



Brussels, 14 March 2003

Mr. Pieter Parlevliet
Secretary General
CENELEC
Rue de Stassart 35
1050 - Bruxelles

EN 50160 : Voltage characteristics of electricity supplied by public distribution systems

Dear Mr. Parlevliet,

Orgalime and its member federations and the European sector committees in the electrical and electronic field believe that standard EN 50160 on voltage characteristics of electricity supplied by public distribution systems is a matter of great concern to the industry producing apparatus to be operated at 230 V mains voltage. In our view, its application would cause severe problems for all products operating under these conditions.

Standard EN 50160:1999 “*voltage characteristics of electricity supplied by public distribution systems*” is a European standard which was developed at the request of the European Commission. Although this standard is a European Standard, it is not a “harmonised standard” according to the New Approach and it is not listed under the LVD 73/23/EEC or any other product related New Approach directive.

NOTE – EN 50160 is not an EMC standard. It does not give compatibility levels or emission limits. Compatibility levels are given in IEC 61000-2 series. Emission limits are provided in IEC 61000-3 series, and immunity refers to product standard or generic immunity standards. EN50160 is a product standard.

Unfortunately tolerances and characteristics of the supply voltage in EN 50160 seem to be developed independently from product standards and are different from the safety requirements laid down in these standards. Product standards are consistently based on IEC standards and take into account also IEC 60038 “Standard voltages”.

EN 50160 allows greater voltage tolerances and higher transient over voltages than the product safety tests, according to the harmonized product standards such as, for example EN 60601, EN 60335, or EN 60950. This results in an unacceptable situation where products which are designed and placed on the market according to all relevant legal and product standard requirements may be damaged or even become unsafe due to a supply voltage consistent with EN 50160.

These technical problems caused by inconsistencies in different standards may lead to product liability issues. Therefore, we believe it necessary to remedy this unsatisfactory situation within a short time by either withdrawing standard EN 50160 or amending the standard by removing all contradictions to the harmonized product standards. This point of view is supported by the following facts:

1. In 2002, the French government notified a draft decree (2002/0252/F) and an ordinance (2002/0251/F) containing a requirement that customer installations have to fulfil the conditions of EN 50160. The objections raised during the notification process led the French authorities to exclude all references to EN 50160 from the decrees and to support any activity aimed at removing inconsistencies in EN 50160 with respect to the existing product standards.

NOTE – This decision is reflected in the latest issue of the French decrees. Moreover the French Authorities have left in force the decree published on 29 May 1986, which implements the data published 3 years later in HD 472 (230 V or 400 V, - 10%, + 6%) for the minimum and the maximum of the voltage, which cannot be exceeded in normal service. The new decrees will refer to the existing rules and consequently to the Decree of 1986. A similar statement exists from the British authorities.

3. If EN 50160 would have to be taken into account, the whole harmonisation process and the listing of product standards in the Official Journal of the European Union would become questionable with unclear consequences with regard to product liability or warranty issues.

NOTE – The statement in the scope of EN 50160 that this standard is not intended to serve as a basis for product requirements does not clarify the situation.

4. For quite some time now BTTF 68-6 has worked on a guideline to EN 50160, which it has been announced would resolve the problems in relation to the product standards. It is planned that a working group under the future TC 8x will continue this work. The last draft of this guideline published as version no. 7 in July 2002 does not offer solutions for these problems. Furthermore, the route proposed does not seem appropriate to solve problems whose origin lies in the very provisions of the standard. Thus, we believe that the Application Guide will fail to change or override such provisions and will never prevail in a court case against the provisions laid down in the adopted standard EN 50160.

Therefore, ORGALIME requests CENELEC to remedy this unacceptable situation either by withdrawing standard EN 50160 or by introducing substantial changes that would bring the standard in line with product standards and IEC standards on which they are based.

Yours sincerely,

Adrian Harris

Cc.: Mr Ulrich Spindler, President