



POSITION PAPER

on

CE Marking of single products and kits in end use conditions

(Common position¹ of CEPMC and EOTA)

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Many construction products can be used in a number of different combinations or in a variety of different “end-use conditions” (also called “end-use applications”)².

For characteristics which are influenced by the end-use applications (e.g. fire resistance, reaction to fire, acoustic insulation) it is necessary to define the end-use conditions for which the assessment/evaluation of the product performances (declared values and classes) will be valid³ and to test the product in a test configuration which is supposed to be representative for these end-use conditions.

If several products are put on the market together as a kit which as such bears the CE marking the information accompanying the CE marking will indicate the characteristics and performances of the assembly⁴ taking into account the installation instructions of the kit manufacturer. Thus, in the case of kits, the manufacturer has the opportunity to declare in the information accompanying the CE marking of the kit the performance of the assembly, i.e. the declared values and classes of the assembly.

Should this opportunity for kits also be possible in cases where a package only includes one real product, while the other components are only specified in the technical specification for the so-called “virtual kit” but not included in the package/delivery as put on the market? There is agreement that the term “virtual kit” should no longer be used in relation to the CE marking of construction products because it does not correspond to any industrial reality and it could introduce ambiguities in the responsibility of the producer of a specific product.

The performance of a construction product, for characteristics influenced by the end-use application, should be assessed/evaluated according to the following principles:

- If the product is part of a kit⁵ and therefore intended to be incorporated in a defined assembly, the assessment/evaluation of the performances also includes the assembly and leads to the declaration of the performances of the assembly;

- If the end-use conditions are clearly and unambiguously defined in a harmonised European product standard ⁶, the product is tested and the declaration of performance is made as defined in the harmonised standard. If these end-use conditions are expressed as a series of defined “standard-configurations”, the manufacturer decides according to which of these standard configurations the product may / should ⁷ be assessed;
- If the product deviates from the harmonised European product standard with regard to the end-use conditions, the manufacturer may apply for an ETA to assess the product. The ETA will define, as specified by the manufacturer, the end-use conditions and indicate the respective product characteristics and associated performances.
- If the harmonised European standard does not provide an appropriate test configuration for intended end-use conditions (e.g. only the reference to the test method is given or this definition is not specific enough) the manufacturer has to decide on the most appropriate test configuration, which lies within the limit(s) given in the relevant product standard. Then, the manufacturer submits the product in such test configuration, according to the Attestation of Conformity system to be applied, either to own testing or to a Notified Body for testing. The manufacturer will declare the performance of the product and the associated intended use, corresponding to the test configuration, in the information accompanying CE marking.⁸

¹ This position paper has been agreed by CEPMC members and EOTA Members

² These terms are used indiscriminately in various documents. End-use conditions correspond to both the influence on the product of the other components with which the product is assembled and/or the way on which the product is used (fixing and mounting.)

³ The end-use conditions depend on the intended use of the product. Recently, CEN/TC 127 has issued guidance on mounting and fixing instruction, in a prTS (Technical Specification document) which gives the definition for the terms “end-use conditions” and “intended use” for fire aspects in product standards.

⁴ Also referred to as "assembled system" (see Guidance Paper C on Kits and Systems, clause 2.2)

⁵ This is the explicit decision of the manufacturer or supplier to place a product on the market as a kit or as single products

⁶ For ETAs, the end-use conditions can always be accurately defined because an ETA is delivered for a specific product

⁷ Depending on what will be written in the harmonised standards.

⁸ It should be noted that such a standard and its application in the sense of this 4th indent would lead to a situation where one and the same value or class of a characteristic accompanying the CE marking would have different meanings i.e. expresses different performances. On the other hand a product with the same performance with regard to a particular characteristic could have different classes for that characteristic. hence these characteristics can no longer be compared