
Natural Cement Distribution Ltd CE Marking Research Report

November 2014



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Brief

The directors of Natural Cement Distribution Limited had been asked several times by existing and potential customers if the product was or could be; CE Marked. After investigating a number of EU Directives and Standards it was found that the mapping of the attributes of Natural Cement Distribution Ltd.'s range of products and their component parts proved to be difficult. At this point the standard BS EN 1504 -1 to 10 was identified as a possibility. BS EN 1504 is Britain's first Standard for concrete repair which asks manufacturers to produce specifications in line with the new Standard, which lays down minimum performance levels, provides identifiable performance testing and a standardised approach to design. Although the standard was considered it was still unclear if ultimately this would enable Natural Cement Distribution Ltd to use this standard to CE mark their products. Innovate Now Ltd were commissioned to undertake research into this issue and examine what standard or directive if any, may be the most appropriate for the family of products offered to market by Natural Cement Distribution Ltd.

Approach

The approach taken was to look at the standards and other directives that could be considered the best potential options. A number of areas were considered for this research and those documents, standards, specialist information, industry sector associations and notified bodies were obtained, contacted or met as appropriate. A resource library was created to store this information and a number of conversations were held with industry specialists and technical bodies.

Research

The starting point was to understand what the CE marking requirements entailed for cement based products:

Under the current Construction Products Regulation, the authorities in the UK (DCLG) have regarded CE marking as a voluntary activity but from 1 July 2013 CE marking became mandatory for all products which conform to a European standard (or European Technical Assessment).

- The CE mark demonstrates conformity to a set of requirements as outlined in the Declaration of Performance, it is not a quality mark.
- A CE mark is a statement that a product has been manufactured and tested, in accordance with a "harmonised European Standard" (hEN), although other types of test may also be valid.
- In addition, it shows that the product meets the seven Basic Requirements for Construction Works. These are defined in precise terms, which may require a little interpretation, as:-
 - Mechanical resistance and stability,
 - Safety in case of fire,
 - Hygiene, health and the environment
 - Safety and accessibility in use,
 - Protection against noise,
 - Energy economy and heat retention,
 - Sustainable use of natural resources.



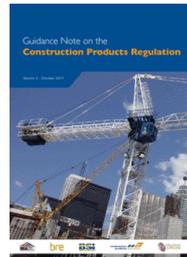
At this time there is no specification nor technical review undertaken in regards to cement products (such as natural cements) where an evaluation or comparison could be made in regards to the performance, material make up or attributes of natural cements against a standard or Harmonised specification.

- The CE marking is a statement that a product has been manufactured and tested in a certain way, so that it conforms to the appropriate European regulations. It does not indicate that the product is fit for any particular purpose.
- Every product for which a particular type of Standard (known as a harmonised European Standard) exists must be CE marked by European law if it is sold with a claim of conformity to that Standard, so long as the country in which the product is sold has enacted the relevant legislation to make adherence mandatory.

Organisations or sources of information contacted for support and information.

A number of regulatory and representative bodies were contacted for information and guidance on this matter. Most of those provided a verbal steer or signposted to other support providers that could assist in the investigation. There were four sources of information that provided information that was seen as most relevant to the CE marking for Natural Cement query. These were:

Construction Products Regulation



Nando



BRE



BBA



Mineral Products Association



The discussion with the MPA was fruitful as they indicated that the only Harmonised European Standard in place currently was for cements specified within those standards and these had undergone an ETA (European Technical Assessment). A list of those was provided and are indicated below. It was pointed out that ***at this time there is no specification nor technical review undertaken in regards to cement products (such as natural cements) where an evaluation or comparison could be made in regards to the performance, material make up or attributes of natural cements against a standard or Harmonised specification.***



Cements are CE marked against the BS EN 197 product standards using BS EN 197-2 conformity evaluation.

There is no harmonised standard in place currently for natural cement based products. Only the cements listed and tested against the standard are permitted to carry the CE mark.

Outcomes

Since April 2011, the Construction Products Regulation (CPR) has been in force. The new CE marking provisions replaced those of the Construction Products Regulation in July 2013. The CE marking of cements is currently facilitated via the procedures outlined below.

- The CE marking, is a European regulatory mark indicating ‘fitness for intended use’ in the sense that it signifies that appropriate, reliable information about the products performance, as required by relevant (generally Member States’ national) legislation, is being declared.
- The CE marking is not a quality mark because the actual level of performance to be achieved for most construction products is permitted to vary across EEA Member States.
- Only in a few cases – such as for cements - does the European standard set regulatory minimum/maximum levels of performance for mandated i.e. harmonised product characteristics.

Types of cement that can be CE marked

Cements are CE marked against the BS EN 197 product standards using BS EN 197-2 conformity evaluation. There are a number of specific cement types covered by a harmonised European standard and conform to a European Standard or undergone a European Technical Assessment.

These are:

- BS EN 197-1 Common cements (now including sulphate-resisting Portland cements and low early strength blast furnace cements)
- BS EN 413-1 Masonry cement
- BS EN 14216 Very low heat special cements
- BS EN 14647 Calcium aluminate cement
- BS EN 15743 Supersulphated cement

There is no harmonised standard in place currently for natural cement based products. Only the cements listed and tested against the standard are permitted to carry the CE mark.

Conclusion

CE marking communicates that a product meets a set of basic European harmonised standards, or a European Technical Assessment. Each product with CE markings has a Declaration of Performance (DoP) that is made available to purchasers and specifiers. For many standardised products, CE marking may become the default requirement by Building Control Officers to demonstrate material suitability, but for many others, particularly bespoke solutions, or those that are not included in the Construction Products Directive, European harmonised standards, or a European Technical Assessment; other means of compliance will continue to be used. These include British Standards and other national and international technical specification; independent certification schemes; tests and calculations (3rd party accredited) and/or past experience.



Natural Cement Distribution Ltd products undergo extensive perpetual testing across a broad range of specific performance criteria.

In the case of natural cements there are no European harmonised Standards or European Technical Assessments in place at the current time.

The manufacturer is not obliged to request a European Technical Assessment in this case. He can also sell the product without Declaration of Performance (DoP) and CE marking.

Furthermore, the manufacturer can expect that the product will not be refused in other EU Member States.

Conclusion (contin)

- **Natural Cement Distribution Ltd products undergo extensive perpetual testing across a broad range of specific performance criteria.**
- Test results for all products are freely available to examine or download from their website.
- There is an extensive range of data sheets that provide technical information for the range of products that are freely available to examine or download from their website.
- Natural Cement Distributions Ltd's products have no requirement to routinely supply proof of CE marking for Building Control approval.
- **In the case of natural cements there are no European harmonised Standards or European Technical Assessments in place at the current time.**

Following this in-depth research it is our understanding that undertaking the CE Marking process for natural cements based products could only become necessary if:

- There were changes to the current requirements of the Construction Products Regulation that would produce a change in the current Harmonised standards to include natural cement based products. There is no evidence that this is likely in the foreseeable future.
- The manufacturers believed that it was in their interests to fund a European Technical Review to enable a standard to be created. This could make public commercially sensitive information to competitors so would not be recommended.

Finally

This extract is taken from the Frequently Asked Questions section on the Construction Products Regulation (CPR) on the European Commission Enterprise and Industry website.

Frequently Asked Question 7:

For a product which is not covered by a harmonised standard, is the manufacturer after 01/07/2013 obliged to request a European Technical Assessment in order to sell the product in the EU?

Answer:

- 1. The manufacturer is not obliged to request a European Technical Assessment in this case. He can also sell the product without Declaration of Performance (DoP) and CE marking.**
- 2. Furthermore, the manufacturer can expect that the product will not be refused in other EU Member States.**
- 3. In this context it is important to remember Regulation (EU) 764/2008 laying down procedures relating to the application of national technical rules to products lawfully marketed in another Member State, thus operationalizing the mutual recognition principle*

Link to above extract is:

http://ec.europa.eu/enterprise/sectors/construction/faq/index_en.htm#Q1-7

