

ITI Position Paper: 1-1 SDoC

What is 1-1 SDoC?

1-1 SDoC, which stands for "One Standard" "One Test" and "Supplier's Declaration of Conformity", is a framework by which regulators can set up and implement regulations and policies that are the least trade restrictive and which enhance the ease of doing business in their countries. The primary concepts are:

- One (1) Standard: ITI encourages regulatory bodies to reference international standards or relevant parts of the international standards as the technical basis in their regulations.
 - For example, regulators can adopt an international standard (such as IEC 62368-1 for safety of information and communications technology (ICT) equipment; IEC CISPR 32 for electromagnetic emissions) or publish a national standard with stated equivalency.
 - o ITI discourages national deviations from international standards, except in cases of unique and essential differences.
- One (1) Test: ITI believes compliance with ISO/IEC 17025, as evidenced by documentation, or by an accreditation organization's or peer assessment's evaluation according to ISO/IEC Guidelines and standards for conformity assessment procedures demonstrates adequate technical competence.
 - For product safety, technical competence of a laboratory can also be demonstrated by qualification under one of the programs recognized by the IECEE or under a program of a National Certification Body.
 - ITI encourages regulatory authorities to recognize testing laboratories in foreign territories on terms no less favorable than those accorded to testing laboratories in its own territory.
- Supplier's Declaration of Conformity (SDoC): ITI believes regulatory authorities should allow ICT products to be marketed based on an SDoC that complies with ISO/IEC 17050 Part 1 and Part 2.
 Compliance with these standards means the manufacturer or supplier who issues a Supplier's Declaration of Conformity undertakes testing, issues a legal attestation of conformity, and maintains a compliance folder.

What are the Benefits of 1-1 SDoC?

The ICT industry has a proven global track record of providing safe, high quality, state-of-the-art products. The industry has worked closely with governments and formal standards-setting bodies to develop internationally recognized standards in areas such as safety and electromagnetic interference (EMI). Nearly all governments that regulate ICT have adopted these international standards, greatly facilitating international trade. However, a proliferation of unique regulatory requirements for conformity assessment can diminish the benefits of these shared standards.

When countries put in place requirements that are more trade-restrictive than necessary to fulfill legitimate regulatory objectives, it can lead to redundant testing and certification that increase customer costs, limit choice, and delay market entry. Given the rapid evolution of ICT, this is a significant impact. Utilizing 1-1SDoC opens up innovation and enhances competition among businesses and better ensures that the benefits of ICT reach consumers and economies in the most efficient way.



1-1SDoC offers ICT regulators a way to meet their objectives in the least trade-restrictive manner, based on the low risk of ICT products in regulatory areas such as product safety and EMI. It also allows governments to direct resources to specific products identified as highest risk and most likely to require regulatory attention while eliminating redundant requirements that slow the introduction of innovative ICT products to consumers and businesses in the country.

Recommendations for Regulators

Adhere to the WTO Agreement on Technical Barriers to Trade (TBT)

ITI supports World Trade Organization (WTO) Members and their fulfillment of obligations under the Agreement on Technical Barriers to Trade (TBT). We encourage WTO Members to notify the TBT Inquiry Point of standards-related activities, measures, technical regulations, conformity assessment procedures, accreditation (or other accepted means, such as peer assessment), and metrology measures, particularly those that influence trade. ITI recommends that Members notify the WTO of any draft standardization, accreditation and metrology measures they intend to adopt as mandatory, no less than 90 days before the adoption of such measures. Where a deviation from an international standard is drafted, ITI recommends notification and explanation, as established in the World Trade Organization Agreement on Technical Barriers to Trade.

Use post-market surveillance

ITI supports the role of governments or designated authorities in conducting effective, focused market surveillance. The assessment of products after they have been placed onto the market is an integral part of a product regulatory system to ensure that products comply, or continue to comply, with the relevant regulatory requirements. For example, it is necessary to ensure that the product being offered for sale in the marketplace has the same performance characteristics as the sample for which the original approval was given.

Base enforcement actions on risk

If a possible non-compliance is detected, regulators can conduct audits of documentation and, if not satisfied based on the documentation, mandate re-testing of products. Depending on the test results, the regulator can then take appropriate actions to determine the compliance of the product in question. Any penalties levied should be based on the risks posed by non-compliance and the ultimate regulatory objective of the regulations to protect public health and safety by correcting non-compliance or defect situations, rather than punitive action.

The Information Technology Industry Council (ITI) is the premier global advocate for technology, representing the world's most innovative companies. Founded in 1916, ITI is an international trade association with a team of professionals on four continents. We promote public policies and industry standards that advance competition and innovation worldwide. Our diverse membership and expert staff provide policymakers the broadest perspective and thought leadership from technology, hardware, software, services, and related industries.

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ⁱ Article 2.9.3, Article 5.6.3 and Annex 3, Sections L and N of the TBT Agreement: https://www.wto.org/english/docs_e/legal_e/17-tbt_e.htm

