the applicable Russian standards.
  - evaluation procedure may include evaluation of technical documentation, surveillance visits, sampling, analysis, type testing in accredited laboratories, factory audits and in certain cases certification of quality management system.
- **Types of certification schemes: single shipment vs. serial production**
  - Single shipment certificates
  - Certificates for serial production

Industry's experience with Russian Conformity assessment

Conformity assessment: certification and declaration

- Product certification seen as costly and out of step with nature of technological advancement. There is a clear lack of predictability;
- Declaration procedures only granted to those companies based in Russia. Establishing a presence in Russia can be problematic;
- Registration procedures can be extremely unpredictable and slow.
- The applications are often rejected based on reasons that have nothing to do with the product conformity as such.
- Any changes in the administration or regulation tend to indefinitely cease conformity assessment procedures. There appears to be no transitional procedures.

Industry's experience with Russian Conformity assessment (cont)

- Accreditation rule
  - Accreditation rules prevents test houses or certification bodies based abroad to obtain accreditation;
  - Only restricted number of certification bodies;
  - No competition in the certification services.

- Technical regulation
  - Technical regulation may contain requirements in terms of performance of products, production process, operation storage, transportation, marketing and utilization;
  - Slow and selective adoption of International standards;
  - Unclear and sometime inexistent transition period.

Industry's experience with Russian Conformity assessment (cont)

- Multiple application procedures
  - Authorities only grant license by product variants, not product family.
  - For minor cosmetic changes require new application.
- Documentation demand
  - Importation procedure very complicated with excessive documentation and inspection requirements. Excessive delay prevents timely delivery and access to critical components, impairing service to Russian consumers;
  - Custom procedure entail substantial costs, are prone to mistakes and consequently incur administrative fines;
  - The actual cost of goods imported can be increased by 75% as a result of fees (and excessive taxes).

Industry's Recommendations:

- Conformity assessment process must be based on proportionality of measures, impartiality , confidentiality and transparency;
- Mandatory requiremenst should be limited to a clearly defined set of requirements that are necessary to protect consumers and public interest, such as safety electromagnetic compatibility and spectrum usage;
- Compliance and Certification process to be based on Internationally recognised standards (e.g. Supplier Declaration as described in ISO/IEC 17050-1 AND iso/iec 17050-2) ;
- Accellerate the process of harmonisation of the Russia standards with the standards of International standardisation organisations such as ISO, IEC, ETSI and ITU.
- Timely adoption of International standards with clear and sensible transitrion period;
- Gradual reduction of the list of products for mandatory certification both for the horizontal product conformity and sectoral telecommunication conformity systems;

Industry's Recommendations (cont):

- **Accreditation system for certification bodies and test laboratories to be based on Internationally recognised and accepted standards and linked to relevant accreditation organisations (ILAC, IAF);**

- **Acceptance of test reports and certifications issued by non-Russian based testing labs and certification bodies, that are accreditated by an internationally recognised body(ILAC, IAF) as basis for conformity assessment;**

- **Industry would benefit from a well established scheme and vehicle, for the publication and announcement of Russian regulation and standard changes in a public forum and of course, being translated into English.**

- **Greater transparency of regulatory and standard development and implementation along with allowing international industry associations to directly participate and provide input.**

- **Shift focus and resources in control functions from pre-market to post market controls.**

Thank you
for engaging in this dialogue