Solar Keymark Scheme Rules

SKN_N0444R8 / Edition 2025-12-10

www.solarkeymark.eu

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0. Introductory note and fall-back rule

These SK Scheme Rules (including the Annexes as listed in chapter 10) replace the version SKN_N0106R31 of March 2018 and the latest version SKN_N0444R7 of January 2024 of the SK Scheme Rules.

Existing certificates issued under previous versions of the Scheme Rules are not affected by the new Scheme Rules, however all new actions on certified products such as surveillance activities, modifications of the product, building new families, adding OBL certificates, re-certification, etc shall be conducted as defined in the latest SK Scheme Rules.

If for any reason the revised Scheme Rules are not applicable or are deemed inappropriate in specific situations, the previous version of the SK Scheme Rules shall be consulted and applied in agreement with the responsible CBs, TLs and IBs. The CBs, TLs or IBs are then obliged to inform the SK Management about such occurrences to propose appropriate modification of the Scheme Rules.

1. Abbreviations and definitions

CB	Certification Body
CB WG	Working Group of all the Solar Keymark Certification Bodies
CC	Complaint Committee
CCB	CEN Certification Board
CEN	European Committee for Standardization
CENELEC	European Committee for Electrotechnical Standardization
CIR4	CEN/CENELEC Internal Regulations: Part 4 Certification (IR4): July 2018[1]
CMC	CEN Management Centre
EA	European co-operation for Accreditation
ECP	Expedite Check Procedure
FI	Factory inspection
FPC	Factory Production Control
GDPR	General Data Protection Regulation, (EU) 2016/679
IB	Inspection Body
ISO	International Organization for Standardization
IEC	International Electrotechnical Commission
KMO	Keymark Management Organization
NDA	Non-Disclosure Agreement
OBL	Own Brand Labeller
OEM	Original Equipment Manufacturer
PI	Physical Inspection
PSA	Product Specific Annex
SCF	Solar Certification Fund
SHE	Solar Heat Europe
SK	Solar Keymark
SKDB	Solar Keymark Database
SKN	Solar Keymark Network
SKNM	Solar Keymark Network Meeting
TL	Testing Laboratory
WG	Working Group

Certificate Holder: Company (legal entity with entry in the commercial register), which is responsible for fulfilment of all duties of the certification and has got the right to use the mark for the certified products. The certificate holder may or may not be the manufacturer of the certified product. In the case of not being the manufacturer, the responsibilities as licensee are the same as if it were a manufacturer.

OEM: A company which supplies equipment to other companies to resell or incorporate that product under their own brand name is called Original Equipment Manufacturer (OEM). Some OEMs place their products on the market also under their own brand name. The term OEM includes this option.

OBL (sub-license, private label): A company which is placing OEM products on the market under its name or trade names is called Own Brand Labeller (OBL). OBLs don't produce the products themselves. In this document the OBL is a company re-labelling a product with valid SK certification under his own company name and product name (brand) without making any other changes to that product, thereby taking responsibility for it as the legal manufacturer under the above definition and thus applies for a SK certificate on his own.

Brand or Trademark: Brand is the name, term, design, symbol, or any other feature that identifies one seller's product distinct from those of other sellers. It is no legal entity with entry in the commercial register. A same product may be sold under different brands or trademark in different markets.

[1] https://boss.cen.eu/media/4qsan04u/ir4_e.pdf

2. Introduction to the Solar Keymark

2.1 General

The Solar Keymark (SK) is a third-party certification scheme based on the general CEN Keymark rules laid down in the CEN – CENELEC Internal Regulations Part 4 (CIR4). According to these regulations, the SK Scheme Rules are published as specific “Keymark-Scheme Rules” (Clause 5 of CIR4), and the Solar Keymark Network (SKN) is established as “Keymark Scheme Group” (Clause 6 of CIR4).

The SKN is a working group bringing together the interested and involved stakeholders and acts as an experience exchange circle between TLs, CBs and industry. The SKN is responsible for developing and managing the SK scheme rules and is operating according to the SK Internal Regulations.

2.2 Governing documents

The governing documents for the Solar Keymark scheme are:

- CEN/CENELEC Internal Regulations: Part 4 Certification, CEN/CENELEC
- Specific Solar Keymark Scheme Rules (this document)
- Solar Keymark Internal Regulations

These documents are updated when needed but are always published in their valid version under solarkeymark.eu. The published version are the valid versions.

The SK Scheme Rules are defining the specific requirements and working rules related to the CEN Keymark certification of solar thermal products. They are kept as close as possible to the minimum requirements for Keymark Scheme Rules as given in 5.2 of CIR4. The SK Scheme Rules are managed by the SKN. All changes to the SK Scheme Rules including all Annexes must be approved by the SKN and by the CCB represented by KMO.

2.3 Product main types covered by the scheme

The scheme covers the following product main types within the work program of CEN/TC 312 "Thermal solar systems and components" always referring to the latest valid version:

- Solar thermal collectors as defined in EN 12975
- Factory made solar thermal systems as defined in EN 12976-1 and EN 12976-2
- Custom built systems as defined in EN 12977-1 and EN 12977-2
- Solar water heater stores as defined in EN 12977-3
- Solar combistores as defined in EN 12977-4
- Control equipment as defined in EN 12977-5

The scheme intrinsically refers to other CEN and ISO standards as referenced in the main standards which are all available from the national standardization bodies (list of standards available on CEN-CENELEC website: standards.cencenelec.eu). The certification procedure is always based on the version of the standards valid at the time of certification. The SKN may define transitional procedures for standards under revision (see PSAs) if necessary.

Similar products can be considered as product families. A product family consists of one or more products as defined in the product specific annexes (PSA) and in the applicable standards. Every certificate covers only one product family.

The rules for building families are defined in the applicable standard and in the PSAs. The final decision on the possibility to unite different products into a family is taken by the CB.

A family is considered as one sub-type of one of the above listed main types.

3. The Solar Keymark certification procedure

3.1 General

The Solar Keymark certificate is held by a certificate holder which can be a manufacturer, or an OBL. Products can also be certified under different brands (Trademarks) to be sold under different brands or trademarks in different markets and by different companies. The specific procedures and requirements for OEM/OBL certification are defined in Chapter 7.

To guarantee the constant quality level of the product, the certification scheme is based on the following four piles

- Random sampling of the products for type testing (clause 3.2)
- Third party initial type testing according to the applicable European standard
- Third party periodic surveillance of the manufacturers quality management system
- Third party periodic surveillance of the certified products

3.2 Random selection of type test samples

The selection of products for initial type testing is made under the responsibility of the CB. The test samples for initial type testing are taken out of the current production or from stock of the manufacturer. Product specific details on the sampling procedures are defined in the PSAs. The inspector selects by random the test samples, marks them with a permanent mark (alternatively seals their packing) and instructs the manufacturer to deliver them to the TL. Sampled products shall be marked and sealed such that they cannot be modified anymore before being delivered to the TL. Remote sampling procedures using video web tools or local representatives of internationally operating inspection companies can be used to reduce travelling expenses as long as all sampling requirements are fulfilled.

3.3 Factory inspection (FI)

The manufacturer shall operate under a factory production control (FPC) system based on the principles of the EN ISO 9000 series of quality management standards. This FPC system must cover the production line of the product for which the Solar Keymark licence is to be granted. The ability of the FPC to guarantee stable production quality is verified through periodic factory inspections (FIs) by inspectors recognized by the CB. The FI shall cover at least the points listed in Annex A1 (factory inspection report), which is available on the SK website and shall also be used as a template for the FI report.

The product specific FPC requirements are defined in the PSAs (Annexes P,Q,R).

With an initial factory inspection on place, it shall be verified that the product for the initial type testing was produced under the FPC, such that also for the future production a stable product performance and quality can be assumed.

The FI must be carried out at least once a year. If the manufacturer is ISO 9001 certified for the production line used to produce the certified product by a certifier accredited by a national accreditation body that is a member of the International Accreditation Forum (IAF, www.iaf.nu), the FI is only required every second year.

Depending on the outcome of an FI, the CB may continue the certification, request additional inspections, suspend the certificate or withdraw the certificate.

All products covered by an FI (including OBLs) shall be listed in the inspection report to confirm the conformity of the FPC for those products.

3.4 Initial type testing and periodic product surveillance

The product to be certified shall be tested (initial type testing) according to the applicable European standard (clause 2.3) by an accredited TL listed on the SK website and considering the corresponding PSAs.

The consistent quality of the products is verified through regular surveillance activities. The

general procedures are given in CIR4 and include product verification tests at least every second year as described below.

The certified products shall be tested for conformity to the product submitted for initial type testing by a physical inspection (PI) of the product on the basis of

- Technical drawings
- Specification files for materials and components
- Visual inspection of products selected at random from production, from stock or from market.

The conformity check and all changes to the product shall be assessed on the basis of the rules defined in the product standards and the PSAs. All findings shall be reported using the templates in Annex A2 (physical inspection report). In case of deviations, the CB decides either on corrective action to maintain conformity with the certified product or to modify the certificate based on partial or full retesting. If conformity cannot be re-established, the certificate shall be withdrawn by the CB.

All OEM and OBL products covered by initial type testing or product surveillance shall be listed in the inspection report to confirm the conformity for those products.

3.5 Remote inspections

To increase efficiency and reduce carbon emissions, the method of remote factory inspection by is applicable for interim and follow-up inspections under the following conditions:

- Within the period of validity of a certificate (5 years), a maximum of two remote inspections is possible.
- Two consecutive remote inspections are not permitted.
- The remote inspection must be approved individually and in advance by the CB.
- If previous inspections had revealed serious non-conformities, the CB should be reluctant to permit a remote inspection.
- The initial FI for a new manufacturer is excluded from the remote inspection method.

3.6 Certification procedure

The applicant and the CB, TL, IB shall supply the CB with at least the following documents:

- Formal application to receive a Solar Keymark certificate for a product.
- Random sampling protocol(s).
- All test reports including all referenced and sub-referenced test reports building the basis for the certificate. All these test reports shall also be listed in the datasheet.
- A FI report covering the product to be certified.
- ISO 9001 certificate (if available)
- The documentation as required in the relevant standard (see Part 2 of the PSAs). The documentation can also be kept in trust by the TL but has to be made available to the CB upon request.
- The datasheet to be published in the SK database.

If all documents are available and all requirements are fulfilled, the SK Certificate can be issued by the CB. There is however no obligation for a CB to issue a certificate, so that in case of any doubts a CB can refuse certification. When the CB issues a certificate, the CB shall upload the datasheet to the Solar Keymark database and shall inform KMO about the new certificate to be inserted in the solarkeymark.eu database.

A product can also be certified using different brand names under the same certificate. For all OEM/OBL certification the specific regulations defined in Clause 7 apply.

3.7 Obligations for SK certificate holders

By applying for the licence to use the Keymark, the manufacturer also agrees:

- to meet the fees specified in CIR4
- to meet the fees for the SK as specified in Clause 0
- to the publication of the data sheet and the SK certificate
- to inform the CB and TL about any planned change to the certified product.
- to inform the CB and TL about any planned change of the production place.

In addition, the manufacturer shall appoint a contact person for the SK management. This will be used to inform the company of relevant updates relating to the SKN and the scheme rules. These contacts may be confidential or may be listed as points of contact with the manufacturer.

The applicant also agrees to the following: In case of a complaint against a certified product, the certificate holder, the CB, TL and IB agree to provide, on request, all necessary information available (e.g. measurement data, drawings, photographs, specification files) to a Third Party Team (TPT) to resolve the complaint, according to the procedures laid out in Clause 8.

4. Validity of the certificates

4.1 Temporal validity

SK certificates are valid for five years as specified in CIR4. If the products and production meet all the requirements, it can be renewed for a further five years without re-testing. At the latest ten years after the start of the first test (i.e. the date of sampling) a full new test must be started and completed within one year to obtain a new certificate or to extend the existing certificate. If the new test is not started in time, the certificate will be declared invalid by the CB.

For collectors only: In the case of a retest after 10 years, only the collector with the lowest thermal performance as stated in the current data sheet needs to be retested to determine the thermal performance.

Clearance selling: If a product is no longer produced, it still may happen that a relevant number of products are on stock. In this case FI and PI are useless. The CB may decide to extend the validity of the certificate for a maximum of two years as appropriate to allow for clearance selling.

4.2 Changes in products – re-testing

In principle, the SK certificate is no longer valid if a certified product is modified. However, depending on the modification, it may not be necessary to carry out a new initial type test. Specific rules and guidelines are given in the applicable standards and PSAs (Annexes P,Q, R).

4.2.1 Equivalencies

To reduce the dependency of manufacturers on specific suppliers for some components so called “groups of equivalent materials/components” can be defined. These groups must be approved by the SKN. Equivalent materials/components are listed on the SK webpage. Manufacturers can replace a component by another component in the same group without further notice to the CB.

For some other materials clear regulations on equivalent components are defined in the PSAs or in the applicable standards. Manufacturers can replace components according to these regulations after prior notice to the CB/TL.

The term “replacing” includes the possibility to have several suppliers at the same time.

4.2.2 Other modifications

If an intended change is not clearly covered by a standard or a SK rule, the manufacturer shall

inform the CB/TL in due time specifying exactly what change(s) are to be made. The CB shall then assess the need for (partial) re-testing/additional testing on the basis of the available standards and taking into account the decisions of the SKN. Depending on the intended modifications the CB will also decide on the need for an additional FI.

4.3 Changing the CB, TL

It is possible for a certificate holder to move a certificate to another CB, TL without re-testing and re-inspection under the following conditions and procedures:

- The CB that issued the original certificate has to be informed by the certificate holder about the cancellation of the certificate.
- A copy of the notification of cancellation by the former CB has to be provided to the "new" CB before issuing the new certificate.
- The test report(s) and the inspection report(s) have to be provided to the new CB.
- The TL that issued the test reports has to be accepted by the "new" CB before issuing the new certificate.
- All documents/data/photos and all other relevant information must be made available to the manufacturer and the TL/CB which is taking over the case.
- A new datasheet shall be issued.
- Change of CB and issuance of new certificate shall be accomplished within 3 months after the request.
- The original certificate shall be withdrawn when a new one is issued.
- The procedure applies to all OBL certificates linked to the original certificate.
- The manufacturer bears the full cost of such a transaction.

In case of ceasing activities of a CB or TL the manufacturer is obliged to move his certificates to a new CB/TL to keep the certificate valid. If this is not requested by the manufacturer and no new TL/CB has a mandate for the certificate, the certificate becomes void within 6 months.

5. Publicity

5.1 Languages

The original language of all SK documents is English. Documents such as inspection reports can be translated in any other language provided that the original English text remains visible in the document. The only exception regards the datasheets which shall be issued in the original English version only.

In case of any doubts, contradictions etc. the English versions prevail.

5.2 SK Database and Keymark database

Every valid certificate shall be listed in the SK database (solarkeymark.eu/database) and in the Keymark database (keymark.eu/en/certificates/certificates-data-base). The SK database is hosted by SHE. The Keymark database is hosted by KMO. For every certificate a datasheet (.xlsx and .pdf) shall be issued using the templates in the PSA. These datasheets are available at least in the two databases. The SK database prevails in any case as it is updated more frequently. The CBs are responsible for the upload to the SK Database and for the notification to KMO. Products not fulfilling this datasheet requirement shall not be considered as certified products.

The CBs are welcome to publish these original datasheets also in their own databases.

Whenever a datasheet is issued or must be re-issued for any reason, the latest version of the datasheet template shall be used. This applies also for OBL datasheets. If this leads to inconsistencies, they shall be named and explained in the "additional information" field of the datasheet.

5.3 Automated read access to the SK Database (SKDB)

An automated read-only access to the SKDB using an API can be granted to specific organizations as defined in the following table:

Organization	Access
National authorities, SK CBs and SK TLs, Software provider etc.	Permanent full reading access
Certificate holders	Permanent but limited access
Other companies	Single and limited access
other organisations (e.g. associations)	By specific case

The access levels are defined as follows

- Permanent and full access: API and user-specific credentials to access the database with all information of the valid certificates.
- Permanent and limited access: API and user-specific credentials with limited access to information of a certificate (only the technical information without certificate holder, registration and type name).
- Single and limited access: If a specific request is approved, the requester will receive once an excel spreadsheet with limited information of a certificate (only the technical information without certificate holder, registration and type name).

Independent of the use of data, it shall always be clearly mentioned that the data are taken from the SKDB.

Based on a request using the SKN_N0557RX template, by the applicant organization to the SK secretariat, a SKN group consisting of the SK chair, the SK manager, the SK secretariat and KMO takes the decision including the conditions (see table) and duration for granting or withdrawing the access to the database. The SK secretariat reports in each SKN meeting on the accesses granted or withdrawn, the motivation for the requests and the arguments for granting/withdrawing the access. The organizations with permanent access are listed on the SK website with an explanation of why and how the data is used. The SK website also hosts a list of software and tools that make use of the SK Database access data.

5.4 Labels and logo

Only products marked with the SK logo and the certificate number are considered as certified products. The Keymark logo shall not be used without certificate number as a certificate is always linked unambiguously to a well-defined product.

The SK logo shall be used only in accordance with CIR4.

The SK logo shall not be used in misleading manner. (e.g. if a collector can also be used as cooling ceiling it is not permitted to mark it with the SK logo when put on market as cooling ceiling.)

Graphics and templates are available from the CBs or from Annex Y. The use of logos for products without certification is considered misuse and will be prosecuted.

6. Financial

By applying for the license to use the Solar Keymark, the client agrees to pay the following annual fees:

- CEN KEYMARK License Fee
- SKN Fee

These fees are annual fees for valid licences, where "annual" and "valid" are defined as follows:

- Annual: If a certificate is valid on one day of the calendar year January 1st – December 31st.
- Valid: If a certificate is found in the Solar Keymark database.

6.1 The KEYMARK licence fee

The Keymark licence fee is an annual royalty fee for the right to use the Keymark and to finance KMO). The Keymark is owned by CEN and the fee is fully forwarded to CEN but collected by the CBs. Part of the fees is used to finance KMO. The Keymark licence fee is defined by CEN and is the same for all certificates, independent of the involved TL, CB or IB.

The KEMARK licence fees are set as follows:

Main type fee: 300 € per product main type and calendar year

Subtype fee: 60 € per product subtype and calendar year

6.2 The Solar Keymark Fee

The SK Fee is used to fund the SCF and to cover the activities of the SK Secretariat, the SK Manager and the SK Chairman. A decision on the amount of the annual fees for the following year shall be made before the end of October of the previous year by the SKN. If no other decision is taken, the fees remain the same as in the previous year.

The SK Fees are set as follows:

Main type fee: 55 € per product main type and calendar year

Subtype fee: 252 € per product subtype and calendar year

Upon proposal, during the October meeting of the SKN – the amount of the annual fee per license for the following year will be determined by resolution by the SKN.

6.3 Collection of the fees

The CBs charge the SK fees to the certificate holders.

The CEN/CENELEC fees are then forwarded directly to KMO. The SK fees are invoiced to the CBs by the SK secretariat.

The basis for the invoices sent out by the SK secretariat is the total number of valid certificates issued or renewed during the previous year. The invoices are sent by the end of the first quarter and are due one month after reception. With this retroactive invoicing the CBS can only be charged for amounts that should have been collected already.

The number of valid certificates is verified by SHE based on the declaration of the Certification Bodies and the total of certificates found in the SK Database during the previous calendar year. A last check of the database is performed in December so that by the end of the year the total amount available for the SCF call will be known.

It is in the responsibility of the CBs to inform their certificate holders about the obligation to pay the annual fees in case they have a valid certificate in a calendar year (starting on January 1st). The CBs shall not issue certificates before the SK fees are received. The CBs shall make sure that only certificates for which fees have been paid can be found in the database. In case the payment has not been done by the Certificate Holder, the CB shall ensure that the certificate is removed from the SK Database immediately.

6.3.1 No payment procedures

In case a CB does not pay the invoice for the SKN fees sent by SHE within 30 days, the following procedure will apply:

1. The SKN Secretariat will send a reminder to the CB with copy to the KMO on the late payment, asking for the invoice to be paid within 2 weeks.
2. In case that payment is not done after that 2-week period, the SKN Secretariat will inform the KMO about the non-payment.
3. The KMO will then send the CB a reminder of its obligation to pay, indicating that there is a period of one month for the late payment, before starting a procedure to withdraw the Empowerment.
4. If the invoice is not paid by the 30th of June, the KMO shall request to CEN the cancellation of the Empowerment. The KMO will inform all the affected license holders of this action and the possibilities, in application of the SK Scheme Rules, to find another CB in a period of 6 months.

6.4 Budget / Reporting

A simple financial reporting shall be presented in the Autumn SKN using the template below. The budget for the use of the SKN fee must be approved by the SKN on an annual basis.

Income

CB	Number of main types / subtypes	SKN Fees Foreseen	Remarks
CB1			
CB2			
…			
CBn			
Total		**xx €**	

Expenses

	Previous year YYYY-1	This year YYYY	Budget next year YYYY+1
SK Chair			
SK Manager			
SK Secretary			
SCF Projects			
others (tb specified)			
SCF safe preview Based on # of certificates foreseen	+++	+++	

Annual Report (31st December)

	Previous year YYYY-1	This year YYYY
Revenues		
Expenses Admin		
Operating Reserve		
Amount blocked for granted SCFs		
SCF safe preview Based on # of certificates on foreseen for	--	--

7. OBL certificates

A SK certificate is typically issued by a CB to a product manufactured by a company in a factory and tested by a TL. The factory has a quality management system and is subject to regular factory inspections. The product is inspected periodically for conformity.

Such a manufacturer can also operate as an Original Equipment Manufacturer (OEM), which is producing products for other companies (Own Brand Labeller, OBL) to sell under their own brand label. The main benefits are that the OBLs can place the certified products quickly on the market under their trademark and product name and only have to pay for certification and the licence fee, not for testing and inspection/surveillance. To the end user, the OBL appears as the manufacturer, and therefore the OBL also assumes all the obligations and liabilities of a certificate holder towards his customers.

- The initial type testing is ordered by the OEM. The factory inspection takes place at the OEM's production facility. The product is SK certified under the OEMs name.
- The conformity of the required documentation (user manual, installer manual and product label) for each OBL product shall be verified by the testing laboratory and a corresponding test report shall be issued. The test report shall also make reference to the original OEM report(s).
- The OBL has to file an application to the CB who issued the OEM certificate, taking in account the relationship between OEM and OBL and the respective obligations (e.g. changing the product, selling different products with the same product name/brand etc.).
  This application shall include at least:
  - a written permission to use the original test report(s) and inspection report for the products for which the OBL manufacturer applies for certification; and
  - a declaration of OEM and OBL that the delivered OBL product is the same as the certified OEM product; and
  - all test reports (OEM test reports and test report on the confirmation of the OBLs documentation).
- The CB issues a new certificate with a new register number and a new datasheet is published. Only the OBLs names are published on the datasheet and in the SK database. The production place address of the OEM is usually mentioned on the certificates. All OEM test reports and the test report about the confirmation of the documents shall be listed in the data sheet.
- The CEN and SK fees for each OBL are the same as if they were producing the product themselves.
- The validity of the OBL certificate cannot be longer than that of the OEM certificate (meaning the expiry date and not the duration).

The CBs are obliged to keep track on OEMs/OBLs. This tracking shall cover at least the date(s) of testing, the validity of the original certificate and all modifications to the product. This is especially important for systems where different valid certificates (such as for collectors, storages) are combined to a Keymark certificate. If an original certificate is modified or withdrawn for any reason, the CB shall verify and update the validity of all its OBLs certificates.

OBL certificates are issued on the basis of OEM certificates. It is not possible to issue an OBL certificate on the basis of a OBL certificate.

If the products(s) listed on the SK data sheet cannot be correlated unambiguously with the products mentioned in the test reports, the correlation must be known and documented by the CB that issued the certificates.

Note: If the OBL customer wants to have a complete test report, the testing laboratory can issue this without referring to accreditation.

The validity of an OBL certificate is directly linked to that of the underlying OEM certificate. The FI must be carried out as for any other certified product in the production place of the original OEM product. The PI has to include the product itself and also the OBL documentation and labelling.

The OEM can ask for withdrawal of an OBL certificate in case the OEM certificate holder does not want to co-operate with the OBL anymore. The certificate for the products on stock of the OBL may remain valid (if all other requirements are fulfilled) for a period of maximum 2 years (See also clause 4.1 Clearance selling).

8. The Solar Keymark complaint procedures

8.1 Introduction

As a general rule, it is very important to avoid complaints and always try to resolve problems in good faith. If a complaint cannot be avoided, it is even more relevant to find a solution in very short time. Doubts about a certificate should be raised immediately.

The financial consequences and complications of a certificate that has to be withdrawn can be substantial, including:

- Who is bearing cost for testing, inspection, certification if a certificate is issued and then later withdrawn
- What happens with subsidies paid on the basis of a certificate that has to be withdrawn
- Who is responsible for the financial damage of the competitors who may have lost business because of invalid certificates.
- The company with a certificate under investigation may suffer from have reputation damages.

Of course, depending on the case there can be other problems. But the general statement remains: “Avoid complaints and resolve them in very short time”.

The SKN has established different procedures to resolve complaints. There are three main types of complaints which must be treated in a different way:

1) Complaints relating to the Solar Keymark activities of TLs, CBs and IBs These include assumed incorrect testing results, incorrect or erroneous datasheets, unfair testing/inspection, etc. These cases shall be treated as described in Clause 8.2 and 8.3of this document.
2) Suspected misuse of the Solar Keymark. This includes products on the market that are not certified, the use of the trademark for non-certified products and similar instances. Such cases shall be reported directly to KMO: https://keymark.eu/en/certificates/misusing-of-the-keymark. The KMO procedures apply.
3) For all other problems/questions/doubts relating to the Solar Keymark, it is recommended that the relevant body or a member of the Solar Keymark Management (SK Manager, SK Chair, SK Secretariat) be contacted directly, depending on the circumstances and as appropriate. Most cases are based on misunderstandings, typos and other low-level errors that can be corrected within a few hours. If this is not suitable or does not resolve the problem, the SK Manager acts as an independent ombudsman and is available at any time to find solutions to resolve any problems in relation with the Solar Keymark.

8.2 First step: Direct complaint

As a general rule, all complaints against a CB, TL, IB or a certificate holder related with the Solar Keymark, should be addressed directly to that party. This includes complaints relating to tests, test reports, data sheets, inspections, inspection reports, and doubts about certified

products. Each of these parties has its own quality management system and will use this to respond to the complainant.

However, it is in the nature of things that complaints can be delicate and that a direct complaint is not always appropriate or possible. If this is the case it is recommended to file an a Expedite Check Procedure (ECP) (Clause 8.3) case before further escalating the complaint using the formal SKN complaint procedure (Clause 8.4).

8.3 Second step: Expedite Check Procedure ECP

The anonymized “Expedite Check Procedure” (here after referred as ECP) is established for handling all kind of informal requests related to certification, testing and inspection in a short time.

The main purpose of the ECP is to identify technical or procedural problems and ambiguities to strengthen the reputation of the Solar Keymark as a trusted quality mark. In addition, the ECP can be an initial step in a complaint procedure to identify errors and mistakes before legal action is taken. The SK Manager (SKM) is the main contact point to address the informal requests under ECP.

The following actions will take place in an ECP:

1. A complaint is emailed to the SKM (drosou@cres.gr) with a request to open an ECP;

2. The SK Manager anonymizes the request, meaning that only the SK Manager knows the identity of the questioner. The request is filed as 'ECP_XXX_Complaint on XYZ';

3. The SK Manager will evaluate the request and decide on the next step to be taken, in general one of the options (A) to (C). With the questioner's consent, other steps may be taken as appropriate.

   Option A: The involved CB/TL is contacted by the SKM directly for clarification. The CB/TL will be asked to provide feedback within one week and to take corrective action within one month. Any deviation from these timescales must be justified by the CB/TL.

   Option B: Request support from an SKN expert. The SKM will contact an unbiased SKN expert to provide a justified opinion. The expert's identity is known only to the SK Manager and is kept strictly confidential. The expert has the right to deny the request if there are legitimate reasons. However, it is considered an important duty of SKN members to support ECPs whenever possible. If the request is accepted, the expert will provide feedback within two weeks.

   Option C: The SKN Manager may initiate web meetings of WG_M29.D8 members in cases that attribute a specific handling or are considered too complex to be treated under the ECP procedure.

4. Following the SKN expert's assessment, the SK manager informs the respective CB/TL of the expert opinion by email to the CB/TL with the subject line 'ECP_XXX_Complaint regarding XYZ'. This mail shall be understood as a formal complaint of the SKN triggering the CB/TL's internal complaint procedures in accordance with EN ISO/IEC 17025 or EN ISO/IEC 17065. The SKM grants a suitable timeframe for feedback (one week) and for implementing corrective measures (one month). Any deviation from these deadlines must be justified by the CB/TL.

5. The SKN Manager will inform the questioner of the outcome of the procedure based on options A to C.

   5.1. If the feedback and relevant corrective measures are deemed satisfactory and are accepted by the questioner, no further action will be taken. The ECP is considered “closed.”

   5.2. If the feedback is not satisfactory, the questioner can either:

   - ask the SK Manager to consult another expert (point 6), or
   - follow the formal SK complaint procedure (Clause 8.4) directly.
     In this case, the ECP is considered 'closed'.

6. If requested by the questioner or if deemed helpful by the SK Manager, the SK Manager can contact a second expert. This process is similar to that for the first expert and is subject to the same conditions. The second expert's opinion will be communicated to the CB/TL, with a copy sent to the Head of the 'WG_M10_CB_Certification Bodies'. Feedback from the TL/CB is expected within one week, with corrective action to be taken within one month. Any deviation from these timeframes must be justified by the CB/TL. The result will be forwarded to the complainant.

7. The process will be finalized after the second assessment, with the following options:

   7.1. The questioner accepts the feedback or chooses not to comment on it. If no feedback is received from the questioner within two weeks, the ECP is considered 'closed'.

   7.2 The questioner considers the feedback as unsatisfactory. In this case, the questioner can either
   - follow the formal SK complaint procedure or
   - file a complaint directly to the responsible CB/TL or
   - file a complaint to its national accreditation body

   and the ECP is considered ‘closed’.

8. The SKN Manager keeps the archive and shortly present an update on all ECP cases in each SKN meeting. ECP cases will be discussed regularly in the WG_M29.D8 – considering the principle of confidentiality – with the scope to improve the procedure and possibly suggest appropriate changes in SK Internal Regulations and Scheme Rules.

8.4 The formal SK complaint process

8.4.1 Appeal to the CB

If the previously described moderate complaint procedures do not resolve a case, the formal SK complaint process can be initiated. In this process it is important to understand that the CB is fully responsible for a SK certificate. Only CBs can issue or withdraw certificates. If there are good reasons, the CB has also the possibility to withdraw a certificate until a case is resolved. All complaints should therefore be filed in a first step to the CB, before continuing with this formal SK complaint procedure.

Depending on the answer received from the CB, the complainant shall either accept the answer of the CB or escalate the case further by sending an appeal to Head of the CB WG.

8.4.2 Appeal to the Head of CB WG

If the answer received from the CB is not satisfactory, an appeal can be sent to the Head of CB WG. Copies of this appeal shall be sent to the CB that issued the certificate related to the complaint, the SKN Chairman and the SKN Manager. The case will be managed by the Head of the CB WG with the following steps:

1. The Head of CB WG will acknowledge receipt of the complaint to the complainant within one week.
2. The Head of CB WG will begin an investigation together with the complaint committee with the following members: Head of the CB WG, SKN Chair, SKN Manager, SKN Secretariat, one representative of a TL, one representative of a CB and one representative of industry. Each group that is represented (CB, TL, industry) shall choose their representative and a substitute. In case that any member of the competent complaint committee is involved and not able to show impartiality, the substitute shall be used. The complaint committee is established and convened by the Head of CB WG upon receipt of an appeal.
3. The maximum time allowed for sending an answer to the complainant is a period of one month. This answer must include either the result of the investigation or the first phase of the investigation, with a clear action plan to finish it. In case of a retest (see 3.4), the complaint committee will determine the maximum time for testing (max 6 months).

4. To facilitate the investigation the Head of CB WG may establish a third-party team and/or ask for a special test according to 8.5 and 8.6
5. After this investigation, the Head of CB WG will send his recommendation to the party in question.
6. After receiving the recommendation from the Head of CB WG, the party in question shall take a decision on how to proceed within two weeks and inform the CB of his actions. Based on these actions the CB shall take action with regard to the certificate. These actions may involve modifications, suspension or withdrawal of the certificate.
7. The CB will then inform the Head of CB WG and the complainant of any actions taken.
8. The complainant must respond to the decision whether it is satisfied or not with the answer specifying the reasons. Not responding within one month implies acceptance of the answer.
9. The Head of CB WG has to create a file containing all documentation of the complaint.
10. Together with the SKN Manager and SKN Chairman, the Head of the CB WG will report on the complaint case and the steps taken (while maintaining confidentiality) at the next SKN meeting. This presentation shall include lessons learnt and recommendations to modify SKN procedures and/or international standards, so as to avoid similar cases in future.

Depending on the answer received from the Head of the CB WG, the complainant shall either accept the answer or escalate the case further by sending an appeal to the KMO (see 8.4.3).

8.4.3 Appeal to the KMO

When sending an appeal to KMO, a copy shall be sent to the previous treaters, i.e. the responsible CB and the head of the CB WG. The Head of CB WG shall send all files and information from the previous investigation to the KMO. The KMO will then start an investigation following its own procedures (Clause 7.4.2 of CIR4).

KMO will report on the complaint case and the steps taken (while maintaining confidentiality) at the next SKN meeting. This presentation shall include lessons learnt and recommendations to modify SKN procedures and/or international standards, so as to avoid similar cases in future. Furthermore, KMO has to report the case to CEN-CENELEC in the annual reports.

Depending on the answer received from the KMO, the complainant shall either accept the answer or escalate the case further by sending an appeal to CEN-CENELEC (see 8.4.4).

8.4.4 Appeal to CEN-CENELEC

If the complainant is not satisfied with the response from the KMO, a complaint may be lodged with CEN-CENELEC. CEN-CENELEC will then initiate an investigation in accordance with its own procedures (in accordance with 7.4.3 of the CIR4) and make a final decision on the complaint. No further out-of-court complaint procedures are possible.

8.5 Third party team

A third-party team (TPT) of experts can be involved at any time in the process of a complaint, if agreed upon by all the involved parties. This TPT is considered as a temporary SK WG that must be established by a decision of the SKN.

A TPT may be established to support the assessment of tests, to act as a third-party auditor during a testing procedure, to make supplementary factory inspections, to prepare reports on technical issues, etc. The TPT has a chair and two additional members as necessary, but it may be also a one-member team or consist of more than three members. The members can be chosen from volunteers of the SKN that can prove their impartiality for the case to be treated, but also external experts can be members of such a TPT. In any case the TPT shall be chosen by consensus between all parties involved in the complaint committee. In case there is no consensus, then each party may choose one member. All the members will sign a confidentiality agreement on the following work to be done.

After the respective action is taken, a report is prepared by the TPT. This report is presented to the involved parties in a confidential manner. The report explains any technical anomalies or differences found. The conclusions of the report can be:

- Communication of discrepancies found in the testing, certification and inspection procedures.
- Communication of discrepancies found in the production of a product.
- Recommendations to the CB, TL and IB for decision to take regarding the data sheet to adopt as annex to the certificate (in case of anomalies in testing procedures)
- Recommendations to the SKN, CEN/TC 312, ISO/TC 180 to update standards and documents.
- Any other recommendations

After closing a specific complaint case, also the corresponding TPT is closed.

8.6 Special test

In the context of a complaint case, anyone can order a special test through the responsible CB if compliance with the certification programme requirements or with the reported results for a certified product are in doubt.

The special test is usually carried out as a type test in accordance with the manufacturer's specifications by a SK testing laboratory not yet involved in the case. Depending on the doubts and questions, a dedicated test programme shall be established that is deemed suitable for eliminating the doubts. It is highly recommended to establish and involve a TPT to accompany special tests and to agree with the CB about the procedures.

The outcome of a special test will then be valuable information for a CB to take a decision on whether a certificate can remain valid or not.

The main issue with special tests is the cost. As a general rule, the complainant has to be able to cover the cost of a special test. If the special test later confirms that the complaint is justified, the cost can be claimed from the CB, as they are fully responsible for the certificate. The CB may then try to claim back the cost from the manufacturer, TL, IB, and so on. Obviously, this situation is a wonderful playground for lawyers, who would undoubtedly benefit from a special test. Therefore, and because of the time required for testing, special tests should be avoided whenever possible.

9. Legal

9.1 European regulations

The SK is not replacing legal requirements set up by the EU such as CE, PED, MD etc. It is under the sole responsibility of the manufacturer to fulfil the regulations and directives.

9.2 EU-GDPR

The contact details of all CBs, TLs and IBs involved in the SKN are published on the SKN Website. It is in their own responsibility to indicate contact details which are not in conflict with the EU General Data Protection Regulation (EU-GDPR).

All SK datasheets are published on the SK webpage. The datasheets may include contact details such as emails and phone numbers. It is under the responsibility of the certificate holder to indicate contact details, which are not in conflict with the EU-GDPR.

All members of the SKN can be listed on the SK webpage with contact details. It is under the responsibility of the SKN member to indicate contact details, which are not in conflict with the EU-GDPR. Anonymous SKN membership is not possible.

The SKN management may send important information to all certificate holders (via the CBs) and to all members of the SKN.

Under no circumstances any contact details which are not published on the SKN webpage

anyway are forwarded to any other organization.

By participating in the SKN and/or by applying for a SKN certificate the rules defined in this chapter are accepted. It is in the responsibility of the CBs to inform applicants accordingly.

10. Annexes, Forms and Templates

The following Annexes are integral part of the SK Scheme Rules

Annex A **Inspection report templates**

- A1 Factory inspection report
- A2 Physical inspection report

Annex P **Product Specific Annex: Collectors EN 12975**

- P1 General
- P2 Technical documentation
- P3 Correction and interpretation file for the standard
- P4.1 Datasheet Scenocalc
- P4.2 Datasheet AirCow
- P4.2 Manual AirCow
- P5.1 PVT
- P5.2 Coloured Glass
- P5.3 Exchange rules for insulation
- P5.4 Hydraulic Designation Code
- P5.5 In-Situ Collector Certification
- P5.6 Calculation Kd ISO 9806
- P5.8 Exchangeable absorber coatings

Annex Q **Product Specific Annex: Systems EN 12976**

- Q1 General
- Q2 Technical Documentation
- Q3 Correction File
- Q4 Datasheet

Annex R **Product Specific Annex: Systems EN 12977**

- R1 General
- R2 Technical Documentation
- R3 Correction File
- R4.1 Datasheet Store
- R4.2 Datasheet Controller
- R5.1 Application of the SolTherm software for EN 12977-2 system simulations

Annex Y **Graphics templates**

- Y1 Keymark Logos and templates

Annex W **Weather Database**

- W1 CEN Locations
- W2 EC Locations
- W3 Other Locations

PQR are annexes where the content should be transferred to ISO/CE/IEC standards if possible. Ideal case: PQR are empty annexes.