CE Technical File Evidence Map

A short guide to linking every requirement to evidence that covers the product you actually ship. Companion to the workbook (XLSX) and blank template (CSV).

Version 1.0 · Last updated 27 November 2026

Why a map, not a folder

A test report describes one sample, built and operated in one stated way, measured against one edition of a standard. The technical file has to show something wider: that each requirement applying to the released product is met, and why the records you hold support that. The gap between those two statements is where most files fail a review. Typical reasons are a different harness, a newer firmware build or a substituted connector.

The evidence map closes that gap row by row. Each row takes one requirement and records the evidence ID, the configuration that evidence covers, the configuration you release, the difference, a written technical conclusion and an owner. It is built for wired electrical and electronic equipment under the EMC Directive and RoHS. For products with a radio, use the companion Wireless Module Integration Evidence Matrix.

> The map is a review record, not a conformity determination. Filling in rows does not establish conformity. The manufacturer's competent reviewer decides; the map records what that decision rests on.

Set up the product record first

Every row compares two baselines, so write both down before you open the first report:

Tested sample(s), exactly as the reports state them: sample ID, hardware revision, firmware, harness or cable set, accessories and operating mode.

Released configuration: the hardware revision, firmware version and BOM revision that ship, plus supplied accessories (adapter, harness, mounting kit, battery).

Intended environment: industrial, or residential / commercial / light-industrial. The choice drives the standard and the immunity levels, and it has to match the instructions.

Placing-on-market date: it decides which standard editions give presumption of conformity and which obligations already apply.

Working through the rows

1. Decide applicability. For each starter row write a one-line rationale: Applies, Does not apply, or To confirm. Do not delete rows; a recorded exclusion survives an audit, a missing row does not.

2. Register evidence before citing it. Give each document an ID in the Evidence register and record the configuration it covers, its scope limits, and the standard edition with its OJ status.

3. Write both halves of the baseline. "Tested / assessed: ..." from the evidence, "Released: ..." from the product record. Then name the difference in plain words.

4. Conclude with an outcome label. Start the conclusion with one of the labels below, give the reasoning, and assign an action owner and a due date.

5. Record the release decision. When the open rows are closed, the decision is a signed sentence on the product record: who, when, what was accepted and why. A green status cell is not a decision.

6. Re-open on change. Hardware, firmware, BOM, harness, enclosure, supplier, intended environment, legislation or a standard edition: any of these sends you back to the affected rows.

Four outcome labels

Label	Use it when	Example (fictional)
JUSTIFIED REUSE	The evidence covers the released configuration, or the difference has been analysed and shown not to matter. State the conditions.	Conducted emissions on the DC port reused because the regulator and input filter are unchanged on the new BOM.
DOCUMENTATION-ONLY CORRECTION	The right evidence exists; the paperwork is wrong or incomplete.	Report cover gives no standard edition; the DoC lists a firmware build that no longer ships.
MATERIAL GAP	The product differs physically or functionally in a way analysis cannot bound. Test, measure or assess before release.	Emissions measured in idle mode with a 1 m cable; the product ships with a 5 m harness and active Ethernet.
EVIDENCE MISSING	A required record does not exist or cannot be obtained.	No materials declaration for a connector from a new supplier.

Rows that only decide scope use SCOPE DECIDED or SCOPE OPEN instead.

Worked example: a 24 V DC industrial controller

The workbook's example tab follows a fictional data-acquisition controller, EX-DAQ-100: 24 V DC input, Ethernet, two sensor inputs on a detachable harness, no radio and no mains adapter, planned for the EU market in 2027-Q1. The EMC report on file was made on an earlier Rev A sample running firmware 2.1, in idle mode, with a short unshielded cable. Rev B ships with firmware 2.3.1, BOM B-07 and a 5 m shielded harness.

Row	What the review found	Outcome	Next step
EX-C01 Scope	EMC, RoHS (category 9) and CRA apply. LVD excluded: rated 24 V DC is below the 75 V DC lower limit and no adapter is supplied. Safety still handled under its own row.	SCOPE DECIDED	File the scope memo; re-open if an adapter is added or the unit is sold with a machine.
EX-C03 Emissions	Idle mode, 1 m unshielded cable, Ethernet idle, versus acquisition mode, 5 m harness, 100 Mbit/s traffic.	MATERIAL GAP	Radiated retest in the shipped configuration; DC-port conducted result reused with stated conditions.
EX-C04 Immunity	Signal and Ethernet ports, whose cables can exceed 3 m, not tested for conducted RF, EFT or surge; manual sets no cable limit.	MATERIAL GAP	Test the ports, or restrict cable length in the manual and drop the 5 m harness.
EX-C06 Edition	Cover says "EN 61326-1" with no year; test plan uses the 2013 edition; lab offers to re-issue "to 2021".	DOC-ONLY CORRECTION	Addendum stating the 2013 edition while that edition stays cited; file the OJ extract with access date.
EX-C09 RoHS	Three part numbers changed since the declarations were collected; one exemption cited without a validity check.	EVIDENCE MISSING	Part-specific declaration for the connector; supplier statements for the capacitors; check the exemption.
EX-C11 CRA	Web interface with a default password; no vulnerability handling, SBOM or reporting route.	EVIDENCE MISSING	Name a product-security owner; set up reporting; remove default credentials.
EX-C12 DoC	Draft DoC: no editions, outdated firmware and hardware revision.	DOC-ONLY CORRECTION	Update and sign only after the rows it depends on are closed.

All EX- identifiers, report numbers and values are teaching content. No measurements, test results or approvals are asserted. Never copy example rows into a real file as evidence.

Where files usually go wrong

LVD exclusion treated as a safety finding. A 24 V input does not settle LVD scope on its own: check every rated input and output and every supplied accessory. Outside LVD, safety is still assessed, under the Machinery Regulation if the product is a safety component or placed with machinery, otherwise through a documented risk assessment.

Cable length ignored. In EN IEC 61326-1 and EN IEC 61000-6-2, conducted RF and fast-transient tests apply to ports whose cables may exceed 3 m. A length restriction is a valid control only if it is printed in the instructions.

Edition taken from the report cover. Use the test plan, then check the Commission summary list for the placing date. A CENELEC date of withdrawal is not an OJ withdrawal: the EMC list cites EN 61326-1:2013, while EN IEC 61326-1:2021 has not been cited.

Generic RoHS letters. Evidence under EN IEC 63000:2018 has to be attributable to part number and supplier, with exemptions checked for the product category. An EMC report says nothing about materials.

DoC signed first. Its content (editions, configurations, firmware) depends on the other rows. Sign it last.

Dates and limits to keep in view

Item	Date or value
LVD voltage scope (lower limit, DC)	75 V DC (50 V AC)
Packaging and Packaging Waste Regulation (EU) 2025/40 applies	12 August 2026
Cyber Resilience Act: reporting of actively exploited vulnerabilities and severe incidents	11 September 2026
Machinery Regulation (EU) 2023/1230 applies	20 January 2027
Cyber Resilience Act: full application (Annex I, conformity assessment)	11 December 2027
Retention of technical documentation and EU DoC	10 years after placing on the market

Standards status: to be re-checked against the current Official Journal before publishing. Editions and OJ statuses in this guide and the workbook reflect the Commission summary lists consulted in October and November 2026. Before you rely on them, open the current EMC summary list for the placing-on-market date and record the access date in your file.

About this resource

Prepared by EcoComply GmbH, Heilbronn, with AI assistance. Version 1.0, last updated 27 November 2026. This guide is not legal advice and is a review record, not a conformity determination. Corrections: john@ecocomply.ai. Related reading: ecocomply.ai/blog/technical-documentation-for-ce-marking and ecocomply.ai/resources/component-change-review-electronics.