



Implications of the New Radio Equipment Directive 2014/53/EU

for Manufacturers and Their Supply Chains

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A New Directive



Since the year 2000, manufacturers of radio and telecommunications terminal equipment have become accustomed to declaring

conformity with the requirements of the Radio and Telecommunications Terminal Equipment (R&TTE) Directive as a means of applying the CE Mark.

Over the last 17 years, many products falling within the scope of the R&TTE Directive, 1999/5/EC, have changed beyond recognition. The development of smart devices and their integration into the Internet of Things (IoT) is fuelling the rapid development of inter-connected products. To remain relevant, the R&TTE Directive needed to be updated.

In parallel, the European Commission has, over the last few years, been reviewing the effectiveness of its CE Marking Directives. As a result a number of provisions were incorporated into a separate piece of legislation known as the New Legislative Framework (NLF) which, in turn, led to the publication of nine new directives in 2014, including new versions of the EMC and Low Voltage Directives.

Radio Equipment Directive 2014/53/EU

Another of the new Directives published was the Radio Equipment Directive (RED), 2014/53/EU. This differed from the other eight in that it truly was a new directive, not just an update of an existing piece of European legislation. As well as incorporating the provisions of the NLF, the RED included a number of technical changes as well as a realignment of its scope.

The RED replaced the R&TTE Directive on 12th June 2016 but because it contained technical changes a one year transition period was included, meaning that it comes fully into force on 13th June 2017. From this date, all products containing a wireless interface and

falling within the scope of the RED must meet its provisions and a Declaration of Conformity (DoC) be made to that effect.

New Name, New Scope

The change in the name of the legislation from the Radio and Telecommunications Equipment Directive to the Radio Equipment Directive suggests that telecommunications equipment is no longer within its scope. Indeed this is correct as wired telecommunications equipment has been moved into the new EMC and Low Voltage Directives. Going the other way are broadcast receivers such as TVs and radios which now fall under RED.



The definition of radio equipment does not allow inbuilt radio functionality to be treated separately from the main product. The presence of an inbuilt radio module or component makes the whole product radio equipment and therefore 'Combined Equipment' is treated as radio equipment.

The RED encompasses the requirements for radio, Electromagnetic Compatibility (EMC), and safety aspects related to electrical safety and RF exposure in its three Essential Requirements:

1. Article 3.1(a) – Health and Safety of the User and others (including domestic animals)
2. Article 3.1(b) – EMC
3. Article 3.2 – Effective Spectrum usage

Key Changes in the RED

Whilst many similarities exist between the RED 2014/53/EU and R&TTE Directive 1999/5/EC there are also significant differences which impact stakeholders ranging from product designers and manufacturers to those operating in the supply chain.

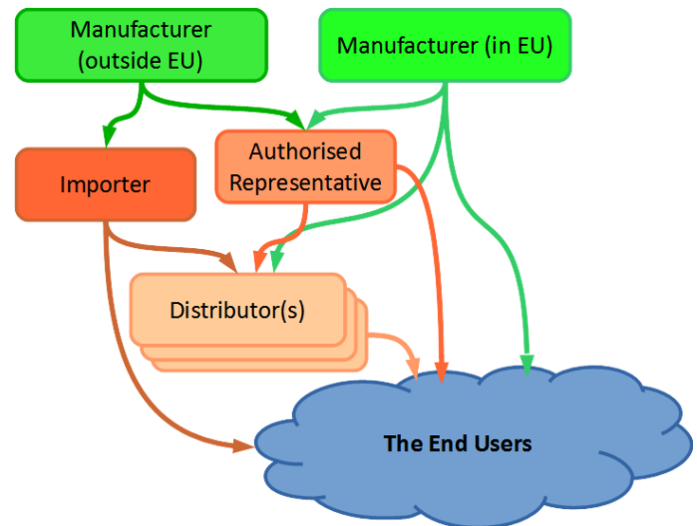
Some of the key differences between the RED and R&TTE Directive are as follows:

- Wired Telecommunications Terminal Equipment (TTE) is moved to within the scope of the LVD and the EMCD.
- Broadcast receivers are moved within the scope of the RED, having previously been within the scope of the LVD and EMCD.
- There is no lower frequency limit to the radio frequency spectrum.
- The RED aligns with the New Legislative Framework (NLF) meaning that all economic operators in the supply chain have legal responsibilities.
- Mobile phone manufacturers are to make their products compatible with universal chargers to reduce wastage.
- Notified Body activity is more closely regulated.
- Market surveillance activities are being increased to ensure that non-compliant products are more easily identified and quickly removed from the market.

Supply Chain Responsibilities

The provisions of the New Legislative Framework will ultimately be implemented in all of the CE Marking Directives but to date this has happened in nine of them, including the RED.

While manufacturers retain responsibility for ensuring product compliance and affixing the CE Mark, under the RED and the other recast directives, the entire supply chain assumes a level of responsibility. Authorised Representatives, importers



and distributors all have an important role to play in making sure that only products which comply with the legislation and bear the CE Mark reach the end user.

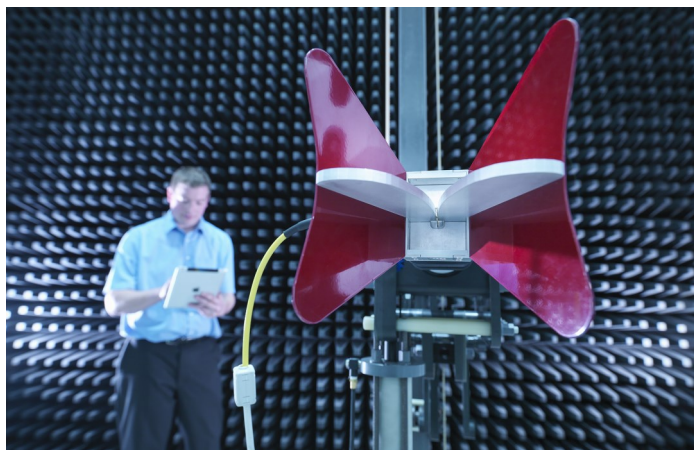
Importers are obliged to verify that a manufacturer outside of the EU has applied the correct conformity assessment process. They must also have access to technical documentation and DoCs in the event that they are requested by national authorities. Importers due diligence process therefore needs to be more thorough than previously required and their contract with the manufacturers needs to ensure that they can obtain the necessary documentation.

Distributors are obliged to ensure that only compliant products reach end users. Firstly this means that they need to be able to identify products which are non-compliant. Secondly, distributors must act with due care to ensure that the storage and transportation of the product whilst in their possession does not adversely affect its compliance.

Ensuring Conformity with the RED

In common with all CE Marking Directives, the RED includes technical and administrative requirements, both of which need to be met in order to satisfy its provisions.

Some new harmonised standards contained in the Official Journal (OJ) listing for the RED contain



technical changes. This means that existing products that have previously been declared against the R&TTE Directive should be re-examined to ensure that any new technical requirements are met.

Irrespective of whether any additional technical assessment is required, all existing products that are placed on the market after 12th June 2017 must be supported by updated Technical Documentation and DoCs referring to the RED.

How can we Help?

Testing



Our UKAS laboratories can provide [testing](#) to ETSI/EN standards for compliance with the **Radio Equipment Directive 2014/53/EU**, as well as the EMC and Low Voltage

Directives. Our test reports provide evidence of compliance which, when combined with Technical Documentation, can robustly support a DoC and placing the CE Mark on a product.

We also offer **FCC** and **Industry Canada** radio and EMC testing for accessing the American and Canadian markets, and electrical safety testing under the **CB Scheme** for global market access.

Advice

Eurofins York (formerly York EMC Services) have experienced compliance engineers that can help with the whole compliance process or individual steps, such as a gap analysis or



reviewing products manufactured outside of the EU. Our expertise can help you ensure compliance with the Radio Equipment, EMC and Low Voltage and Electromagnetic Fields (EMF) Directives.

We also offer a product compliance health check to ensure manufacturers are both technically and administratively compliant.

To comply with their legal obligations under the RED, manufacturers, importers and distributors need to either have an understanding of the directive and CE marking process themselves or have access to the necessary knowledge. Eurofins York is uniquely placed to provide this support and guidance.

Training

Need to know more? We offer scheduled compliance training on the RED in the form of a one day course entitled “**Radio Equipment Directive Explained**”.

Please visit our [training course](#) webpages for course details and online booking.

We also offer one day courses on the new EMC, Low Voltage and EMF Directives.

All of these courses are available as bespoke, in house training at a location of your choice, with content tailored to your company's requirements.

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CPD HOURS

Our training courses count towards the continuing professional development (CPD).

Next Step

For further help and advice contact your local Eurofins York [laboratory](#), e-mail enquiry@yorkemc.com or call us on +44 (0)330 430 3456.

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