

Proposal for Amendments to the Legal Inspection Requirements for Freezers

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

Introduction:

At present, only upright freezers of which the storage volume does not exceed 400L are in the scope of mandatory inspection of BSMI. However, the storage volume of commercial upright freezers has increased. Upright freezers with storage volume not exceeding 700L become popular in the market. In addition to that, horizontal freezers are also getting popular among consumers recently. As a result of risk assessment, BSMI proposes to add upright and horizontal freezers with storage volume not exceeding 700L into the scope of legal inspection.

Date of implementation: 1 January 2025

Scope of covered products:

Item	Description of Goods	Inspection Standards	C.C.C. Code (the first 6 digits are the same as HS Code) (For reference)	Conformity Assessment Procedures
1	Freezers (inspection scope: rated voltage not exceeding 250V and rated storage volume not exceeding 700L)	1. CNS 60335-1 (2014) 2. CNS 60335-2-24 (2016) 3. CNS 13783-1 (2013) 4. CNS 2062 (2000): Section 5.2 "Cooling Performance"; Section 5.3 "Cooling Rate"; Section 5.10 "Energy efficiency"; and Section 7 "Marking" 5. CNS 15663 (2013): Section 5 "Marking of presence" 6. Products with secondary lithium cells/batteries are required to conform to item 2 of the related requirements.	8418.40.90.00.3 8418.30.90.00.5	RPC Scheme (Modules II+IV, II+V, or II+VII) or TABI Scheme

The two kinds of conformity assessment schemes for the commodities are as follows:

1. Registration of Product Certification (RPC) Scheme (Module II + III)

Under this procedure, domestic manufacturers or importers must have their products type-tested by BSMI designated testing laboratories in advance (Module II) before applying for registration of their products. Manufacturers or importers will also be required to ensure by declaration that all products made at their manufacturing facilities or imported are in conformity with the prototypes submitted for type test at Module II stage, and the declaration procedure is called Module III (conformity-to-type declaration). The conformity-to-type declaration shall be drawn up by the manufacturer or the authorized local representative, declaring that the mass-produced products comply with the prototype as described in the type-test report.

Products will be allowed to use the Commodity Inspection Mark with the letter 'R' and the identification number given by the BSMI, after they are certified and registered with the BSMI. These products can then clear customs directly without any further inspection if not being sampled by RPC border check procedure. The application fee and annual fee for RPC are both NT\$5,000 (about US\$170) for each certification, and the RPC certificates are valid for three years. If there are any serial products, an extra NT\$3,000 (about US\$102) is charged for each application in each certificate.

The fees for type-testing vary by products and depend on the fee schedule of the testing laboratories.

2. Type-approved Batch Inspection (TABI) Scheme

Under this scheme, manufacturers or importers shall have their products type-tested by the BSMI or BSMI designated testing laboratories, and then file an application for type-approval with the BSMI or its branches.

After manufacturers or importers have obtained a type-approval certificate, they are still required to file an application for batch inspection with the BSMI each time before their products arrive at the port of entry. The BSMI

will then perform inspection with simplified procedures. Additional samples may be required for further testing if it is deemed necessary. The application fee for a type-approval is NT\$3,500, and a type-approval certificate is generally valid for three years.

The fees for type-testing vary by products and depend on the fee schedule of the testing laboratories.

*Further information about the two schemes is also available on the BSMI web site at <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 branch offices.

Time required for Registration of Product Certification:

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

Conformity assessment procedure: No change.

Related requirements:

1. In addition to section 25.7 of CNS 60335-1, power cords should also conform to CNS 15767-1 “Plugs and socket-outlets for household and similar purposes - Part 1: General requirements” or relevant national standards for power cord sets. For products of which the inspection standard is based on CNS 60335-1, they do not apply to Class 0 electrical structures.
2. For the product with the secondary lithium cells/batteries, its cells (include the cells in the batteries) shall conform to CNS 15364: 2013, and its batteries shall conform to Sections 7.3.8.1 “vibration” and 7.3.8.2 “mechanical shock” of CNS 62133-2: 2018 or meet the requirements of relevant national standards or international standards of newer version. The certificates issued by certification bodies or test reports issued by testing laboratories accredited by Taiwan Accreditation Foundation shall be provided.
3. Section 5.10 of CNS 2062 is replaced by “the measured value of the energy efficiency of the freezer shall be more than 95% of the declared value.”
4. This proposed measure does not apply to products with any of the following features:
 - (1)The rated input voltage is DC 5V and the product has a USB port and does not have an AC to DC adaptor and is not powered by secondary cells/batteries;
 - (2)The product is powered by automotive power only and has automotive cigarette lighter plug and is not powered by secondary cells/batteries;
 - (3)The product is powered by three-phase systems only;
 - (4)The product is powered by primary batteries only; or
 - (5)The product is a toy which is subject to legal inspection.
5. For products newly added to the legal inspection scope, they (both imported and domestically manufactured) will be subject to inspection beginning on 1 January 2025. The inspection methods, conformity assessment procedures of RPC, and inspection fees for listed products remain unchanged.
6. The revised inspection standards (related requirements 1-3) will come into force from the date of announcement and the old version of inspection standards will be invalid beginning on 1 January 2025.
7. Applications for TABI or RPC will be processed in accordance with the followings upon the date of adoption:
 - (1) For products that have been certified: Applicants of the certificate shall provide the type-test report and technical documents that conform to the revised inspection standards and apply to the BSMI on or prior to December 31, 2024. The validity period of the certificate after renewal will remain unchanged; if the certificate is not renewed within the time limit, it will be abolished in accordance with Subparagraph 9, Article 42 of the the Commodity Inspection Act.
 - (2) For extension of validity period of certificates: Applications for extending the validity period of TABI or RPC certificates based on the old version of inspection standards will be accepted under the circumstances stated in the “Regulations Governing Type Approval of Commodities” or “Regulations Governing Registration of Product Certification”, the validity period of the extended certificate will end on December 31, 2024. For applications submitted on or after 1 January 2025, a type-test report and technical documents based on the new versions of the inspection standards shall be submitted.
 - (3) For products newly added to the legal inspection scope: Applicants shall apply for certificate(s) based on the new version of inspection standards by preparing the required type-test reports, technical documents as well as

documents indicating the location of the “Marking of Presence,” samples of the “Marking of Presence” (see Tables 1 and 2), and the “Declaration of the Presence Condition of the Restricted Substances Marking.” The validity period of the certificate is 3 years. For certificates issued on or prior to 31 December 2024, the beginning date of the 3-year validity will be 1 January 2025.

8. For applications mentioned in the previous item, if the RPC was abolished in accordance with Subparagraph 9, Article 42 of the the Commodity Inspection Act, the original type-test reports of safety and electromagnetic compatibility (EMC) of the product may be used for re-applying for RPC.
9. The certificate holders of the products shall clearly label “the presence condition of the restricted substances” on the body, packages, stickers, or user manuals of the products in accordance with the limit stipulated in Section 5 “Marking of presence” of CNS 15663. Those who use website as a means to announce “the presence condition of the restricted substances” shall also clearly label the website address on the body, packages, stickers or user manuals of the products. In that case, the requirements of Section 5.3 of CNS 15663 regarding the position of labeling are not applicable.
10. The Commodity Inspection Mark:
 - (1) The Commodity Inspection Mark shall be printed by the certificate holders. The identification number of the Commodity Inspection Mark consists of “A Letter (R or T),” “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. Where the size of connectors for wiring or cord sets is too small to label information about RoHS or RoHS (XX) below or to the right of the Commodity Inspection Mark, it can be labeled near the Commodity Inspection Mark.
 - (3) The size of the Mark can be applied proportionally on a prominent location of the products. The Mark shall use materials that are not easily altered, and the content shall be in a clearly identifiable and indelible form affixed permanently to the product.
 - (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.

14. The C.C.C. Code listed in the table is used for reference only. The products listed in the table shall still complete the inspection procedures before entering into the market even though their C.C.C. Code is determined differently by the Customs Administration, Ministry of Finance, or Bureau of Foreign Trade, Ministry of Economic Affairs.
15. 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 further announcement.
16. The import regulation code for the listed products is C02.
17. Commodities with combined features or multifunctional products shall comply with the respective inspection standards and the applicable modules under the 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: Freezers, Type designation : XXX						
Unit	Restricted substances and its chemical symbols					
	Lead (Pb)	Mercury (Hg)	Cadmium (Cd)	Hexavalent Chromium (Cr ⁺⁶)	Polybrominated Biphenyls (PBB)	Polybrominated Diphenyl Ethers (PBDE)
Plug Plastic Frame	Exceeding 0.1 wt %	○	○	○	○	○
Wire Material	○	○	○	○	○	○
Solder (ire and Copper Sheet)	—	Exceeding 0.1 wt %	○	○	○	○
Socket Housing	○	○	○	○	○	○
Copper Sheet	○	○	Exceeding 0.01 wt %	○	○	Exceeding 0.1 wt %
<p>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.</p> <p>Note 2: “○” indicates that the percentage content of the restricted substance does not exceed the percentage of reference value of presence.</p> <p>Note 3: The “—” indicates that the restricted substance corresponds to the exemption.</p>						

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: Freezers, Model : YYY						
Unit	Restricted substances and its chemical symbols					
	Lead (Pb)	Mercury (Hg)	Cadmium (Cd)	Hexavalent chromium (Cr ⁺⁶)	Polybrominated biphenyls (PBB)	Polybrominated diphenyl ethers (PBDE)
Plug Plastic Frame	○	○	○	○	○	○
Wire Material	○	○	○	○	○	○
Solder(Wire and Copper Sheet)	-	○	○	○	○	○
Socket Housing	○	○	○	○	○	○
Copper Sheet	○	○	○	○	○	○
<p>Note 1: “○” indicates that the percentage content of the restricted substance does not exceed the percentage of reference value of presence.</p> <p>Note 2: The “-” indicates that the restricted substance corresponds to the exemption.</p>						

- Note
- *The 1st “name and model” row can be omitted if the position of “the markings for the presence conditions” shows clearly to specify the corresponding commodity.
 - *Multiple models could be shown together in the same field if “the markings for the presence conditions” can be applied to contemporarily.