

25 February 2019.

Government Gazette No. 42108 of 13 December 2018. *The Draft Conformity Assessment Framework for Equipment Authorization*

Introduction:

- The South African Domestic appliances Association (SADA) recognizes the need for conformity in the area of Electro Magnetic Interference emanating from domestic appliances.
- SADA makes special note of ICASA`s intentions to comply with the terms of the World Trade Organization agreement to which S. Africa is a signatory.
- We note that in this Government Gazette, reference is made only to Information and Communication Technology equipment with no mention of domestic appliances or electronic entertainment goods. (The comment presented below, is given in a general sense currently assuming a commonality with the product categories.)
 - The question we pose is whether an additional GG covering the excluded range of items is to be expected?
- RED – Radio Equipment Directive from the EU is mentioned in the GG however this is only on the context of ICT equipment.

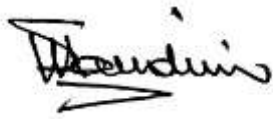
General:

- The document recognizes the accreditation processes under the ILAC/IAF/ SANAS protocols for test laboratories and certification bodies and clearly identifies the various types of Conformity Assessment Bodies.
- The GG makes mention of the differences between a Test laboratory (for the submission of samples for testing commonly referred to as `Golden Samples`) and Certification Bodies addressing the ongoing conformance, the aspect that does not exist with holding a test report from an accredited test laboratory.
- We laud the introduction of CB`s into the regulatory process as this minimizes risk to users/consumers although this does attract inflationary costs to suppliers and manufacturers.
- The inclusion of the CB step in the regulatory process could well allow the local Regulator to Risk profile various product categories and at the same time extend periods of certification validity, this mitigating against higher inflationary costs to be passed on to consumers/users.
- Note on NRCS
 - With the current structure of the local regulator, market surveillance is not possible and there is limited testing ability available to support this. The NRCS is an administrative body highly dependent on Certification from a recognized and accredited source upon which it relies to make decisions relating to market entry.



- Not evident in the GG is the process for the selection of Certification Bodies. This matter is of concern to industry as opportunities for corrupt practices arise if the process is not transparent and flexible.

We thank you for the opportunity to study and comment on the Draft and assure you of our willingness to engage further with ICASA if required.



M. Saunders.