

A HOLISTIC APPROACH FOR hENs

- Standardization Requests
- Sustainability of natural resources (Basic Work Requirement number 7)
- Release of dangerous substances (Basic Work Requirement 3)

Oscar NIETO

Technical Director

Construction Products Europe

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EVENTUALLY

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A holistic approach for hENs

Oscar Nieto 04/12/2019



Standardisation requests

Standardisation requests

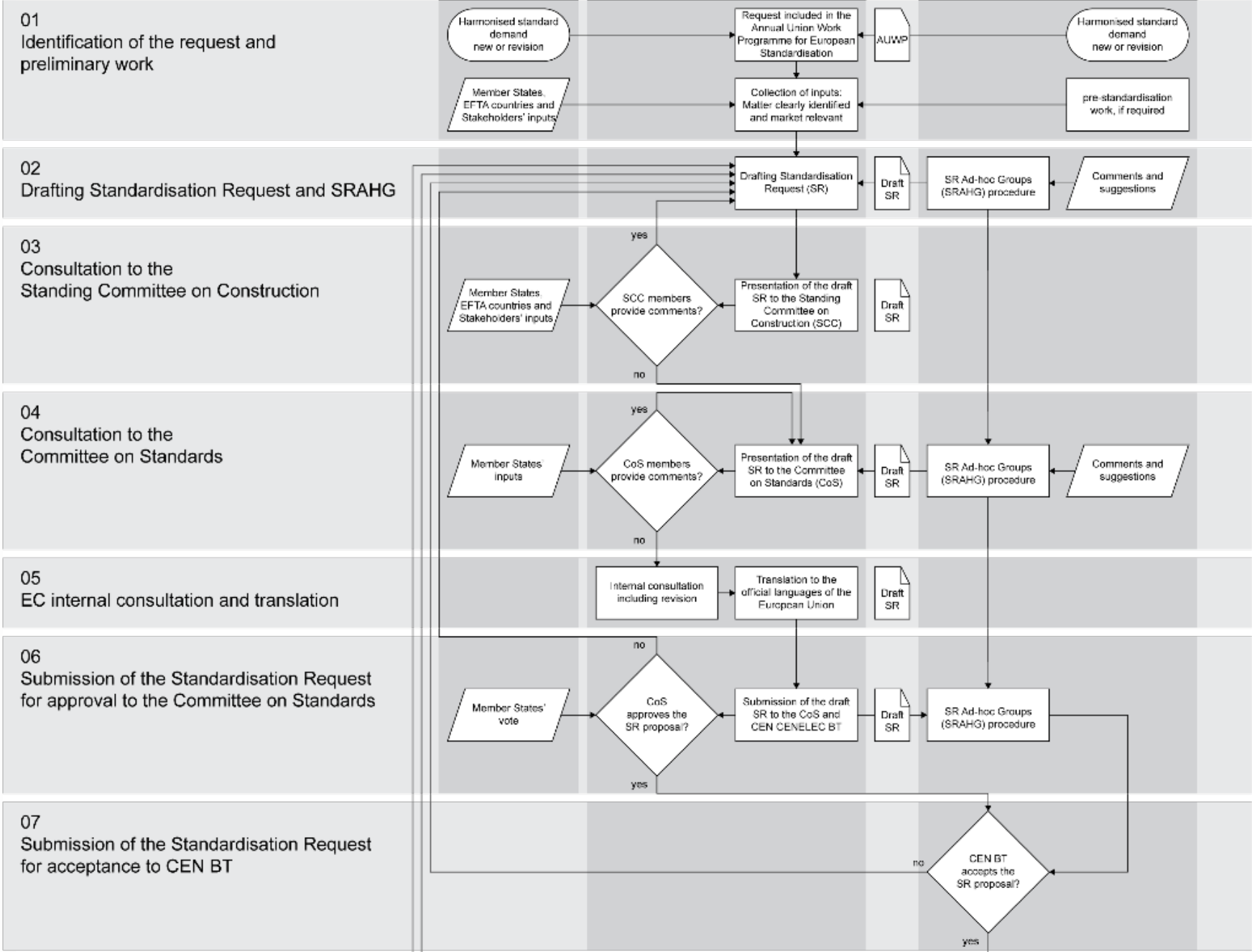
EC objectives

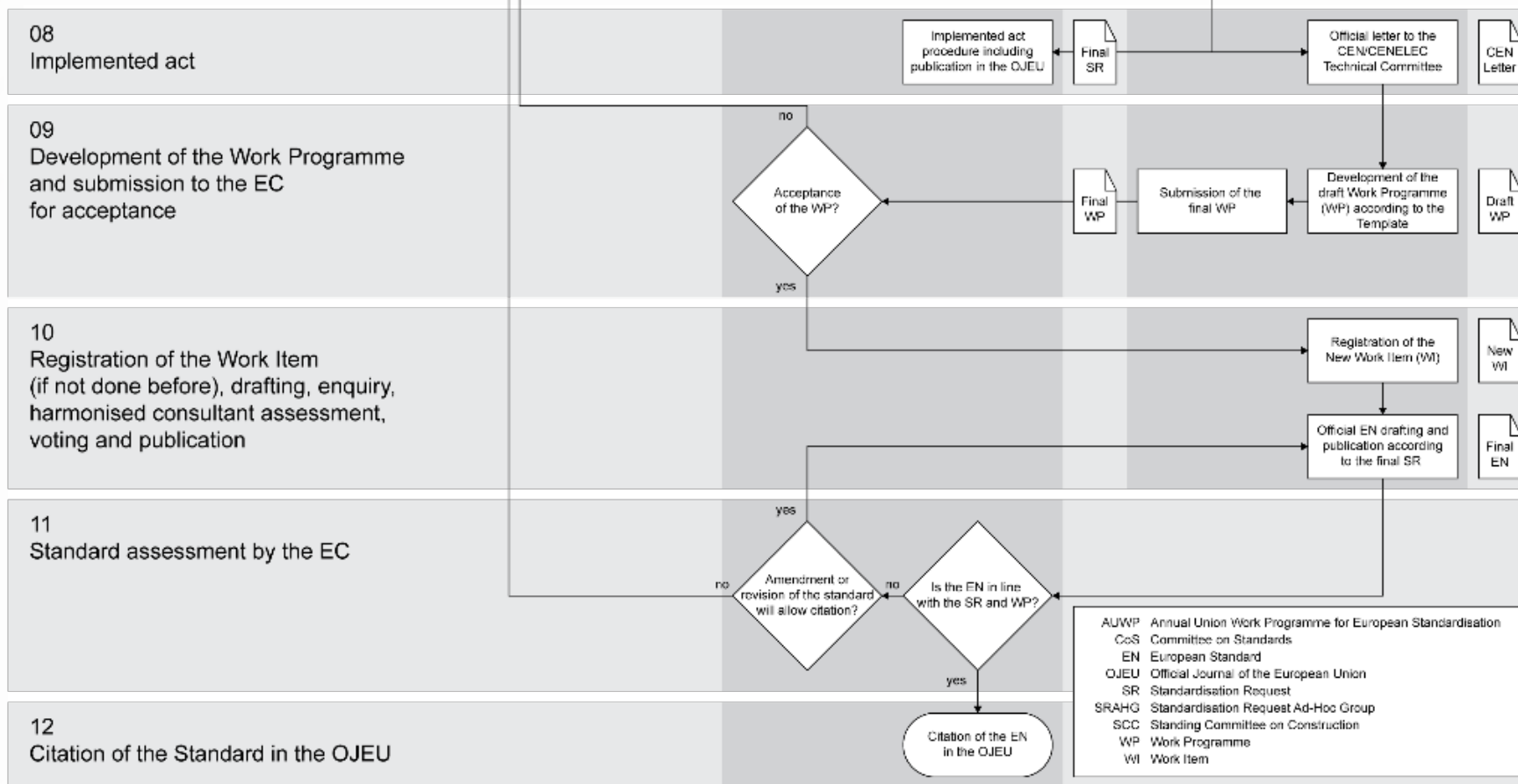
- move from CPD to CPR
- integrate European Court of Justice legal interpretation (ECJ aquis)
- revise the technical content of mandates
- cover the declaration of essential characteristics (all needs identified)
- implement BRCW7
- pre-empt the need for delegated acts for classes and thresholds

Replies to questions from MS

Industry involvement required

- Standardisation requests can only be modified following the full procedure
- European coverage (e.g. exclude national annexes in Eurocodes)
- Timeframe is flexible
- JIS action 5 document (flowchart) describes the process





Standardisation request in first stages

This draft has not been adopted or endorsed by the European Commission. Any views expressed are the preliminary views of the Commission services and may not in any circumstances be regarded as stating official position of the Commission.



Brussels, XXXX
[...](2018) XXXX draft

COMMISSION IMPLEMENTING DECISION

of XXXX

on a standardisation request to the European Committee for Standardisation as regards space heating appliances in support of Regulation (EU) No 305/2011 of the European Parliament and of the Council

(Text with EEA relevance)

Space heating appliances

BRCW3 includes pollutants and threshold values

BRCW6 includes thresholds for energy efficiency and a table for the energy efficiency classification based on the energy index (EEI)

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Brussels, XXXX
[...] (2018) XXXX draft

COMMISSION IMPLEMENTING DECISION

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on a standardisation request to the European Committee for Standardisation as regards space heating appliances in support of Regulation (EU) No 305/2011 of the European Parliament and of the Council

(Text with EEA relevance)

Space heating appliances

BRCW7 implemented according to EN 15804

New clause called descriptive features e.g. mass, cleanability

Supposed to be pieces of information to be delivered not being essential characteristics

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Brussels, XXX
[...] (2018) XXX draft

COMMISSION IMPLEMENTING DECISION (EU) .../...

of XXX

on a standardisation request to the European Committee for Standardisation as regards reinforcing and pre-stressing steel in support of Regulation (EU) No 305/2011 of the European Parliament and of the Council

(Text with EEA relevance)

Reinforcing steel

BRCW3 not implemented due to the lack of requirements

BRCW7 implemented according to EN 15804

Additional environmental indicators

Dangerous substances



Regulations in place

VOC classification blocked

REACH restriction for formaldehyde release

Dangerous substances clauses under discussion

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 the field of use.

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

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

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

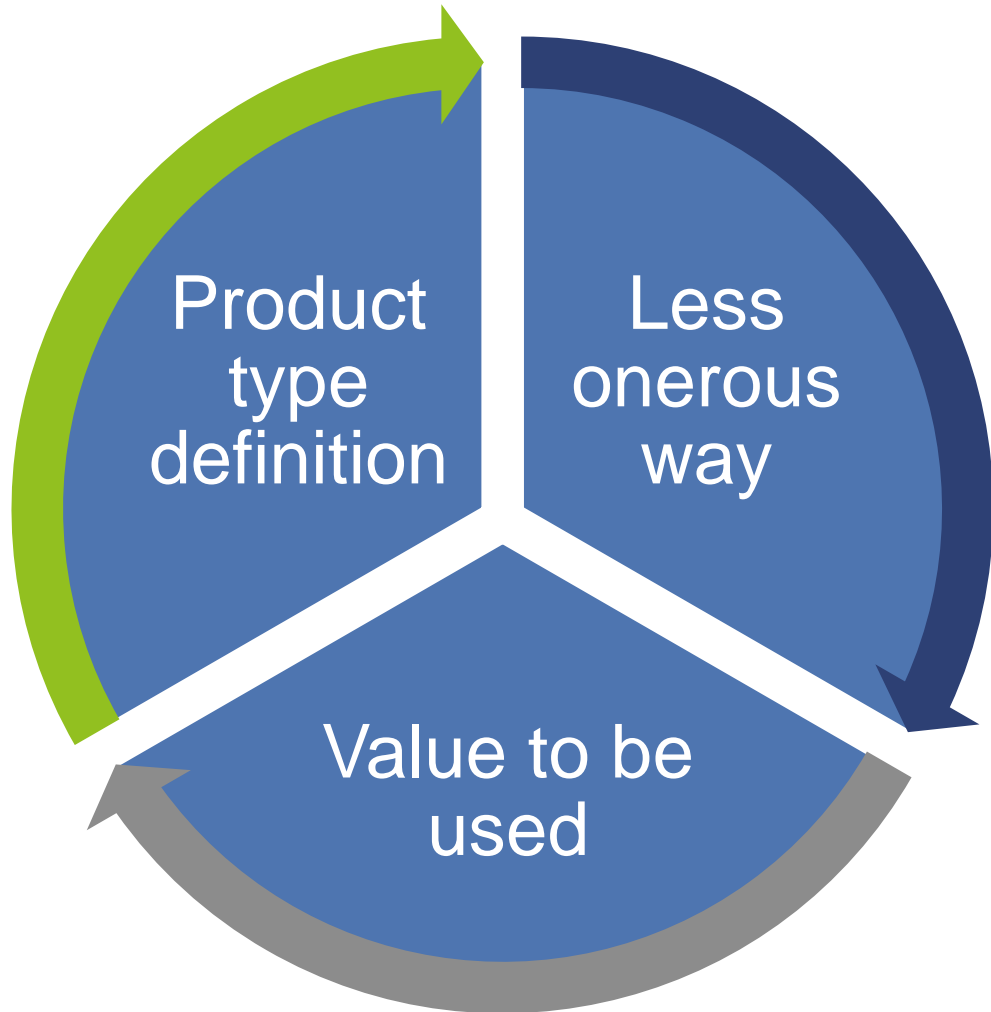
To be able to deliver we need a declaration approach

Declared values

- Long list to be included in CE marking and DoP
- CPR allows this approach as it is being implemented in coordination with BIM developments – Smart CE®



Assessment



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

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”.

Assessment clause

An aerial photograph of a quarry or construction site. The ground is a mix of brown earth, grey gravel, and large piles of sand. A prominent feature is a large, red and white conveyor system that runs across the site. A white truck is parked near the conveyor. The scene is captured from a high angle, showing the layout of the equipment and the terrain.

Change of raw materials but same performance?

Same raw material/component but different supplier?

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?

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?

Environmental performance

Our goal is the delivery of relevant information for the calculation of the environmental performance of the BUILDING

Level(s)

Building sustainability
performance

#BuildCircular

Common technical language

European Commission requested the update of EN 15804 to their requirements – Single European approach



Harmonised standards to follow amended EN 15804 for the assessment and declaration

Unique declaration of performance (DoP) at European level (no National approaches) including required third party tasks

Aligned to PEF methodology

Third party tasks

CPR determines required third party tasks for the assessment in this case AVCP system 3 (ongoing discussion)

Bodies notified by Member States to perform third party tasks

Single market for Notified Bodies (manufacturer's choice)

AVCP system 3: Notified body to assess the performance

Program operators current activities not aligned to the regulatory approach

	Manufacturer	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"/>
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"/>
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"/>
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"/>
Audit — testing of samples taken by the Notified Body		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Single European declaration

Problem – Single declaration at EU level to fit National needs

National declaration is not possible within the CPR framework

Harmonised common rules (PCR) per product family:

- Scenarios – “parametric” declaration
- Reference service life and functional/declared unit
- Modelling details to be implemented

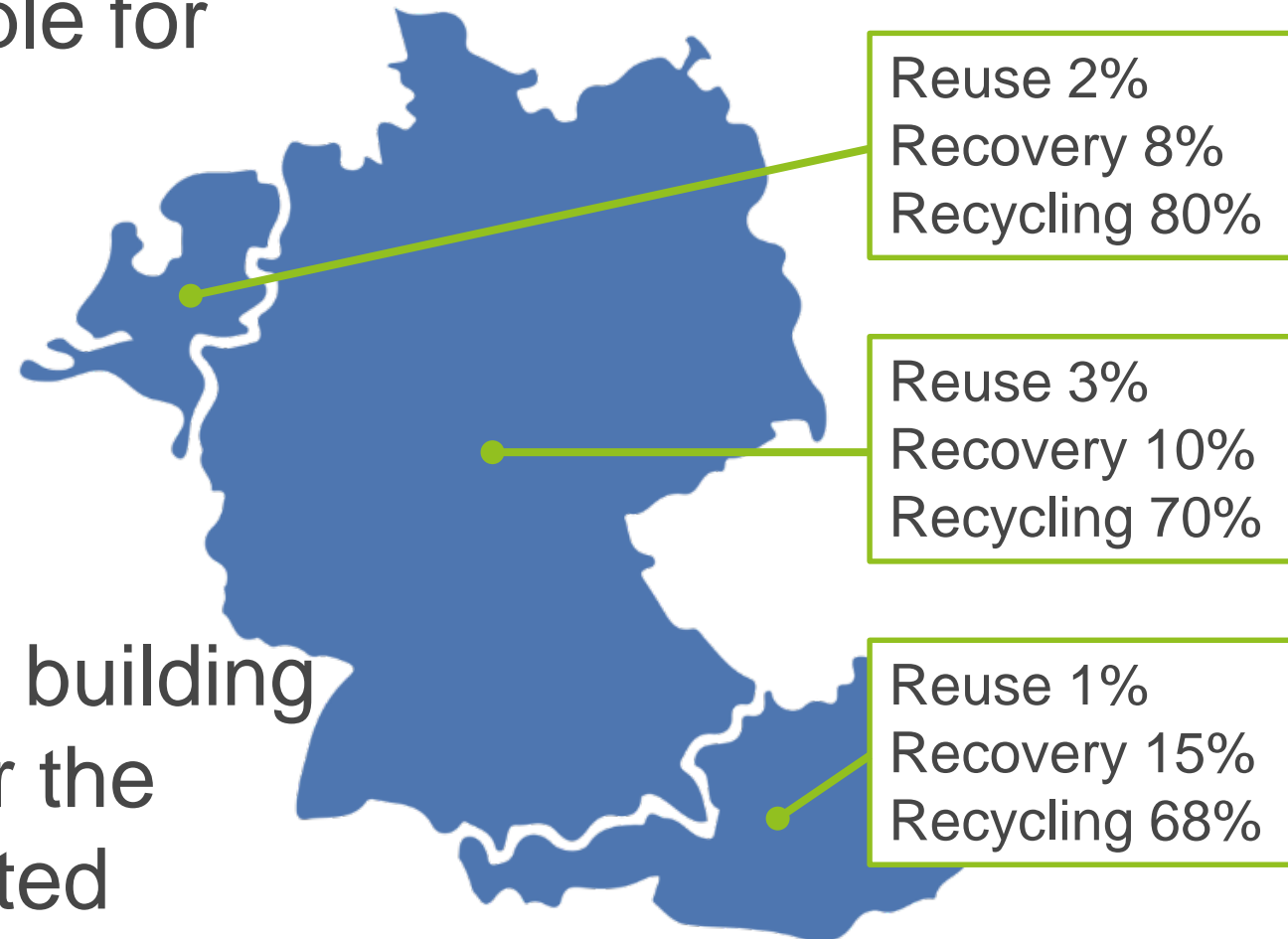
Alignment to Member States’ requirements in an early stage

Single European declaration to fit National needs

“Parametric” approach example for
module C3:

- C3 full reuse scenario
- C3 full recovery scenario
- C3 full recycling scenario

During the assessment of the building
the most relevant scenario, or the
combination of them, is selected



Other pending issues

CPR provides options to the declaration

Declaration of NPD (no performance determined) for the full table unless

- there is a National requirement
- the information is declared in other document

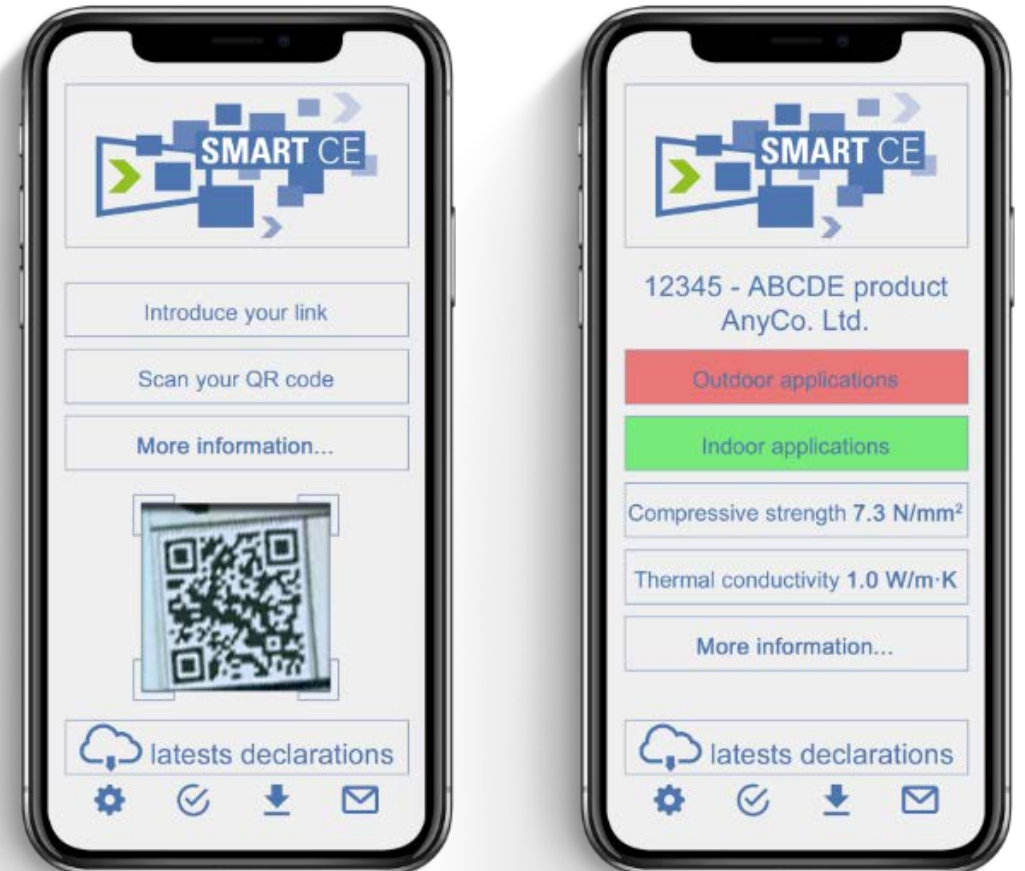
Sharing and cascading allowed – applicable for “sectoral” EPD under a contractual agreement and for products manufactured from components

Information delivery and use

EPD information is too complex and long for PDF documents

Data to be provided in a computer readable way to be used for building assessment

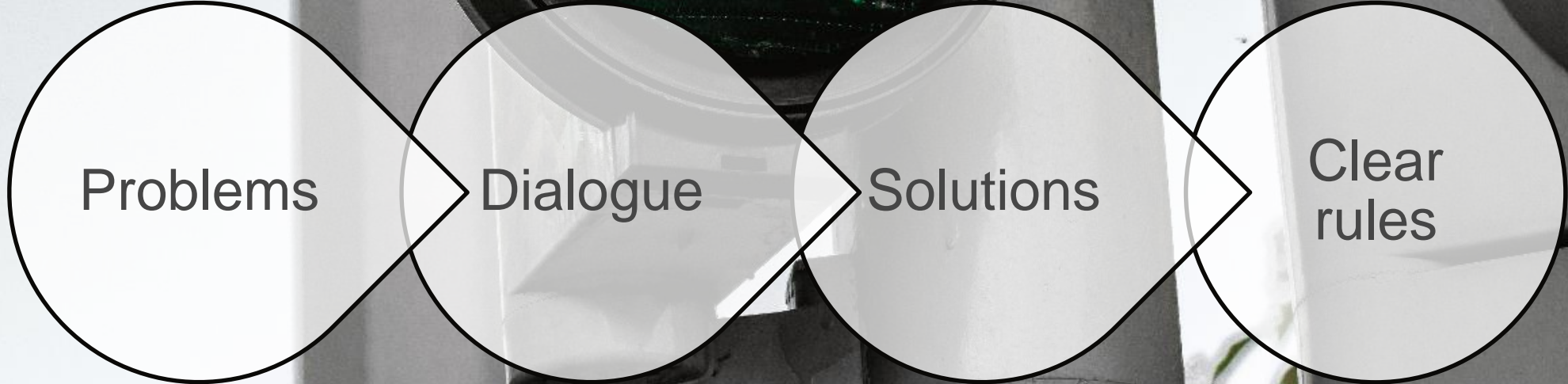
CPR allows this approach as it is being implemented in coordination with BIM developments – Smart CE®



Industry needs solutions in the short term
Collaboration is granted by the industry
Commitment of EC – MS – CEN/CENELEC required

**push button and wait
for signal opposite**

WAIT



30
YEARS
ANNIVERSARY



CONSTRUCTION PRODUCTS EUROPE
LET'S BUILD AN EFFICIENT EUROPE

Oscar Nieto
Technical Director

Construction Products Europe AISBL
Blv du Souverain 68, 1170 Brussels - Belgium
t +32 (0)2 463 49 57

EU Transparency Register 48010783162-91

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