

What bodies notified under the CPD need from CEN

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Introduction - role of the GNB-CPD (start)

NBs need clear, unambiguous standards stating

- What needs to be done to assess conformity
- What are the responsibilities of
 - NB
 - Manufacturer



Introduction - role of the GNB-CPD (2)

- Most hENs mandated for the CPD have been published
- CEN may need to adapt these standards for a CPR
- Meanwhile, there is an opportunity to improve many hENs for the CPD



Introduction - role of the GNB-CPD (3)

- An advantage of the CPD is that manufacturers only need the hEN
- NBs also need Commission Guidance Papers 'A' to 'M'
- Depending on AoC system(s), NBs may be responsible for
 - ITT
 - inspection and surveillance of FPC



Introduction - role of the GNB-CPD (4)

- If a task is not clearly explained in the hEN, NBs could work differently
- The GNB-CPD “fills in the gaps” in hENs
 - Seeks equivalent work from all NBs



Introduction - role of the GNB-CPD (5, concluding)

- Question - can hENs refer to:
 - Commission GPs, or;
 - GNB-CPD position papers
- Annex ZAs refer to the Commission's website for dangerous substances



Limitations of GNB-CPD PPs

- Limitations of GNB-CPD position papers
 - Do not have the same legal status as hENs
 - GNB-CPD PPs not usually ready during rush for CE marking when a standard is first cited



Need for clarity in standards

- Most CEN standards address testing well
 - (TCs experienced at drafting test methods)
 - Some still need improvement
- Most hENs at AoC systems 1+, 1 or 2+ need more detailed descriptions of the inspection tasks for NBs
 - Without this NBs will work in different ways despite GNB-CPD PPs
- Would an extended GN 'B' help CEN/TCs?



Durability test in EN 1279-5:2005

- Durability test for resistance to moisture penetration, EN 1279-2:2002
 - Most important and onerous test for insulating glass units
- Not clear from EN 1279-5:2005 who is responsible for durability test
 - CEN/TC 129 believes it is assigned to a NB
 - CEN Consultant and GNB-CPD Technical Secretariat believe it is assigned to the manufacturer

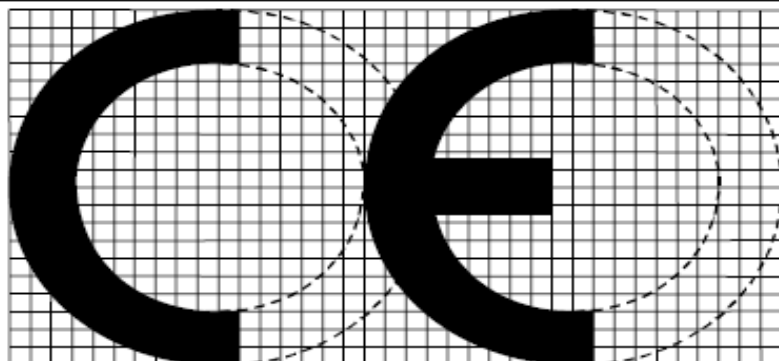


“Last two digits of the year” - thermal insulation products (start)

- CPD Annex III §4.1 *“The CE marking shall be accompanied by ..., the last two digits of the year in which the marking was affixed ...”*
 - Confirmed by GP ‘D’ and then in GNB-CPD AG minutes as the date the marking is affixed to the individual product, ~ date of manufacture
- Many CEN/TC 88 standards for thermal insulation, eg EN 13163:2001, link this date to the ITT (initial type testing)



Table ZA.3 — Example CE marking information



Number of notified body (for products under system 1)

Name or identifying mark and registered address of the manufacturer

Two last digits of year of affixing CE marking (ITT)

Number of EC certificate of conformity (where appropriate)

EN number of this product standard

Product identity

Reaction to fire – Class

Thermal resistance – Thermal conductivity

Thickness

Designation code (in accordance with clause 6 of this standard for the relevant characteristics according to Table ZA.1)

Cumulative AoC (start)

- Cumulative AoC is usually, but not always, associated with fire performance
- CONSTRUCT 06/761
 - Cumulative attestation levels apply only to specific characteristics
 - Generic level for intended use should be unchanged
- If only some characteristics requires inspection and surveillance of FPC
 - Difficult for specification writers to draft precisely
 - Difficult for NBs to interpret



Cumulative AoC (2)

Typical example: EN 15102:2007 '*Decorative wallcoverings — Roll and panel form products*'

- Generic wallcovering products in roll or panel form - AoC system 4
- Reaction to fire performance - AoC system 1, 3 or 4
- CONSTRUCT 06/761 - if fire performance is AoC system 1:
“the certification body issues a certificate of conformity only regarding the specific performance characteristic(s) concerned and not regarding the entire product”



Table ZA.3 — Assignment of evaluation of conformity tasks for wallcovering products under system 1

Tasks		Content of the task	Evaluation of conformity clauses to apply
Tasks under the responsibility of the manufacturer	Factory production control (FPC)	Parameters related to all characteristics of Table ZA.1 relevant for the intended use	5.3
	Initial type testing by the manufacturer	All characteristics of Table ZA.1 relevant for the intended use, except reaction to fire in the classes below	5.2
Tasks under the responsibility of the product certification body	Initial type testing	Reaction to fire classes (A1, A2, B, C)*	5.2
	Initial inspection of factory and of FPC	Parameters related to all characteristics of Table ZA.1 relevant for the intended use, in particular reaction to fire	5.3
	Continuous surveillance, assessment and approval of FPC	Parameters related to all characteristics of Table ZA.1 relevant for the intended use, in particular reaction to fire	5.3

* See footnote (*) to Table ZA.2.

Cumulative AoC (4)

- Contrary to CONSTRUCT 06/761, if reaction to fire is AoC system 1, EN 15102:2007 Table ZA.3 requires the NB to check the FPC for all characteristics
- The NB is required to pay “**particular**” attention to reaction to fire
 - Which production processes are relevant to reaction to fire performance?
 - What action should the NB take if it finds a failure to conform to a procedure not thought relevant to fire performance?



Cumulative AoC (5, concluding)

- The Commission and CEN should agree a consistent and workable approach to cumulative AoC
- CEN's standards should make explicit
 - The particular features of the FPC that NBs should inspect if the task only arises for characteristics cumulated at AoC system 1+, 1 or 2+
 - Should the certificate only cover those characteristics?



Alternatives to testing (1)

- The Commission permits alternatives to ITT, eg
 - Calculation
 - Shared ITT results or cascading ITT
 - Conventionally accepted performance or generic testing
- Set out in GP 'M'
- If a manufacturer believes the performance of his product has been established, NBs do not like to demand new testing because the manufacturer's source is not recognized by the hEN
- The GNB-CPD supports the GP 'M' approach that alternatives to ITT should only be permitted if foreseen in the hEN
- More hENs should offer alternatives



Alternatives to testing - shared ITT at system 3 (2, concluding)

- GP 'M' §4.13.1 requires the NB to verify conditions of sharing
- Can lead to tasks outside the notified competence for a notified test laboratory (AoC system 3)
- Why must a NB verify sharing at system 3?
 - Manufacturer is responsible for sampling - normally no check that the NB tests a representative product
- Proposed amendments to
 - EN 1279-5:2005 (Insulating glass units) and
 - EN 14351-1:2006 (Windows and doors)included proposals for sharing that caused concern in the GNB-CPD



The end

Thank you

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