

Finnish comments on ETAG 007 'Timber building kits', version 23.06.2010

Clause	Comment
General 1	<p>This ETAG deals with a kit as also shown in the title. However, the requirements set to the components of the kit are not defined and are not clear. In clause 2.5 there is nothing written about which (harmonised) specifications shall be used for different components to be used as part of the kit. Also clauses 2.4.7.3.1 and 2.4.7.3.2 identifying the materials and components are too general. Requirements for different components used as part of the kit shall be given accurately.</p> <p>Especially for prefabricated timber frame elements and for logs, for which harmonised standards are still missing, the principles of evaluation should be included in this ETAG.</p> <p>ETAG format for kits shall be used for this ETAG.</p>
General 2	<p>Guidance Paper L has not been applied correctly in this ETAG. CE marking is different depending on the method which has been used. That is why different CE-marking examples are needed for different methods (presented in Guidance Paper L i.e. Method 1, 2, 3a or 3b). CE-marking shall also give information which method is used.</p>
Foreword	<p>The definition of 'the list of reference documents' is unclear.</p>
1.1	<p>The content of the kit i.e. what is included in the kit and thus assessed shall be clarified. Fifth paragraph states that e.g. all necessary thermal insulation shall be included to the minimum content of the kit, but seventh paragraph states that thermal insulation may not necessarily be part of the kit. Which statement is correct?</p> <p>The concept of virtual kit has been used, but the text is not explaining this.</p>
1.1	<p>There is missing a statement that there shall be one manufacturer that takes the responsibility of the kit to be delivered, even if the components are manufactured by different manufacturers.</p>
1.2	<p>Replace "Kits or products" with "Kits".</p> <p>It shall be specified exactly how big multi-storey buildings are included as part of the kit.</p>
2.3	<p>In the Note under the table, add a third footnote: "Long term experience is applicable only when it is based on experience on similar climatic conditions compared to the intended use of the kit".</p>
2.3 Table 1	<p>It shall be left up to the Member States for which characteristics requirements are not given and thus the NPD option can be used. Delete the 2nd column in Table 1.</p>

2.4.1.1.2	"Horizontal load capacity of log building structures cannot be calculated and the assessment is based on experience." This statement is too general. Some limitations shall be made with regard to the size and complexity of the works and the climatic conditions where the kit is intended to be used.
2.4.1.2.1	According to our understanding Method 2 is not relevant for this type of kits.
2.4.1.2.1	It shall be explained when method 3b is used, the calculation has to be performed according to the Eurocodes.
2.4.1.2.1	Remove the paragraph above clause 2.4.1.2.2. It is not possible for the manufacturer to combine different CE-marking methods for different parts of the kit.
2.4.1.2.2	In the 1 st paragraph it shall be specified what are the 'other relevant means'.
2.4.1.2.3	When design resistance is declared, the NDPs (nationally determined parameters) used in the calculations shall be given.
2.4.1.2.3	Reference to EN 1991-1-1 shall be deleted. Method 2 shall be deleted or if not, then only load bearing capacities or resistances are to be declared. Actions are not considered under the CE-marking for products put on the market using Method 2.
2.4.1.2.4	It shall be explained when method 3b is used, the calculation has to be performed according to the Eurocodes.
2.4.3.1.1	Verb 'should' be replaced with the verb 'shall'.
2.4.4.2.1	Calculation method shall be accepted as an alternative to impact test method. In Finland static horizontal load requirement is given for walls. This makes it possible to calculate this performance. This ETAG shall not give requirements for the impact resistance when the impact resistance is determined based on soft body or hard body impact tests.
2.4.6.2.1 and 2.4.6.2.2	ETAG shall require an assessment of an estimate of the n_{50} value that can be expected for the building, because this is subject for national regulations.
2.4.6.2.1	This clause gives two examples how sufficient air tightness may be achieved. This field has been subject for extensive development; especially regarding tapes for better air tightness. There shall be advice how the performance of these kinds of tapes shall be assessed especially to guarantee adequate long term behaviour.
2.4.6.2.1, 3 rd paragraph	The assessment of air permeability shall be undertaken...
3.2	Tasks of the NBs with regard component manufacturing are missing. Especially this shall be added for components that are not standardised as timber frame elements and logs.
3.2	It shall be clarified how to handle the case of subcontracted manufacturing. This is often the case with these kinds of kits.

3.3	More examples of CE-marking shall be given. In this example, the information regarding used GPL Method is missing. Characteristics should be specified as proposed e.g. by the Position paper of NB Sector Group 21.
5, 2 nd paragraph	Parts of the kit falling outside the ETA... -> Parts of the delivery of the ETA holder falling outside.
6	Parts of the ETA shall be prescribed more precisely.
7	References to EN 338 and EN 12524 are missing.

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