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Conformity assessment procedures for health and environmental construction products

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Dear Mr. Leoz-Argüelles,

the implementation of requirements for hygiene, health and environmental protection set out in the European technical specifications for construction products can lead to considerable problems if they are not underpinned by harmonised conformity assessment procedures.

To date the basic requirement on "hygiene, health and environmental protection" is not part of the technical specifications since the harmonised assessment procedures are currently being drawn up. Conformity assessment procedures are therefore defined on the basis of other fundamental requirements such as "stability" or "safety in case of fire". Consequently, construction products with high stability or fire safety requirements had to prove conformity according to a technical specification 1 or 2+ procedure, whereas construction products without stability or fire safety requirements only have to prove conformity according to procedure 4. Only conformity assessment system 1+ provides for a random evaluation by a testing laboratory. In this system, as in conformity assessment procedures 1 and 3, a one-off initial test is carried out by a testing laboratory; in all other procedures manufacturers just have to carry out in-plant production monitoring.

In a first draft on conformity assessment procedures the European Commission proposed the application of procedure 3 for the basic requirement "health, hygiene and environmental protection". However, the adoption of the first three amended standardisation mandates (M/103, M/119, M/125) only called for conformity assessment proce-





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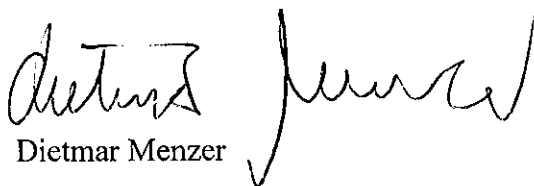
dures so far required by standardisation procedures for general uses without taking the release of hazardous substances from these groups of construction products into consideration. Since there are also groups of construction products which can have a varying relevance for human health and the environment depending on their composition, a graded conformity assessment system should be included taking account of potential releases of hazardous substances.

Furthermore, the release of hazardous substances should be checked by a testing laboratory and not by the manufacturer. Moreover, certain cases also require a regular assessment by a testing laboratory of the release of hazardous substances.

I would like to bring the following suggestion for discussion into the Standing Committee on Construction: "For the requirement "hygiene, health and environmental protection" a separate conformity assessment procedure should be put into place depending on the specific relevance".

It would be grateful if you could put this topic on the agenda of the Preparatory Group and the Standing Committee to discuss the conformity assessment procedure for the requirements regarding hygiene, health and environmental protection in relation to the release of hazardous substances of construction products.

Yours sincerely,



Dietmar Menzer