

Guidance note on RFID and similar devices

Introduction

Under the R&TTE Directive, RFID readers (this term includes terminals, interrogators) and transponders (this term includes tags, contactless cards and similar devices) all fall within the definition of "radio equipment" and must be assessed against the essential requirements of the R&TTE Directive.

Due to interaction between a reader and the corresponding transponder these two parts of a system cannot readily be independently assessed for compliance with Article 3.2.

This Guidance Note has been constructed to allow a harmonised approach by manufacturers and Notified Bodies across Europe regarding the assessment of RFID and similar systems. It ensures that all readers and transponders are assessed in at least one compatible system.

Conformity Assessment to the Essential Requirements of the Directive

Where the manufacturer is the manufacturer of both the reader and the transponder he shall assess the combined system for compliance with the essential requirements.

Where the manufacturer is the manufacturer of the reader only he shall assess the reader in conjunction with at least one representative transponder with which the reader is intended to interact for compliance with the essential requirements.

Where the manufacturer is the manufacturer of the transponder only he shall assess the transponder in conjunction with at least one representative reader, with which the transponder is intended to interact, for compliance with the essential requirements.

Note: Assessment means following all the conformity assessment procedures of the R&TTE Directive.

Marking & User Information

Both readers and transponders shall bear the CE marking. In the case of small, passive transponders¹ supplied independently of readers, it may be appropriate to apply the CE marking to packaging rather than the transponder itself.

In all cases, appropriate user information should be supplied. In the case of small, passive transponders supplied independently of readers the user information may be provided with each batch of transponders delivered to the supplier using them for stock identification etc. For the purposes of Article 6.3 of the R&TTE Directive, the supplier of the product incorporating the transponder or to which the transponder is attached shall be regarded as the user of the transponder and not the eventual purchaser of the product itself.

Disclaimer

This guidance document does not replace the text of the R&TTE Directive and is for guidance only. In legal disputes the text of the Directive, or its implementation in National legislation takes precedence.

¹ ETSI TR 102 449 V1.1.1 (2006-01) defines a passive RFID tag as an "RFID tag that does not have its own power source". Here, "passive transponders" should be interpreted in the same sense, that is to say, they do not contain a power source and, as such, are completely dependent on power from the RFID reader to activate them.