Comments to the proposal for harmonised emission classes

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Martin Glöckner

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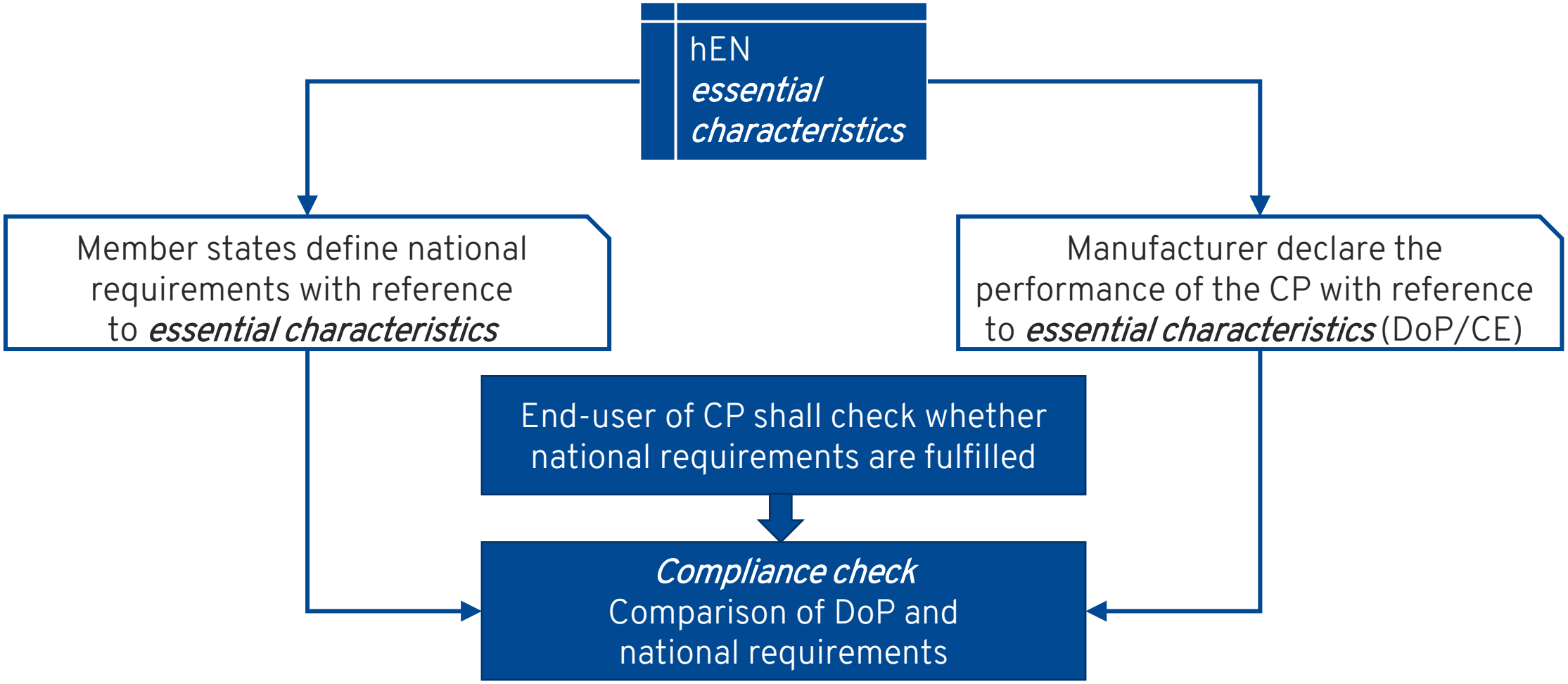
Essential characteristics of construction products 1



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Essential characteristics of construction products 2

Conclusions for the implementation of EN 16516

- Parameters of EN16516 need to be defined as essential characteristics within the hENs
- Results of tests according to EN16516 should be expressed in an easily understandable way
  - to facilitate reference by MS
  - to facilitate the compliance check by the end user
- EU-VOC-classes could streamline the process and could offer a solution

Comments on the proposed classes

- Performance classes should be open
- Perfomance classes should not be mixed up with NPD

Class	VOC 0	VOC 1	VOC 2
sum EU-LCI ratios	sum ≤ 1.0	sum ≤ 2.0	sum > 2.0

Class	CMR 0	CMR 1
CMR_{VOC}	≤ 1 µg/m³	>1 µg/m³

Class	F0	F1	F2	F3
Formaldehyde	≤ 10 µg/m³	≤ 30 µg/m³	REACH limit	>REACH limit

Class	SUM 0	SUM 1	SUM 2	SUM 3
TVOC	≤ 200 µg/m³	≤ 500 µg/m³	≤ 1000 µg/m³	>1000 µg/m³

Class index	A	B	C
∑ without EU-LCI	≤ 100 µg/m³	≤ 200 µg/m³	> 200 µg/m³

Comments on essential characteristics

- According to CPR it is needed to define essential characteristics for CE marking + DoP
  - essential characteristic are part of harmonised technical specifications (hEN / EAD)
- Distinction between
  - ***essential characteristics for health assessment*** and
  - ***essential characteristics for hygienic assessment***

  is not 100% in line with the current CPR legal text
- Possible essential characteristics in the sense of the current CPR
  - ✓ Sum of EU-LCI ratios (R value)
  - ✓ CMR_{VOC}
  - ✓ Formaldehyde
  - ✓ TVOC (*only in combination with sum of EU-LCI ratios and CMR_{VOC}*)
  - × ∑ without EU-LCI (*is this really a performance of the product?*)

Comments on CMRs

- Important: Exemption for CMRs for which an EU-LCI was derived
  - Threshold carcinogens (e.g. Formaldehyde, Acetaldehyde)
  - repro-tox subst.: often possible to derive health-related limit value
  - These CMRs should be excluded from CMR_{VOC}
  - Comments/justification from EU-LCI-WG in 2017
- CMR classifications change frequently (ATPs to CLP, Annex VI)
  - Challenging to follow and consider changed classifications
  - Solutions for a pragmatic update process are needed
- Formaldehyde classified as Carc. 1B (CLP, Annex VI)
  - Threshold carcinogen: EU-LCI adopted
  - REACH restriction: most likely different reference test method
    - REACH emission limit cannot be adopted directly as class F2
      (adaptation needed due to different model rooms, loading factors, air exchange rate)

Colour code

- CE marking printers are often black and white. A color code should be avoided because of unjustified additional effort and costs.
- The proposed grouping of the various classes does not reflect all possible combinations and does not correspond to existing national requirements.
  - Grouping of classes should be reconsidered or deleted completely.

Future development

Digitalisation could provide alternative solutions

- Digital DoP using the *smart CE marking* concept as the basis
- Additionally: App for end-users to check the conformity of an DoP with national requirements
- Digital approach could work without VOC classes.
- However, the European VOC classes are required for short- and medium-term implementation of health-related aspects (BRCW3)

Thank you for your attention!

Questions?

Martin Glöckner
Deutsche Bauchemie
E-Mail gloeckner@vci.de
Phone +49 / 69 / 25 56 – 16 33

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