

Gas Appliances Directive - Advisory Committee
Comité Consultatif de la Directive Appareils a Gaz

FOR ACTION

CONCERNING:

Item: Ad-hoc GA-DAC 05 May 2006: Conclusions of the Ad Hoc group on the transition of EN298 version 1993 to version 2003 per September 2006

To all Gadac members,

Apeldoorn, 5 May 2006

Dear Members of Gadac,

During the last Gadac meeting held on 30 March 2006, it was decided that a special ad-hoc group should meet on the transition of EN 298. This ad-hoc group has met on the 5th of May.

Decisions of the ad-hoc group:

- 1) The ad-hoc group has met as requested by the GAD-AC meeting of 30th March 2006 to consider how to handle the 2 versions of the standard of EN 298. The attached paper sets out the conclusions of the ad-hoc group and the deliberations which led to the conclusions.
- 2) The ad-hoc group asks GAD-AC members to indicate their endorsement to these conclusions.

Please send your reply to the Technical Secretariat, preferably by email:
wolter.buiter@kiwa.nl

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Wolter Buiter', written in a cursive style with a large loop at the beginning.

Wolter Buiter,

T.S. to GAD-AC

Revision of EN298

View of Ad-hoc GAD-AC working group

Issue

EN298:1993 has been amended by EN298:2003 which was introduced with a transitional period of 3 years. For existing products industry has questioned how to handle the two versions of the standard with regard to compliance with the Essential Requirements of the Gas Appliances Directive (GAD).

Background

CEN agreed to defer the date of withdrawal of EN 298:1993 for a transition period of 3 years as the revision of EN 298 was due to implementation of other technologies, not due to shortcomings of EN 298:1993

Discussion

The requirement is to comply with the Essential Requirements of the GAD. This requires that full account is taken of the state of the generally accepted technical knowledge and the ability of technology to provide technical solutions at the time the product is put on the market.

Note:

For brevity 'the state of the generally accepted technical knowledge and the ability of technology to provide technical solutions at the time the product is put on the market' is subsequently referred to as '*technical knowledge*'.

The manufacturers, with their Notified Bodies, are free to use whatever means they wish to demonstrate compliance with the requirement of GAD. The easiest means is likely to be by the use of Harmonized Standards which provide a presumption of conformity to the Essential Requirements of the GAD. However the use of a standard is not mandatory.

As a type has been assessed to conform with the Essential Requirements of the GAD, products conforming to this type can be put on the market as long as they continue to meet the Essential Requirements, based upon *technical knowledge*.

Under these conditions the following examples apply:

- Burner controls approved to EN298:1993 before September 30th 2006 can continue to be supplied after that date as long as they continue to meet the relevant essential requirements of the GAD based on *technical knowledge*
- Appliances with EC type approval for controls referencing an undated version of EN298 can continue to be supplied provided that the appliance with the control used continue to meet the essential requirements of the GAD based on *technical knowledge*.

- Appliances assessed against GAD after September 2006 may use controls to EN298 of any date provided the appliance continues to comply with the Essential Requirements of the GAD based on *technical knowledge* – it would be logical (but not mandatory) to use EN298:2003

Presumption of conformity:

It is correct that after 30th September 2006 only EN298:2003 provides presumption of conformity to the Essential Requirements of the GAD, BUT that does not prevent controls conforming to EN298:1993 continuing to be used provided that the control continues to meet the Essential Requirements of the GAD based upon *technical knowledge*.

Conclusion

- 1) It is the manufacturer's responsibility to regularly review the design of their products to ensure they continue to meet the Essential Requirements of the GAD based on *technical knowledge*.
- 2) It is the responsibility of the NB performing the CE surveillance to verify that the process as mentioned under 1) is in place and effective.

Based upon the above no special action is required.

Supplementary note:

Examples of *technical knowledge* to be found in the revision of EN 298 are the following:

- EN298:2003 - 6.1.2 (independent switching element)
- EN298:2003 - 9.1.6.1 (one fault in lock-out or safety shutdown)
- EN298:2003 - 9.1.6.2 (second fault in lock-out or safety shutdown)
- EN298:2003 - Annex A (fault modes for relays)

5th May 2006