

16 May 2025

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PARTICIPATION IN CENELEC ACTIVITY

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Changes from the previous edition:

- Changes in the SESKO and CEN-CENELEC websites are considered
- Figure 3 is updated

INTRODUCTION

This Directive applies to participation in [CENELEC](#) standardization activity. The main purpose of this Directive is to guide the members of Finnish expert groups in standard preparation procedures. This Directive briefly introduces the activities of CENELEC and its different publications. This Directive also describes the types of documents in the standardization activity, their significance and how to respond to them in order to ensure that Finnish views are taken into account in the preparation of standards.

CENELEC’s own directives are available online: [CEN/CENELEC internal regulations](#).

CENELEC is committed to the rapid and efficient preparation of publications. Speed and efficiency require digital exchange of working documents, sticking to deadlines and submitting matters in the specified format.

Distribution of CENELEC committee and working group documents is handled via the CENELEC website and [Collaboration Platform](#). The SESKO office handles the distribution of the standard proposal votes as well as the completed standards. Complete EN-standards are also available on the CENELEC website.

The overview of SESKO standardization work and organisation is included in Directive TO 1, *Taking part in the SESKO activity*. Instructions for participation in IEC activity are described in Directive TO 2. These instructions are available on the SESKO website <https://sesko.fi/en/getting-involved/sesko-directives/>

1 CENELEC OVERVIEW

1.1 Member countries

[CENELEC](#) (European Committee for Electrotechnical Standardization) is a European, EU and EFTA **standardization organization** established in 1973. CENELEC is responsible for developing European Standards for the electrotechnical sector in Europe and for issuing Harmonization Documents (HD) currently adopted in specific technical areas.

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CENELEC consists of [member countries](#) (34) and [affiliate members](#) (3). They are represented by national standardization organizations. The Finnish national committee is SESKO. Decisions are made by weighted votes in CENELEC, listed in Table 1.

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Table 1 – CENELEC member countries and weighted voting

Full member countries (2022)	
France, Germany, Italy, Turkey, United Kingdom	29 votes
Poland, Spain	27 votes
Romania	14 votes
Netherlands	13 votes
Belgium, Czech Republic, Greece, Hungary, Portugal	12 votes
Austria, Bulgaria, Sweden, Switzerland	10 votes
Croatia, Denmark, Finland , Ireland, Lithuania, Norway, Serbia, Slovakia	7 votes
Cyprus, Estonia, North Macedonia, Latvia, Luxembourg, Slovenia	4 votes
Iceland, Malta	3 votes
<p>In addition, Albania, Bosnia and Herzegovina, and Montenegro are affiliate members. In addition, there are 10 partner countries that are members of the IEC and are committed to technical harmonization and removal of trade barriers with Europe. These are Egypt, Georgia, Israel, Jordan, Moldova, Morocco, Kazakhstan, Tunisia, Ukraine and Belarus.</p>	

1.2 CENELEC Standards and publications

Most CENELEC publications are EN Standards or Harmonization Documents (HD). Both types of publications are commonly referred to as standards.

The EN Standard (*European Standard*) shall be adopted as it is in all member countries. In technical areas, legislation (directives) of the European Union often regulates merely essential requirements. Compliance with these can be demonstrated by using EN standards. Finland's membership in CENELEC is binding in such a way that all EN standards **must be implemented as national standards, i.e., SFS Standards** (SFS-EN Standards). At the same time, any conflicting previous SFS standards shall be withdrawn.

About 80 % of EN standards in the electrotechnical sector are based on international IEC Standards, either as such, or as amended using so-called CENELEC *Common Modifications*.

Harmonization Documents (HD) are almost as binding as EN Standards. However, these do not have to be implemented per se as national standards, but member countries are not allowed to publish their own national standard (e.g. SFS Standard), which can conflict with the HD. Any previous conflicting national standards shall also be withdrawn or amended to conform with the HD requirements. If relevant national standards exist, these shall be in line with the corresponding HD.

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Technical Specification (TS) is a document prepared and approved by the CENELEC Technical Committee and has a simpler preparation process than a standard. Technical specifications are often published when the technology is new and evolving, or consensus required for developing a standard has not been reached, but it is important to publish a document on the subject. According to CENELEC rules, technical specifications should be reviewed and reconfirmed at intervals not exceeding three years.

Technical Report (TR) is a document approved by CENELEC whose guidance is not suitable for publication as a European Standard or technical specification. The Technical Report can include, for example, survey findings of enquiries among CENELEC national members, information on activity in other organizations, or information on the recent developments in the sector.

Guides and **CEN/CENELEC Workshop Agreement (CWA)** documents are published by CENELEC to supplement standards and guide in their usage.

1.3 CENELEC Organization

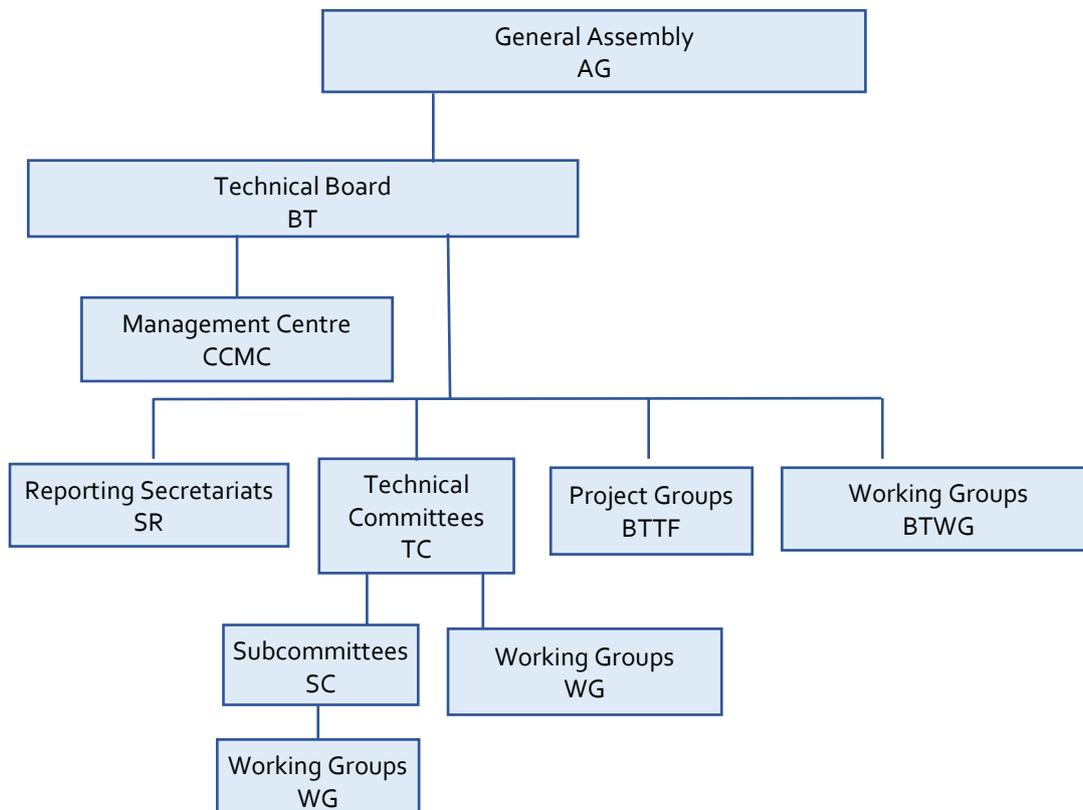


Figure 1 – Organization of the CENELEC technical activity

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[General Assembly](#) (AG) is the highest decision-making body of the organization. It governs administrative matters, finances and contacts with other organizations (e.g. EU, EFTA, IEC, CEN, ETSI).

[Technical Board](#) (BT) supervises the standardization committees and coordinates the work of technical standardization. For example, it decides on ratification of standards based on the voting results.

Committees, subcommittees and working groups are groups that develop the actual technical content of the standards, the subject of which is consistent with the IEC international committee divisions. **Technical committees** (TC) and, if necessary, their **subcommittees** (SC) are formed in accordance with the subject matter. Expert-level drafting is done in subordinate **working groups** (WG).

Project teams (BT-*Task Force*, BTF and BT-*Working Group*, BTWG) are working groups directly supervised by the *Technical Board* (BT) for a specific standardization project.

Project teams will be established when standardization is required, but there is a lack of a corresponding technical committee (TC) or subcommittee (SC). When the project is completed, the project teams will be disbanded.

In addition, [CEN](#), CENELEC and [ETSI](#) have **joint technical committees and working groups**, CEN/CLC/TC, CEN/CLC/JTC, CEN/CLC/ETSI/JWG. Extending standardization beyond traditional field allocation increases the need for different collaborative groups.

The European Standards organizations CENELEC and CEN have a common **management centre** ([CCMC, CEN-CENELEC Management Centre](#)), which performs the daily tasks of CENELEC, i.e. standards publication. The CCMC has its office in Brussels, where a significant number of meetings of CENELEC technical committees and their working groups take place.

2 TECHNICAL WORK IN CENELEC

2.1 Technical committees (TC) and subcommittees (SC)

CENELEC organizes work in **technical committees** (TC) for the various sectors within the electrotechnical industry (see Figure 1), which mainly have the same division of fields of expertise as IEC. Committees can be divided into **subcommittees** (SC) for narrower subject areas. Only the chair and secretary should be permanent members of the committees and subcommittees. Other members are **member countries** that can appoint **representatives** for each meeting. In this way, the meeting participants represent their country, not themselves or their company.

Between meetings, the chair and secretary together with the CENELEC Management Centre (CCMC) will communicate with member countries, e.g., SESKO in Finland, on the preparation of draft standards. SESKO office is responsible for the transfer of information to the experts participating.

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For distribution of committees' digital working documents, CENELEC uses the [Collaboration Platform](#) tool, a joint platform used together with IEC. SESKO provides members of National Committees, follow-up groups and working groups with access to the working documents of the relevant working groups of the CENELEC Committee. *The Collaboration Platform* is intended for the distribution of documents, summons to meetings, minutes of meetings and annexes thereto required by the committees in their activity.

Standards proposals (prEN, FprEN) are not distributed on the *Collaboration Platform*, but are distributed by CENELEC members (national committees, i.e. SESKO in Finland). However, drafts related to the *Secretariat Enquiry* will be distributed through the *Collaboration Platform*, since these consultations are not official enquiry or voting procedures.

PLEASE NOTE: [Collaboration Platform](#) is jointly used with IEC. Thus, usernames and passwords are **the same** for the documents of both organizations. Document archives have also been created for the *Collaboration Platform* for SESKO national committees and follow-up groups.

The purpose of the meetings of committees and subcommittees is to make necessary decisions for the preparation of draft standards and ensure the overall planning of the committee's field.

2.2 Working groups (WG)

The committees and subcommittees include **working groups** (WG) that draw up the technical content of the standard to be worked on. The working group is created by a technical committee or subcommittee by appointing its chair and secretary or simply the so-called **convener**. The national committee of each member country, i.e., SESKO in Finland, has the right to appoint members to the working group.

The appointment will **always** be done by SESKO, irrespective of whether the meeting of the technical committee (TC), for example, has already inquired about the potential interest of the participants when the working group was created.

In working groups, each participant represents only **personal expertise**, not his/her company or member country. The working group has a permanent composition of members, and information is exchanged directly within the group. The [Collaboration Platform](#) is also used as a document archive for working groups.

2.3 Project teams (BTTF, BTWG)

For standardization initiatives not suitable for any specific technical committee, the *Technical Board* can create **project teams** (BTTF or BTWG). Member countries' national committees (SESKO in Finland) have a right to appoint representatives to these teams.

The starting point for these project teams on a defined activity is often a subject proposed by a member country (for example, the Vilamoura notification, see paragraph 6.1), the preparation of which is also of interest to other CENELEC member countries.

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For standardization topics in which member countries have shown broad interest, the *Technical Board* will create the **BTTF** (BT Task Force) **project team**, which will act **like a committee** and with designated members representing their member countries. The BTTF project team working documents are distributed to the national committees via the [Collaboration Platform](#).

For issues of narrower interest, the *Technical Board* will set up a **BTWG** (BT Working Group), which will act as a **working group** and only experts practically involved in the tasks of the project group will have access to working documents related to its activity.

2.4 Reporting secretariats

There is a **reporting secretariat** (SR) for IEC technical committees which have no counterpart in CENELEC. It is maintained by one of the CENELEC member countries. The reporting secretariat organizes the necessary CENELEC questionnaire, enquiry and voting procedures in cooperation with the CENELEC Management Centre (CCMC) for standards that are being prepared or have already been published by the IEC Committee in question. It also makes recommendations for resolution by the Technical Board.

2.5 Joint CEN/CENELEC and ETSI/CENELEC committees and working groups

It may be impossible to draw a clear line between standardization in the electrotechnical industry and other technical standardization ([CEN](#)). CEN and CENELEC have established **joint technical committees and working groups** for areas that are closely related to each field. In Finland, the CEN member is the [SFS Finnish Standards](#), with which SESKO negotiates on the necessary Finnish expert group and its composition.

In some cases, the difference between the electrotechnical and telecommunications industries ([ETSI](#)) can also be difficult to identify and therefore CENELEC and ETSI also have **joint working groups**. ETSI is represented by [Finnish Transport and Communications Agency Traficom in Finland](#).

3 CENELEC ACTIVITY IN SESKO

In CENELEC, Finland is represented by SESKO, which acts as the **Finnish National Committee** (Finnish NC, abbreviated FI-NC).

At the Finnish National Committee,

- Chair is the Chair of the SESKO Board of Directors
- Secretary is the SESKO Managing Director.

SESKO as a national committee

- **represents** Finland in the governing bodies of CENELEC
- **organizes** Finnish experts to participate in technical work

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- **appoints** Finnish experts to committee meetings (as representatives of Finland) and working groups (as personal representatives).

The SESKO office forms a communication channel

- that handles communication between the CENELEC Management Centre (CCMC) and Finnish experts in the Finnish National Committee,
- organizes national enquiry and voting procedures,
- supervises the voting deadlines and manages the sending of vote responses according to the opinions of the National Committee / follow-up group.

3.1 SESKO follow-up groups

Each CENELEC technical committee/subcommittee has a corresponding **follow-up group** in SESKO. The follow-up group consists of a **contact person** and **participants** who have registered for participation. The SESKO office forwards the relevant CENELEC documents to the follow-up group. In practice, most of the exchange of information between CENELEC and members of follow-up groups takes place through the [Collaboration Platform](#). There is a **contact person** in the SESKO office **responsible** for each follow-up group who assists the contact person and members in matters related to the group's activities.

The duties of a follow-up group member include:

- **following** the preparation of draft standards of interest through the working documents of the committee in question
- making the necessary **comments**, well in advance of the deadlines, to the **contact person** of the follow-up group.

The duties of the **contact person** of the follow-up group include:

- using documents to **monitor** the preparation of draft standards of **significant importance for Finland**,
- formulating **Finland's position** (comment or vote) based on the views expressed by members of the group,
- **sending** the votes, replies to questionnaires, and comments to the SESKO office well in advance of the deadlines indicated in the documents.

Follow-up groups shall convene only **when necessary**. If the members have no comments, the contact person can formulate Finland's position based on their own views.

In cases when the IEC and CENELEC have similar technical committees/subcommittees, there is usually only one corresponding follow-up group in Finland.

The relations of the follow-up group with the standardization committee (SK) are described in SESKO Directive TO 1 *Taking part in the SESKO activity*. Instructions can be found on the SESKO website (<https://sesko.fi/en/getting-involved/sesko-directives/>)

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3.2 Document distribution

All CENELEC documents are distributed **digitally**.

The distribution of CENELEC documents differs from that of the IEC in that the working documents of the technical committees do not pass through the Management Centre (CCMC). Technical committees upload their working documents to the [Collaboration Platform](#) for download by experts of national committees (i.e., members of follow-up groups).

Since not all CENELEC documents are accessible to experts (e.g., draft EN Standard and voting cover letters), SESKO sends these working documents to experts (i.e., members of follow-up groups) by email.

The CENELEC document distribution process is presented in Figure 2.

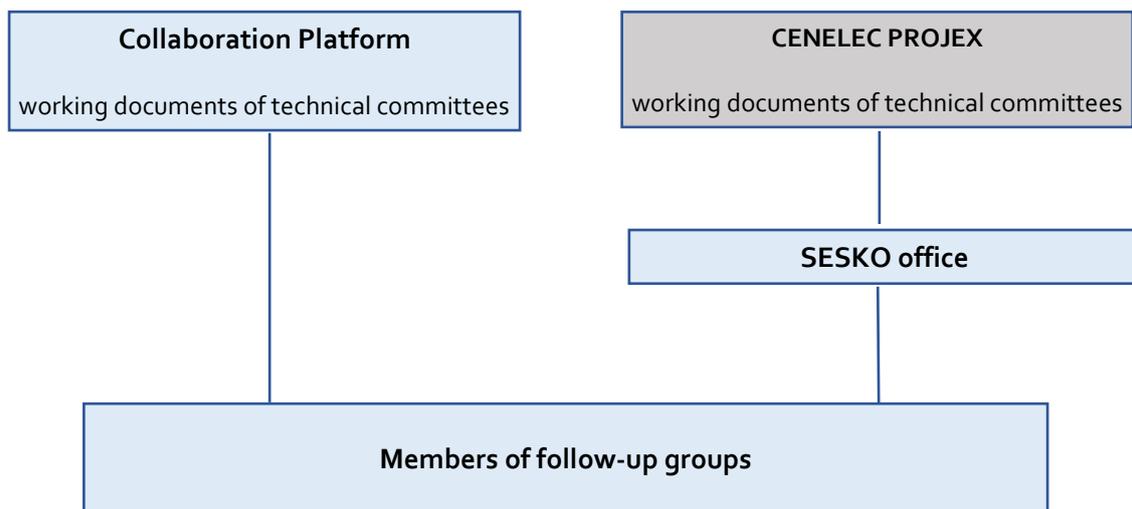


Figure 2 – CENELEC document distribution

Members of follow-up groups, therefore, receive documents **in two ways**:

- working documents directly from the [Collaboration Platform](#) (independent download)
- standard proposals and voting cover letters via the SESKO office by email.

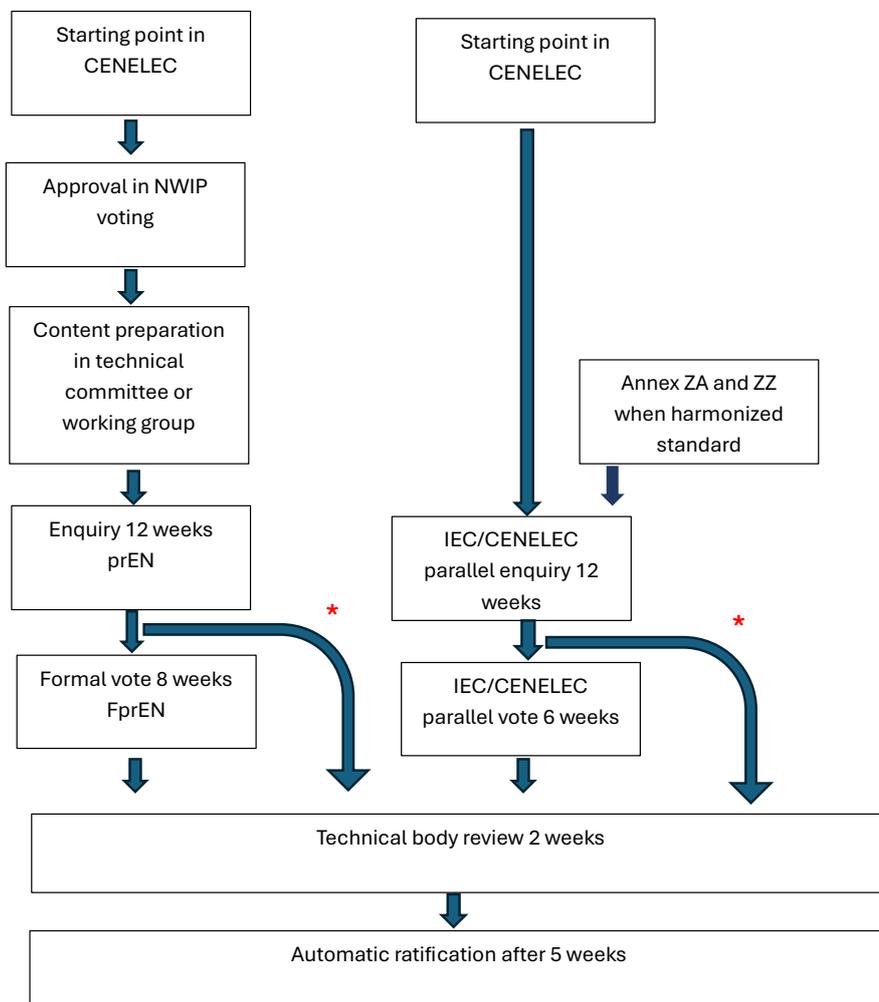
PLEASE NOTE: There is no separate prEN document for the EN Standard proposals in the parallel process, but the proposal text is the IEC document (CDV or FDIS). The IEC document ID is indicated in the EN voting cover letter.

In order to facilitate the follow-up of open CENELEC requests and opinions, SESKO maintains a list "[drafts open for commenting or voting](#)".

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4 CENELEC STANDARD PREPARATION AND WORKING DOCUMENTS

The CENELEC standard preparation process is presented in Figure 3.



* The final vote can be skipped by TC decision if no technical changes are made to the approved Enquiry document

Figure 3 – The stages of the preparation for a CENELEC Standard

4.1 Standards based on IEC equivalents

About 80 % of CENELEC's EN standards and HDs are based on international IEC standards. The standards are either **identical** (in this case, CENELEC only publishes a **notice of endorsement**) or slightly amended by CENELEC **common modifications**. There are two options for preparing standards based on IEC equivalents:

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- implementation of the already published IEC standard using the harmonization questionnaire, or
- introduction of an IEC standard proposal in preparation by simultaneously sending it to the CENELEC **parallel enquiry** (IEC-CENELEC Parallel Enquiry) at the IEC CDV voting stage and/or sending it to the CENELEC **parallel voting** (IEC-CENELEC Parallel Vote) at the subsequent stage of the final FDIS IEC vote.

In both cases, the technical content of the text of the final CENELEC standard is published as an IEC standard. The native text of the CENELEC standard contains only the IEC **notice of endorsement** and, if common modifications are made, only the text of these modifications.

The parallel process is based on the Frankfurt agreement between IEC and CENELEC, whereby IEC shall offer a standard proposal at the CDV stage for the CENELEC enquiry at the same time. The parallel process is the default method, deviation from which must be justified.

4.1.2 Parallel processing of the IEC and CENELEC Standards

IEC and CENELEC have agreed (Frankfurt Agreement) that most of the draft IEC standards will also be sent to CENELEC members simultaneously with the IEC preparation, first for parallel enquiry and then for voting on the final EN standard. Parallel preparation improves uniformity between IEC and EN standards and speeds up the completion of EN standards. For example, collaboration is possible because almost all CENELEC member countries are also involved in the IEC.

4.1.2.1 IEC-CENELEC Parallel Enquiry

The actual text of the proposal in the CENELEC **parallel enquiry** is contained in the IEC's CDV proposal (Committee Draft for Vote). If available, parallel enquiry should also include ZA and ZZ annexes which are needed for harmonization.

If the technical committee finds that it is not possible to get the standard harmonized within the planned timeframe, by a decision of BT the standard and its Common Modifications, if any, may be published without harmonization. Necessary modifications to fulfil EU Commission requirements may then be done as a new project (Amendment A1X) later.

The SESKO office sends a cover letter on the CENELEC parallel enquiry to the members of the national standardization committee or follow-up group corresponding to the CENELEC technical committee responsible for this proposal. The response form contains the identifier "prEN" of the proposed standard and refers to the IEC CDV proposal (IEC document ID). The CENELEC cover letter already contains the prEN identifier for a draft standard. The actual standard number is the **same** for both IEC and CENELEC. The exception to this rule is IEC/CISPR standards, which have an EN code of EN 55 0xx, where xx is the same as the CISPR standard identification number, e.g. CISPR 32 → EN 55 032.

Comments on the standard proposal in the parallel enquiry are addressed to the IEC since it is a CDV vote. The contact person is responsible for preparing and submitting both the IEC vote response and the CENELEC vote response to the SESKO office.

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The CENELEC enquiry response indicates the voting position, but any comments potentially delivered to the IEC do not need to be submitted to CENELEC unless the voting position is negative. In addition, **any existing regulatory exceptions or specific national conditions that require deviations from the standard** should be indicated in the CENELEC response.

PLEASE NOTE: The progress of preparation of the draft standard primarily depends on the results of the CDV vote in the IEC, see Directive TO 2. It is also possible that the voting results will be different between different organizations, see Table 2.

Table 2 – The result of the Parallel Enquiry

IEC results	CENELEC results	Next stage in IEC	Next stage in CENELEC (*)
Yes	Yes	Publication	Publish as EN Standard
Yes	No	Publication	Further development at CENELEC, e.g. CENELEC common modifications
No	Yes	Returned to the committee	Discontinued
No	No	Returned to the committee	Discontinued

*) The next stage at CENELEC is always a bit uncertain. Even after the vote has passed, there can be delays due to harmonization. Similarly, a proposal that has been rejected by IEC can continue to advance at CENELEC if the subject is considered to be important.

4.1.2.2 IEC-CENELEC Parallel Vote

The actual technical text of the CENELEC **parallel voting** proposal is contained in the IEC Final Draft for International Standard (FDIS) proposal.

CENELEC only supplies a **cover letter** for the parallel vote, which is sent by the SESKO office to the members of the national standardization committee / follow-up group corresponding to the CENELEC committee responsible for the proposal. The cover letter contains the "FprEN" identifier of the proposed standard and refers to the IEC's FDIS proposal (IEC document ID).

PLEASE NOTE: Members of the follow-up group should note that the draft FDIS standard proposals marked as "Submitted for parallel voting in CENELEC", are in formal vote also to be endorsed as European EN standards. This means that **after approval they must also be implemented as such as SFS standards**, and any conflicting SFS standards shall be withdrawn. From the CENELEC point of view, the important part of this vote is the implementation schedule of the future EN standard, and the CENELEC vote applies to it as well.

Each organization calculates the voting results in accordance with its own rules. In CENELEC, votes are weighted (see clause 1.1). The proposal is approved if it receives more than 71 % of the votes.

4.2 Standard proposals purely prepared in CENELEC

CENELEC technical committees (TC, SC) and project teams (BTWG, BTTF) can prepare their own draft standards (prEN ~ European Standards, prHD ~ Harmonization Documents).

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The starting point or initiative for CENELEC standardizing work can arise at a meeting of the CENELEC technical committee on the initiative of a member country or be based on the Vilamoura notification (see clause 6.1).

4.2.1 Working group stage and committee documents marked "Secretariat"

The draft standard in the technical committee is (usually) drafted by the working group (WG). Only members who have been appointed through [Collaboration Platform](#) will be informed about the activities and proposals of the group. Participation in working group activity is the **most effective** and **most important** way to have an influence.

Once the working group has completed its proposal, it will be forwarded to the committee for processing. As with other documents intended for committee meetings, the proposal receives a secretariat document identifier, which comprises the committee number, the abbreviation Sec indicating it is in secretariat processing, and a sequential serial number, such as "CLC / TC XX / Secyyyy/[document type]".

Each preparatory stage for CENELEC documents in most cases is indicated on the title page. Committee documents of this stage will be distributed to the members of the follow-up groups through CENELEC's [Collaboration Platform](#).

Comments and improvement suggestions for standard proposals are given in the committee stage. At later stages, making changes is much more difficult.

The technical committee decides whether to forward the draft standards prepared by its working groups to member countries for comment prior to the formal enquiry. In this case, the title page or cover letter of the proposal shall indicate the text "Secretariat Enquiry" or "Secretariat Questionnaire" and the deadline by which responses should be delivered to the relevant secretary.

Secretariat Enquiry proposals can be handled also with Committee Internal Voting (CIV) in the CENELEC voting tool.

4.2.2 CENELEC enquiry

When the proposal of the working group sent to the committee/subcommittee is considered sufficiently mature, during its meeting the committee/subcommittee can decide to send the draft standard to the 12-week Enquiry. The enquiry procedure will be conducted by the CENELEC Management Centre (CCMC), which already at this stage assigns the proposal its future standard identifier.

The SESKO office distributes the text of the draft standard to the Finnish follow-up group. Therefore, these proposals will **not be distributed** via the [Collaboration Platform](#). The deadline for sending any comments to the CENELEC office is indicated on the cover page of the proposal. In addition to the text of the proposal, a cover letter for the enquiry will be delivered.

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4.2.3 CENELEC Formal Vote

After processing the comments received during the enquiry on the draft standard, the committee/subcommittee can decide at the meeting to forward it to an official eight-week formal vote.

The SESKO office distributes the text of the draft standard to the follow-up group. The deadline for sending any comments to the CENELEC office is stated on the cover page of the proposal. In addition to the text of the proposal, a voting cover letter is also delivered.

Since this is a formal and final vote, suggesting changes at this stage is often pointless, especially if the vote is to approve the proposal. The contents of the standard should be influenced at an earlier stage. The voting result is calculated by the weighted votes of the member countries (see clause 1.1). Approval requires more than 71 % of the votes. If the result indicates acceptance, potential comments will not be processed. Only purely editorial corrections can be made at this stage.

4.2.5 Ratification of CENELEC Standards

4.2.5.1 *Automatic ratification*

If the standard proposal is approved in the formal vote, it is automatically ratified after 5 weeks after Technical Committee review. CENELEC Management Centre (CCMC) sends voting results to BT members for information purposes.

4.2.5.2 *BT ratification*

If the voting result is positive, but Technical Committee finds a need to make technical change, the proposal is moved to be processed by the BT by correspondence.

4.3 Harmonization procedures

EN and EN IEC standards intended for harmonization need annexes ZA and ZZ. Annex ZA includes normative references to international publications with their corresponding dated European publications. Annex ZZ indicates clauses in the standard, which cover the essential requirements of a Directive concerned, and if any essential requirements is not covered. If the standard is used with more than one Directive, each Directive needs its own Annex ZZ.

Standard drafts are checked with help of HAS consultants. HAS assessment may be done four times during a project, and it's mandatory with IEC CD and Public Enquiry phases. In addition, CCMC carries out their own Quality Check for IEC CD.

If the assessment by HAS consultant is negative, EN IEC standard continues normally to Final vote and publication, but it is not offered for harmonization. The standard may be

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harmonized later by issuing a European Amendment, where the deficiencies have been rectified.

If a CENELEC home-grown standard receives negative HAS assessment, it will not continue to Final Vote; instead the Technical Committee makes necessary changes and includes them to document to be sent for Final Vote.

This CENELEC process is described in CENELEC web in [Drafting EN IEC standards for citation in the OJEU](#)

4.4 National enquiry in Finland

The obligation to publish European EN Standards as SFS Standards requires SESKO to manage the organization of national enquiries at a sufficiently early stage. All prEN-proposals in CENELEC enquiry (ENQUIRY or PARALLEL ENQUIRY) will be automatically adopted by SESKO as SFS standard proposal projects. Proposals will be added to the list of standard proposals sent to the SESKO enquiry, which will be distributed monthly to SESKO member organizations for information purposes and posted on the SESKO website under [SESKO enquiries](#).

If any comments are received, they are forwarded to the contact person of the appropriate follow-up group. The comments shall be considered when compiling the Finnish comments or vote response.

If, at a later stage, the standard proposal at the SESKO enquiry stage is implemented in Finnish, it will no longer be subject to a new enquiry merely due to translation into Finnish.

4.5 National deviations

Standardization undertakes to maximize consistency in all user groups. However, in Europe, where EN standards are also national standards, this is not always possible. Standardization organizations cannot withdraw national laws or regulations issued by authorities. In addition, geographical conditions can impose their own demands. CENELEC recognises a so-called A-deviation and the Special National Condition (SNC).

A-deviation

The deviation is due to **government regulation**, the existence of which cannot be impacted by the national standardization organization.

Special National Condition (SNC)

National conditions due to earthing conditions, voltage values, climate, etc., **which cannot be changed even in the long term**. The typical Finnish example is low winter temperatures.

Instead of adding individual exceptions, it would be more reasonable to impact the content of the standard so that it is already reflected in the requirements. However, this is not always achievable. Nevertheless, the necessary deviations should be declared as early as possible, at the latest during the enquiry stage, and they should be detailed point by point in relation to the text of the standard. In addition, A-deviations based on legal exceptions should be

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indicated with a clear, particular reference to the existing regulation and its paragraphs. Notification of deviations in the standard helps users find the right information.

4.6 Responding to votes and commenting

The contact person of the follow-up group is responsible for formulating Finland's position, vote response and any comments on the proposals during enquiry and voting.

Table 3 below shows the stages of preparation of an EN standard and related requests for comments and votes, and the responses to these.

Table 3 – The stages of standard preparation

Stage of the standard	Influencing/Response	Remarks
Working group	Active participation in working group activities.	The best way to influence the technical content of a standard.
Secretariat enquiry	In practice, the last stage at which the technical content of the proposal can still be influenced. (Equivalent to IEC CD enquiry)	Not mandatory to respond to the secretariat enquiry.
Enquiry	Technical comments can also be issued at this stage. A negative vote shall be justified. At this stage, the A-deviation and special national conditions shall be presented.	Response is mandatory.
Formal Vote	A negative vote shall be justified. Only editorial comments can be submitted.	Response is mandatory.

Comments should be filled in on the existing commenting form ([form comments](#)). This form has been prepared by the IEC but shall also be used for comments submitted to CENELEC.

The completed comment form will be sent as an email attachment to the SESKO office to the contact person for the committee in question, who will take care of submitting it. Comments can be submitted to SESKO in Finnish, Swedish or English. At the same time, the email should indicate whether the vote is for or against.

The general principle of voting is that **negative voting shall always be justified**. This requires a technical or general comment. Similarly, a technical comment usually leads to a negative vote.

Responses to votes, including votes, shall be submitted to the SESKO office **well in advance** of the deadline. Responding to CENELEC is done digitally, so technical problems with data transfer can cause difficulties with last-minute responses. Usually, **a week or two** before the deadline is sufficient. If the response is close to the deadline, this should be agreed with the

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contact person in advance. If the contact person in charge is not available, the responses can be sent to SESKO via email (asiakaspalvelu@sesko.fi), from which the message will be forwarded.

5 IMPLEMENTING CENELEC STANDARDS IN FINLAND

The standards (HD, EN) ratified by CENELEC are subject to the following obligations:

PUBLIC ANNOUNCEMENT (DOA)

The existence (endorsement) of certified EN standards and HDs must be publicly announced by the DOA mentioned in the standard.

DOA = *latest date of announcement of the existence of the standard at national level*

The SESKO office will handle the announcement on its [web pages](#).

IMPLEMENTATION (DOP)

Ratified EN Standards must achieve national standard (SFS) status by the DOP stated in the standard.

DOP = *latest date of publication at national level*

The standard is implemented in Finland and published as an SFS-EN Standard.

The publication contains the SFS cover page, the text of the EN publication and, in cases based on IEC Standards, the text of the IEC publication combined into one document.

The standard is translated into Finnish if its user base is large, and it is assumed that the language skills of the user community will be inadequate for using the original text (English) of the standard.

In all cases, despite the possible translation into Finnish, the original standard in **English** will be given the status of an English-language SFS-EN standard. It is not mandatory to make HD documents into national standards.

WITHDRAWING CONFLICTING STANDARDS (DOW)

If there is a national SFS standard conflicting with an EN standard or HD document, it should be withdrawn or brought into conformity with the EN Standard/HD no later than by DOW.

DOW = *latest date of withdrawal of conflicting national standard*

CESSATION OF THE WITHDRAWN/REPLACED STANDARD (date of withdrawal from OJ)

The end of the transition period applicable to the EU Directives will be announced by the European Commission in an implementing decision as the date of withdrawal from OJ (end of presumption of conformity). This is a date after which a withdrawn or replaced standard **can no longer be used for presumption of conformity**. This date is not necessarily

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the same as CENELEC's DOW, and it's not included in standards, but in list of harmonized standards which is published in EU Official Journal.

6 NATIONAL STANDARD PREPARATION AND CENELEC

CENELEC member countries must inform each other of their intentions to develop national standards. A member country interested in participation is entitled to be involved in the work, and if there is sufficient comprehensive interest, the standard development can be transferred to the European level at CENELEC. Notifications are made following the so-called Vilamoura notification procedure.

Subject matter that CENELEC is currently working on is under **standstill**, a prohibition order. Member countries shall not publish their own national standards on this subject. The goal is to only allow the publication of a standard conforming to the CENELEC standard, once completed.

Notification procedure for national standards is described in CEN-CLC Internal Regulations Part 2 Common rules for standardization work, and in CENELEC Guide 8.

6.1 The Vilamoura notification procedure

6.1.1 Notification

The member country notifies its intention to develop a new national standard or revise an old standard. The notification obligation applies to standards that do not fully comply with the corresponding CENELEC or IEC Standard. A guide is available about this [CENELEC Guide 8:2016](#).

The Vilamoura notification contains information about the title and content of the project. Furthermore, reasons must be justified for why the work should be done immediately and not, for example, within the work program of the relevant IEC technical committee. The notification shall also state the planned deadline for completing the standard proposal for the enquiry.

The Vilamoura notification is prepared by the SESKO office, which should be consulted in each particular case. The SESKO office forwards the Vilamoura notification to CENELEC for processing.

6.1.2 Response

The SESKO office informs contact persons of follow-up groups about Vilamoura notifications made by other countries in their area of interest. If the subject matter is of interest and a positive response is intended to be issued, the contact person should submit a response to the SESKO office before the deadline specified in the notification. The response should include the name and contact details of the expert participating.

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If the subject of the task is not of interest to Finland, replying is not mandatory. However, if no CENELEC member country is interested in the subject matter, the CENELEC *Technical Board* (BT) should indicate the situation and provide the notifying country with the permission to make a national standard.

If no CENELEC technical committee is interested in the task, but at least four member countries are interested, the standstill will take effect at the end of the notification submission period. The CENELEC *Technical Board* will create a project team (BTTF) for the work, which is usually led by the notifying country.

If there are less than four interested countries, work will continue on a national level, but interested countries can still send participants. There is no standstill in this case. However, the initiating country can use its own language for the project, regardless of the other participating countries.

7 MEETING PARTICIPATION

The technical committees meet at the time agreed by their chair and secretary or at the time agreed by the committee during its last meeting, often at the CENELEC Management Centre in Brussels.

Participation in committee meetings always takes place **as a delegate appointed by SESKO**. The committees (TC, SC) do not have individual members, but each member country can name their delegate(s) for the meeting in question. SESKO also appoints members to working groups (WG) that internally agree on the dates and places of their meetings.

In committees (TC, SC) and project teams (BTTF), representatives of the meeting are also representatives of their country. In working groups (WG), participants represent only their personal expertise.

7.1 Taking part in the CENELEC committee meetings

A participant of a CENELEC technical committee/subcommittee meeting shall complete the registration form that can be found in the [Meeting Registration System](#).

SESKO accredits meeting participants. If more than one participant attends the same meeting, it will be necessary to agree who will be the head of the Finnish delegation (with voting rights).

The main language of committee meetings is English.

The SESKO office does not handle travel arrangements for meeting participants.

After the meeting, the participant should prepare a report on the essential meeting issues related to Finland and send it digitally to the SESKO office **no later than one month** after the meeting.

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7.2 Taking part in the CENELEC working group activity

A member of the committee or follow-up group interested in CENELEC activity (or another person from same company) can apply for joining the working group (WG) created by the committee or the CENELEC project team (BTTF, BTWG). Registration is done through SESKO office, by providing the necessary contact information. Appointments are confirmed by the SESKO Board of Directors.

Registration for working groups shall always be done through the SESKO office, which will act as the national committee of Finland. This also applies to working groups agreed at meetings of the CENELEC committee, where attendees may have been asked about their interest in joining.

The member of the group represents his/her own expertise at the meetings and shall bear the costs himself/herself. The documents of the working group are intended for use by the working group members only.