

hEN	TITLE	Received on	OUTCOME OF EC ANALYSIS
12878:2014	Pigments for the colouring of building materials based on cement and/or lime - Specifications and methods of test	2014	<ul style="list-style-type: none"> • We believe that new thresholds have been introduced • Section (Clause) 4.1.2.2 which is basis for one of the essential characteristics in Annex ZA introduces a maximum difference between the final setting time of mixes with and without the single pigment or a blend (both as powder, granulate or preparation) shall be not greater than 120 min - p. 7 • Same as previous bullet for 4.2.3: introduction of a new threshold in Category B (8% of carbon black) • The arguments brought forth in an email on 1 OCT 2015 - if I have understood them correctly - are only moderately convincing. They explain why these thresholds are needed for technical reasons. They may indeed be very valid. However, we are questioning the fact that these are NEW thresholds. As foreseen in Articles 3(3) & 27 of the CPR, the establishment of classes and / or threshold levels is to be authorised either by revising existing mandates or by adopting delegated acts. In either case, EC services need a robust factual and technical information base with appropriate justifications to proceed with the decision making. Under the current circumstances, we cannot cite the standard.
13859-1:2014	Flexible sheets for waterproofing - Definitions and characteristics of underlays - Part 1: Underlays for discontinuous roofing	2014	<p>The following sections of EN13859-1 are excluded from the scope of the reference published: this list was discussed with the TC and CEN. The TC would prefer to review the EN rather than applying all these exclusions.</p> <ol style="list-style-type: none"> 1. Foreword, third to last paragraph "..., and supports essential requirements of Regulation (EU) No. 305/2011." 2. Clause 1 first paragraph "...and provides for the evaluation of the products with the requirements of this document." 3. Clause 3.2 4. Clause 4.1 last paragraph 5. Clause 4.3.2.3 last paragraph 6. Clause 4.3.6 last paragraph 7. Clause 4.3.7 first paragraph 8. Clause 4.3.8 first paragraph second sentence 9. Clause 4.3.11 10. Clause 4.4 11. Clause 5.2.2 NOTE (second paragraph) and

			<p>third paragraph</p> <p>12. Clause 5.2.13</p> <p>13. Clause 6.2.2 first paragraph first sentence</p> <p>14. Clause 6.3.1 last paragraph first sentence</p> <p>15. Clause 6.3.2.3 first paragraph last sentence</p> <p>16. Clause 6.3.3 last paragraph second dash</p> <p>17. Clause 6.3.4 a)</p> <p>18. Clause 7</p> <p>19. Clause 8 e)</p> <p>20. Annex D Table D.1 line on Emissivity</p> <p>21. Annex D Table D.1 column 'product type determination'</p> <p>22. Annex D Table D.1 note b</p> <p>23. Annex E</p> <p>24. Annex ZA Clause ZA.1 two last paragraphs (below Table ZA.1)</p> <p>25. Annex ZA Table ZA.1 column 'Regulatory classes' and column 'Notes'</p> <p>26. Annex ZA Table ZA.1 line 'Dangerous substances'</p> <p>27. Annex ZA Clause ZA.2.1 first paragraph "...are shown in Table ZA.2 for the indicated intended use(s) and relevant level(s) or class(es) of performance"</p> <p>28. Annex ZA Clause ZA.2.1 last paragraph last sentence</p> <p>29. Annex ZA Table ZA.3.1 row 'Tasks for the notified testing laboratory' box in second column and row 'Tasks for the notified product certification body' first box in second column</p> <p>30. Annex ZA Table ZA.3.2 row 'Tasks for the notified testing laboratory' box in second column</p> <p>31. Annex ZA Table ZA.3.2 row 'Tasks for the notified testing laboratory' box in second column</p> <p>32. Annex ZA Clause ZA.2.2</p> <p>33. Annex ZA Clause ZA.3</p>
13859-2:2014	Flexible sheets for waterproofing - Definitions and characteristics of underlays - Part 2: Underlays for walls	2014	<ul style="list-style-type: none"> • A new product characteristic “Emissivity” has been added and made mandatory (normative) under the FPC (Annex D). This characteristic even if voluntary should not be mandatory under the FPC.

<p>13963:2014</p>	<p>Jointing materials for gypsum plasterboards - Definitions, requirements and test methods</p>	<p>2014</p>	<p>1) Water absorption classes envisaged in Table 3, pg 9 2) Classification WFT supposed but without being based on any existing legal act.</p> <ul style="list-style-type: none"> • Treatment of essential (& other) characteristics incoherent throughout the EN <ul style="list-style-type: none"> o p. 6 [Cl 1], "covers the following characteristics: reaction to fire and flexural strength" (i.e. 2) o p. 7 [Cl 3.2, Table 1]: Also dangerous substances & tensile strength (making it 4) o p. 31 [Annex ZA, Table ZA.1]: reaction to fire and flexural strength + dangerous substances (so here 3) {besides, separately mentioned that "the same scope as Cl 1} o p. 37 & 39 [DoP & CE examples] containing all 4 <ul style="list-style-type: none"> • p. 8 – 9 [Cl 4.1. – 4.10], Listing of 10 "product characteristics", including the 4 ones mentioned above {and Cl. 5 presenting test methods for them}; Cl. 4.10. also containing a (new) classification for water absorption • p. 22 [Cl 6.2.2.], "all prod char-s in Cl 4 [...] shall be subject to the det of the product type", although the product type is defined in Art 2(9) in relation to ess char-s only • p. 28 [Annex B], Which CWT Dec? Not mentioned • p. 31 ff, Old Annex ZA ... • p. 32 & 33, Cf. Tables ZA.2 & ZA.3.1.: System 1 presented as applicable to all ess char-s in ZA.2, whereas ZA.3.1. refers only to reaction to fire when dealing with det of product type {which moreover assigned to NBs}
<p>16025-1:2013</p>	<p>Thermal and/or sound insulating products in building construction - Bound EPS ballastings - Part 1: Requirements for factory premixed EPS dry plaster</p>	<p>2014</p>	<p>Technical classes: there are different terms ("levels" and "classes") through the whole document - for both the term classes shall be used;</p> <ul style="list-style-type: none"> - clause 4.3.3.3, Table 6: Classification to be explained by TC. Why CP1 is not possible? - clause 4.3.7, Table 7: Classification to be explained by TC. Why highest class is SD50? - clause 4.3.2.1, Table 4: Why minimum pressure is 10 kPa? - clause 4.3.2.2., Table 5: Why minimum pressure is 30 kPa? chapter 6: designation code: "The following shall be included except when there is no requirement for a property described in 4.3" is a reference to national requirements and shall be avoided;

			chapter 6: designation codes are not obligatory for manufacturers - therefore, "shall" has to be deleted;
1790:2013	Road marking materials - Preformed road markings	2014	1) Clause 4.1.2 contains classification of luminance factor β to which the product performance must comply. 2) Clause 4.1.7 contains classes on UV resistance. 3) Clause 6.2.1 seems to oblige producer to test all product characteristics. TC to clarify in the standard.
12368:2015	traffic control equipment - signal heads	2015	The document contains new class in table 1
13924-1:2015	Bitumen and bituminous binders - Specification framework for special paving grade bitumen - Part 1	2016	Introduction of classes D18 and T11; AVCP system shall not be mentioned in the standard; New class for consistency at intermediate service temperatures. Inconsistency between ess. characteristics in Annex ZA1 (britlenes at low service temperature) Existence of Table 2 (page 9). How will "informative properties" be declared? "Regulatory classes" in Annex ZA.1 does not follow the agreed model ZA.
1304:2013	Clay roofing tiles and fittings - Product definitions and specifications	Jan-14	Classes of frost resistance introduced in clause 4.4.3 Information in Annex C on which MS accept which class.
13707:2013	Flexible sheets for waterproofing - Reinforced bitumen sheets for roof waterproofing - Definitions and characteristics	Jan-14	The TC expected to justify why they have decided to delete the ess. characteristic "External fire performance" for these products, as this ess. characteristic is in the mandate and was included in the previous hEN version. At least one Member State (Finland) has confirmed to regulate on external fire performance of roofs for these products and this intended use.
1504-5:2013	Products and systems for the protection and repair of concrete structures - Definitions, requirements,	Jan-2014	Table ZA.1.a includes new threshold values higher than the previous ones (may exclude products which could previously be CE marked). Shrinkage is now expressed with a different indicator introducing an additional threshold (may exclude products which could previously be CE marked).

	quality control and evaluation of conformity - Part 5: Concrete injection		
124-2 to 6	Gully tops and manhole tops for vehicular and pedestrian areas	Jan-2015	EN 124-1 which applies to ALL product standards for this family contains a number of performance thresholds not foreseen in the mandate in Tables 1, 2, 3, 4, 5 and in clauses 4.1, 6.3, 6.4.1, 6.11, 6.15, 6.16, 6.17, 7.3, 7.4.2 and 7.4.3. The same standard also contains additional requirements on the product dimensions and design which manufacturer is obliged to follow. EN 124-2 sets in the Scope limitations to the intended use of the product which may not be in the hEN (matter to be covered by national building regulations). Document retention period in AVCP part in conflict with the principle of 10 years in the CPR. Wrong use of NPD approach in page 23. EN 124-5 contains a threshold in clause 5.2.2 and similar problematic clauses on document retention period and the use of NPD page 31. FPC surveillance frequency in EN 124-5 is 6 times more frequent than for EN 124-1 leading to higher certification burden for composites products !!!
13282-2:2015	Hydraulic road binders - Part 2: Normal hardening road binders	Jan-2015	Classes and/or thresholds in compressive strength, sulfate content and composition. Composition is not an essential characteristic according to the mandate.
13561:2015	External blinds and awnings	Jan-2015	The following listing aims at distinguishing the elements currently included in EN 13561:2015 which would have to be excluded from the scope of citation in the OJEU under the CPR. Additionally, Annex ZA to this EN would need to be replaced in accordance with the new template. The listing below does not therefore mention any features of the current Annex ZA. 1) In Foreword (p. 4), the last part of the fifth chapter starting with "and supports essential requirements ...". 2) Section Introduction (p. 6) related to Machinery Directive. 3) In Section 1, Scope (p. 7), the second sentence of the first chapter. "[...] installation [...]" 4) In Section 1, Scope (p. 7), the sixth chapter dealing with machinery.

			<p>5) In Section 3, Terms and definitions (p. 8 pp.), Clauses 3.2 "[...] intrinsic performance [...]", 3.3 "[...] specific performance [...]" and 3.14 "[...] determination performance [...]".</p> <p>6) In Section 4, Product characteristics (p.10 pp.), Clauses 4.2 to 4.11 and 4.13 to 4.16. [Until dealt within the process leading to the revision of the current mandate M/101; these clauses on additional characteristics also contain certain wordings which would have resulted in similar treatment.]</p> <p>7) Section 5, Handling and storage (p. 28 pp.).</p> <p>8) Section 6, Information for use (p. 29 pp.) dealing with machinery.</p> <p>9) Annexes A (p. 40) and B (p. 47) both not linked to essential characteristics.</p> <p>10) Annex ZB (p. 55).</p>
13637:2015	Building hardware - Electrically controlled exit systems for use on escape routes - Requirements and test methods	Jan-2015	Several performance classes included (since it is a new standard none of them have been introduced previously); most of them are "pass an fail"
13830:2015	Curtain walling - Product standard	Jan-2015	Clause 4.3, second paragraph to be deleted as it sets requirements on limitation of fire propagation (which are not to be included in the standard). Limit values in 5.6 in 5.7 different from those in the 2003 version of the hEN. Clause 5.8 on snow load resistance contains new thresholds and clause 5.9 on impact resistance contains impact classes. New clause 5.10 contains thresholds. Table ZA.1 contains new essential characteristics (resistance to live horizontal loads, seismic resistance, flanking sound transmission).
13924-2:2014	Bitumen and bituminous binders - Specification for hard paving grade bitumen	Jan-2015	Classes (values) used in Table 1 ff have changed compared to EN 13924;

14303:2015	Thermal insulation	Jan-15	chapter 6: designation code: "The following shall be included except when there is no requirement for a property described in 4.3" is a reference to national requirements and shall be avoided; chapter 6: designation codes are not obligatory for manufacturers - therefore, "shall" has to be deleted; 7.2 Product Type Determination (PTD): "shall be subject to Product Type Determination (PTD)" is also not correct, because this cannot be demanded by hEN;
14304:2015	Thermal insulation	Jan-15	chapter 6: designation code: "The following shall be included except when there is no requirement for a property described in 4.3" is a reference to national requirements and shall be avoided; chapter 6: designation codes are not obligatory for manufacturers - therefore, "shall" has to be deleted; 7.2 Product Type Determination (PTD): "shall be subject to Product Type Determination (PTD)" is also not correct, because this cannot be demanded by hEN;
14305:2015	Thermal insulation	Jan-15	chapter 6: designation code: "The following shall be included except when there is no requirement for a property described in 4.3" is a reference to national requirements and shall be avoided; chapter 6: designation codes are not obligatory for manufacturers - therefore, "shall" has to be deleted; 7.2 Product Type Determination (PTD): "shall be subject to Product Type Determination (PTD)" is also not correct, because this cannot be demanded by hEN;
14306:2015	Thermal insulation	Jan-15	chapter 6: designation code: "The following shall be included except when there is no requirement for a property described in 4.3" is a reference to national requirements and shall be avoided; chapter 6: designation codes are not obligatory for manufacturers - therefore, "shall" has to be deleted; 7.2 Product Type Determination (PTD): "shall be subject to Product Type Determination (PTD)" is also not correct, because this cannot be demanded by hEN;
14307:2015	Thermal insulation	Jan-15	chapter 6: designation code: "The following shall be included except when there is no requirement for a property described in 4.3" is a reference to national requirements and shall be avoided; chapter 6: designation codes are not obligatory for manufacturers - therefore, "shall" has to be deleted; 7.2 Product Type Determination (PTD): "shall be subject to Product Type Determination (PTD)" is also not correct, because this cannot be demanded by hEN;

			(PTD)" is also not correct, because this cannot be demanded by hEN;
14308:2015	Thermal insulation	Jan-15	chapter 6: designation code: "The following shall be included except when there is no requirement for a property described in 4.3" is a reference to national requirements and shall be avoided; chapter 6: designation codes are not obligatory for manufacturers - therefore, "shall" has to be deleted; 7.2 Product Type Determination (PTD): "shall be subject to Product Type Determination (PTD)" is also not correct, because this cannot be demanded by hEN;
14309:2015	Thermal insulation	Jan-15	chapter 6: designation code: "The following shall be included except when there is no requirement for a property described in 4.3" is a reference to national requirements and shall be avoided; chapter 6: designation codes are not obligatory for manufacturers - therefore, "shall" has to be deleted; 7.2 Product Type Determination (PTD): "shall be subject to Product Type Determination (PTD)" is also not correct, because this cannot be demanded by hEN;
14313:2015	Thermal insulation	Jan-15	chapter 6: designation code: "The following shall be included except when there is no requirement for a property described in 4.3" is a reference to national requirements and shall be avoided; chapter 6: designation codes are not obligatory for manufacturers - therefore, "shall" has to be deleted; 7.2 Product Type Determination (PTD): "shall be subject to Product Type Determination (PTD)" is also not correct, because this cannot be demanded by hEN;
14314:2015	Thermal insulation	Jan-15	chapter 6: designation code: "The following shall be included except when there is no requirement for a property described in 4.3" is a reference to national requirements and shall be avoided; chapter 6: designation codes are not obligatory for manufacturers - therefore, "shall" has to be deleted; 7.2 Product Type Determination (PTD): "shall be subject to Product Type Determination (PTD)" is also not correct, because this cannot be demanded by hEN;

14388:2015	Road traffic noise reducing devices - Specifications	Jan-15	Errors in Table ZA.1.n note mentioning the classes of the performance for several characteristics. Wrong title on "regulatory classes". Shatter properties and light reflectivity are not mandated characteristics. Error in Table ZA.1.2 containing the "essential characteristic" environmental protection". Tables ZA.3.1, ZA.3.2 and ZA.3.3 contain wrong distribution of tasks between manufacturer and NB (AVCP system 3 does not allow manufacturer to assess product performance).
14680:2015	Adhesives for non-pressure thermoplastics piping systems	Jan-15	<ul style="list-style-type: none"> • ANNEX ZA: all based on pass / fail (same as in version EN14527: 2006 + A1 : 2010)
16351:2015	Timber structures - Cross laminated timber	Jan-15	unclear requirements for "reaction to fire" (reaction to fire layers/reaction to fire from tests); reference to MS obligations (page 92-94); AVCP reference wrong;
16475-7	Chimneys - Accessories - Part 7: Rain caps - Requirements and test methods	Jan-15	<ul style="list-style-type: none"> • Threshold levels of performance regarding compressive strength, wind load, heat resistance, resistance to sootfire, rainwater ingress, ice formation and in Annex A. • Obligation to declare reaction to fire, coefficient of flow resistance • AVCP system not correct (for plastic products)
331:2015	Manually operated ball valves	Jan-2015	additional classes introduced or classes values changed in several requirements
459-1:2015	Building lime - Part 1: Definitions, specifications and conformity criteria	Jan-2015	The standard foresees the possibility for additional properties (e.g. clause 4.4.5 and 5.4.5) and additional requirements (in Annex B). Need to clarify the role of Declaration of Composition (Annex D) as it is not allowed in addition to DoP. Upper limits for essential characteristics in Annex ZA. Clauses on dangerous substances problematic.

<p>54-22</p>	<p>Fire detection and fire alarm systems - Part 22: Resettable line-type heat detectors</p>	<p>Jan-2015</p>	<ul style="list-style-type: none"> • EN 54-22 is a new standard which contains pass fail criteria. These deficiencies are exceptionally acceptable as far as it does not go beyond those of previously cited hENs (such as EN 54-12 for example). However, it also contains new threshold levels not present in the existing hENs. The TC will have to engage in the normal procedure in getting these threshold levels accepted, i.e. provide the necessary information to the Commission to elaborate Delegated Act(s). Furthermore, these candidate hENs will have to be scrutinised by the CEN consultants for all other pertinent aspects. In conclusion, before these issues are solved, we cannot yet cite these candidate hENs. • Like the other EN 54 standards, this one is also built around pass/fail criteria • Presence of heat response classes and thresholds (p.10 + 24 + 29) • Ratio of response times $t(3)_{max} : t(3)_{min} \leq 1.3$ and $t(20)_{max} : t(20)_{min} \leq 1.6$ (p.20 ff) • Statement that "No classifications specified in this EN", although there are classes (p.54) • Annex ZA: dry heat (endurance) sensing element not in reply to mandate. Mandate 109 says: max. ambient temperature (sensing element)
<p>54-26</p>	<p>Carbon Monoxide detectors - point detectors</p>	<p>Jan-2015</p>	<ul style="list-style-type: none"> • EN 54-26 is a new standard which contains pass fail criteria. These deficiencies are exceptionally acceptable as far as it does not go beyond those of previously cited hENs (such as EN 54-12 for example). However, it also contains new threshold levels not present in the existing hENs. The TC will have to engage in the normal procedure in getting these threshold levels accepted, i.e. provide the necessary information to the Commission to elaborate Delegated Act(s). Furthermore, these candidate hENs will have to be scrutinised by the CEN consultants for all other pertinent aspects. In conclusion, before these issues are solved, we cannot yet cite these candidate hENs. • Pass/fail: 5.2.2: "The detector shall be deemed to meet the requirements of this clause if this assessment shows that the detector will not signal an alarm condition when subjected to a step change in CO concentration of 10 µl/l, superimposed on a background level between 0 µl/l and 1,5 µl/l." (p.17) • Annex ZA: cannot find in Annex ZA 'response

			<p>delay', which is in the original mandate (p.70)</p> <ul style="list-style-type: none"> • The COM acceptance letter for M109 (and other mandates) of 28/03/2014 mentions certain prerequisites under which the standards have to be elaborated, however, reproducibility and repeatability still figure in this standard. These are not ECs. Furthermore, an indicator for end-of-life of the battery does not figure in the standard.
54-27/2016	Fire detection and fire alarm systems - Part 28: Non resettable line type heat detectors	Jan-2015	<ul style="list-style-type: none"> • Annex ZA: We cannot find all essential characteristics of Annex ZA in the original mandate (e.g. air leakage...) (p.71-72) • The COM acceptance letter for M109 (and other mandates) of 28/03/2014 mentions certain prerequisites under which the standards have to be elaborated, however, reproducibility and repeatability still figure in this standards. These are not ECs. Furthermore, there is no EC for containment of radioactive sources.
54-29	Multi sensor fire detectors - point detectors smoke and heat	Jan-2015	<ul style="list-style-type: none"> • Annex ZA: cannot find in Annex ZA 'response delay' and 'safe containment of radioactive sources', which are both in the original mandate (p.86) • The COM acceptance letter for M109 (and other mandates) of 28/03/2014 mentions certain prerequisites under which the standards have to be elaborated, however, reproducibility and repeatability still figure in this standards. These are not ECs. Furthermore, there is no EC for containment of radioactive sources.
12050-1:2015 12050-2:2015 12050-3:2015 12050-4:2015	Wastewater lifting plants for buildings and sites. Part 1-2-3-4	Apr-2015	<p>All:</p> <ul style="list-style-type: none"> • Section 4.10 on dangerous substances (referenced in Annex ZA) does not have the correct wording <p>12050-1:2014:</p> <ul style="list-style-type: none"> • There is a new threshold level for the lifting effectiveness: $\leq 30\%$ falloff if cloth gets stuck (p.15) • Annex ZA: New essential characteristics have been introduced: Useful volume, load bearing capacity, structural stability of the collection tank <p>12050-2:2014:</p> <ul style="list-style-type: none"> • A new pass/fail in the testing method for the discharge pipe connection: 1.5 max perssure x 10 minutes (p.10) • Annex ZA: New essential characteristics have been introduced: Useful volume, load bearing

			<p>capacity, structural stability of the collection tank (p.27-28)</p> <p>12050-3:2014:</p> <ul style="list-style-type: none"> • A new pass/fail in the testing method for the minimum flow velocity: 30 kPa (p.9) • A new pass/fail in the testing method for the discharge pipe connection: 1.5 max pressure x 10 minutes (p.14) • Requirements of minimum value for backflow: 50ml, ... (p.15) • Annex ZA: New EC's have been introduced: Minimum useful volume, load bearing capacity, structural stability of the collection tank (p.29-30) <p>12050-4:2014:</p> <ul style="list-style-type: none"> • A new threshold on nominal pressure: resistance to >= PN 4 (p.7) • Annex ZA: New EC's have been introduced: Nominal Pressure (p.19-20)
12057:2015	Natural stone products - Modular tiles - Requirements	Apr-2015	<ul style="list-style-type: none"> • Clauses 4.2.2 - 4.2.3 - 4.2.5 - 4.2.6 - 4.2.8 - 4.2.10.2 - concern characteristics non listed in Annex ZA. • For several characteristics the EN expect them to be declared "when required" • Clause 4.2.18.1 makes reference to national provisions in the place of use. (The same goes for clause 4.2.18.2) • First sentence of clause 6.1 inaccurate • In clause 6.2.1 and in Tables 3 and 4 the FPC rules are presented to be applied to all characteristics. • Old Annex ZA • Clause 4.2.13 speaks about "insufficient slip resistance". Which is the thresholds for insufficient? • The essential characteristic "Reaction to fire" and thermal shock resistance is missing from the table ZA.1.2 (external uses).
12058:2015	Natural stone products - Slabs for floors and stairs - Requirements	Apr-2015	<ul style="list-style-type: none"> • Clauses 4.2.2 - 4.2.3 - 4.2.5 - 4.2.6 - 4.2.8 - 4.2.9 - 4.2.10.2 - 4.2.11 - 4.2.12 concern characteristics non listed in Annex ZA. • For several characteristics the EN expect them to be declared "when required" • Clause 4.2.18.1 makes reference to national provisions in the place of use. (The same goes for clause 4.2.18.2) • First sentence of clause 6.1 inaccurate • In clause 6.2.1 and in Tables 4 and 5 the FPC rules are presented to be applied to all

			<p>characteristics.</p> <ul style="list-style-type: none"> • Old Annex ZA
14195:2014	<p>Metal framing components for gypsum board systems - Definitions, requirements and test methods</p>	Apr-15	<ul style="list-style-type: none"> • New essential characteristic in Table ZA1 (loadbearing capacity) • Load bearing classes in clause 4.6.2. • Clause 4.1 second paragraph must also refer to Decision 96/603/EC for reaction to fire classification other than A1.
16397-2:2014	<p>Flexible couplings - Part 2: Characteristics and testing for metal banded flexible couplings, adaptors and bushes</p>	Apr-15	<ul style="list-style-type: none"> • Introduces minimum torque: 17Nm, 10Nm, 6000Nm, ... (p.10) • In Annex ZA: Some EC's from the original M/131 have not been introduced: internal pressure, max load for admissible deformation. Why has the TC considered these not relevant, e.g. in Doc CEN/TC 165 N 2009 (Amendment 1 of answer to the Mandate M131 work programme of CEN/TC 165)? • Annex ZA makes reference to sections from part 1 of this standard (non-harmonised) (p.22) • We received justifications on the issues (at right) on 5 OCT 2015. These were not convincing enough to cite the EN. • The standard needs to directly reference any performance requirements/ECs mentioned in its ANNEX ZA and cannot refer to another non-harmonised part (EN 16397-1) that contains them.
16497-1:2015	<p>Chimneys - Concrete Systems Chimneys - Part 1: Non-balanced flue applications</p>	Apr-15	<ul style="list-style-type: none"> • Table 4 p.17 introduces Pressure classes M1 and M2 which we do not find in the component standards (e.g. EN 1858) • Introduces maximum values for 'water vapour diffusion' (p.12-13) • Introduces maximum values for 'rainwater ingress' (p.15) • Temperature classes in table 3 (p.16) are limited to <=600 degrees • Annex ZA (p.48) under Durability chemicals and Durability corrosion, reference is made to classes that are not in the standard • Many references to CE marking (p.11-13) • We received justifications on the issues (above) on 22 SEPT 2015. These were not convincing enough to cite the EN.

1873:2014	Prefabricated accessories for roofing - Individual rooflights of plastics - Product specification and test methods	Apr-2015	<ul style="list-style-type: none"> • New classification for air permeability • Light transmittance as new essential characteristic and a range for that
54-28/2016	Fire detection and fire alarm systems - Part 27: Duct smoke detectors	Apr-2015	<ul style="list-style-type: none"> • This is a new EN • It is not part of the special treatment given to EN 12, 27, 29, 26, 22, 30 in the letter sent to CEN (2016) ARES 987305 in Feb 2016. • This letter excludes any citation for any new ENs of the 54 series if containing pass fail • This EN has a similar structure as the others, with many pass fail criteria • Introduces "performance types" (p.9) with an abbreviated format • Introduces "environmental groups" (p.9 ff) • Visibility of 6 meters (p.10) • DoP and CE marking examples (p.61 ff) clearly show a pass fail structure • This EN cannot be cited as such and should be reviewed by a Consultant
13659:2015	Shatters and external venetian blinds	Sept-2015	<p>The following listing aims at distinguishing the elements currently included in EN 13659:2015 which would have to be excluded from the scope of citation in the OJEU under the CPR. Additionally, Annex ZA to this EN would need to be replaced in accordance with the new template. The listing below does not therefore mention any features of the current Annex ZA.</p> <ol style="list-style-type: none"> 1) In Foreword (p. 5), the last part of the fifth chapter starting with "and supports ...". 2) Section Introduction (p. 7). 3) In Section 1, Scope (p. 8), the second sentence of the first chapter. 4) In Section 1, Scope (p. 8), the sixth chapter. 5) In Section 3, Terms and definitions (p. 10 p.), Clauses 3.2, 3.3 and 3.15. 6) In Section 4, Product characteristics (p.11 pp.), Clauses 4.2 to 4.13 and 4.16 to 4.18[.4]. [Until dealt within the process leading to the revision of the current mandate M/101; these clauses on additional characteristics also contain certain wordings which would have resulted in similar treatment.] 7) Section 5, Handling and storage (p. 37). 8) Section 6, Information for use (p. 37 pp.).

			<p>9) Annex A (p. 48 p.).</p> <p>10) Annexes C (p. 52), D (p. 53), E (p. 54 pp.), F (p. 58) & G (p. 59 pp.).</p> <p>11) Annex ZB (p. 68).</p>
14081-1:2016	Timber structures - Strength graded structural timber with rectangular cross section - Part 1: General Requirements	Jan-16	<ul style="list-style-type: none"> • p. 8 – 9 [Cl 4.1. – 4.10], Listing of 10 "product characteristics", including the 4 ones mentioned above {and Cl. 5 presenting test methods for them}; Cl. 4.10. also containing a (new) classification for water absorption
54-30	Fire detection and fire alarm systems - Part 30: Multi-sensor fire detectors - Point detectors using a combination of carbon monoxide and heat sensors	Jan-16	<ul style="list-style-type: none"> • EN 54-30 is a new standard which contains pass fail criteria. These deficiencies are exceptionally acceptable as far as it does not go beyond those of previously cited hENs (such as EN 54-12 for example). However, it also contains new threshold levels not present in the existing hENs. The TC will have to engage in the normal procedure in getting these threshold levels accepted, i.e. provide the necessary information to the Commission to elaborate Delegated Act(s). Furthermore, these candidate hENs will have to be scrutinised by the CEN consultants for all other pertinent aspects. In conclusion, before these issues are solved, we cannot yet cite these candidate hENs. Comparing it with the last accepted (MAR 2014) reply to the mandate (1st amendment): • Like the other EN 54 standards, this one is also built around pass/fail criteria • Threshold: "The detector shall be deemed to conform...in CO concentration of 10µl/l

			<p>superimposed on a background level between 0 and 1.5µl/l" (p.19)</p> <ul style="list-style-type: none"> • Threshold: "the ratio delta S of the response values Smax : Smin is not greater than 1.6, and;" (p.20 ff.) • Threshold: "the lower response value Smin is not less than 25µl/l." (p.20 ff.) • Threshold: "the ratio delta S1 of the response values Smax : Smin is not greater than 1.33, and the ration delta S2 of the response values S : Smin is not greater than 1.5"; (p.22) • Threshold: "The detector shall be deemed to conform...if the ratio in delta T of the heat response values Tmax : Tmin is not greater than 1.3" (p.22 ff.) • Annex G (normative): G.6 Test validity criteria: NOTE: " if the end of test condition mE = 2dB/m is reached before all the specimens have responded then the test is only considered valid if S>150µl/l" (p.66; and similar condition in Annex H on p.71 and Annex I p. 74) • Annex ZA: table ZA.1: there is a small discrepancy between Vibration (operational) and vibration (endurance) with the accepted reply to the mandate which says vibration sinusoidal (operational) and vibration sinusoidal (endurance)
12209:2016	Building hardware Mechanically operated locks and locking plates - Requirements and test methods	09/2016	Additional requirements beyond the essential characteristics in Annex A. Clause 4.1.8 contains requirements belonging to regulatory authorities (not for standardisers to decide). Clause 4.5 on "suitability for use on fire resistance contains obligatory requirements. Annex A includes decisions belonging to regulators not to standardisers to make. Annex ZA does not contain the essential characteristic "operating force".
13055:2016	Lightweight aggregates	09/2016	Annex A contains a non transparent approach regarding positive/negative history and reference to additional specific requirements. Also unclear statements regarding which source materials are covered by the scope. Allows additional requirements to be applied. Clause 5.13 refers to freeze thaw tests in accordance with provisions valid in place of use without specifying the test methods to be used. Clause 5.25.7 contains new threshold and undated reference to the test standard containing the threshold. Clause 5.27.1 is problematic regarding the integrity of the CE marking approach. Unclear provisions in 7.2.3. Last

			paragraph of ZA.2 must be deleted because these products are not submitted to AVCP system 3.
13108-1 to 13108-8	Bituminous mixtures	09/2016	additional values/categories introduced in tables 9, 10, 12, 13, 14, 19, 20
13616-1:2016	Overfill prevention devices for static tanks for liquid fuels - with closure device	09/2016	<ul style="list-style-type: none"> • Why was the EC "non-vapour tight" introduced? What is the added value? (p.6) • Thresholds and pass / fail (were all there in 2004 v.): the device shall not reopen >15kPA (p.6); static pressure 200kPA; shall not exceed 300kPA (p.7); "shall withstand static pressure of ..." (p.8), etc. • Static pressure of 600kPA was 400 in previous 2004 version (p.7) • ANNEX C (normative) "shall be in accordance with..." why it this table limited to these diameters? Was already there in 2004 v. (p.23) • ANNEX ZA: Vapour tightness in not part of the answer to the mandate of 2012 (p.26); most of the numbered references to the clauses are wrong; pass fail structure • The consultant (G.Bedotti) noted in his preliminary conformity check of FEB 2016 (sent to us on 14/9/2016) that the draft contains elements that are in conflict with the Directive/Regulation and Standardization Request. These are detailed in the annex to his reply.
13616-2:2016	Overfill prevention devices for static tanks for liquid fuels - without closure device	09/2016	<ul style="list-style-type: none"> • 2 x "The sensor shall be accepted .."(p.15) --> pass fail • ANNEX ZA: all ECs are in the reply to the mandate of 2012 (p.30) BUT all are pass/fail as illustrated on p.34 • The consultant (G.Bedotti) noted in his preliminary conformity check of FEB 2016 (sent to us on 14/9/2016) that the draft contains elements that are in conflict with the Directive/Regulation and Standardization Request. These are detailed in the annex to his reply.

14814:2016	Adhesives for thermoplastic piping systems for fluids under pressure	09/2016	<ul style="list-style-type: none"> • Scope issue (p.6):" ...for fluids under pressure independent of the application area" --> incorrect. This should be complemented by: ...but not intended for human consumption" as specified in table ZA.1. (p.18) • Why is there no EC on reation to fire in Annex ZA? (p.18) • M/131 requires an AVCP system of 3 (p.19)
16622:2015	Silica-calcium fume for concrete	09/2016	Clause 4.2 contains regulatory requirements. Thresholds introduced in 5.2.1, 5.2.2, 5.2.3, 5.2.7, 5.2.8, 5.3.1 and 5.3.2 different from the threshold contained in EN 13263-1. Wrong statements in 6.1 where the role of the certification body is neglected (AVCP system 1+). Clause 6.3.4 is presented as belonging to the manufacturer's FPC. Needs to be clearly separated and the role of NB clearly identified.
12467:2012+A:2016	Fibre-cement flat sheets - Product specification and test methods	Jan-17	<ul style="list-style-type: none"> • 5.1.1.: There are some obligations on the general composition of the products (p.9) • 5.7: p.15, 19: A new characteristic "apparent density" is not in annex ZA • Table ZA1.1.: Durability results are expressed as pass/fail (p.52) • Table ZA.2.: is wrong – levels or classes of performance (p.53) • Table ZA.3.3.: Why are notified test laboratory determining the product type? (p.54 + 56) • Examples of CE marking show pass fail for 'heat rain' (p.59+61-62)
12566-1:2016 12566-3:2016 12566-4:2016 12566-6:2016 12566-7:2016	Small wastewater treatment systems	Jan-17	In 5.1.2.4 prescribed load without allowing for local MS regulations on load parameters. Nominal capacity is not considered as essential characteristic in Annex ZA though included in CE marking. Crushing resistance is not mentioned in Annex ZA Wrong interpretation of the applicable AVCP system 1 in table ZA.3.1 and ZA.3.3.. Wrong statements in ZA.3 against the CE marking provisions of the CPR.
13160-2-3-4-5-7	Leak detection systems	Jan-17	<p>We did not yet receive EN 13160-1 which is supposed to provide the general principles of the whole series and without which we cannot pronounce ourselves on the others.</p> <ul style="list-style-type: none"> • The alarm device presents a threshold of min. 70 dB at a distance of 1m. (p.10, 12, 20) • Table ZA.3.: Why are notified test laboratory

			determining the product type? (p.58)
13163:2012+A2:2016	Thermal insulation products for buildings - Factory made expanded polystyrene (XPS) products - Specification	Jan-17	Reference to "voluntary marks" and "voluntary certification" made several times in the hEN; An additional certificate is required for PEF raw materials (chapter E.6-E.9); Annex F is introducing "additional properties" which are not mandated
14411:2016	Ceramic tiles	Jan-17	The scope has been unilaterally reduced to exclude products which were covered by the previous version. Chapter 8 contains unclear provisions therefore the compatibility with CE marking requirements under the CPR cannot be evaluated. Page 30 top contains new performance thresholds regarding surface flatness without following the provisions of CPR, Article 27. Annexes G, H contain thresholds for new product family of products < 7cm covered by the standard. In page 74, footnote c foresees the use of national test methods which is not compatible with the principle of the implementation of a harmonised standard under the CPR. Table ZA.2.1 contains errors regarding the applicable AVCP system.
15048-1:2016	Structural bolting assemblies	Jan-17	New performance classes have been added to the standard in Table 1, Table 2 and Table 3 without respecting the provisions of CPR, Article 27. of the standard. Standard EN 15048-2 now contains all requirements for the product therefore this is considered an integral part of the candidate hEN EN 15048-1. EN 15048-2 contains ambiguous and unnecessary conditions in clauses 5.2, 5.3.3, 5.3.4 and 5.5 regarding the assessment of product's performance.
15701:2016	Thermoplastic jackets for insulation	Jan-17	<ul style="list-style-type: none"> • Annex ZA: ECs are OK (= mandate) but the requirement 'impact strength' (see bullet 3 above) does not figure in table ZA.1 (p.15) • There is a mistake in table Z.A.3.1 "determination of the product type by the testing lab" (p.17)
16361:2013+A1:2016	Power operated pedestrian doors	Jan-17	The standard requires the application of EN 16005:2012 which in 4.7.2 contains obligatory and descriptive safety provisions applicable to all products. There is no assessment method for other safety solutions. New classification on wind load

			resistance and air permeability without respecting the provisions of CPR, Article 27.
12004-1:2017	Adhesives for ceramic tiles	May-17	The definitions of characteristics (3.6) differ from the CPR and result in an obligation to declare some of them. Threshold levels in tables 1, 2 and 3.; additional requirements in table 1 (3.6). 4.4.4.3.: Rules for tests differ depending on the outcomes of these tests. Class A1 missing. 4.5.: This characteristic is missing from everywhere in the standard, including annex ZA. Section 7: classification uses the concept "class" in a manner different from the CPR.
12101-2:2017	Smoke and heat control ventilators	May-17	<ul style="list-style-type: none"> • "the standards specifies requirements..." (p.7) • new threshold not present in 2003 v.: release behaviour $(Y+37)/0.35 \geq X$ (p.14) • the reaction under 60sec. was already present in 2003 v. (p.14) • new threshold not present in 2003 v.: "the NSHEV shall have according to national requirements a minimum class B300 30 (p.15) • new threshold not present in 2003 v. on mechanical stability: "no part shall fall during 6 mins. (p.16) • new threshold not present in 2003 v. on stability under wind load: "shall not open pare than 50mm" (p.16) • fewer classes than before: SL 0, 125 and 250 are missing vs. 2003 v. (p.30) • OLD Annex ZA • Table ZA (p.80) mentions "classes" • Example of DoP shows threshold $\leq 60s$ instead of a performance (p.85 and 87)
14891:2017	Liquied qplied water impermeable products	May-17	The definitions of characteristics differ from the CPR and result in an obligation to declare some of them. Table 1/1b (tensile adhesion strenght): not in annex ZA, but dealt with under AVCP rules (6.3.2.6). Section 7: classification uses the concept "class" in a manner different from the CPR. Threshold levels in table ZA1. AVCP related decision 99/90/EC contains systems 2+ and 3 (not system 4). Besides no differentiation of the treatment of different essential characteristics (see table ZA 3, water tightness).

15651-1:2017	Sealants	May-17	Classification uses the concept "class" in a manner different from the CPR (4.3.1, 4.3.2.1, 4.4). 4.3.2.1, 4.3.2.3: Rules on what to be declared ("shall be declared") not in line with CPR. Rules for "mounting and fixing" differ depending on the outcomes of these tests (4.6.2), classes A1 and F missing. Footnotes a in tables ZA 1.1 and ZA 1.2 reflect additional classes/threshold levels not present in the main part of the standard. Table ZA 3 1-6 make reference to different treatment of different reaction to fire classes.
15651-2:2017	Sealants	May-17	Classification uses the concept "class" in a manner different from the CPR (4.3.1, 4.3.2.1, 4.4). 4.3.2.1, 4.3.2.3: Rules on what to be declared ("shall be declared") not in line with CPR. Rules for "mounting and fixing" differ depending on the outcomes of these tests (4.6.2), classes A1 and F missing. Footnotes a in tables ZA 1.1 and ZA 1.2 reflect additional classes/threshold levels not present in the main part of the standard. Table ZA 3 1-6 make reference to different treatment of different reaction to fire classes.
15651-3:2017	Sealants	May-17	Classification uses the concept "class" in a manner different from the CPR (4.3.1, 4.3.2.1, 4.4). 4.3.2.1, 4.3.2.3: Rules on what to be declared ("shall be declared") not in line with CPR. Rules for "mounting and fixing" differ depending on the outcomes of these tests (4.6.2), classes A1 and F missing. Footnotes a in tables ZA 1.1 and ZA 1.2 reflect additional classes/threshold levels not present in the main part of the standard. Table ZA 3 1-6 make reference to different treatment of different reaction to fire classes.
15651-4:2017	Sealants	May-17	Classification uses the concept "class" in a manner different from the CPR (4.3.1, 4.3.2.1, 4.4). 4.3.2.1, 4.3.2.3: Rules on what to be declared ("shall be declared") not in line with CPR. Rules for "mounting and fixing" differ depending on the outcomes of these tests (4.6.2), classes A1 and F missing. Footnotes a in tables ZA 1.1 and ZA 1.2 reflect additional classes/threshold levels not present in the main part of the standard. Table ZA 3 1-6 make reference to different treatment of different reaction to fire classes.

16475-2:2017	Chimneys	May-17	<p>Forward and section 4.7 refer to other directives while the standard does not contain annexes Z for them. 4.4.1: "Reaction to fire" not relevant? 4.4.2 & 4.4.3.2.1: "Distance to combustible material for exhaust fans" is an installation requirement, not a product performance. 4.4.3.1: Temperature classes stated to be declared but not present in annex ZA as essential characteristics. 4.4.4, a): clause on flow resistance not clear. It is not clear why "gas tightness" is reflected both under 4.4.4 and 4.5.1. 4.5.2: "condensate resistance" missing from annex ZA. For six additional criteria: partly missing from annex ZA, partly concerning "cleaning and maintenance" (not an essential characteristic). The purpose of 5.1.1 unclear. Under 6.2.2 "condensate resistance and flow characteristic" treated for AVCP although missing from annex ZA. 7.1: General rule ambiguous ("if appropriate"?). On the contrary 7.2 and 7.3 set a designation obligation, listing some characteristics both from annex ZA and outside it. 8.1: "temperature class" to be mentioned in labels. 8.2: obligation to present designation (see F above) on a plate fixed to the product. Tables ZA 1.1 and ZA 1.2 are not accurately reflecting the essential characteristics of the main text.</p>
16497-2:2017	Chimneys	May-17	<p>Clause 5.1: obligation to declare the density. 5.3.2, 7.1: "CE marked components deemed to satisfy these requirements". In section 8 several mentions of "shall be declared" and "CE marked components deemed to satisfy". 8.13 & 8.14: references to "national requirements" not allowed. 8.10 "bulk density" and 8.16 "relative movement" missing from annex ZA. Although the scope of the standard consists of system chimneys for which terminal are just on component clause 8.17 deals separately with terminals, quite like AVCP in 12.3 and annex ZA table ZA 1.2 (which contains only one essential characteristic). Clause 9 "designation": obligations to declare certain characteristics. 9.2, 9.3, 9.4, 9.5 additional/new classes. 9.6 (resistance to fire classification): differing from the applicable Commission Decision. Annex ZA classes and thresholds in table ZA 1.1. ZA 2 decision 2010/679/EU not taken into account (customary 1, 3, 4 for reaction to fire in tables ZA 3).</p>

490:2011+A1:2017	Concrete roofing tiles	01/05/2017	<p>EN 490 is a revised standard which contains threshold levels, which were included already in the previous version (2011). The use of the old Annex ZA is no longer acceptable (the standard was adopted by CEN first in 2017), and has led to additional errors.</p> <ul style="list-style-type: none"> • OLD Annex ZA is used à not acceptable • Old note on DS and the non-functioning link are still used (p.19) • Old NPD para. à not acceptable • Tables ZA 1.1 and 1.2 contain "Declared Compliance" (p.20 à not acceptable • DoP and CE marking examples in Annex ZA "Shall not be greater than 4mm..." (p.6) • "value of Fmin shall not be less than..." (p.7) • Table 1 (p.8) seems to set the scope of the EN • "shall conform to the requirements..." (p.8) • Reaction to fire characteristics shall be declared when subject to regulatory requirements and may be declared when not subject..." (p.9) • "Tiles and fittings which meet the requirements of this European Standard ..." (p.17)
13915:2017	Prefabricated gypsum plasterboard panels with cellular paperboard core	Jan-18	<p>Foreword talks about "essential requirements" of the CPR;</p> <p>Inconsistency between the main text of the hEN (esp. Chapter 1, Scope) & Annex ZA on essential characteristics;</p> <p>Ch 1 also explicitly refers to "additional technical characteristics" "covered" by the hEN;</p> <p>Clauses 4.2 and 4.4 include a "pass/fail" criteria;</p> <p>Inconsistency between Clauses 4.4, 4.8 & 5.4.3 on the thickness of panels;</p> <p>Clause 4.10 comprises an additional characteristic (core adhesion, assessment method cf. Clause 5.5) not present in Annex ZA;</p> <p>Clause 4.11 on dangerous substances obsolete;</p> <p>Clause 5.6 contains an assessment method for an issue (surface hardness) otherwise missing from the whole hEN;</p> <p>Clause 6.2.2 subjects all "product characteristics in Clause 4" to ITT;</p> <p>Table ZA.3.1 is internally incoherent, when assigning manufacturers tasks for assessing the performance under AVCP systems 1 & 3 (or lacking clarity here)</p>

<p>13967:2012+A1:2017</p>	<p>Flexible sheets for waterproofing - Plastic and rubber damp proof sheets</p>	<p>Jan-18</p>	<p>MLV & MDV (Clauses 3.4 & 3.5; cf. also Clause 5.1.3 et al) defined confusingly; Clause 5.1.2 sets an unjustifiable 1 month time limit for (re-)testing the products; Several characteristics missing from Annex ZA (cf. Clauses 5.3, 5.9, 5.12 & 5.15); Clause 5.16 (reaction to fire) refers to Fire Experts Group, not existent since 10+ years; Clause 5.17 on dangerous substances obsolete; Table 1 (compliance criteria) include a "pass/fail" criteria for several characteristics; Clause 7 on product data sheets obsolete; Clause 8 e) presents the obligation to label "according to national regulations"; Table ZA.3.1 is internally incoherent, when assigning manufacturers tasks for assessing the performance under AVCP systems 1 & 3 (or lacking clarity here); Bibliography has not been renewed since the CPD era (references to guidance papers and essential requirements)</p>
<p>14353:2017</p>	<p>Metal beads and feature profiles for use with gypsum plasterboards - Definitions requirements and test methods</p>	<p>Jan-18</p>	<ul style="list-style-type: none"> • Clause 4.2 contains wrong statements regarding the classification in classes E and F. • Clause 4.3 contains outdated approach regarding dangerous substances. • Clause 4.6.2.1 prescribes obligatory performance thresholds +5 to -2 mm. • Clause 4.7.1 prescribes what is to be declared by manufacturer. • Clauses 4.7.2 to 5.2.2.4 speak about "comparison with nominal values" declared by manufacturer. The approach should be to assess the performance characteristic and state the performance in the assessment report. It is then for the manufacturer to decide what to declare. • Clause 6.2.2 follows wrong approach regarding the meaning of the "product type" and regarding the determination of all product characteristics. • Clause 6.2.3 follows wrong approach regarding the "further type testing". • Clause 6.3.9 and 8 follow wrong approach regarding the "conformity (or compliance) of the product with this standard". • Table ZA.3.1 regarding the further testing of samples by the manufacturer under AVCP system 1 must be limited to the essential characteristic "reaction to fire" only.

14496:2017	Gypsum based adhesives for thermal/acoustic insulation composite panels and gypsum boards	Jan-18	<p>Number of essential characteristics varies from the main text (also containing variation, cf. Chapter 1 & Clause 3.1) to Annex ZA;</p> <p>Additional "technical" characteristics (Clauses 4.1.2 & 4.4) included, missing from Annex ZA;</p> <p>Clause 4.3 on dangerous substances obsolete;</p> <p>Clause 5.3 concerns an issue (water/adhesive ratio) missing from anywhere else in the hEN;</p> <p>Under Clause 6.2.2, all "product characteristics in Clause 4" are subjected to "the determination of the product type", which according to the CPR occurs when drawing up the DoP: however, some of these characteristics remain outside Annex ZA. Furthermore, it is not up to CEN to determine which characteristics the manufacturer is to declare (include in "the determination of the product type");</p> <p>Table ZA.1: Bond strength (4.2) as "pass/fail" criteria;</p> <p>Table ZA.3.1 is internally incoherent, when assigning manufacturers tasks for assessing the performance under AVCP systems 1 & 3 (or lacking clarity here)</p>
14915:2013+A1:2017	Solid wood panneling and cladding - Characteristics, evaluation of conformity and marking	Jan-18	<ul style="list-style-type: none"> • regarding dangerous substances (clause 5.3) the EN does not follow the agreed approach. • product type (clause 6.1) in conflict the term of CPR, Article 2. • Clause 6.2.4 with limitations going beyond the provisions of Art 36 of the CPR. • Introduction of durability classes in Annex ZA • Table ZA.3.2 and Table ZA.3.3 to be revised regarding the content of the tasks for manufacturer and for NB
13361:2018	Geosynthetic barriers - Characteristics required for use in the construction of reservoirs and dams	Jun-18	Concerns similar to those expressed for EN 13491:2018

<p>13362:2018</p>	<p>Geosynthetic barriers - Characteristics required for use in the construction of canals</p>	<p>Jun-18</p>	<p>Concerns similar to those expressed for EN 13491:2018</p>
<p>13491:2018</p>	<p>Geosynthetic barriers - Characteristics required for use as a fluid barrier in the construction of tunnels and associated underground structures</p>	<p>Jun-18</p>	<ul style="list-style-type: none"> • Introduction contains reference to future characteristics to be added. • The relevance of characteristics is indicated by symbol "A" and "S", this distinction doesn't coincide with the listing of essential characteristics in Annex ZA. • The standard contains several additional characteristics on top of the essential ones. • Clause 4.4 (specific conditions of use) implies that certain characteristics need to be declared under conditions defined in the standard moreover clause about gas permeability contains the second sentence which is incompatible to the role of standards according to the CPR. Furthermore some clauses are linked to installation provisions. • Clause about dangerous substances corresponds to the one subject to COM decision. • In Clause 5.1, the first sentence doesn't make any sense. • Clause 6 about FPC contains also clauses on additional characteristics. The same goes for the normative Annex A. • Annex A also sets requirements for product information and it contains other incoherences. Furthermore in clause A.5.n there are gaps for FPP considering 50 years of service life. • In Annex ZA there is incoherence between Table ZA.1 and ZA.2 concerning essential characteristics. In addition in clause ZA.2 the sentence about micro-enterprises is superfluous.
<p>13492:2018</p>	<p>Geosynthetic barriers - Characteristics required for use in the construction of liquid waste disposal sites, transfer stations or</p>	<p>Jun-18</p>	<p>Concerns similar to those expressed for EN 13491:2018</p>

	secondary containment		
13493:5018	Geosynthetic barriers - Characteristics required for use in the construction of solid waste storage and disposal sites	Jun-18	Concerns similar to those expressed for EN 13491:2018
14041:2018	Resilient, textile, laminate and modular multilayer floor coverings - Essential characteristics	Jun-18	AVCP Commission AoC decisions referred to in annex ZA do not appear to contain any general rules on the choice of AoC now applicable to any other essential characteristics than reaction to fire. For dangerous substances, it remains therefore unclear whether 1+, 1 or 3 were applicable. In these circumstances the alternative of assessing the performance without testing (see clause 4.2.2.2. and 4.3.3.1.) cannot be taken (this would be the first standard in general introducing such an approach, not in line with annex V to the CPR). <ul style="list-style-type: none"> • 4.2.2.2., 4.2.2.3.2., 4.2.2.3.3.: the expressions of performance are not completely clear (– the two latter ones: references made to "threshold values" which is not in line with the CPR); • table 4: references made to "threshold values" which is not in line with the CPR; these are presented as "threshold levels" in annex ZA for each respective substance; • 4.3.3.2.: talks about "threshold requirements" for formaldehyde (not in line with CPR); • 4.4.: references made to threshold values which are not in line with the CPR; • It is not clear in 4.3.2. and annex ZA how VOC emissions are declared; • It is not clear in annex ZA how formaldehyde emissions are to be treated for AVCP; Some of them could be most likely covered in an amendment. However, we have checked the AVCP classes in the hEN and according to our information there is no AVCP (or former AoC) class for formaldehyde and PCP emissions (or any other VOCs) into indoor air (if you have any additional information, please let us know!). Since this would require a delegated act, be aware that this will take significant time. • Standards shall not contain

			normative references or normative reference chains ending up with undated standards or U.S. standards.
15382:2018	Geosynthetic barriers - Characteristics required for use in transportation infrastructure	Jun-18	Concerns similar to those expressed for EN 13491:2018
16993:2018	Geosynthetic barriers. Characteristics required for use in the construction of storage lagoons, secondary containment (above and below ground) and other containment applications for chemicals, polluted water	Jun-18	Concerns similar to those expressed for EN 13491:2018

	and produced liquids.		
16994:2018	Clay Geosynthetic barriers. Characteristics required for use in the construction of underground structures (other than tunnels and associated structures)	Jun-18	Concerns similar to those expressed for EN 13491:2018
15129:2018	Anti-seismic devices	Jul-18	<p>The standard has been written for designers, also Annex A (commentary to the scope) provide information for designers. Therefore the scope of the standard is out of CPR.</p> <ul style="list-style-type: none"> • Clauses 3.1.18, 3.1.19, 3.1.39 are defining “essential characteristics”, “FPC”, and “product-type” despite they are already defined by CPR. • Clauses 4.4.4 4.4.5 deal with issues not related to the marketing of these products. • Clause 4.5.1, 2nd sentence to be deleted. • Clause 4.7 to be deleted. • Clause 4.8 on dangerous substances does not follow EC guidance. • For several clauses (e.g. 5.3.3, 5.4.3, 6.2, 7.3, 7.4.2.10, 8.2.1.3.1, 8.2.3.4, 10), requirements are set for designers, which is out of the scope of CPR and hENs under it. • Several clauses (e.g. 5.4.4.3, 5.4.4.5, 5.4.4.6, 11) contain acceptance criteria, not acknowledged within CPR. • Clause 6.4.2.1 to be deleted as non compliant with CPR. • Clause 8.2.1.2.2 contains provision for FPC, which are to be provided in the specific clause for FPC. • In clause 10 and neither in Annex ZA AVCP

			<p>system has not been indicated and the clauses, while following the template, should be rethought.</p> <ul style="list-style-type: none"> • Clause 11 "Installation", and clause 12 "in-service inspection" contain provisions which are not foreseen for a standard under CPR. • The reference to OJEU in Annex ZA.1 does not relate to coexistence period, but instead to the AVCP system. This should be clarified • Annex ZA contains not mandated characteristics such as: Resistance to seismic loads/shock absorption, Stiffness, Energy dissipation capability, Dangerous substances. • In Tables ZA.1.n one should not list essential characteristics which at the same time are deemed not applicable. • In Tables ZA.1.n references to "conforming" remain unclear. The same goes for "information on characteristics". • In clause ZA.3 the source of the AVCP choice has not been mentioned, therefore while the AVCP decision should be referred to. • Standards shall not contain normative references or normative reference chains ending up with undated standards or U.S. standards.
16954:2018	Agglomerated stone - Slabs and cut-to-size products for flooring and stairs (internal and external)	Jul-18	<ul style="list-style-type: none"> • New Classification in Table 2. • In clauses 4.2.3 and 4.2.13 reference to areas for use and requirements there. • In clause 4.2.6 the characteristic is presented as always to be declared. • Characteristics in clauses 4.2.8 to 4.2.10 and 4.2.12 missing from Annex ZA. • Durability aspects in clauses 4.2.14.1 and 4.2.14.2 make reference to condition of use. • In Table 3 FPC rules presented also for characteristics in clauses 4.2.8 to 4.2.10 and 4.2.12. • In Annex ZA tables ZA3.1 and ZA3.2 are to be adjusted for the treatment of reaction to fire classes. • Standards shall not contain normative references or normative reference chains ending up with undated standards or U.S. standards.