

POSITION PAPER:

TRANSITIONAL ARRANGEMENTS FOR THE CE-MARKING OF THERMAL INSULATION PRODUCTS

Not valid after March 2003

GENERAL

These rules apply for the hEN product standards for thermal insulation products (package EN 13162 through 13172).

During the transitional period, as defined in the Guidance paper J, up till March 2003 some transitional arrangements shall be allowed.

This position paper covers the following transitional arrangements:

1. Acceptance of testing reports based on prEN's for the ITT tests (Cf. SG19 N36).
2. Historical data as a basis for declaration of thermal properties (Cf. SG19 N32).

1. ACCEPTANCE OF TESTING REPORTS BASED ON prEN's FOR THE ITT TESTS.

Test reports established in a period before the EN-publication can be taken into account within the assessment and the ITT providing all following conditions have been fulfilled:

1. Sampling has been done by the 3rd party (later becoming a notified body), or by his representative. documentary evidence must be available (identification of the samples, dates, traceability to the FPC, ..., reporting);
2. The test methods have been executed according EN's or prEN's methods, already passed the CEN enquiry stage 41, and for which no substantial changes have been made. Reports should not be older than 1998.
3. The manufacturer can provide evidence to the 3rd party that the product characteristics will have the same declaration.

After March 1, 2003 only test reports produced in accordance with published standards are allowed.

It is the responsibility of the certification body to accept/reject test reports executed in accordance with earlier test methods.

2. HISTORICAL DATA AS A BASIS FOR DECLARATION OF THERMAL PROPERTIES

General

In order to obtain a satisfactory declared level, a sufficient number of test results is required.

In the co-existence period (March 2002-March 2003) it may be a practical problem to achieve a sufficient number of test results if they should all be based upon the new technical basis.

If the initial declaration is based on an insufficient number of test results, the declaration will have to be changed later when a sufficient number of results is obtained.

The Sector Group 19 finds it acceptable that historical data is used as a basis for declared values for thermal properties within the limits mentioned below. These limits have been set up to ensure that the use of historical data does not affect the credibility of the conformity mark.

Historical data may only be used for the calculation of the $\lambda_{90/90}$ value or as part of the ITT performed by a notified laboratory, if the data can be proven to be made on equipment calibrated to be at the European lambda level, or if the difference to this calibration level is taken into account in a calculation of 'corrected historical data'.

NOTE: The term 'European λ_{10} level' is used for the evaluation of the checks performed in comparative testings where the same test specimens are used by both expert and registered laboratories. It is defined by showing compliance with EN 1946 part 1 and/or 2 and the IRMM 440 reference material.

Historical data is defined as results of thermal tests performed on any technical basis other than the relevant European testing standards and / or before the start of the procedures related to CE-marking.

a) Manufacturer's historical data

Any use of historical data shall be agreed upon between the notified body and the manufacturer.

Historical data less than 12 months old at the date of declaration may be included in the calculation if the following requirements are met:

1. The calibration of the equipment shall be in accordance with the 'European level' or the deviation shall be taken into account in the calculation for the data performed on equipment which deviates from the European lambda level.
2. The product and production specifications are unchanged as far as λ_{10} is concerned for the period, from where historical data are used.
3. Each test can be traced back with respect to product, production line, and production run.
4. The tests have been performed in accordance with the basic principles of the relevant EN 13162 through EN 13171 and EN 13172 standards. National or other international test methods are accepted if they lead to the same results as the test methods referred to in the relevant EN 13162 through EN 13171.

b) Initial Type Testing (ITT)

The ITT consists of samples taken from four different production runs and tested by the notified body. One test result shall be made from each production run. Each of the four test results shall be better than or equal to the declared value.

Use of historical data is not foreseen in the EN standards, but as the testing capacity of the notified bodies is limited, it is recommended to accept the use of historical data if the following requirements are met.

1. The calibration of the equipment shall be in accordance with the 'European level' or the deviation shall be taken into account in the calculation for the data performed on equipment which deviates from the European lambda level.
2. Only the 2 most recent measurements on the specific product (group) and production unit (line) may be used.
3. The product and production specifications are unchanged as far as λ_{10} are concerned for the period, from where historical data are used.
4. The tests have been performed in accordance with the basic principles of the relevant EN 13162 through EN 13171 and EN 13172 standards. National or other international test methods are accepted if they lead to the same results as the test methods referred to in the relevant EN 13162 through EN 13171.
5. Samples have been taken out by a 3rd party according to an existing national certification scheme.
6. Each test can be traced back with respect to product, production line, and production run.
7. Use of historical lambda data does not limit the initial type testing on other characteristics as required in the product standard.

c) EXAMPLE: INITIAL TYPE TESTING USING HISTORICAL DATA.

Property	Historical samples (test results)		Samples for Initial Type Testing (Four test results from four different production dates)				Total number of test results
	1	2	1	2	3	4	
Thermal resistance, thermal conductivity, and thickness ¹⁾	X	X	-	-	X	X	4
Compressive strength / Compressive stress ²⁾	-	-	X	X	X	X	4
Point load ²⁾	-	-	X	X	X	X	4
Water absorption, Short term ²⁾	-	-	X	X	X	X	4
Water absorption, Long term ²⁾	-	-	X	X	X	X	4
Reaction to fire ^{2) 3)}	-	-	Test specimens cut from one or more of the 4 samples				1

Notes:

- ¹⁾ Historical data may only be used under the conditions specified above. Tests on two samples for the ITT can be omitted if historical data is used. The total number of results in the ITT may not be reduced.
- ²⁾ Initial type testing on this property is only performed if a value is to be declared
- ³⁾ Only one test result is required.