

Unclear scopes in harmonised product standards and gaps in standardisation under the CPR

Finland informed at the SCC meeting 26th of March 2013 on problems which concern unclear scopes in harmonised product standards and gaps in standardisation under the CPR. The Commission asked to send a written document on this issue. We hope that the Commission could put this document on the agenda of next PG- and SCC-meetings.

1. Unclear scopes in harmonised product standards

According to the Construction Product Regulation the declaration of performance and CE marking is mandatory when the product is covered by a harmonised product standard (article 4). It is important that the scopes of harmonised standards are clear. When the product is covered by the scope of a harmonised product standard, the manufacturer has to follow the rules in the harmonised product standard and fix CE-marking to the product. This is a juridical obligation.

Note: In new approach directives the situation is different. The manufacturer has to always fulfil the essential requirements of the directive even when there is not a harmonised product standard which covers the product. Harmonised product standards are a tool to show compliance with essential requirements of a directive.

We have noticed different national interpretations on scopes of harmonised product standards for construction products. This is due to fact that scopes are not always clear. This will cause problems when a CE marked construction products will be exported to another Member State where the interpretation does not allow the product to be CE-marked based on the harmonised product standard in question. If the product cannot be CE marked based on a harmonised standard, then national approval or CE marking based of ETA are possible. In addition it is important to the writers of national approvals to understand the scope of harmonised product standards correctly since there cannot be national approvals when a harmonised product standard exists for the product.

CEN CSN should ask CEN product TCs check the scopes of harmonised product standards and clarify them when needed. Because standardisation process is slow the relevant TCs should write separate documents clarifying the scopes when needed.

Examples on unclear scopes

a) EN 1090-1 *Execution of steel structures and aluminum structures – Part 1: Requirements for conformity assessment of structural components*

The scope of EN 1090-1 seems to be covering all kind of structural steel components. However, the verification methods given in EN 1090-1 do not cover following structural steel components:

- structural steel parts (e.g. beams and columns) used in composite steel-concrete structures for which CE marking Method 2 or 3b is used (combined actions between steel and concrete are not covered by 1090-1).
- structural steel connections which are cast into concrete (combined actions between steel and concrete are not covered by 1090-1).

- rock shoes and splices for foundation piles (dynamic effects caused during pile driving to the ground are not covered by EN 1090-1).

b) EN 845-2 *Specification for ancillary components for masonry – Part 2: Lintels*

The scope of EN 845-2 covers lintels but it has never been clarified what is the difference between lintel and load bearing beam. According to Table ZA.2 in EN 845-2 it can be seen that lintels are not loadbearing products since they are semi-structural products and thus having AoC-system 3. Also the term semi-structural has never been clarified.

2. Gaps in standardisation under the CPR

From the regulators point of view harmonised product standards should cover all relevant products which belong to the same product group. It would also be beneficial to the manufacturers by decreasing FPC and surveillance costs.

According the article 8.6 of the CPR the methods used by the Member States in their requirements for construction works, as well as other national rules in relation to the essential characteristics of construction products , shall be in accordance with harmonised standards.

If there are gaps in harmonised product standards and they are not covering specific products, the products need national approvals. Of course, CE marking based on ETA is always possible. But since ETA cannot be mandatory even there is an ETAG (EAD), a national approval system will be used.

It is not practical when one day the factory is under surveillance of notified body based on a harmonised product standard and another day the same factory is under surveillance of third party based on national system.

The development or revision of national approval systems which are needed due to lack of harmonised product standards is waste of limited national resources.

CEN TCs should investigate the gaps which should be covered by existing harmonised product standards or when necessary new harmonised products standards should be prepared.

Examples on gaps in harmonised product standards

a) Harmonised product standards for precast concrete products

CEN TC 229 has prepared the following harmonised product standards for precast concrete units:

- EN 1168 Hollow core slabs
- EN 12737 Floor slats for livestock
- EN 12794 Foundation piles
- EN 12839 Elements for fences
- EN 12843 Masts and poles
- EN 13224 Ribbed floor elements
- EN 13225 Linear structural elements
- EN 13693 Special roof elements

- EN 13747 Floor plates for floor systems
- EN 13978-1 Precast concrete garages
- EN 14843 Stairs
- EN 14844 Box culverts
- EN 14991 Foundation elements
- EN 14992 Wall elements
- EN 15037 Beam-and –block floor systems
 - Part 1: Beams
 - Part 2: Concrete blocks
 - Part 3: Clay blocks
 - Part 4: Expanded polystyrene blocks
- EN 15050 Bridge elements
- EN 15258 Retaining wall elements
- EN 15435 Normal weight and lightweight concrete shuttering blocks
- EN 15498: Wood-chip concrete shuttering blocks

Unfortunately these standards do not cover solid concrete slabs which are commonly used e.g. in balconies and pedestal level. In addition the standards do not cover basement wall elements for fluid reservoirs.

b) EN 14509 *Self-supporting double skin metal faced insulating panels - Factory made products - Specifications*

EN 14509 covers self-supporting sandwich panels but it does not cover structural loadbearing sandwich panels. Finland has asked the Commission to amend the mandate M120 to cover structural loadbearing sandwich panels. See the letter attached.

With best regards,

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