

Component Change Review for Electronics

Technical briefing with an evidence matrix and release record

1 / Scope and change record

The worked example is a fictional wired industrial sensor supplied from an external 24 V DC source, with no radio transmitter; it illustrates a suggested review workflow and assumes no test or conformity outcome.

EMC Article 7(4) and RoHS Article 7(e) require relevant changes in series production to be taken into account. EMC Annex II point 2 covers representative configurations. The Blue Guide section 2.1 explains that unaffected aspects of a modified product do not require repeated tests or new documentation; record the rationale establishing what remains unaffected. [1, 2, 6]

At 24 V DC the sensor is outside the LVD voltage range. Safety still has to be covered: the risk assessment, the GPSR where consumer use is reasonably foreseeable (for risks not covered by specific EU safety rules), and the LVD for any mains supply shipped with it. [5, 9]

Field	Record before review
Product identity	Model, intended use, environment and applicable legislation
Configuration	Old/new hardware revision, firmware, BOM and drawings
Component change	Old/new part, supplier, datasheet revision and reason
Implementation	Pinout, layout, switching behaviour, thermal limits, accessories
Existing evidence	Report IDs, supplier records, assessed build and limitations
Traceability	Change notice, production boundary, reviewer and release date

Procurement obtains supplier records; engineering evaluates implementation; the conformity owner coordinates the review. The manufacturer retains responsibility. [1, 2]

2 / Worked evidence matrix

Converter A becomes converter B. Both provide the required output; that alone does not establish equivalent EMC behaviour or materials evidence.

Review area	Existing evidence	Potential change	Next action
EMC	Report for hardware Rev A with converter A	Switching characteristics or layout may affect emissions/immunity	Compare circuit and implementation. Ask specialist/lab what evidence resolves the impact.
RoHS	Supplier declaration and materials records for A	Records may not identify B or its applicable exemptions	Obtain B-specific evidence. Check which Annex III exemption the new part relies on. Lead exemptions 6(a)-(c), 7(a) and 7(c)-I were revised by Delegated Directives (EU) 2025/1802, 2025/2363 and 2025/2364; some expire in 2026-27. Check the exact entry, category and transition date.
Configuration	BOM, drawings and report configuration	Rev B may differ from the assessed build	Map the changed parts and relevant operating modes against representative configurations.
Safety and scope	Applicable-rule review and risk analysis	Thermal behaviour or intended use may change	Assess safety risks. At 24 V DC the sensor is outside LVD voltage scope; check GPSR where consumer use is reasonably foreseeable and LVD for any mains supply shipped with it.
Documentation	Technical file and declaration for original model	Descriptions or references may no longer match	Update affected records and keep the EU declaration of conformity continuously updated.

EN IEC 63000:2018 (Implementing Decision (EU) 2020/659) sets the structure of RoHS technical documentation. [3]

Check new-part Candidate List substances: above 0.1% w/w in an article, REACH Article 33 communication duties apply; SCIP notification applies to EU suppliers within scope. [8]

3 / Evidence review and release record

Complete once per change notice. Identify attachments by document ID and revision.

Product / model	
Change notice / reason	
Old / new revision and component	
Production boundary / first batch	

Review field	Record or attachment reference
Applicable requirements	
Original report / assessed configuration	
Changed characteristic / potential impact	
Evidence gap / required action / owner	
Completion evidence / technical rationale	
Outstanding limitations / resolution	

Decision: retain evidence with rationale / obtain information / targeted assessment or testing / hold release

Reviewer and role: _____ Date: _____

Approval record / signature: _____

Update affected technical documentation and keep the EU declaration of conformity continuously updated (EMC Article 15(2)); check instructions and labelling for necessary changes. [1]

Where the EMC EU-type examination route is used, Annex III, Module B, point 7 requires notification of modifications that may affect conformity or certificate validity, and additional approval. For radio equipment, use RED Annex III point 7. [1, 4]

4 / Laboratory questions and references

- Which earlier results remain relevant to the revised configuration, and why?
- Which changed characteristics could affect conformity, including worst-case modes?
- What targeted checks or additional assessment would resolve the uncertainty?
- Does the lab's scope cover the tests needed, and do you want an accredited report?
- Which configuration, accessories, sample records and limitations will the report identify?

EMC Module A does not itself require accredited testing. Agree the evidence needed and any project-specific accreditation requirements. [1]

Firmware or connectivity changes require a cybersecurity scope review. RED cybersecurity rules concern specified radio equipment. CRA main requirements apply from 11 December 2027; reporting duties apply from 11 September 2026 for products within scope. [10]

Primary references

1. **EMC Directive 2014/30/EU**. Articles 7(2)-(4), 15(2); Annex II points 2-5; Annex III, Module B, point 7.
2. **RoHS Directive 2011/65/EU**. Article 7(b)-(e), Annex III; consolidated version 1 July 2026.
3. **Implementing Decision (EU) 2020/659**. Annex I: EN IEC 63000:2018.
4. **Radio Equipment Directive 2014/53/EU**. Article 10(5): series-production changes; Article 10(4): retention; Annex III point 7: approved-type changes. Radio equipment only.
5. **Low Voltage Directive 2014/35/EU**. Article 1: 50-1000 V AC / 75-1500 V DC.
6. **Blue Guide 2022 (2022/C 247/01)**. Section 2.1: modified products and unaffected aspects.
7. **RoHS lead exemption amendments**. 2025/1802: 7(a); 2025/2363: 7(c); 2025/2364: 6(a)-(c). See each Annex. 2025/2363; 2025/2364.
8. **REACH / SCIP**. REACH Article 33; Waste Framework Directive Article 9(1)(i); ECHA supplier guidance.
9. **General Product Safety Regulation (EU) 2023/988**. Articles 2-3: consumer-use scope and interaction with specific EU safety rules.
10. **Cybersecurity scope and dates**. RED Delegated Regulation (EU) 2022/30 for specified radio equipment; CRA Regulation (EU) 2024/2847, Articles 2, 14 and 71. RED 2022/30.

References checked 9 October 2026. Check the current legislation, exemption entry and applicable assessment route for the actual product.