

Proposal for Legal Inspection Requirements for PV Inverters

By the Bureau of Standards, Metrology and Inspection (BSMI), Ministry of Economic Affairs

Introduction:

To achieve net-zero carbon emissions by 2050, it is expected that renewable energy power generation equipment and energy storage systems will gradually be installed not only at outdoor sites but also in indoor households and factories. Considering that the PV inverter is a critical component of energy storage systems, the BSMI proposes to include PV inverters not exceeding 100 kW in the mandatory inspection scope to ensure consumer safety. Two alternative conformity assessment procedures are made available for the choice of applicants, i.e. Registration of Product Certification (RPC) or Type-Approved Batch Inspection (TABI).

Proposed date of implementation: 1 July 2027

Scope of covered products:

Description of Goods	Inspection Standards (Note)	C.C.C. Code (the first 6 digits are the same as HS Code) (For reference)	Conformity Assessment Procedures
PV Inverters (inspection scope: not exceeding 100 kW)	1、CNS 15426-1: 2011 & CNS 15426-2: 2013 2、Electromagnetic Compatibility: Choose one of the two options (1)For those used only in industrial environments: CNS 14674-2: 2023 & CNS 14674-4: 2023 For those not used only in industrial environments: CNS 14674-1: 2023 & CNS 14674-3: 2022 (2)CNS 62920: 2023 3、For those with the function of transmitting power to the grid of Taiwan Power Company (hereinafter referred to as grid-connected function): CNS 15382: 2018 4、Technical Specification for Security Testing of PV Inverters and Monitoring Units (draft) 5、CNS 15663: 2013: Section 5 “Marking of Presence”	8504.40.99.40.1	RPC Scheme (Modules II+IV or II+V or II+VII) or TABI Scheme
Note: 1. For the listed products tested in accordance with inspection standards CNS14674-2 and CNS14674-4, a warning stating “This product is for industrial use only” shall be clearly marked on the product body, packaging, or instruction manual. 2. For the listed products without grid-connected functions, relevant supporting documents verifying the absence of grid-connected capability shall be submitted.			

Description of the two kinds of conformity assessment procedures:

1. Registration of Product Certification (RPC) Scheme: Modules II+IV or II+V or II+VII

For product subject to Modules II+IV, II+V, or II+VII procedures, not only the products shall be type-tested in advance (Module II) by the BSMI or BSMI-recognized testing laboratories, but the quality management systems of the production premises must be in conformity with Module IV (Full Quality

Management System), Module V (Production Quality Management System) or Module VII (Factory Inspection).

For Module IV and Module V, a registration certificate in accordance with the CNS 12681 (ISO 9001) is required to be obtained from the BSMI, or certification bodies recognized by the BSMI. As for Module VII, a factory inspection report issued by the BSMI or BSMI-recognized factory inspection bodies is needed in the same way.

In addition, a declaration of conformity-to-type is also required to ensure that the mass-produced commodities are in conformity with that shown in the type-test report for all the above three IV, V, VII modules.

After being certified and registered by the BSMI, products will be allowed to use the Commodity Inspection Mark with the letter 'R' and the identification number given by the BSMI. Additionally, these products can clear customs directly without any further inspection if not being sampled by RPC border check procedures. The application fee and annual fee for RPC are both NT\$5,000 (about US\$170) for each certification, and the RPC certification is valid for 3 years. If there are any serial products, an extra NT\$3,000 (about US\$102) of application fee will be charged for every application in each certification. The fees for type testing vary by products and depend on the fee policies of the testing laboratories.

2. Type-Approved Batch Inspection (TABI) Scheme

Under this procedure, manufacturers or importers shall have their products type-tested by the BSMI or BSMI-designated testing laboratories, and file an application for Type Approval to the BSMI or its branches.

After manufacturers or importers obtain a Type Approval certificate, they are required to file an application for batch inspection to the BSMI each time before their products are released from the production premises or arrive at the port of entry. The BSMI will then review the application and the related documents while additional samples may be required for further testing if it is deemed necessary.

After the products have passed the inspection, they will be allowed to use the Commodity Inspection Mark with the letter 'T' and the identification number given by the BSMI. The application fee for the Type Approval is NT\$3,500, and a Type Approval certificate is valid for three years. The fees for type testing vary by products and depend on the fee policies of the testing laboratories.

*Further information on this scheme can also be found on the BSMI website:

<https://www.bsmi.gov.tw/wSite/lp?ctNode=9768&CtUnit=4132&BaseDSD=7&mp=2>

Locations to apply for Type Testing:

The BSMI designated testing laboratories.

Locations to apply for Registration of Product Certification:

The BSMI or its branches.

Locations to apply for Batch Inspection:

1. Domestic manufacturers or consigned manufacturers: submit inspection applications to the BSMI or the branches of the BSMI according to the place of production. If necessary, the manufacturers can apply for cross-jurisdictional inspections.
2. Importers or entrusted importers: report to the BSMI or the branches of the BSMI for inspection according to the jurisdiction of the port where the imported goods arrive. If necessary, the manufacturers can apply for cross-jurisdictional inspections.

Time required for Registration of Product Certification:

14 working days. (This period does not include the time for corrective actions by the applicant due to deficiencies in the documents or samples. Extra 7 working days may be required if additional tests are required.)

Related requirements:

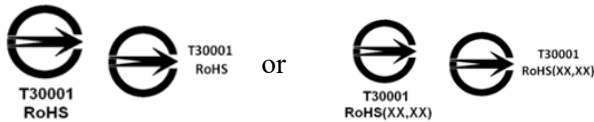
1. The inspection for the above listed commodity, no matter imported and domestically produced, will begin from 1 July 2027. The import regulation code is C02. From the announcement date, the BSMI can accept

applications for Type Approval Batch Inspection and Registration of Product Certification for the above listed commodity.

2. Those who apply for a certificate to the BSMI from the date of announcement shall provide the type test report that meets the inspection standards. The certificate shall be issued after the examination by the BSMI. The validity period of the certificate shall be three years from the date of issuance. (If the issuance date is before 30 June 2027, the effective date will begin from 1 July 2027 and the expiry date will be 30 June 2030)
3. For products that have obtained the Voluntary Product Certification (VPC) certificates from the BSMI, if there are differences in the testing standards, the product shall be retested by the original designated testing laboratory to address the divergent items and then the test report for VPC can be converted into a type test report.
4. The technical documents required for type testing shall comply with the requirements specified in the "Directions Governing Type Approval of Electrical and Electronic Commodities."
5. Fees for product type-testing: Charged in accordance with the fee regulations of the BSMI's designated testing laboratory.
6. Fees for product registration of product certification and type approval batch-by-batch inspection: Charged in accordance with the relevant provisions of the "Regulations Governing Fees for Commodity Inspection."
7. The above listed products should indicate the presence of restricted substances in accordance with Section 5 "Labeling" of CNS 15663 (2013) (the example format shown in Table 1 and Table 2) on the body, packaging, label, or instructions. However, for those who provide (disclose) the presence of restricted substances via webpage, the URL link should be clearly stated on the body, packaging, label, or instructions. The location of the indication is not subject to the provisions of Section 5.3 of CNS 15663.
8. After the above listed products are approved by the BSMI for the issuance of certificate, the labeling requirements are as follows:
 - (1) Based on "Regulations Governing the Use of Commodity Inspection Mark", the Commodity Inspection Mark shall be printed by the certificate holders. The identification number of the Commodity Inspection Mark consists of "A Letter (R)," "Designated Code (5 digits)" and "the presence conditions of the restricted substance" (e.g., RoHS or RoHS (XX,XX)).
 - (2) The identification number shall be placed below or right next to the graphic symbol and "the presence conditions of the restricted substance" shall be indicated in the second row.
 - (3) The product inspection mark is not designated with a fixed size, but it should be marked prominently on the product body in an appropriate proportional size. It should be made of durable materials, with clear and legible content that is not easily worn out, and it should be affixed permanently. For those who obtained the Registration of Product Certification before 30 June 2027, they may print the product inspection mark themselves in accordance with the above regulations from the date of obtaining the certificate.
 - (4) For RPC scheme, the examples of the Commodity Inspection Mark are listed below:



- (5) For TABI scheme, the examples of the Commodity Inspection Mark are listed below:



- (6) “RoHS” indicates “the content of restricted substance(s), other than exemptions stated in CNS 15663, does not exceed the reference percentage value of presence condition.

“RoHS(XX,XX)” indicates the content of restricted substance(s) (element XX, element XX, ...), other than exemptions stated in CNS 15663, exceeds the reference percentage value of presence condition.

Restricted substances: Pb, Cd, Hg, Cr⁺⁶, PBB, and PBDE.

Examples:

RoHS (Pb) indicates that the percentage content of Pb in certain parts of the commodity exceeds the reference percentage value specified in Annex A to CNS 15663.

RoHS (Cd, Cr⁺⁶, PBB) indicates that the percentage content of Cd, Cr⁺⁶, and PBB in certain parts of the commodity exceeds the respective reference percentage value specified in Annex A to CNS 15663.

9. The inspection standards of the products listed in the table shall be the version published in this announcement. If any updated version is available, the BSMI shall publish the implementation date of the updated version in a further announcement.
10. The C.C.C. Codes listed in the table are used for reference only. The commodity shall still comply with the requirements before entering into the market, even though its C.C.C. Code is identified differently by the Customs Administration, Ministry of Finance or International Trade Administration, Ministry of Economic Affairs.
11. Commodities with combined features or multifunctional products shall comply with the respective inspection standards and conformity assessment procedures of RPC scheme.

Table 1. Example of markings for the presence conditions of the restricted substances exceeds the reference percentage value of presence conditions

Equipment name: PV Inverters, Type designation : XXX (Note)						
Unit	Restricted substances and its chemical symbols					
	Lead (Pb)	Mercury (Hg)	Cadmium (Cd)	Hexavalent Chromium (Cr ⁺⁶)	Polybrominated Biphenyls (PBB)	Polybrominated Diphenyl Ethers (PBDE)
Circuit	Exceeding 0.1 wt %	○	○	○	○	○
Case	○	○	Exceeding 0.1 wt %	○	○	Exceeding 0.1 wt %
Control Board	—	○	○	○	○	○
Accessory	—	○	○	○	○	○
Note 1: “Exceeding 0.1 wt %” and “exceeding 0.01 wt %” indicate that the percentage content of the restricted substance exceeds the reference percentage value of presence condition. Note 2: “○” indicates that the percentage content of the restricted substance does not exceed the percentage of reference value of presence. Note 3: The “—” indicates that the restricted substance corresponds to the exemption.						

Table 2. Example of markings for the content of the restricted substances other than exemption do not exceed the reference percentage value of presence condition

Equipment name: PV Inverters, Type designation : XXX (Note)						
Unit	Restricted substances and its chemical symbols					
	Lead (Pb)	Mercury (Hg)	Cadmium (Cd)	Hexavalent chromium (Cr ⁺⁶)	Polybrominated biphenyls (PBB)	Polybrominated diphenyl ethers (PBDE)
Circuit	○	○	○	○	○	○
Case	○	○	○	○	○	○
Control Board	—	○	○	○	○	○
Accessory	—	○	○	○	○	○
Note 1: “○” indicates that the percentage content of the restricted substance does not exceed the percentage of reference value of presence. Note 2: The “—” indicates that the restricted substance corresponds to the exemption.						

Note: If the position of the label clearly indicates the relationship with the product, the column for device name and model number may be omitted above the label. Additionally, if the label applies to multiple models, their numbers can be listed in the same column.