

Finnish comments on CEN/TC's answers to mandates received from CEN Technical Committees in the framework of the 13th consultation (e-mail from Manfred Fuchs on 24.11.2015)

3. CLC/TC 216 'Gas detectors' answer to the mandate M/109.

Clause A.1 item (vi) 'Other aspects' uses CPD terminology and should be updated.

4. CEN/TC 112 'Wood-based panels' (N 2011) – Answer of CEN/TC 112 on Mandate Dangerous substances

Formaldehyde (pages 3-4): According to the instructions by the Commission there should be only one test method. TS 16516 developed by CEN/TC 351 should be the test method which will be used in the future. The test method expressed in EN 120, EN 717-1/2 which has used by EN 13986 should not be used any more. From the regulatory point of view it is important that the same test method is used for emissions of formaldehyde.

page 7: There is no European LCI-value for phenol.

page 8: It is important to know which emissions are harmful or not, but it is not the task of Technical Committees of CEN to determine that.

5. CEN/TC 67 'Ceramic tiles' (N578) – 1st amendment of the answer to the mandate M/119

No estimation is given when the standards will reach e.g. Stages 40 and 45 and when they will be available.

6. CEN/TC 246 'Natural stones' (N 662) – Answer to mandate M/119 for prEN xxxx Agglomerated stone – Slabs and cut-to size products for flooring and stairs (internal and external)

No estimation is given when the standard will reach e.g. Stages 40 and 45 and when it will be available.

7. CEN/TC 246 'Natural stones' – Answer to the Mandate Dangerous Substances

The proposal of TC needs rewriting.

Depending on their geological origin certain stones emit gamma radiation. However the dose caused by finished products (e.g. thin slabs) in their intended use is negligible. CEN TC 351 is developing standards for assessment of ionizing radiation and caused dose. However this work has not been finalized yet.

8. CEN/TC 67 ‘Ceramic tiles’ (N579) – 1st amendment of the answer to the mandate M/121

No estimation is given when the standards will reach e.g. Stages 40 and 45 and when they will be available.

9. CEN/TC 99 ‘Wallcoverings’ (N448) – New revised answer to the mandate M/121 rev 1 “Internal and external wall and ceiling finishes” covering dangerous substances

Deletion of Finnish national regulation (notifications 2007-372 FIN) in the Tables is not acceptable. It is true that Finnish national regulation for indoor air quality is not giving requirements directly for construction products. However, it is giving requirements to the content of some dangerous substances (ammonia and amines, asbestos, formaldehyde, carbon monoxide, particles, radon and styrene) into indoor air. Test methods for release of these dangerous substances from construction products are needed to show compliance of the Finnish national requirements when needed.

10. CEN/TC 295 ‘Residential solid fuel burning appliances’ (N510) – 3rd amendment of the answer to the mandate M/129

Finland **cannot accept the document CEN TC 295 N510** for the following reasons:

- 1) page 5: 0.7 Other issues which TC considers necessary for comprehension of the answer to the mandate
The test method and declared value for flue gas temperature has been discussed in Queries group and SCC meetings. Finland has carried out studies which have been translated into English and sent to the Commission and other Member States.
According to Finnish experts and studies the declared value for flue gas temperature should be tested in the safety test and declared as a peak value during the test (not the average value). This declared value should be compared to declared T class values of chimneys. E.g T 600 it is 600 degrees, not test temperature (as TC 295 proposes) which is 700 degrees.
- 2) No estimated timetable is given for the preparation of harmonised product standards in clauses I...P. Timetable is necessary information to be given to the Commission and the Member States in the TC response to the mandate.
- 3) Clauses I...P, item 3.9.1: Arguments not to include essential characteristic ‘reaction to fire’ should be improved since reaction to fire considers how the fire propagates e.g. on the outer surface of the appliance when the room is in fire.
- 4) Clause H is confusing since it gives information on prEN 16510-1, which is not intended to be a harmonised product standard (hEN) to be published in the OJEU. It is a reference standard of candidate harmonised product standards prEN 16510-2-1...7. And in the future EN 16510-1 will be vital harmonised part of these hENs. Information on standards referred to in hENs should normally be given under each hEN.
- 5) Clause M concerning prEN 16510-2-5 includes mistakes:
 - 3.1: Text is copied from item 3.1 of clause N concerning prEN 16510-2-6 and is not correct for prEN 16510-2-5.
 - 3.9.1: Text is copied from item 3.9.1 of clause N concerning prEN 16510-2-6 and is not correct for prEN 16510-2-5.
- 6) Clause P is concerning prEN 16510-2-7, not prEN 16510-2-6 as indicated in the title.

Chapter 0 has been changed but it has not been said in pages 1-3 where changes have been expressed.

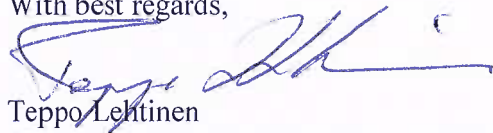
11. CEN/TC 393 'Equipment for storage tanks and for filling stations' (N255) – 2nd revision of the answer to the mandate M/131

1) Intended use of EN 13160-5 in clause A.4.1 is limited to underground tanks and underground and/or above ground pipework.

Also tanks above ground shall be added to the intended use of EN 13160-5.

2) Item (vi) 'Other aspects' in clauses A.1.1...A.5.1 and B.1.1 and B.2.1 uses CPD terminology and should be updated.

With best regards,



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