



IECRE OPERATIONAL DOCUMENT

**IEC System for Certification to Standards relating to Equipment for use in
Renewable Energy applications (IECRE System)**

WE-OMC Transition Plan





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IEC Central Office
3, rue de Varembe
CH-1211 Geneva 20
Switzerland

Tel.: +41 22 919 02 11
Fax: +41 22 919 03 00
info@iec.ch
www.iec.ch

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WE-OMC Transition Plan

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1 Introduction

In April 2015 the second WE-OMC meeting was held in Feldkirch, Austria. One of the topics discussed was how to make the transition to start issuing certificates for the wind energy sector in 2016. The discussion is minuted under agenda point 13.1 in Feldkirch Minutes of Meeting, with the relevant decision repeated here:

"Decision 17/2015: The WE-OMC Chairman, together with the Conveners of Stakeholder Groups, will develop a more detailed proposal regarding transition plans for Test Labs and Certification Bodies by 2015-06-08. This information will be shared with Stakeholder Groups (SG) as considered relevant by the SG Conveners. The detailed proposal will be submitted to the WE-OMC and the members of the Stakeholder Groups no later than 2015-06-08. WE-OMC Member Bodies are asked to comment and vote with a deadline of 1 month (2015-07-08). "

This document is the detailed proposal for a transition plan as requested in decision 17/2015, for comments and voting by the Member Bodies. The document will also be sent to all members of the stakeholder groups for information. The document reflects the consensus agreed between the conveners of the stakeholders groups and the WE-OMC chair as being the best possible plan achievable at this moment.

In order to start issuing certificates for the wind energy sector from the IECRE system, a number of Test Laboratories (RETLs) and Certification Bodies (RECBs) must be recognized as part of IECRE by WE-OMC.

WG501 is working on the general approach, which will involve amongst others a peer assessment. This will be described in the Rules of Procedure (RoP) for WE-OMC as well as various more detailed Operational Documents (ODs). The best estimate from WG501 is that this will not be ready before 2017. This transition plan will address the agreements that need to be in place in the interim period to still allow certificates to be issued by IECRE in 2016.

A second reason for drafting a transition plan is that in order for peer assessment to work, a number of RETLs and RECBs need to be accepted by the system using a pragmatic interpretation of peer assessment. This transition plan will also address the transition of accepting the first RETLs and RECBs into the IECRE system.

Finally, a number of objectives have been set for the IECRE, as stated in the IECRE Basic Rules:

"The objective of the IECRE System is to facilitate international trade in equipment and services for use in Renewable Energy Sectors while maintaining the required level of safety:

- 1) Operate a single, global certification System
- 2) Consistent understanding of what a certificate means, which certificates exist and how they are related
- 3) The System must be effective (avoid double work, which information must be given when and to whom) and will include a mechanism to solve disagreements between stakeholders both on the content of the System as well as its correct application
- 4) The System aims for a harmonized application around the globe to ensure a uniform implementation and mutual recognition between certification bodies and test labs
- 5) The System will make use of high quality international standards and will allow for continuous improvement of the System
- 6) The System aims for harmonized application around the globe to ensure a uniform implementation and delivery of information by suppliers, sub-suppliers, end users and others providing documentation for certification
- 7) The System aims for harmonized application around the globe to ensure a uniform implementation and clear understanding of all suppliers, sub-suppliers, end users and other applicants for the elements and modules as well as reports, statements and certificates of the certification processes
- 8) The System aims for acceptance by local/national authorities or other bodies requiring and benefiting from certification"

These objectives are strongly supported and are aimed to be implemented in 2017 and improved upon afterwards. As part of this transition plan we need to identify specific goals

that need to be in place already in 2016 to ensure IECRE delivers the required value contribution with certification in the wind energy sector.

2 Referenced documents

The list of documents used in this transition plan:

Document name	Document reference
IECRE Basic Rules	IECRE 01
WE-OMC Rules of Procedure (draft) (abbreviated as RoP)	WE-OMC/007/DC
WE-OMC Minutes of Meeting Feldkirch	WE-OMC/009/RM
-22	IEC 61400-22

3 Goals and boundary conditions for this transition plan

- 1) The transition plan must aim at issuing certificates for the wind energy sector under IECRE in 2016
- 2) The transition plan will not interfere with the work of WG501, but may use documents (especially ODs) as developed by WG501
- 3) The transition plan may indicate (in agreement with WG501) which ODs need to be prioritised
- 4) As per REMC decision, there will not be an appeal process other than that being worked on by WG001 (still to be decided by REMC and CAB). When an applicant sees the need for an appeal, the applicant (not the member body) shall contact the IECRE secretariat to discuss the appropriate course of action. The issue shall be dealt with at the lowest possible level and escalated when a solution acceptable to all parties cannot be found within a reasonable time frame. The escalation will go from WE-OMC to REMC to CAB.
- 5) The WE-OMC Rules of Procedure must be approved by the WE-OMC prior to issuing the first certificate from IECRE.

4 General Approach

The general approach of the transition plan will be to issue certificates based on -22 with specific improvements identified with regards to defined formats and quality requirements. The clarification sheets agreed under WT-CAC will be mandatory requirements under the transition plan.

The transition period covers the time from the moment the transition plan is approved (expected summer 2015) to the moment the WE-OMC decides the system can be run on the Rules of Procedure and underlying Operational Documents. This latter date is defined as 2017-08-31.

However, some ODs will be needed for the transition plan as well; WG501 is therefore asked to come up with a list of ODs required for the assessment of CB and TL, in line with decision WE-OMC 06/2015:

Decision 06/2015: WE-OMC assigned WG 501 to decide and recommend which Operational Documents (ODs) are to be taken on by stakeholder groups, and to communicate this to the specific stakeholder groups by the end of June 2015.

This list will be prioritised by the stakeholder group conveners and WE-OMC chair and the relevant stakeholder groups will be asked to indicate when ODs can be ready. The final decision on which ODs are required for TL and CB assessment will be made by the member bodies upon a proposal from the stakeholder group conveners and WE-OMC chair.

Apart from issuing (new) certificates according to the WE-OMC certification rules (a copy of -22), certificates are planned to be issued for small wind turbines according to ODs to be developed by the SWT stakeholder group.

Mutual recognition is a pillar of the IECRE system, as such RETLs and RECBs will be expected to mutually recognise each other's Test Reports and certificates. Details regarding such mutual recognition still need to be worked out and this will start as soon as possible and continue during the transition period.

The assessments are based on the principle of peer assessments. In order to start off the system the definition of 'peer' will be taken as RECB and RETL, including candidate RECB and RETL. Each assessment will be led by a Lead Assessor. This Lead Assessor is normally the Executive Secretary. In case the Executive Secretary is not available, another Lead Assessor may be appointed by the Executive Secretary and WE-OMC chair jointly. Additional experts may be added to the assessment team if required.

4.1 Test Labs

In order to issue certificates, Test Labs will have to be recognized under IECRE. For the transition period the following requirements for Test Labs are agreed:

- 1) Test Labs must declare one or more competence areas as per draft RoP (document WE-OMC/007/DC) and will be assessed for each.
- 2) Test Labs must be accredited to ISO17025 for the standard(s) covering the competence area(s) when asking for recognition under IECRE (the actual application must be submitted by a WE-OMC member body).
- 3) Test Labs must have participated in the proficiency testing, or have declared their willingness to participate in proficiency testing as part of the assessment, as organised by SG551; the TL group under the CAC or in proficiency tests such as performed within MEASNET for relevant competences areas (not required if such proficiency testing did not cover a specific competence area).
- 4) Test Labs must be a member of the Test Laboratory Stakeholder Group or must apply for membership at the same time as applying for recognition under IECRE.
- 5) If the proficiency test showed the test lab to be an outlier, data must be available to show that the root cause has been found and improved.
- 6) Test Labs must agree to participate in future proficiency testing if/when organised by SG551 (for the relevant competence area).
- 7) Test Labs must indicate their understanding that a full peer assessment (to be further detailed as considered most efficient within the IECRE system) will be set up to be functional in 2017, which will replace this ad-hoc procedure.
- 8) Test Labs must agree to adhere to the (draft) RoP and current and future clarification sheets.
- 9) Test Labs must agree to pay membership fees as per approved budget for the relevant year.
- 10) Test Labs must agree to pay the assessment fee (if applicable), which will be established together with the applicant. The candidate may withdraw from the application process after the assessment fee has been established without incurring any costs.
- 11) A peer assessment will be done by a (group of) identified peers (with possible additional experts). A specific peer or expert may be refused as long as argumentation is provided.

The assessment will be done based on ODs for the relevant competence areas to be written by the Test Lab Stakeholder Group; the task of the selected peers (and possibly additional experts) will include the further development of this OD based on the issues found. In case even a draft for the specific competence area is not available at the time a specific assessment will be held, the peers (and possibly additional experts) will perform the assessment based on their expertise and include in their report the principles of how the assessment was organised. This will form a basis for the draft OD, to be written by the assessors. This OD must indicate the division of tasks between the peers and experts, if the latter are used.

The aim of the assessment will be to get all recognised RETLs up to a specific quality level and agreed interpretation of the standard. As such, an identified deficiency may be addressed with a specific action plan. The acceptance may be conditional on the execution of the action plan. The correct execution of the action plan must be assessed again by the assessors; the

costs for this are not included in the original assessment and a further agreement on this needs to be worked out with the applicant.

The final acceptance of an RETL in the transition period will be made by the WE-OMC based on the recommendation from the Executive Secretary. This recommendation will be based on formal evidence for compliance with the interim acceptance criteria defined in the OD(s) still to be developed. Such formal evidence must include a report from a peer assessment. The formal evidence will be shared with the Executive Secretary. The formal evidence will also be shared with the WE-OMC member bodies to facilitate their decision making.

Test Labs may start tests for IECRE purposes before they are recognised as RETLs; they may not issue a Test Report with IECRE logo before they are recognised as RETL. In doing so, they knowingly take on the risk of not passing the assessment and the possible financial consequences.

4.2 Certification bodies

In order to issue certificates, Certification Bodies will have to be recognized under IECRE. For the transition period the following requirements for Certification Bodies are agreed:

- 1) Certification Bodies must be accredited to ISO17065(with IEC 61400-22 included in the scope) when applying for recognition under IECRE (the actual application must be submitted by a WE-OMC member body)
- 2) Certification Bodies must be member of the Certification Body Stakeholder Group or must apply for membership at the same time as applying for recognition under IECRE.
- 3) Certification Bodies must agree to adhere to the (draft) RoP, (draft) ODs and current and future clarification sheets
- 4) Certification Bodies must indicate their understanding that a full peer assessment (to be further detailed as considered most efficient within the IECRE system) will be set up to be functional in 2017, which will replace this ad-hoc procedure
- 5) A peer assessment will be done by (a group of) identified peers (and possibly additional experts). A specific peer or expert may be refused as long as argumentation is provided.
- 6) Certification Bodies must agree to pay membership fees as per approved budget for the relevant year
- 7) Certification Bodies must agree to pay the assessment fee, which will be established together with the applicant

The assessment will be done based on a (draft) OD to be written by the Certification Body Stakeholder Group; the task of the selected peers (and possibly additional experts) will include the further development of this OD based on the issues found. In case even a draft is not available at the time a specific assessment will be held, the peers (and possibly additional experts) will perform the assessment based on their expertise and include in their report the principles of how the assessment was organised. This will form a basis for the draft OD, to be written by the assessors. This OD must indicate the division of tasks between the peers and experts, if the latter are used.

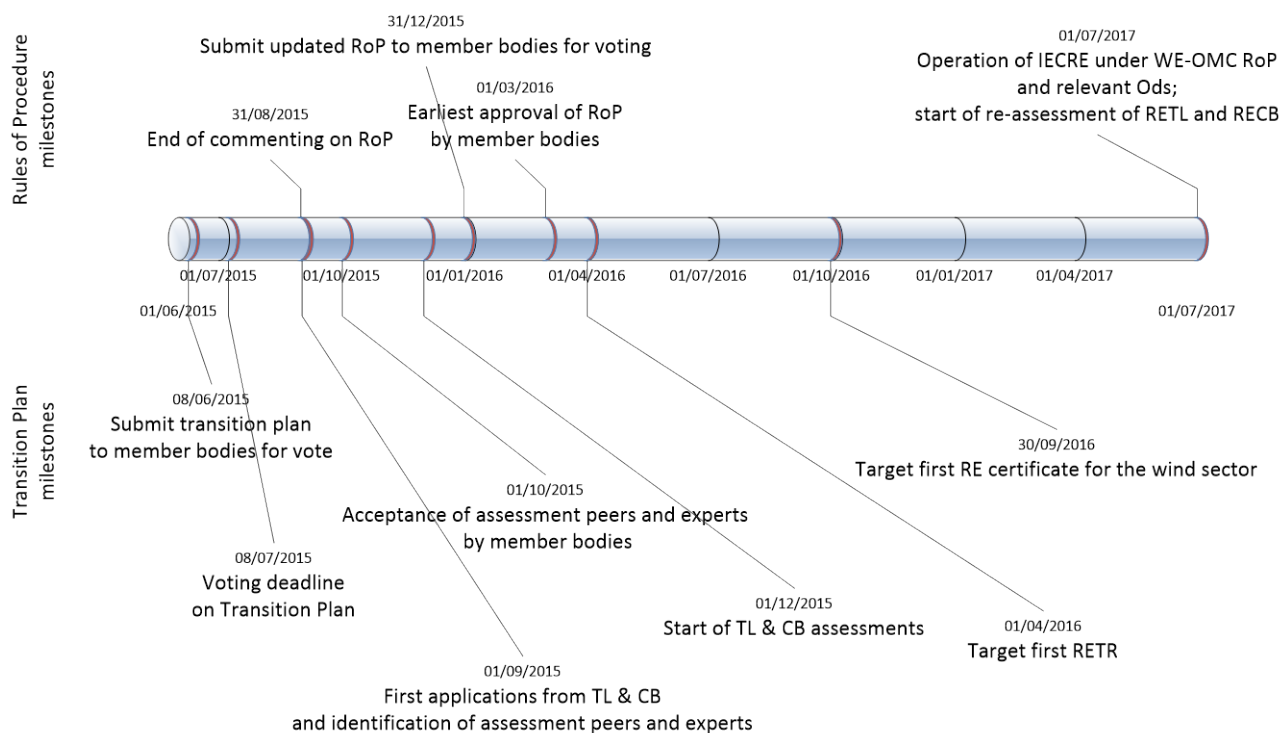
The final acceptance of an RECB in the transition period will be made by the WE-OMC based on the recommendation from the Executive Secretary. This recommendation will be based on formal evidence for compliance with the interim acceptance criteria defined in the OD developed by the CB stakeholder group. Such formal evidence must include a report from a peer assessment using the reporting format according to the OD developed by the CB stakeholder group. The formal evidence will be shared with the Executive Secretary. The formal evidence will also be shared with the WE-OMC member bodies to facilitate their decision making.

Certification Bodies may accept certification work for IECRE purposes before they are recognised as RECBs; they may not issue a certificate with IECRE logo before they are recognised as RECB. In doing so, they knowingly take on the risk of not passing the assessment and the possible financial consequences.

Assessed RECB can utilize work modules (as defined in IEC 61400-22) from Type Certificate work performed to IEC61400-22 within 5 years of the first publication of the Type Certificate. This also applies to test reports from non RETL labs (for tests not covered by a defined competence area) and non-accredited OEM/EU labs which are accepted by the CBs in line with their interpretation of IEC 61400-22 requirements.”

All decisions regarding recognition of RETLs and RECBs by WE-OMC must be ratified by the REMC. However, the system may start using such RETLs and RECBs after the decisions from WE-OMC (or a group mandated to do such by WE-OMC).

5 Timeline & Milestones



6 Actions

In order to support the goals and the outlined general approach, the following actions must be done:

#	Action	Owner	Deadline
1	CB SG to develop an OD for the assessment of applicant Certification Bodies	Christer Eriksson	2015-10-01
2	TL SG to develop an OD for the assessment of applicant Test Labs per competence area	Jeroen van Dam	2015-10-01
3	Develop ODs to allow certificates for small wind turbines to be issued under IECRE	Brent Summerville	2016-02-01
4	Agree on a list of ODs required for the full TL and CD assessment (for the 2017 assessments)	Leo Jensen	2015-06-30
5	SG conveners and WE-OMC chair to prioritize the list of ODs in the light of the TL and CB assessments for the transition plan	Frank Ormel	2015-07-30
6	TL and CB stakeholder groups to set target dates based on prioritized OD list and commit to these dates	Jeroen van Dam, Christer Eriksson	2015-08-30
7	SG conveners and WE-OMC chair to decide on proposal of final list of ODs for assessments in transition plan and submit (via IECRE secretariat) to the member bodies for voting	Frank Ormel	2015-09-30

#	Action	Owner	Deadline
8	Identify peers and experts for TL and CB assessment in transition period and propose to SG conveners. CBs interested in being a peer can sign up through the secretariat. Experts will be selected based on identified needs.	Frank Ormel	2015-08-01
9	SG conveners and WE-OMC chair propose consensus on assessment peers and experts to member bodies for voting with one month voting deadline	Frank Ormel	2015-09-01
10	SWT SG to establish list of intended ODs	Brent Summerville	2015-09-01
11	SWT to commit to target dates for SWT ODs	Brent Summerville	2015-10-01
12	IECRE Secretariat to make available an application form for recognition of TLs and CBs as RETL and RECB on the IECRE website, after commenting by the SG conveners	Kerry McManama	2015-08-01
13	IECRE Secretariat to be ready to handle applications for recognition of TLs and CBs as RETL and RECB by relevant member bodies	Kerry McManama	2015-09-01

7 Risks

The main risk currently identified is the list of ODs required for the TL and CB assessment for the transition period, including the writing of these ODs. This will need to be managed closely in order to meet the transition plan goals; this will also require effort to achieve consensus during the execution of the transition plan.

A second risk is to ensure alignment between the assessors in the transition period. These assessors will not have the same extended training as is intended for the more fully developed assessment of 2017; hence the IECRE secretariat will have to work more closely with these assessors.

8 Communication

Communication with the member bodies as well as stakeholder groups is essential. Formal communication (as per decision WE-OMC 17/2015) will be done through the secretariat.

Stakeholder group conveners are encouraged to share the draft transition plan with the stakeholder group members to keep them informed and involved. The deadlines for commenting on the draft plans (see earlier in this document) are short – this should be pointed out to the SG members.

The convener of WG501 as well as its members also should be kept closely involved; the intention is that WG501 keeps focus on the 2017 "full operation" of the IECRE with an approved RoP and relevant Operational Documents; the Transition Plan will influence the prioritization of the OD list and subsequent development of ODs and so a certain linkage cannot be completely avoided, hence the need to keep WG501. We therefore should add the WG501 members on the distribution list of the transition plan when it will be distribution for comments and voting on the 8th of June. Leo is requested to share the document with WG501 members as he sees fit.

WE-OMC should inform REMC as well as the other sectors of the Transition Plan at the REMC meeting in September 2015; furthermore the REMC chair and Marine and Solar PV chairs should be included in the commenting round on June 8th (without voting).

**INTERNATIONAL
ELECTROTECHNICAL
COMMISSION**

3, rue de Varembé
PO Box 131
CH-1211 Geneva 20
Switzerland

Tel: + 41 22 919 02 11
info@iec.ch
www.iec.ch

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3, rue de Varembé
PO Box 131
CH-1211 Geneva 20
Switzerland

Tel: + 41 22 919 02 11
secretariat@iecre.org
www.iecre.org