




Amending product mandates

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ER3 – The quest for tests

- What is regulated?
- What is relevant?
- What has to be declared?

- ▶ Horizontal test methods (to avoid « inventing the wheel » several times)
- ▶ Using knowledge at TC level

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Horizontal and vertical approach

- For which substances/materials/release scenarios do we need horizontal test methods?
 - *Knowledge in TC 351*
 - *Knowledge in product TCs*
 - *Knowledge in Member States*

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Amending product mandates

- Transparency for each step in mandating work to CEN:
 - *Mandate (Commission)*
 - *Work programme (CEN)*
 - *Reply/acceptance of work programme (Commission)*
- Clear information on regulatory requirements for
 - *Each product standard*
 - *Each substance*
 - *Reference to specific law/administrative provision (notified)*

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Amending product mandates (cont.)

- Transparent information for
 - *Product TCs*
 - *Regulators*
 - *Other stakeholders*
 - ▶ *Clear information on what information is expected in product standards*
 - ▶ *Easier to compare final standard with requirements*
 - ▶ *Easier to justify decisions on how regulatory requirements have been addressed in harmonised product standards*

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Amending product mandates (cont.)

- Annex I
 - *Product standard*
 - *Substances*
 - *Indoor/outdoor use*
 - *Reference to regulations (TRIS database)*
- Annex II
 - *Indicative list (general regulatory requirements)*
- Annex III
 - *Definition of regulatory requirements for standardisation*

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Work programmes (product TCs)

- Screening regulatory requirements from a technical point of view
- Test methods already used?
- Test methods needed?
- Technical dossiers – WT/WFT

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Without Testing/Without Further Testing (the quest for reducing testing)

- Is testing for all substances mentioned in regulations necessary?
 - ▶ Installation/location/performance of products
- Standardisation vs. Commission approach
 - ▶ Work programme vs. Legislative act

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Work programme – reply of the Commission

- First (not yet complete) work programmes for mandates M/103, M/119 and M/125
 - *First feedback in both directions (what should be clearer/differently addressed?)*
 - *Common format for work programmes? (clearer to compare between work programmes – fewer risks of getting different replies from the Commission)*
 - *Feedback to TC 351 (scope of validation)*
 - *Faster implementation when horizontal test methods are available*

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BWR3 Starting the whole work all over again?

- Wider scope than ER3
 - ▶ Does a wider scope automatically indicate more testing?
 - ▶ Assessment of BWR 3 in 2013
 - ▶ **If necessary, mandates will be amended**


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DON'T PANIC!

- Be honest!
 - *« Does my product look good? » vs. « Am I reliable and professional in this approach? »*
- Keep it simple!
 - *Not the ones with the most terrible « worst case » scenario are the best but the ones with the most realistic scenario*
 - *WT/WFT: « political approach » via Commission decisions vs. « technical approach » in standardisation*

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« Don't try to find us, ... »

- Construction website
http://ec.europa.eu/enterprise/sectors/construction/index_en.htm
- Construction Products – Dangerous Substances Database (CP-DS)
http://ec.europa.eu/enterprise/sectors/construction/cp-ds/index_en.htm
- TRIS (Technical Regulations Information System) database
<http://ec.europa.eu/enterprise/tris/default.htm?CFID=6874874&CFTOKEN=19d211e0e0d4e955-89479FFC-072D-5682-089E2C7D23C29BF5>

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