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Goals




Declaration of dangerous substances under the CPR framework:

- Transparent and effective communication
- Level playing field
- Scientific approach
- Less onerous system

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Dangerous substances



Regulations in place
 VOC classification blocked
 REACH restriction for formaldehyde release
 Dangerous substances clauses under discussion

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Construction Products Directive



5.2.13 Dangerous substances
 National regulations on dangerous substances may require verification and declaration on release, and sometimes content, when construction products covered by this standard are placed on those markets.
 In the absence of European harmonized test methods, verification and declaration on release/content should be done taking into account national provisions in force at the time of use.

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Starting point

Regulated dangerous substance
 A substance included in the indicative list of regulated dangerous substances

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Starting point

Substances to be considered for my product family

Included in the regulatory documents:

- product specific mandates
- amendments to mandates
- standardisation requests

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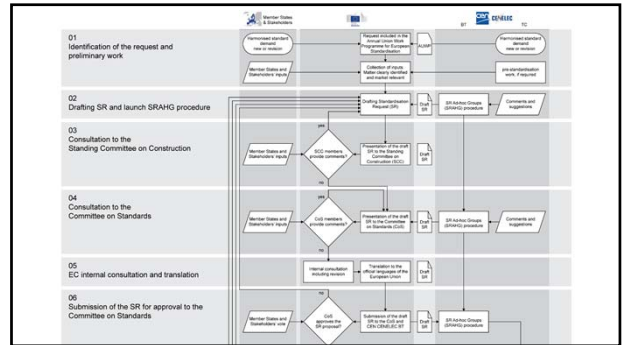
Standardisation request

Regulatory approach according to a complex procedure

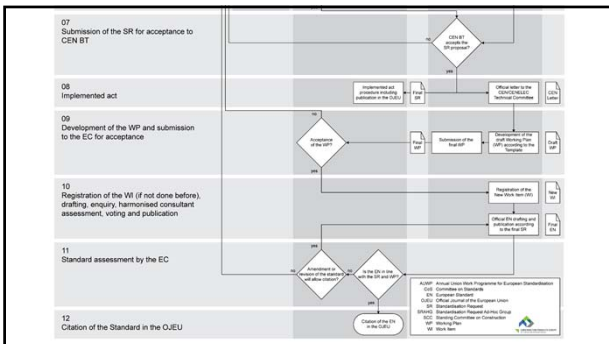
Transparent process

Voting by Member States (Committee on Standards)

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Product TC

List of substances to be declared

- According to Member States' needs
- Other needs?

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Product TC

To be able to deliver we need the list of substances in the applicable standardisation request

Substances not to be declared to be removed from the list

- No content or generation of the substance
- Release/emission below detection limit
- Release/emission not relevant for the intended use

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Product TC

To be able to deliver we need assessment methods

Scope

- European approach
- Horizontal, if possible

Based on the less onerous approach

- Release
- Content as a proxy of release if less onerous

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Product TC

To be able to deliver we need a declaration approach

Classification

- Requires agreement - EC and Member States
- Requires a delegated act
- Member States obliged to adapt their regulations


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Product TC

To be able to deliver we need a declaration approach

Declared values

- Long list to be included in CE marking and DoP
- Limited added value in paper form



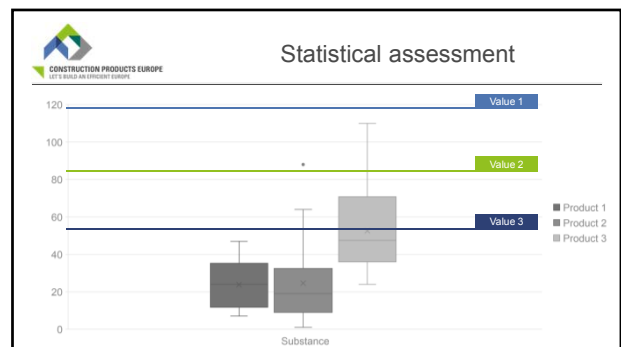
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Technical dossier

Representative assessment of the products covered by the standard and substances in the standardisation request or mandate

Reference information to be used as background information for the classification of substances

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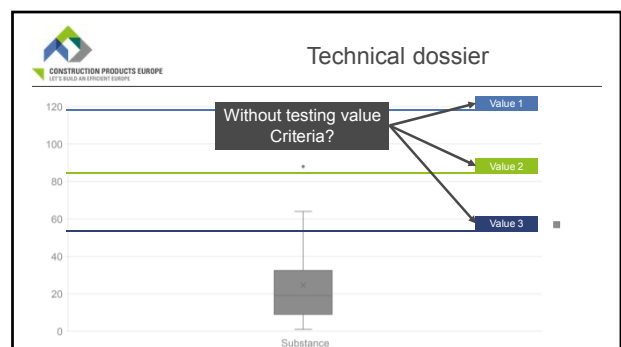
Delegated act

Substances to be declared without testing

The less onerous approach is not to assess the performance but it is only possible if:

- Properly justified from the technical point of view
- Representative technical dossier
- Delegated act adopted on this topic

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Assessment

Dangerous substances clauses to address three main issues to be properly implemented by manufacturers

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Assessment clause

Definition of product type – key issue

“means the set of representative performance levels or classes of a construction product, in relation to its essential characteristics, produced using a given combination of raw materials or other elements in a specific production process”.

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Assessment clause

Change of raw materials but same performance?
Same raw material/component but different supplier?

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Assessment clause

Less onerous way - FPC

Standard to define the options, if any, to assess the performance:

- Testing according to the relevant method?
- Content assessment?
- Other proxy characteristics?
- Alternative method?

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Assessment clause

Assessment of the performance

Standard to define how to assess the performance including the statistical value to be declared e.g:

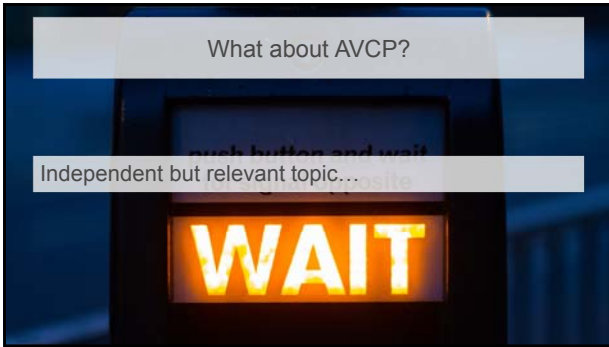
- Average (50% percentile) with 90% confidence level?
- Greater value of 5 samples?
- Single value?

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EC assessment

Positive assessment and citation
Member States to adapt their legislation to the European approach for declaration (CPR Article 8)

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CONSTRUCTION PRODUCTS EUROPE
LETS BUILDER AN EFFICIENT EUROPE

AVCP system

	Manufacturer	<input checked="" type="checkbox"/> Notified Body	AVCP system	1+	1	2+	3	4
Factory production control (FPC)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Further testing of samples taken by the manufacturer	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Assessment of the performance	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Initial inspection (plant and FPC)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Continuous surveillance, assessment and evaluation of FPC	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Audit — testing of samples taken by the Notified Body	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

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