Mr. Kerry McManama,
IECEE Executive Secretary
IEC Central Office
3, rue de Varembé
P.O. Box 131
CH - 1211 Geneva 20
Switzerland

Dear Mr. McManama,

First of all, I would like to thank you for the given delay to the response on the matter of adoption of stage 4 of the CTF.

Electrical equipment that is put into circulation on the territory of the Russian Federation must comply with the requirements of the technical regulations of the Customs Union "On safety of low-voltage equipment" (TR CU 004/2011). In accordance with clause 4 of the Article 7 of TR CU 004/2011, "an accredited testing laboratory (center), included in the Unified Register of Certification Bodies and Test Laboratories (Centers) of the Customs Union" carries out the tests for certification purposes.

Previously, adopting the steps 2 and 3 of CTF Program NCB GOST Re was guided by the fact, that the works on testing in the customer's testing laboratory, including the use of the customer's personnel, could be considered as the place of temporary work of an accredited testing laboratory.

We hereby inform, that in accordance with the Order of the Ministry of Economic Development of the Russian Federation No. 570 from 07.09.2016, which entered into force on 10.03.2017, amendments were made to the Order of the Ministry of Economic Development of the Russian Federation No. 326 from 30.05.2014 "On the endorsement of the Criteria of accreditation, list of documents confirming applicant, accredited person compliance with accreditation criteria and the list of standardization documents, permitting the applicants, accredited persons to ensure their compliance with accreditation criteria" (hereinafter - Accreditation criteria).
In accordance with clause 21 of the Accreditation Criteria (as amended by Order No. 570 of the Ministry for Economic Development of the Russian Federation from 07.09.2016), "the laboratory may carry out research (testing) and measurements at the place of temporary work if:
in accordance with laws and regulations, documents in the field of standardization, rules and methods of research (testing) and measurements, including sampling rules and other documents, specified in the field of accreditation, works on research (testing) and measurements are carried out outside the place (places) of activities of the laboratory, but using test equipment, measuring instruments, as well as other technical means and material resources, belonging to the laboratory on the right of property or other legal ground, envisaging the right of ownership and use;
in accordance with these accreditation criteria, laws and regulations, standardization documents, rules and methods of research (testing) and measurements, including sampling rules, and other documents, specified in the field of accreditation, the use of equipment, that is not widespread and requires regular maintenance (unique equipment), and that is located at the place of activity of the owner of the works on research (testing) and measurements is required for carrying out the works on laboratory research (testing) and measurements”.

In connection with these amendments, which do not allow the use of outside personnel and, in particular cases, the testing equipment belonging to customer, for testing in accordance with the approved scope of accreditation, NCB GOST Re reports that it is not possible to adopt stage 4 of the CTF.

Considering that Steps 2 and 3 of the CTF were adopted by the NCB GOST Re before the date of these amendments, we ask you to provide an opportunity to review the decisions taken earlier.

Encl.: legal documentation excerpts related to the non-acceptance 4 p.

Sincerely yours

[Signature]

Anton Shalaev
Head of NCB GOST Re
CUSTOMS UNION COMMISSION

DECISION
from August 16, 2011 N 768

ON THE ADOPTION OF THE TECHNICAL REGULATIONS OF THE CUSTOMS UNION
"ON SAFETY OF LOW-VOLTAGE EQUIPMENT"

List of changing documents
(as amended by the decision of the Commission of the Customs Union
from 09.12.2011 N 884,
decisions of the Board of the Eurasian Economic Commission
of 10/10/2016 N 120)

In accordance with the Article 13 of the Agreement on the Common Principles and Rules for Technical Regulation in the Republic of Belarus, the Republic of Kazakhstan and the Russian Federation from November 18, 2010, the Commission of the Customs Union (hereinafter - the Commission) decided:

1. To adopt the technical regulation of the Customs Union "On safety of low-voltage equipment" (TR CU 004/2011) (attached).
TECHNICAL REGULATION OF THE CUSTOMS UNION

TR CU 004/2011

ON SAFETY OF LOW-VOLTAGE EQUIPMENT

List of changing documents
(as amended by the decision of the Commission of the Customs Union
from 12/09/2011 N 884)

Article 1. Scope

1. The present technical regulation of the Customs Union applies to low-voltage equipment, issued for circulation in a single customs territory of the Customs Union.

   Electrical equipment intended for use at a nominal voltage of 50 to 1000 V (inclusive) of alternating current and 75 to 1500 V (inclusive) of direct current relates to low-voltage equipment for which this technical regulation of the Customs Union applies.

Article 7. Confirmation of compliance

4. Certification of low-voltage equipment is carried out by an accredited certification body (assessment (confirmation) of compliance ), included in the Unified Register of Certification Bodies and Test Laboratories (Centers) of the Customs Union.

   Tests for certification purposes are carried out by an accredited testing laboratory (center) included in the Unified Register of Certification Bodies and Test Laboratories (Centers) of the Customs Union.
MINISTRY OF ECONOMIC DEVELOPMENT OF THE RUSSIAN FEDERATION

ORDER
from May 30, 2014 N 326

ON APPROVAL OF ACCREDITATION CRITERIA, OF THE LIST OF DOCUMENTS CONFIRMING THE COMPLIANCE OF APPLICANT AND ACCREDITED ENTITY WITH ACCREDITATION CRITERIA, AND THE LIST OF REGULATORY DOCUMENTS IN THE FIELD OF STANDARDIZATION, THE COMPLIANCE WITH WHICH ENSURES THE APPLICANTS’ AND ACCREDITED ENTITIES’ CONFORMITY WITH ACCREDITATION CRITERIA

List of changing documents
(as amended by the Orders of the Ministry of Economic Development of Russia from 07.09.2016 N 570, from 17.03.2017 No. 114)

In accordance with the clause 1 of the article 7 and the part 6 of the article 13 of Federal Law No. 412-FZ from December 28, 2013 "On Accreditation in the National Accreditation System" (Legislation Bulletin of the Russian Federation, 2013, No. 52, Article 6977), I order:

1. To approve the attached:

   accreditation criteria and a list of documents, confirming the compliance of the applicant, accredited entity with the accreditation criteria (Annex No. 1);

   a list of documents in the field of standardization, compliance with the requirements of which permits the applicants, accredited entities to ensure their compliance with the criteria for accreditation (Appendix No. 2).

2. The Order of the Ministry of Economic Development of Russia from October 16, 2012 N 682 "On Approval of Criteria for Accreditation of Certification Bodies and Test Laboratories (Centers) and Requirements for them" (registered by the Ministry of Justice of Russia on November 16, 2012, registration No. 25847) shall be considered to have lost force.

3. The present order shall enter into force in accordance with the established procedure, but not earlier than the entry into force of Federal Law No. 412-FZ from December 28, 2013, "On accreditation in the national accreditation system", with the exception of the seventh and eighth paragraphs of the clause 9, sub-clause 14.12, paragraphs fifth to the ninth of the clause 19, sub-clauses 23.22, 55.8 of the Accreditation Criteria and the list of documents, confirming the compliance of the applicant, the accredited entity with the accreditation criteria, approved by this order, coming into force three months after the entry into force of the Federal Law from December 28, 2013 N 412-FZ "On Accreditation in the National Accreditation System".

The Minister
A. V. ULYUKAEV
EXCERPT
(the full version is available on the official website of the Federal Service for accreditation
http://fsa.gov.ru/index/staticview/id/192/)

ACCREDITATION CRITERIA
AND LIST OF DOCUMENTS CONFIRMING
COMPLIANCE OF APPLICANT AND ACCREDITED ENTITY WITH
ACCREDITATION CRITERIA

List of changing documents
(as amended by the Order of the Ministry of Economic Development of Russia from 07.09.2016 N 570)

Laboratories Accreditation Criteria

21. Availability of rooms, testing equipment, measuring instruments and standard samples corresponding to the requirements of the legislation of the Russian Federation on ensuring the traceability of measurements, as well as other technical means and material resources necessary for the performance of works on research (testing) and measurements in accordance with the requirements of laws and regulations, standardization documents, rules and methods of research (testing) and measurements, including sampling rules, and other documents specified in the field of accreditation in the application for accreditation or in the register of accredited bodies at the place of activity in the field of accreditation, including at the place of temporary works, on the right of property or other legal ground, envisaging the right of ownership and use.

(as amended by the Order of the Ministry of Economic Development of Russia from 07.09.2016 N 570)

The laboratory may carry out works on research (testing) and measurements at the place of temporary work in case of:

in accordance with laws and regulations, documents in the field of standardization, rules and methods of research (testing) and measurements, including sampling rules, and other documents specified in the field of accreditation, works on research (testing) and measurements are carried out outside the place (places) of activities of the laboratory, but using test equipment, measuring instruments, as well as other technical means and material resources, belonging to the laboratory on the right of property or other legal ground, envisaging the right of ownership and use;

(as amended by the Order of the Ministry of Economic Development of Russia from 07.09.2016 N 570)

in accordance with these accreditation criteria, laws and regulations, standardization documents, rules and methods of research (testing) and measurements, including sampling rules, and other documents, specified in the field of accreditation, the use of equipment, that is not widespread and requires regular maintenance (unique equipment), and that is located at the place of activity of the owner of the works on research (testing) and measurements is required for carrying out the works on laboratory research (testing) and measurements;

It is necessary to use the equipment located in the places of production of railway products for laboratories, carrying out works on research (testing) and measurements of railway products in accordance with laws and regulations, documents in the field of standardization, rules and methods of research (testing) and measurements, including sampling rules, and other documents, specified in the field of accreditation.

(the paragraph is introduced by the Order of the Ministry of Economic Development of Russia from 07.09.2016 N 570)