

e-marking FAQs

I receive a great number of questions about e-marking mostly from manufacturers who are familiar with CE-marking but have little or no knowledge of e-marking. Here are the frequently asked questions. PLEASE only email me if your question isn't here.

1) What are the differences between the e-mark, E-mark, and CE-mark?

The e-mark is an EU mark for approved vehicles and vehicle components sold into the EU. It is an old-fashioned type approval mark given by a certifying authority, you cannot self-declare and affix an e-mark.

The E-mark is a United Nations mark for approved vehicles and vehicle components sold into the EU and some other countries under UN-ECE Regulation 10.02.

The CE-mark is an EU mark for many other sorts of products approved or declared compliant under a great number of EU directives, not just the EMC directive.

2) What are 2004-104-EC and 95-54-EC?

2004-104-EC is the Automotive EMC Directive. It replaces the now obsolete 95-54-EC. It deals only with the EMC aspects of E-marking.

3) Can I self-declare to 2004-104-EC?

No, but see my answer to question 8.

4) What is an ESA?

An ESA is an Electronic Sub Assembly. All after-market electronic products are termed ESAs.

5) Who is the authority for issuing e-marking certificates?

In the United Kingdom this is the Vehicle Certification Authority (VCA) <http://www.vca.gov.uk/>. Other EU member states have equivalent authorities.

6) What is a Technical Service?

A Technical Service (TS) is a commercial test laboratory certified by the certifying authority as competent to act as a TS under 2004-104-EC.

7) What if my product is intended for use both within and without a vehicle?

For use without a vehicle your product must be CE-marked. For fitting within a vehicle it may additionally need e-marking, see point 8 below. If it may get used in a vehicle but is not specifically intended for such 2004-104-EC does not apply. For example a mobile phone but not a mobile phone car kit.

8) What if my products intended for fitting in vehicles are already CE-marked, can I self-declare them under 2004-104-EC?

Yes and no! Certainly you cannot e-mark them yourself but you might be able to sell them for fitting to a vehicle. The relevant clause of 2004-104-EC is 3.2.9. and I reproduce it below:

“Components sold as aftermarket equipment and intended for the installation in motor vehicles need no typeapproval if they are not related to immunity-related functions (Annex I, 2.1.12). In this case a Declaration of Conformity according to the procedures of Directive 89/336/EEC or 1999/5/EC must be issued. Part of this declaration must be that the ESA fulfils the limits defined in paragraphs 6.5, 6.6, 6.8 and 6.9 of Annex I to this Directive. During a transition period of four years after coming into force of this directive the responsible for placing on the market of such a product has to submit all relevant information and/or a sample to a technical service which will determine if the equipment is immunity-related or not. The result of the inspection shall be available within three weeks and not require additional testing. A document according to the example given in Annex III C shall be issued by the technical service within the same period. Member States shall report, by a date three years from the entry into force of this Directive, any cases of refusals on safety grounds. Based on the practical experience with this requirement and based on the reports submitted by Member States, it will be decided, according to the procedure referred to in Article 13 of Directive 70/156/EEC, and before the end of the transition period, if this document is still required in addition to the Declaration of Conformity.”

In essence it says that if your ESA cannot affect the drivers control of the vehicle a TS (Technical Service) may allow you to self-declare it for fitting in a vehicle providing it meets the EMC directive (now 2004-108-EE) or the R&TTE directive (1999/5/EC). After 1st January 2010 you no-longer need the opinion of a TS you can self-declare as long as you are sure your ESA cannot affect the drivers control of the vehicle and that it meets paragraphs 6.5, 6.6, 6.8 and 6.9 of Annex I of 2004-104-EC.

9) What does the term “immunity related” mean?

If an ESA fitted to a vehicle affects the driver’s control of the vehicle then the immunity related clauses of 2004-104-EC apply to it. This requires additional immunity testing and also full e-marking type approval. Self-declaration under clause 3.2.9 (see point 8) doesn’t apply. An obvious example of an “immunity related” ESA is ABS control system, however any ESA that might distract the driver whilst he’s driving, e.g. by issuing a loud noise or bright flashing light is also considered to have an immunity related function by most certifying authorities and so most car alarms would be captured by this.

10) If I get my product e-marked in one member state can I then sell it in any other member state?

Yes.

11) Where can I source information and stay updated on automotive EMC and the e-mark?

I recommend that you join the Auto EMC Network <http://www.autoemc.net/>.

12) What is the number after the e-mark for?

It's the number of the EU member state where the approval was granted.

1 for Germany	18 for Denmark
2 for France	20 for Poland
3 for Italy	21 for Portugal
4 for the Netherlands	23 for Greece
5 for Sweden	24 for Ireland
6 for Belgium	26 for Slovenia
7 for Hungary	27 for Slovakia
8 for the Czech Republic	29 for Estonia
9 for Spain	32 for Latvia
11 for the United Kingdom	36 for Lithuania
12 for Austria	49 for Cyprus
13 for Luxembourg	50 for Malta
17 for Finland	

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