

# Assessment of Release of Dangerous Substances

*Actual CEN activities concerning test methods for construction products*

Dr. Inga Hohberg



# Contents



- n Introduction, M366 and TC 351
- n Actual test and assessment methods
  - n Indoor air
  - n Soil, surface and ground water
  - n Robustness validation
- n Product TCs and CEN-Mandates
- n CWFT-possibilities
- n RGDS and EOTA
- n Summary



# Initial Situation- Implementation of CPD



1989: Construction Products Directive (CPD) – Council Directive 89/106/EEC

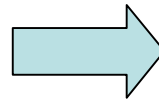
European Commission issued 43 mandates to CEN to elaborate harmonized European standards (hEN)



CEN published about 250 hEN

## Requirements of the Construction Products Directive (CPD)

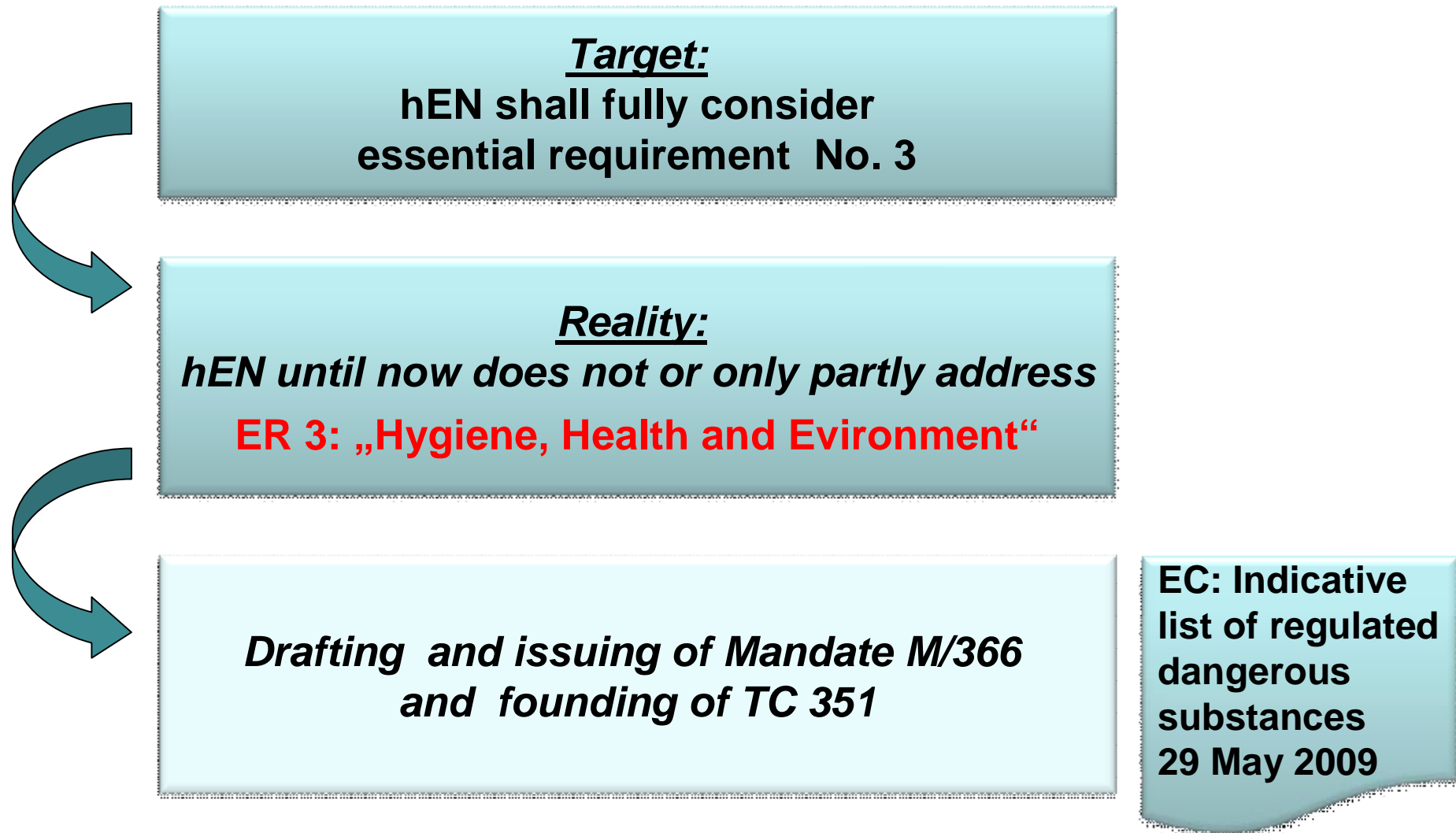
1. Structural stability
2. Fire safety
- 3. Hygiene, health and environment**
4. Safety in use
5. Protection against noise
6. Energy economy and heat retention



**The construction work must be designed and built in such a way that it will not be a threat to the hygiene or health of the occupants or neighbours**



# Initial Situation- Implementation of CPD



# Horizontal Mandate M/366



- n 16<sup>th</sup> March 2005: Mandate M/366 was issued by the European Commission to CEN



 EUROPEAN COMMISSION  
ENTERPRISE AND INDUSTRY DIRECTORATE-GENERAL  
Chemicals and construction  
**Construction**

Brussels, 16<sup>th</sup> March 2005  
M /366 EN

HORIZONTAL COMPLEMENT TO THE MANDATES  
TO CEN/CENELEC

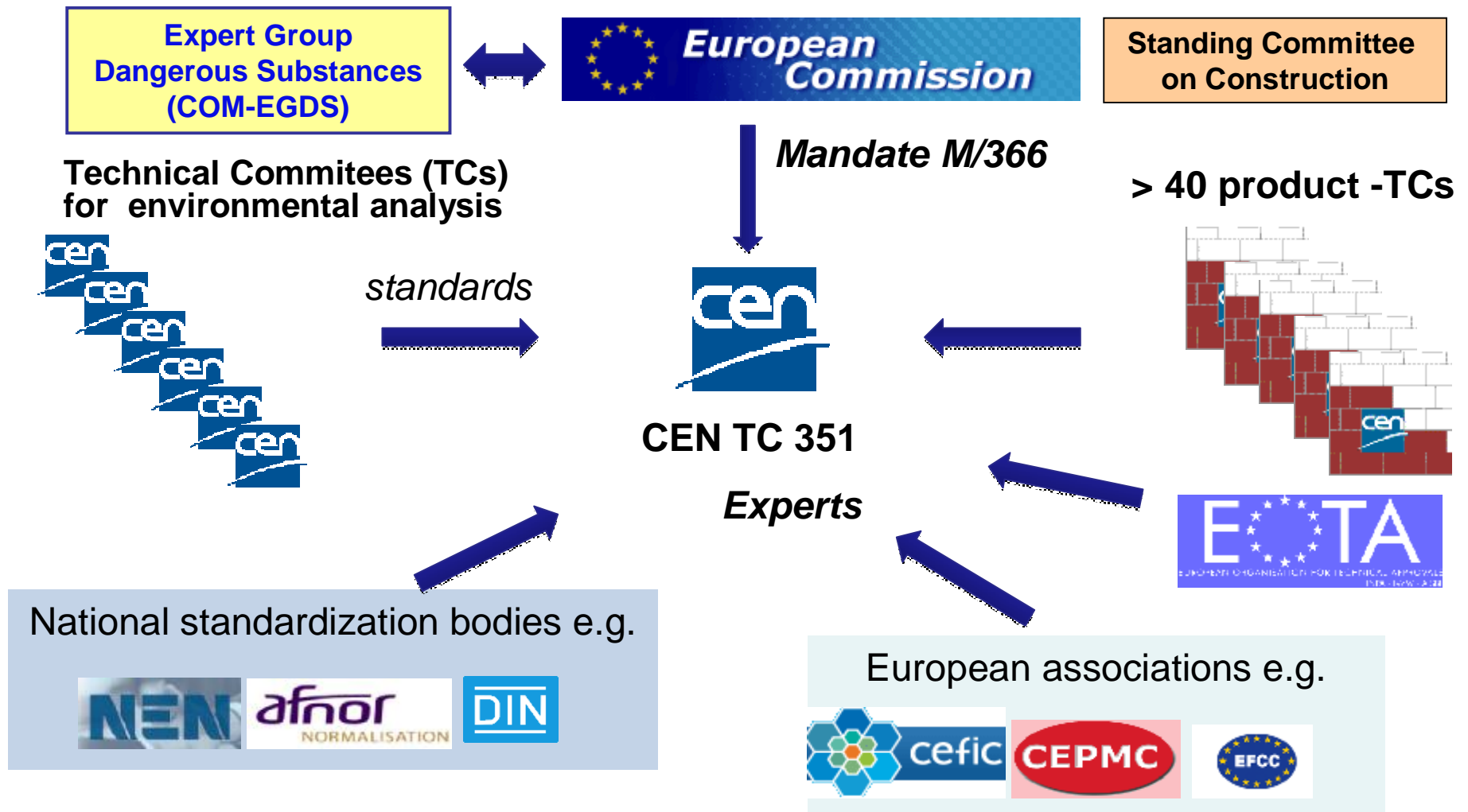
CONCERNING THE EXECUTION OF STANDARDISATION WORK FOR THE  
DEVELOPMENT OF HORIZONTAL STANDARDISED ASSESSMENT METHODS  
FOR HARMONISED APPROACHES RELATING TO DANGEROUS SUBSTANCES  
UNDER THE CONSTRUCTION PRODUCTS DIRECTIVE (CPD)  
Emission to indoor air, soil, surface water and ground water

## Goals:

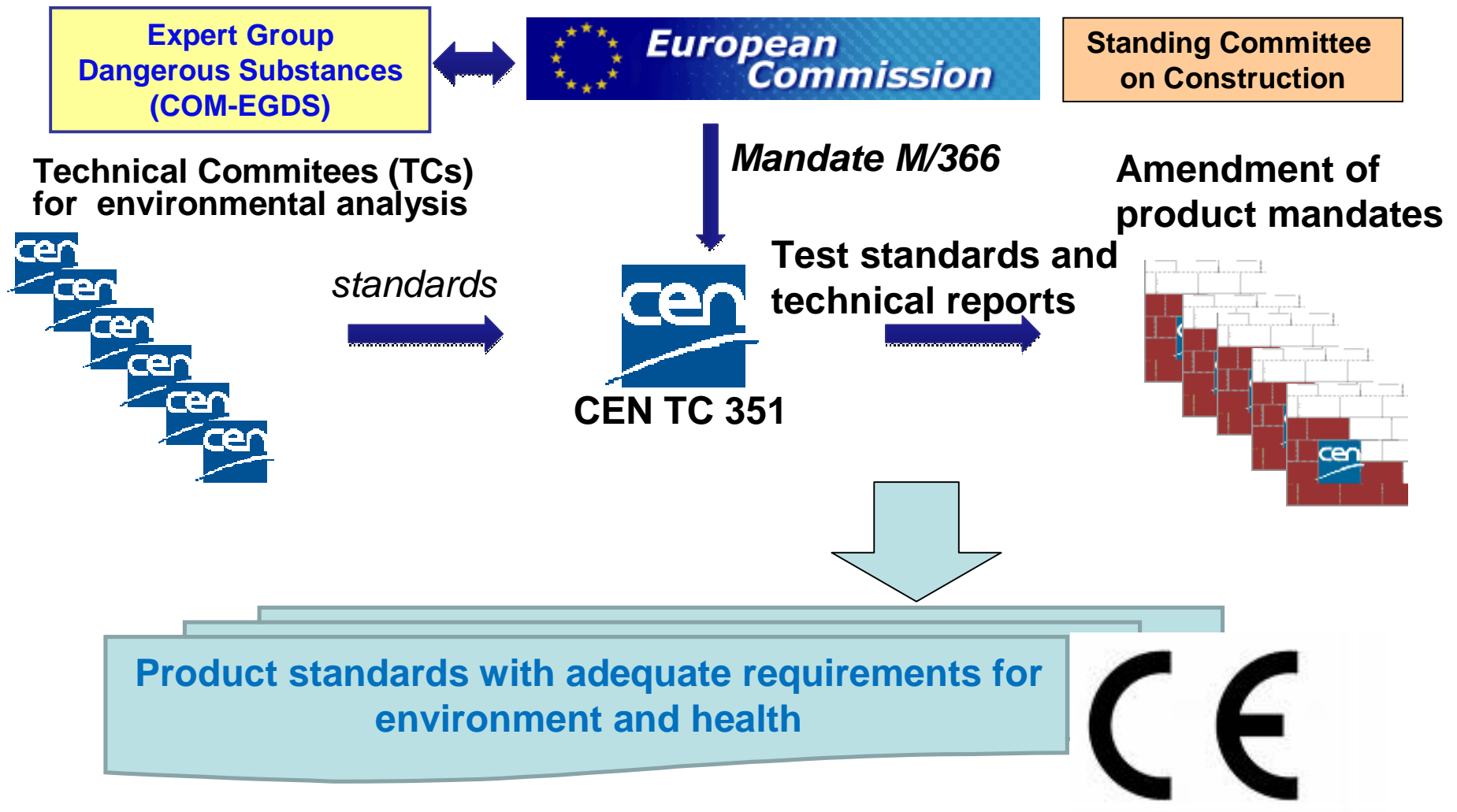
### Harmonisation of

- Sampling
- Determination of composition
- Determination of release
- Release scenarios

# Implementation of Mandate M/366 at CEN



# Mandate M/366 – Steps until 2012





# CEN/TC 351 - Title and Scope



- n **Construction Products: Assessment of Release of Dangerous Substances (DS)“**

- n **Scope:**

Development of **horizontal standardised assessment methods** for harmonised approaches relating to the release (and/or the content when this is the only practicable or legally required solution) of regulated dangerous substances under the Construction Products Directive (CPD) taking into account the intended conditions of use of the product. It addresses emission to indoor air, release to soil, surface water and ground water.

- n Chairman: Jerome Bartels (NL),

- n Secretary: Annemieke Venemans, NL

## CEN/TC 351

Construction products: Assessment of release of dangerous substances

### WG 1

Release into soil, ground water and surface water

### WG 2

Emissions into indoor air

### WG 3

Radiation

### WG 4

Terminology

### AHG

Validation

### TG 1

Barriers to trade/use

### TG 2

Horizontal test methods

### TG 3

WT/WFT

### TG 4

Sampling

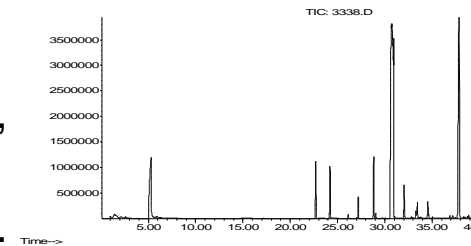
### TG 5

Content

### TG 6

Evaluation of conformity

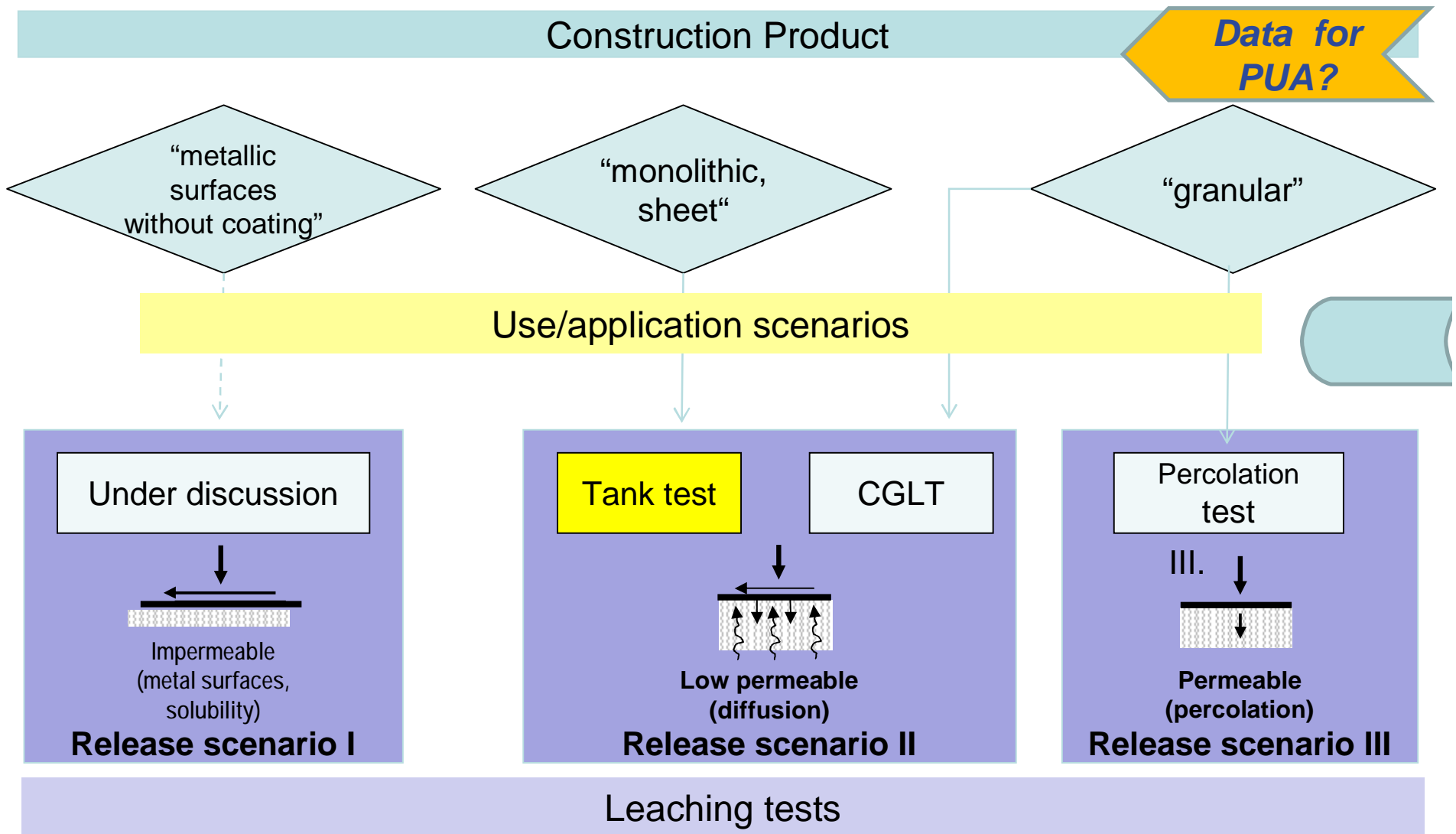
- n Base for a harmonized procedure in Europe: ECA Report 18 (1997)
- n Mostly consensus on relevant test methods
- n Test chamber method (EN ISO 16 000 – 9) is suited to assess release of VOC/SVOC from construction products
- n Target of CEN/TC 351/WG2: improve reproducibility and soundness of the test method
  - limit test parameter (volume, air exchange rate, loading factor)
- n Draft of test standard is ready for validation; available as EN (expected) 2012
- n **Open question:** Communication of test results in the CE-mark



*Classes of emission??*

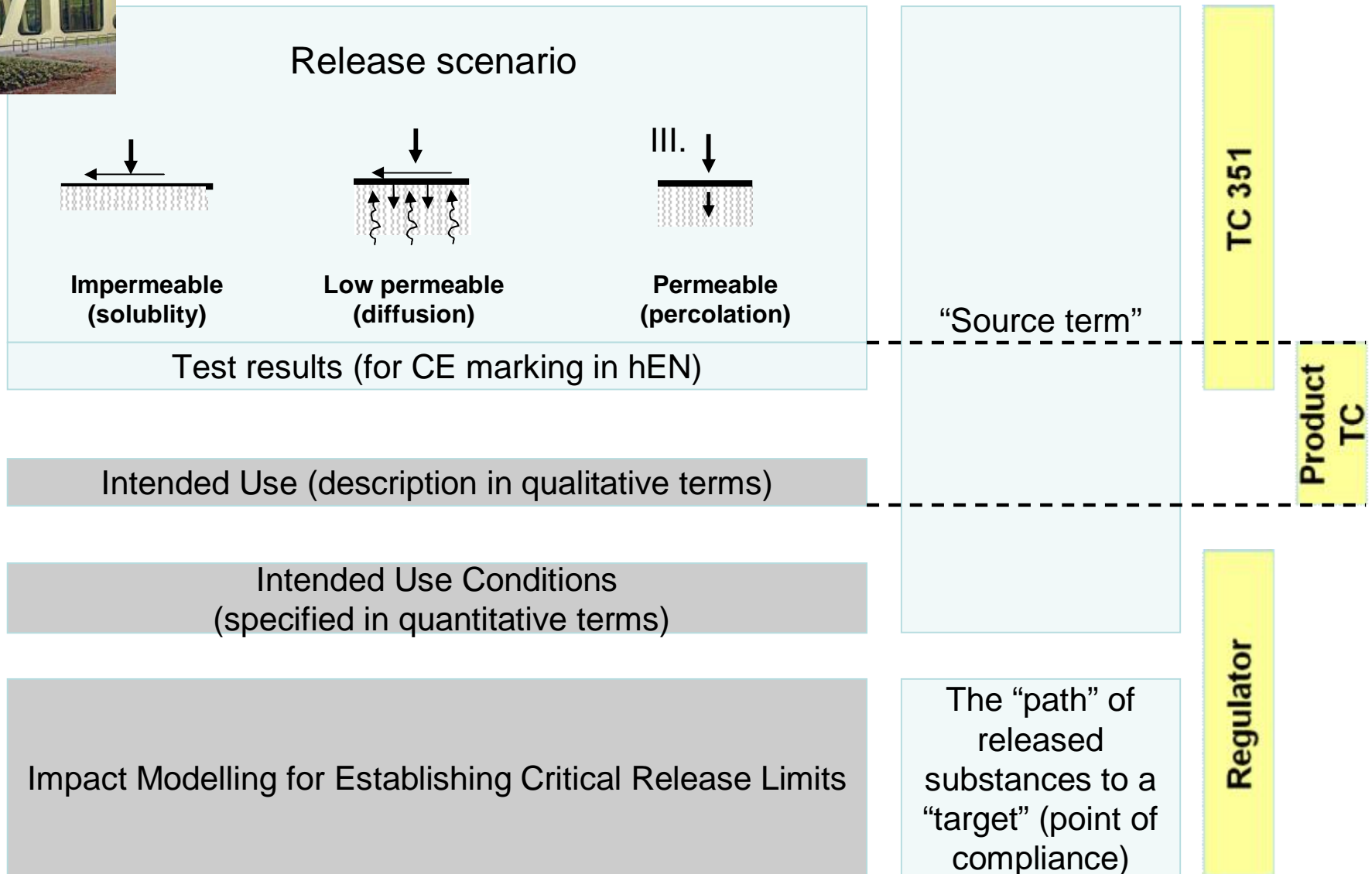
**Data for PUA?**

# Release into soil, surface and ground water





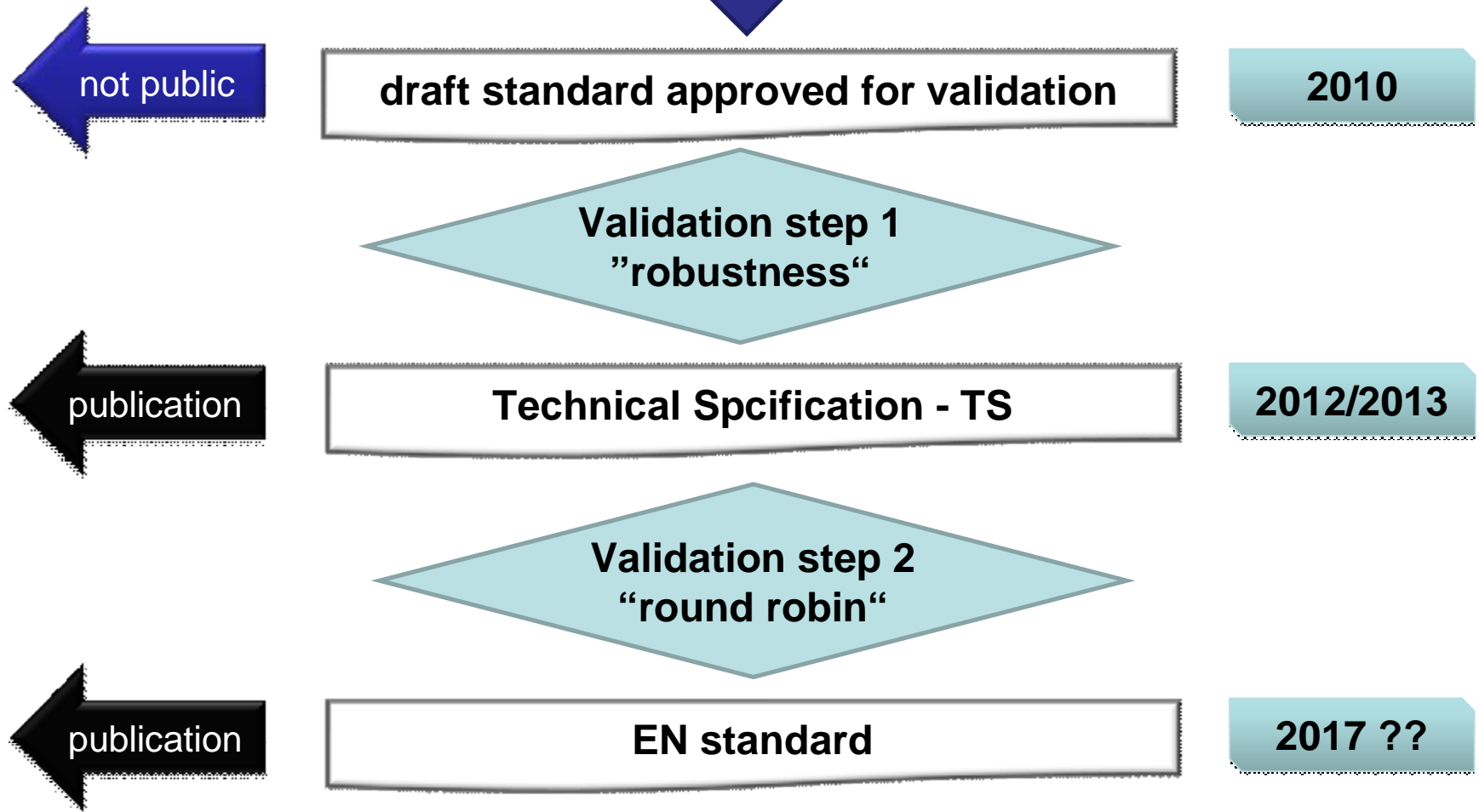
# Release into soil, surface and ground water



# CEN/TC 351 - Standardization



## CEN/TC 351/WGs: draft test standards/specification

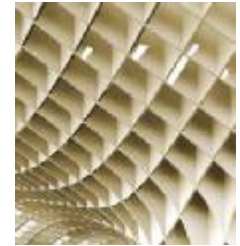




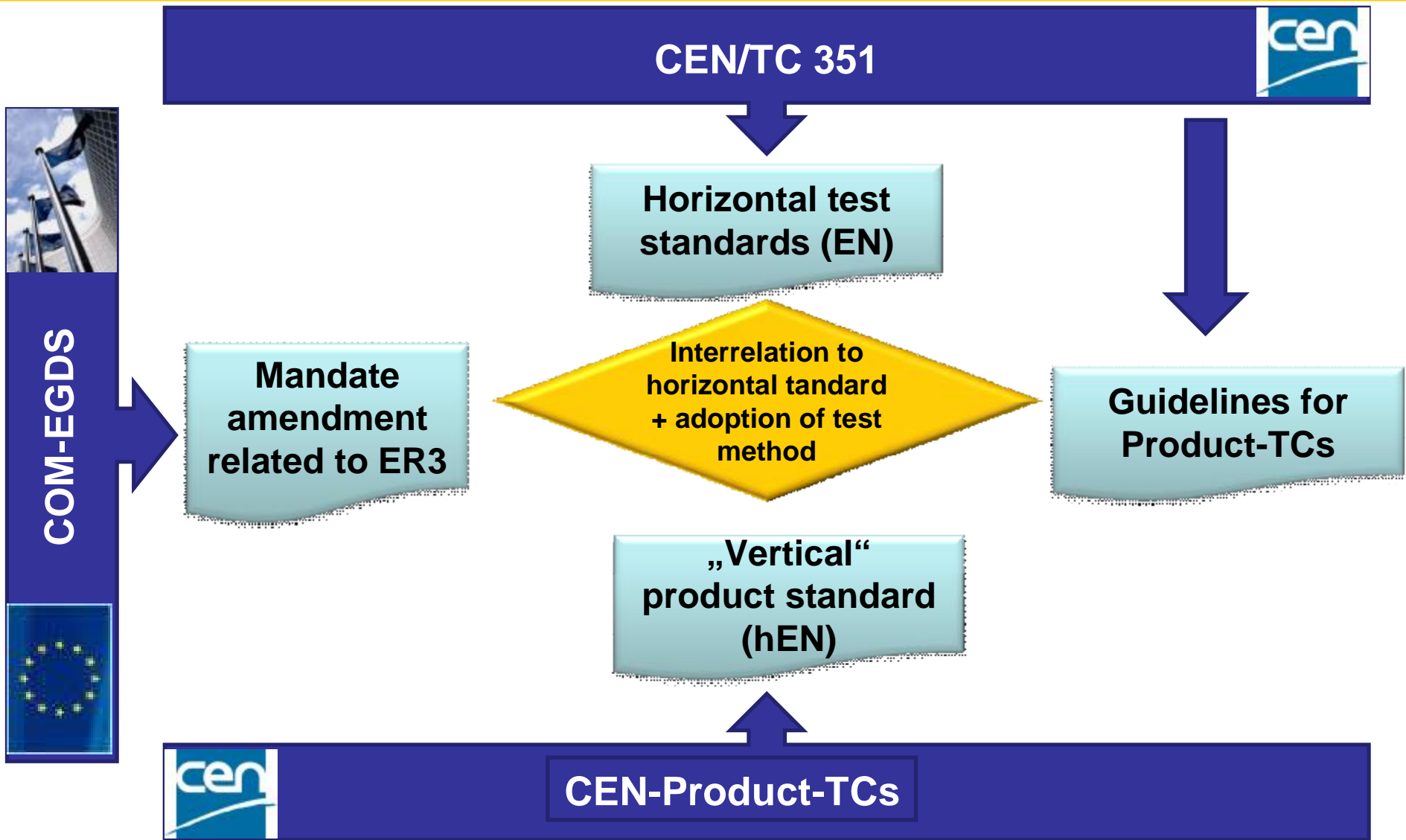
# Amendment of mandates concerning regulated DS



- n Amendment of (construction) products mandates
  - n In the progress of the implementation of the CPD the EC issued mandates to CEN.
  - n On the base of these mandates the product-TCs elaborated European harmonised product standards.
  - n In the past CPD-ER3 was excluded in this process.
  - n The ongoing activities have the target to add the aspects of health, hygiene and environment (ER3-aspects) into the CP-mandates.
  - n As a rule: Only if notified regulations concerning ER3 exist in the EU-MS, the relevant product standard/mandate will be amended to resolve barriers to trade.



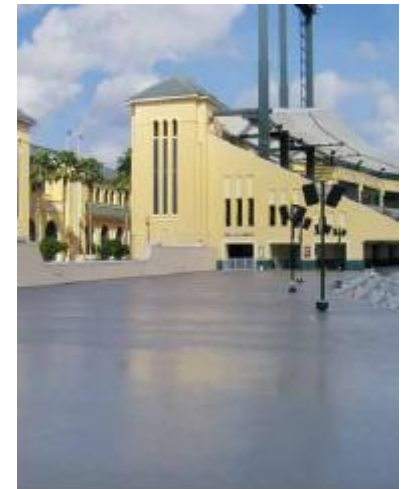
# Amendment of mandates and product standards concerning DS



# Amendment of EC mandates concerning dangerous substances



- n Status of revision of mandates:
  - n As proposal of the EU-commission following amendments of mandates were adopted and given to SCC and CEN:
    - M/103 “Thermal Insulation“
    - M/119 “Floorings“ (EN 13813, resin screeds)
    - M/125 “Aggregates“
  - n Following mandates are under revision by COM-EGDS:
    - M/101 “Doors, Windows and related Products”,
    - M/106 “Gypsum”,
    - M/111 “Circulation fixtures”,
    - M/115 “Reinforcing steel”,
    - M/116 “Masonry and related products”,
    - M/120 “Structural metallic products”,
    - M/121 “Internal and external wall and ceiling finishes”,
    - M/122 “Roof coverings”
    - M/124 “Road construction products”.





# European approvals - EOTA



- n EOTA-PT9 “Dangerous Substances“
  - n Products (Systems) too innovative or too complex to get standardized, can achieve e. g. an European technical approval (ETA).
  - n **EOTA-PT9 discusses how aspects of environment and health have to be considered in ETAs.**
  - n Lists with relevant groups of products have been elaborated.
  - n Relevance of EOTA-Product groups (ETAGs) in relation to the different emission scenarios have partly been laid down.
  - n **But:** as long as TC 351 is not ready, test and assessment procedures are missing – therefore for the time being national methods are applied.



# CWFT-Procedure

## Annex 1 of mandate M/366

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- n It should be possible to demonstrate for a large number of products, that they do not contain any regulated dangerous substance or do not have the ability of releasing dangerous substances into soil, ground or surface water, or the indoor air in quantities above the limits regulated in any Member State of the EU.
- n Based on a generally accepted knowledge by EU or MS authorities on the constituents and/or estimated release behaviour of the products/materials, some products might not even need testing and could be classified as “Without Testing (WT)”

# CWFT-Procedure - Dossiers



- n Dossier of information
- n Name and contact details of the applicant
- n Relevant European standard to which the product conforms
- n Description of the construction products to which the dossier applies
- n Intended use(s)
- n Any limitations on the scope of the application, e.g. excluding products made with material “yy”
- n Release/emission scenario (soil, groundwater and surface water or indoor air)
- n List of mandated “regulated dangerous substances“ (RDSs) and the RDS classes for which the WT procedure is sought for
- n Description of the evidence of conformity to the relevant RDS classes



# CEN/TC351 – WT/WFT/FT decision tree - Working draft - March 2010



Starting point: Product with an existing harmonised standard and mandate



Is there a requirement to declare specific RDSs based on EU Regulations and/or notified national regulations?

Yes



Comission prepares an amendment to a mandate listing RDSs to be declared and sends this to the relevant product TC



Product TC responds to the mandate and proposes the use of classes and/or declared values. The Product TC may:

- provide justification for excluding certain RDSs listed in the mandate and including RDSs missed by the mandate;
- provide justification for declaring classes (not necessarily the most onerous class) for some or all listed RDS without testing by the manufacturer;
- provide justification where on the base of defined initial assessment/testing a class/value may be declared without further testing by the manufacturer;
- provide justification for using an alternative test method as the primary means to declare a class/value of performance

No

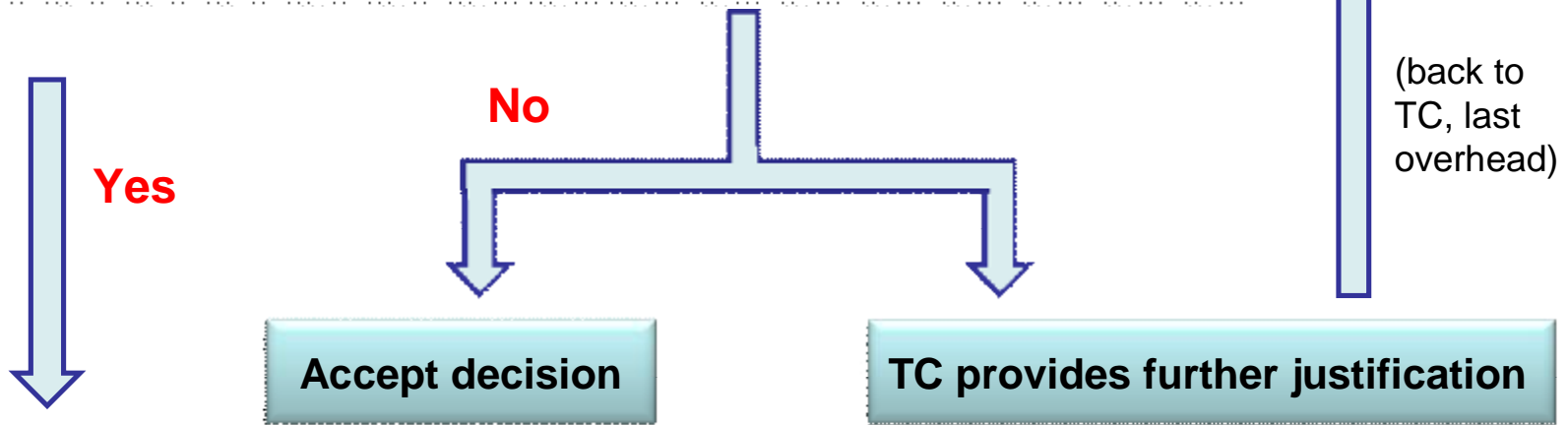


No amendment to existing mandate

# CEN/TC351 – WT/WFT/FT decision tree - Working draft - March 2010



Is the justification given in the dossier accepted by the Commission



Product TC prepares details rules based on general guidance prepared by CENT/TC 351 and amends the relevant hENs

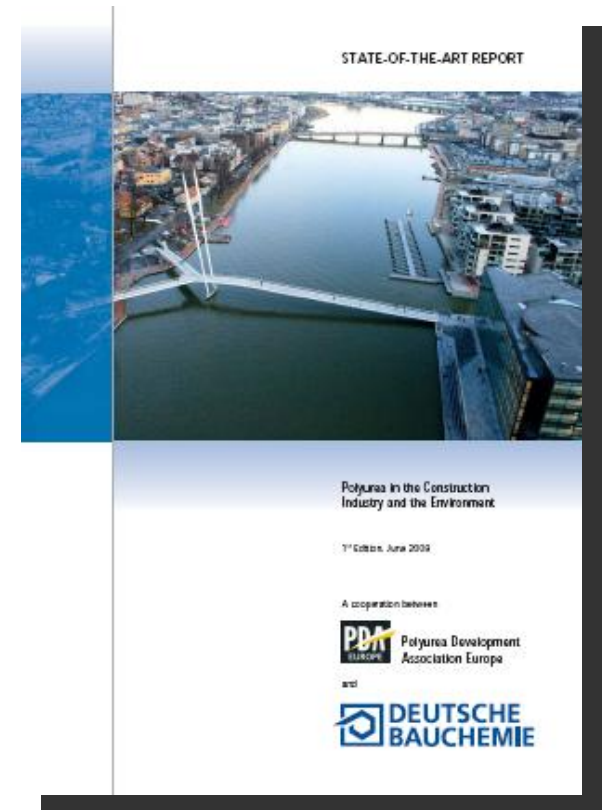
Commission cites the hEN in the OJ and thus gives it their approval

After publication of the amended product standard and associated test methods, individual manufactures following the rules in the hEN declare classes for all mandated RDSs where required for placing on the market

# Summary

- n CPD and the new CPR require information on environmental information. This information shall be integrated in CE-Mark
- n CEN and EOTA are preparing rules and/or test methods to address release into indoor air and soil, surface and groundwater
- n Manufacturers should be prepared to draft dossiers on environmental data
- n In the „state-of-the-art-report“ some of these aspects are already adressed

**Data for  
PUA?**





**Thank you for your attention!!**

Dr. Inga Hohberg  
Deutsche Bauchemie  
Mainzer Landstr. 55, 60388 Frankfurt  
Germany  
[inga.hohberg@vci.de](mailto:inga.hohberg@vci.de)



# CEN/TC 351 - Activities



- n April 2006: 1. Plenary TC 351 (Malta)
- n November 2006: 2. Plenary TC 351 (Berlin)
  - 1. Questionnaires Product TCs „Indicative list“
- n March 2007: 2. Questionnaires Use/scenario/release
- n 09./10. May 2007: 3. Plenary TC 351 (London)
- n 24 May 2007: Workshop TC 351 with product-TCs (Rotterdam)
- n 23./24. October 2007: 4. Plenary TC 351 (Nizza)
- n 29. November 2007: Conference with product-TCs (Berlin)
- n 22./23. April 2008: 5. Plenary (Gran Canaria)
- n 28./29. October: 6. Plenary (Vienna)
- n April 2009: 7. Plenary (Helsinki)
- n January 2010: 8. Plenary (Prague)
- n October 2010: 9. Plenary (Ghent)