

The logo for NEN (Nederlandsche Normalisatiecommissie) is displayed in blue, bold, sans-serif capital letters. The background of the top right corner features a faded, blue-tinted image of two hands shaking in a firm grip, symbolizing agreement or partnership.

**NEN**

# Dangerous Substances: Consequences for steel, coatings and insulation products

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*CEN/TC 351 Chair*

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# CEN/TC 351 and sandwich panels

- Introduction to the work of CEN/TC 351
- Test methods and CE marking
- Impact on steel, coatings and insulation products

# Construction products

- CEN/TC 351: Construction Products: Assessment of Release of Dangerous Substances
- **Essential Requirements 3** of the Construction Products Directive: hygiene, health and environment
- Harmonised, **horizontal** methods for testing for leaching to soil and ground water and release to indoor air
- **Mandate** M/366 from the European Commission based on the Construction Products Directive

# Dangerous Substances

- **Risk** management approach
- When **regulated** presumably there exists a risk
- Regulated by:
  - Existing national regulations (**notified** by Member States)
  - Existing international regulations (European Directives)
- List of Regulated Dangerous Substances
  - Release to soil and ground water
  - Emission to indoor air

# Mandate M/366

- Title:  
Horizontal **complement** to the mandates to CEN/CENELEC (for construction products), concerning the execution of standardisation work for the development of horizontal standardised assessment methods for harmonised approaches relating to **dangerous substances** under the Construction Products Directive (CPD)

# Content of the mandate

- 4 Technical Reports
- Test methods for assessment of emission to soil, groundwater and surface water
- Test methods for assessment of emission to indoor air
- Test methods for content (to be used in ITT)
- Standard for sampling (sampling strategy)

It is important to take into account the developments in related fields such as water, drinking water and soil

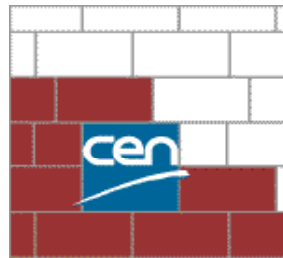
# Scope of CEN/TC 351

- Development of horizontal standardised assessment methods for harmonised approaches relating to the **release** of regulated dangerous substances under the CPD taking into account the **intended conditions of use** of the product.
  - Release versus content
  - Intended use
  - Release scenarios

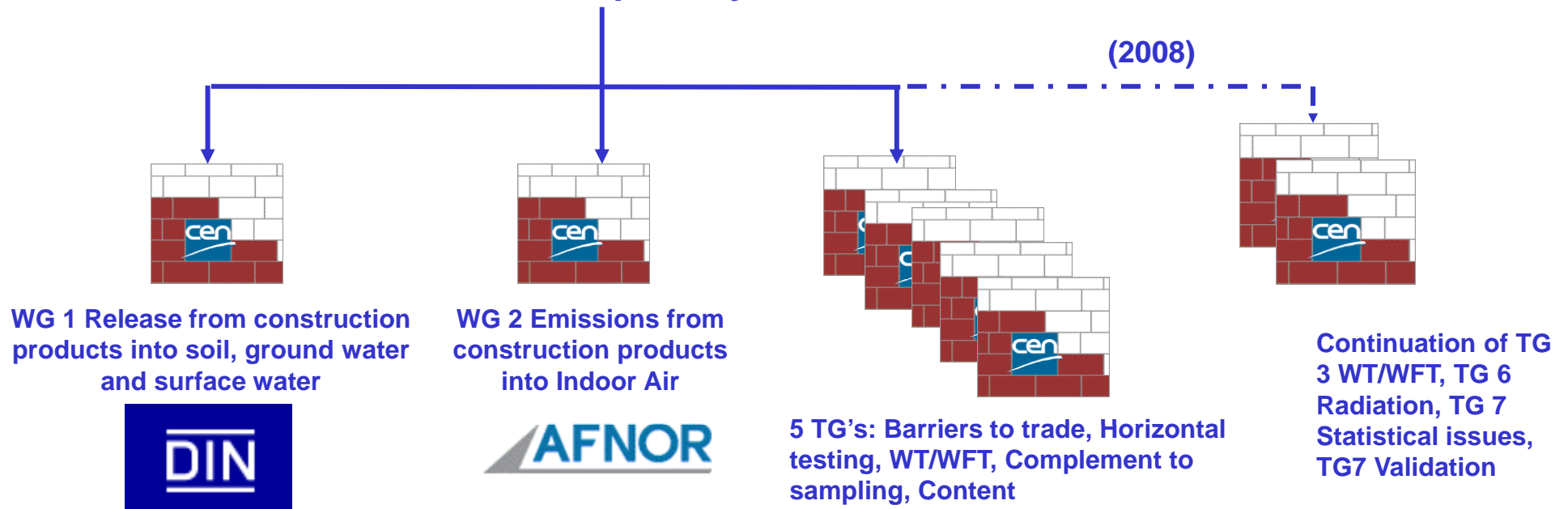
# Work plan of CEN/TC 351

- Listing of existing standards
- Selecting and adapting test method standards
- Publication as TS
- Validation programme (no EN without validation)
- Publication of EN after CEN voting procedure
- Revision of harmonised product standards (mandated under CPD) by Product TCs

# Structure of CEN/TC 351

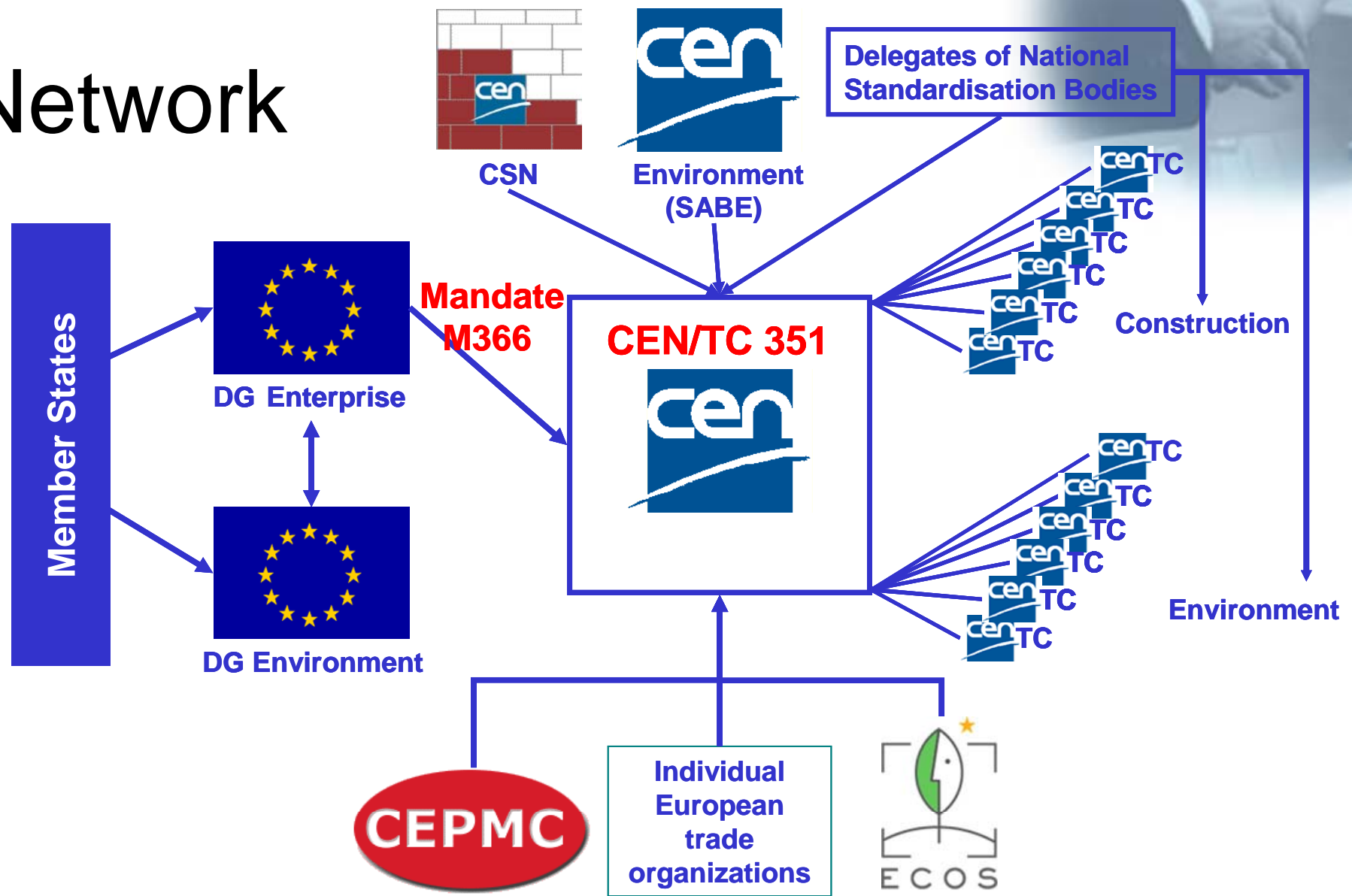


CEN/TC 351 plenary



# Network

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# Timeline for standards

- For most or all parameters, standards exist both on leaching and on emission to indoor air
- Need to be adapted for use with construction products
- Expected time frame:
  - Listing of existing standards, 6 months
  - Selecting and adapting standards, 18 months
  - Validation programme, 24 months
  - Publication after voting procedure, 12 months
- Resulting in a time frame of five years

# Task Group 1 Barriers to Trade

- Definition of (technical) barriers to trade, when does it occur
- Inventory of experiences of product manufacturers
- Including upcoming regulations
- Voluntary (de facto) barriers to trade need to be discussed
- Review danger of new de facto barriers to trade

# Technical Report 1

- Inventory of barriers to trade for construction products, caused by regulations on content or emission of dangerous substances
- Suggestions on how horizontal standards can help to resolve these barriers-to-trade
- Part 2 on de facto barriers to trade/barriers to use

The TR will be used by the Commission to discuss barriers-to-trade with Member States regulators

# Task Group 2 Horizontal Testing/ Use of horizontal methods

- Review of existing practices regarding horizontal standardisation
- What is the purpose of horizontal standards, how can they be applied by the product TCs
- What are the criteria for deciding when a horizontal method is appropriate considering the relevant scenario
- What to do when product TCs are already making use of different test methods
- TR 2 and TR 4 are giving guidance to the work of the WGs
- Close co-operation with product TCs, WG 1 and WG 2 and liaison with Group of Notified Bodies
- Development of and communication on the procedure on how the standards can be incorporated in harmonised European Technical Specifications, ETAGs and CUAPs

# Technical Report 2

- How to deal with horizontal standards
- Incorporating the experience of the Product TCs
- Sets the guidelines for deciding whether a horizontal test method is applicable or a vertical test method is required
- Suggestions on how to set up a test programme based on horizontal test methods

The TR is intended to support Product TCs in amending 'second generation' product standards

# Technical Report 4

- Step-by-step guidance for Product TCs to incorporate test methods on DS in product standards
- Addresses the Attestation of Conformity for CE-marking
- Suggests levels for Attestation of Conformity
- States possibilities and limitations of testing schemes of TR2
- Addresses the ability of measurement methods and testing schemes for use in regulations

The TR supports the Commissions Expert Group in advising the SCC on the use of the test methods in regulations

# Task Group 3 WT/WFT

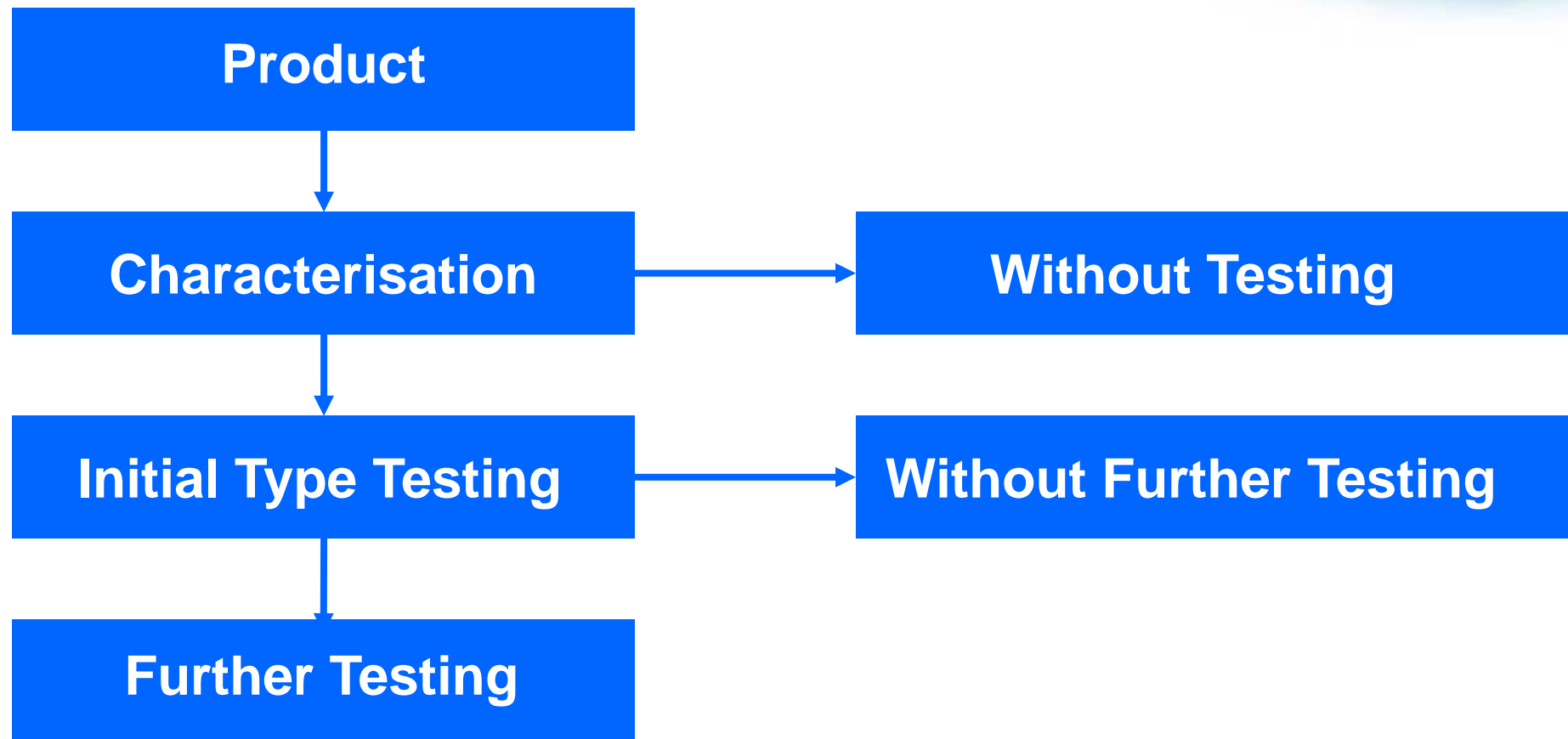
- Positive communication with product TCs for proposals and justifications for WT/WFT
- Guidelines and criteria for WT/WFT
- German workshops results can be distributed
- How to inform consumers and regulators about the product conformity
- How to deal with secondary materials
- Relation with CE-marking
- Relation with Commission document on WT/WFT

# Technical Report 3

- Develops criteria for classifying products as
  - Without Testing (WT)
  - Without Further Testing (WFT)
  - Further Testing (FT)
- Does not set limit values for regulations
- Could result in a list of WT/WFT products based on Initial Type Testing and general knowledge and historical data

The TR is intended to support the Commissions Expert Group in advising the SCC in acknowledging a WT/WFT list and procedure

# Without Further Testing



# Task Group 4 Content

- A wide range of methods exist, focus on existing documents
- List of existing standards attached to the business plan, will be completed by AFNOR based on the information provided by all members of TC 351
- One of the criteria for the standard test methods could be the information on validation
- Attention should be given to the mandate for content determination when this is the only practicable or legally correct solution

# Technical Report 5

- State-of-the-art document
- Standardised measurement of content of DS in construction products
- Intended for ITT to support claim on WT/WFT

# Task Group 5 Complement to Sampling

- Stay as close as possible to current and available sampling procedures within product standards
- Sampling of end-products?
- Relating to the intended conditions of use scenario
- Sampling may also relate to the groups of products
- Representative sample
- Coherence and harmonisation of sampling procedures
- Environment might have different requirements than quality control sampling
- Validation also on the sampling procedures
- Identifying gaps in standardisation and ways to overcome these
- Resulting in an overview in a final TR

# Timeline for Technical Reports

- TR 1 Barriers to trade, 31-12-2007
- TR 2 Concept of horizontal test procedures, 31-3-2008
- TR 3 WT/WFT, 31-3-2008
- TR 4 Use of harmonised test methods, 31-12-2007 – 31-12-2009
- TR 5 Selection of appropriate standards for content testing, 31-12-2007 – 30-6-2008

# Leaching to soil and groundwater

- Standardised generation of the release (specific for a product in its intended use)
- Standardised measurement of release of dangerous substances:
  - Metals
  - Sum parameters for organic carbon
  - Specific (groups of) substances
  - Inorganic substances

# Emission to indoor air

- Standardised generation of emission to indoor air (specific for a product in its intended use)
- Standardised measurement of emission of dangerous substances:
  - Specific substances (e.g. aldehydes, phtalates, etc.)
  - Carcinogenic, mutagenic and reprotoxic substances
  - Dangerous particles, gases and VOC
- Standardised measurement of radiation
- Standard on indoor conditions of growth of micro-organisms

# Validation of test methods

- Quality of test method, not of the product
- Industry to provide samples, money, manpower
- Validation based on Technical Specification
- If validation fails, is a vertical standard required
- If so, what is the justification

# Communication is the key

- 67 product TCs, environmental TCs
- European Commission: SCC, DG Enterprise, DG Environment, DG Research
- 27 Member States / 30 CEN Members
- Industry, industrial sectors
- CEN bodies: CMC, CSN, CSNPE, SABE
- Regulators, experts from various fields
- Liaisons with interest groups

# Ways to communicate

- Various enquiries and questionnaires to product TCs, EOTA and organizations in liaison for information and to improve awareness
- Encourage establishment of liaisons to CEN/TC 351
- [www.centc351.org](http://www.centc351.org)

# ER3 in harmonised product standards

- Now: Note in Annex ZA: existing national requirements regarding Dangerous Substances have to be met
- Future: Note is to be replaced by assessment of Dangerous Substances as essential characteristic
- CE mark provides information: value/class or No Performance Declared)
- Product TCs can make use of Without Testing or Without Further Testing procedures

# Release from laminated panels

- Define intended use (indoor, outdoor)
- Release/emission from components is meeting requirements
- If yes, does the product apply for WT/WFT
- If yes, CE marking with declared values/classes
- Is the lamination necessary to achieve limit values?  
(if so, you have a marketing problem)
- Can the product make use of the Approved Constituents approach?

# CE marking on Construction Products

- Declaration of (lack of) emission of Dangerous Substances
  - VOCs, formaldehyde, radiation (indoor)
  - Organics, metals, pesticides, ..... (soil & ground water)
- Harmonised horizontal test methods
- Limit values are prerogative of Member States

**CE marking on construction products does not solve poor design or poor installation**

# Thank you for your attention

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