

FINNISH REQUEST FOR EXTENSION OF CE-MARKING CO-EXISTENCE PERIOD AND REDRAFTING OF EN 14080

European harmonised product standard EN 14080 'Timber structures – Glued laminated timber – Requirements' has been adopted by CEN and published in the Official Journal. The CE-marking co-existence will end 1.4.2007.

We have noticed that there are many deficiencies in EN 14080. The standard shall be redrafted as soon as possible. The co-existence period shall be extended at least until EN Eurocodes with National Annexes can be used.

Our justifications are described below.

Guidance Paper L Methods 1, 2, 3a) and 3b)

EN 14080 has not drafted according to Guidance Paper L and Guidance Paper K.

The 3 Methods of GP L has not been mentioned. Standard includes three CE-marking examples. Figure ZA.1 and ZA.2 present CE-marking information appearing on the accompanying commercial documentation. Figure ZA.3 present CE-marking information to be shown on the product.

We can interpret that Figure ZA.1 and ZA.2 are based on the idea of Method 1 of GP L. Unfortunately geometrical data is missing. Methods 2 and 3a) and 3b) are missing.

Method 1 means that products have been put on the market without knowing end use applications. However, glue laminated timber products are usually designed to a specific construction works as beams and columns. Methods 3a) and 3b) are absolutely needed. Method 3b) can be probably used from the second semester of 2007 when EN Eurocodes with National Annexes have been adopted in use at least in some Member States.

It is totally unsatisfactory to have a harmonised product standard for structural products without having possibilities to use all those business models recognized by GP L which are in use in Member States. From regulators point of view it is impossible to demand that one product has to use CE-marking and the other does not depending on which business model will be used. If the product is under the scope of the standard all applicable business models shall be allowed for the manufacturer. That was one of the targets of Guidance Paper L.

Detailed remarks

Clause Z.2

The standard refers to other standards e.g. EN 386 'Glued laminated timber - Performance requirements and minimum production requirements' (published 2001) and EN 387 'Glued laminated timber - Large finger joints - Performance and minimum production requirements' (published 2001).

EN 386 includes its own factory production control, organization of factory production control and inspection and testing rules.

EN 387 includes its own factory production control, organization of factory production control, inspection and testing rules and also Annex A 'The task of the third party certification body'.

Attestation of conformity decision is level 1 for glued laminated timber products. FPC rules in the harmonised product standard and in standards it is referring make understanding of the FPC rules for the CE-marking confusing and very difficult to understand.

Clause Z.2.2.1, third paragraph

Recognized glue-testing institute is mentioned. The CPD does not recognize this kind of institute.

In view of the above, and pursuant to Article 19.1 of the CPD, we are requesting an urgent consultation of the Committee pursuant to Article 19 of the Directive with a view to demand CEN to redraft EN 14080 as soon as possible and extend the co-existence until the redrafted standard has been adopted and if appropriate to determine a new co-existence period.

Yours sincerely,

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