

For people and the environment

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INFORMATION

Conformity assessment of the suitability of products made from on- site manufactured materials for drinking water hygiene in accordance with Regulation (EU) 2024/370

Version 1

1 Foreword

To date, the Environment Agency (UBA) has set out requirements for materials in contact with drinking water on the basis of Section 15 of the Drinking Water Ordinance (TrinkwV). To this end, the UBA has published three binding, material-specific Evaluation Criteria Documents (BWGL). The national regulations will be superseded from 31 December 2026 by new EU regulations on materials in contact with drinking water. Directive (EU) 2020/2184 of the European Parliament and of the Council of 16 December 2020 on the quality of water intended for human consumption sets out, in Article 11, general minimum hygiene requirements for materials that come into contact with water intended for human consumption. The European Commission has set out these general minimum hygiene requirements in detail in six legal acts, which were published on 23 April 2024.

Under Delegated Regulation (EU) 2024/370 of the European Union, certification is mandatory for products made from final materials intended to come into contact with drinking water. In the case of products manufactured on site¹ – for example, drinking water tanks, the coating inside a drinking water tank, or repair work carried out on a tank – the final materials are only produced on site. These are therefore considered new products, for which an EU certificate will be required with immediate effect from 31 December 2026. The new European requirements will therefore apply directly to products or constructions manufactured on-site from 31 December 2026, with no transition period. A supplementary document, the Supporting Document², describes the possibility of pre-certification to obtain EU certification for the product made from the final materials. This document sets out the precise conformity assessment procedure for products manufactured on site and is supplemented by specific examples.

2 Terminology

Source	Term	
	User	<i>User</i> means the specialist contractor that applies an organic or cementitious coating on site.
	Construction	<i>Construction</i> is used in this information in addition to the term ‘product’, as a product manufactured on-site may also constitute a construction (e.g. a drinking water storage tank). However, the use of the term ‘construction’ in this information is limited to the product made from the material produced on site and does not include any other factory-manufactured constituents that are incorporated into the construction.
Supporting Document (with addition)	Constituent product	<i>Constituent product</i> refers to a commercial product (for example, an addition, admixture, cement or aggregate) from a manufacturer or supplier, <i>which is used in the production of a cementitious material</i> (final material).

¹ Components installed inside the tank, such as corrosion protection electrodes, are not products made from materials manufactured on site. These are manufactured in a factory and then installed as they are.

² <https://circabc.europa.eu/ui/group/65764c73-4a57-45dc-8199-473014cf65bf/library/80f1e078-bf23-4f08-95ac-c64802090f04/details>

Source	Term	
	Constituent product certificate	<i>Constituent product certificate</i> is a preliminary assessment of constituent products for the assessment of final materials in accordance with Regulation (EU) 2024/370.
	Concrete batching plant	<i>Concrete batching plant</i> is the ready-mixed concrete plant in which the individual constituent products (cement, aggregate, etc.) are mixed to produce ready-mixed concrete.
Implementing Decision (EU) 2024/368	Final material	<i>Final materials that are subject to testing and confirmation of in accordance with the test requirements and acceptance criteria set out in the relevant Annexes I, II, III and IV to this Decision.</i>
	Commissioning	<i>'Commissioning'</i> , for the purposes of this information, means the commencement of the intended use of the product or construction, for example the (re)filling of the water chamber with drinking water.
Implementing Decision (EU) 2024/368	Test specimen	<i>Test specimen is an item that is representative of the final materials used for the testing in accordance with the procedures and methods set out in Annexes I, II, III and IV to this Decision.</i>
Implementing Decision (EU) 2024/368	Formulation	<i>Formulation is the list of all substances or constituents used in the manufacture of an organic material or a cementitious material, and their respective proportions</i>
Supporting Document (with addition)	Relevant substances	<i>Relevant substances are those substances which, in accordance with the respective formulation, must be analysed in the migration water.</i>
	Risk group (RG)	<i>Risk group</i> is used to determine the testing requirements for the finished materials/substances in accordance with Decision (EU) 2024/368 and the conformity assessment procedure in accordance with Regulation (EU) 2024/370 (Modules B and D or Modules B and C in accordance with Annex II to Decision No 768/2008/EC).
Implementing Decision (EU) 2024/368	materials manufactured on site	<i>'Materials manufactured on site' is the finished materials or constituents produced on a construction site.</i>
Supporting Document	Intermediate product	<i>Intermediate product</i> means a commodity that undergoes a chemical reaction (e.g. vulcanisation of rubber, cross-linking of plastics) in order to produce the end product.
	Intermediate product certificate	<i>Intermediate product certificate</i> is a preliminary assessment of intermediate products that can be used for the assessment of final materials in accordance with Regulation (EU) 2024/370.

3 Conformity assessment procedures

3.1 Legal basis

The EU Drinking Water Directive (EU) 2020/2184 sets out, in Article 11, minimum requirements for materials in contact with drinking water. The general requirements of the Directive have been specified in further legal acts. The three legal acts listed in Table 1 are of particular importance for the conformity assessment and labelling of products.

Table 1 Legal acts specifying the conformity assessment, testing and labelling of products

Legal act	Content
Implementing Decision (EU) 2024/368	Procedures and methods for the testing and verification of the suitability of final materials used in products
Delegated Regulation (EU) 2024/370	Conformity assessment procedures
Delegated Regulation (EU) 2024/371	Labelling of products

This means that the hygiene requirements for materials are now regulated in a binding manner at European level. The testing requirements for final materials for EU certification are set out in Implementing Decision (EU) 2024/368. Under Delegated Regulation (EU) 2024/370, the introduction of the European regulations means that products made from final materials that come into contact with drinking water are subject to a certification requirement. The standardised labelling of certified products is laid down in Delegated Regulation (EU) 2024/371.

The requirements for materials in contact with drinking water apply independently of other product requirements, and the relevant products are certified under Delegated Regulation (EU) 2024/370 separately from the conformity assessment for other requirements. The corresponding labelling under Delegated Regulation (EU) 2024/371 is applied independently of any CE marking that may be required for the product.

3.2 Special provision for on-site manufactured products

From 31 December 2026, a conformity assessment in accordance with Delegated Regulation (EU) 2024/370 will be mandatory for products made from final materials intended to come into contact with drinking water. For products made from finished materials that are on the market on 31 December 2026 and may be lawfully installed in water supply systems at that time, a transitional arrangement applies until 30 December 2032 at the latest³.

In the case of products or constructions made from materials produced on site, the final materials are only produced on the construction site. In accordance with Implementing Decision (EU) 2024/368, the requirements for the final materials apply. Conformity assessment in accordance with Delegated Regulation (EU) 2024/370 may only be carried out for products made from these materials. For products made from materials produced on site,

³ <https://www.umweltbundesamt.de/dokument/uba-information-hygienische-anforderungen-an>

this means that only the individually manufactured product can obtain EU certification. This takes the form of an individual product certificate, which is issued for the specific product or construction.

Products made from on-site manufactured materials that are completed after 31 December 2026 are regarded as new products and are therefore not covered by the transitional arrangements. This means that all products made from on-site manufactured materials completed on or after 31 December 2026 must comply directly with the new European requirements and must be certified accordingly.

Why is a conformity assessment of the individual product necessary for products made from materials or substances manufactured on site?

In the case of products manufactured on-site, the final material or substance is only produced on the construction site. Under the new European system, a conformity assessment based on Delegated Regulation (EU) 2024/370 is required for products made from the final materials or components. The on-site manufactured product is regarded as a single product and must be distinguished from mass-produced products, which are manufactured in a factory setting. The difference between a mass-produced product and an individual product lies in the fact that mass-produced products are clearly defined by their construction, geometry and the materials used, and are manufactured in a factory-based mass production process. However, in addition to on-site manufactured products, there may also be factory-manufactured individual products. An example of this is products that are coated as individual items in a factory.

3.3 Marking

Products made from final materials or constituents for which a successful conformity assessment has been carried out in accordance with Delegated Regulation (EU) 2024/370 must be labelled in accordance with Article 11(11) of Directive (EU) 2020/2184. Delegated Regulation (EU) 2024/371 provides for the marking of the product, the accompanying documentation and the packaging with the EU tap symbol (see Figure 1).

In the case of a product manufactured on site, there are no plans to distribute that product. For this reason, corresponding labelling of the product is not actually necessary and is usually impracticable. It is therefore sufficient for the operator of the water supply system to provide evidence of suitability for drinking water hygiene in the form of the manufacturer's or user's EU Declaration of Conformity, based on an EU certificate.

Figure 1 : EU symbol for labelling in accordance with Delegated Regulation (EU) 2024/371



3.4 Risk-based approach

In accordance with the European procedure, the necessary tests and the applicable conformity assessment procedure are determined on the basis of a risk-based approach. The

higher the risk of drinking water contamination posed by the product under assessment, the more extensive the testing requirements and the conformity assessment procedure. The decisive factor is the risk group determined for the relevant product or construction in accordance with Implementing Decision (EU) 2024/368. Table 2 shows examples of how products are assigned to risk groups. Pipes, for example, always belong to risk group 1, whilst tanks used in water supply systems belong to risk group 2.

Table 2 Examples of products and their classification into risk groups

Risk group (EU regulations)	Examples of products/constituents
RG1	Pipes (e.g. cement-lined cast iron and steel pipes, concrete pipes)
RG2	Tanks used in water supply systems, including tank linings where the proportion of the surface area in contact with water is $\geq 10\%$ of the total tank surface area Fittings (e.g. pipe couplings, valves)
RG3	Constituents of water supply tanks, including tank linings where the proportion of the surface area in contact with water is $< 10\%$ of the total tank surface area (e.g. repair mortar)
RG4	Constituents of water supply tanks, including tank linings where the surface area in contact with water is $< 1\%$ of the tank's total surface area (e.g. tile adhesive, grout)

For products in **risk groups 1 and 2**, Delegated Regulation (EU) 2024/370 specifies a conformity assessment in accordance with Modules B (EU type examination) and D (conformity to type based on quality assurance relating to the type) of Decision No 768/2008/EC. For both modules, the manufacturer or the user who applies the coating (hereinafter referred to simply as the “user”), must engage an accredited and notified certification body. This body takes the test specimens for the EU type examination during the initial inspection of the production site and carries out all relevant tests in accordance with Implementing Decision (EU) 2024/368, or subcontracts these to an independent, accredited testing laboratory.

Under Module D, the certification body must assess and monitor the manufacturer's or user quality management system. Formally, this requires an initial inspection and annual inspections of the production sites. During the annual inspections, test specimens are also taken and reassessed with a reduced scope of testing.

It is clear that this approach is not suitable for products manufactured on site. The production facility is only set up whilst the specific product or construction is being manufactured, and there is no series production that can be monitored through the annual inspection. For these reasons, Module D can only be applied mutatis mutandis to products or constructions manufactured on site.

To ensure appropriate implementation, the certification body must monitor the quality assurance system for one-off production and take test specimens for the EU type examination (Module B). As part of this monitoring, the certification body must assess the quality assurance system, in particular to ensure that only the specified intermediate products or constituent products are used in the manufacture of the final product. Furthermore,

compliance with the specifications for the manufacture of the final material must be monitored. The certification body is free to decide whether to be present on site for this supervision or to monitor the implementation of the quality assurance system through other measures (e.g. by the user providing documentation of the manufacturing process in the form of, for example, delivery notes, site logs or monitoring records of the processing conditions). However, the certification body must in all cases supervise the taking of test specimens or the production of test specimens. For the conformity assessment of products or constructions manufactured on site, the contractor will generally produce specific test specimens, as the actual product or construction cannot be tested. The location where the test specimens are produced may vary depending on the material (see chapters 3.6 and 3.7).

If the specialist contractor is certified in accordance with Chapter 3.8, this is equivalent to certification under Module D in accordance with Annex II of Decision No 768/2008/EC for the respective individual product.

As a result of the conformity assessment, the certification body issues an EU certificate for the specific product or construction manufactured on site. This confirms that this individual product or construction complied with the requirements of the EU Drinking Water Directive at the time of manufacture or construction. The certificate has no expiry date, as the confirmation is limited to the individual product or construction at the time of manufacture or construction.

For products in **risk groups 3 and 4** (small-scale applications), Delegated Regulation (EU) 2024/370 provides for a conformity assessment in accordance with Modules B (EU type examination) and C (conformity to type based on internal production control) of Decision No 768/2008/EC. In this case is only required to involve an accredited and notified certification body for the EU type examination. Conformity assessment under Module C is carried out exclusively by the manufacturer or user, and this module is also not entirely suitable for products manufactured on site. In this context, ‘application in accordance with the spirit of the legislation’ means, for example, that the user of an organic coating confirms that they have complied with the applicable application regulations, or that the contractor carrying out repair work on a concrete tank confirms that they have used only the constituent products specified by the certification body in the prescribed proportions.

The test specimen for the EU type examination may be provided by the user to the certification body, which will then carry out the tests required under Implementing Decision (EU) 2024/368 or have them carried out by an independent, accredited testing laboratory.

In this case, the EU certificate issued by the certification body is limited to the conformity assessment of the test specimen. By means of the declaration of conformity required under Delegated Regulation (EU) 2024/370, the user must confirm that the individual product or construction has been manufactured in accordance with the requirements.

These procedures are very labour-intensive in their current form. For this reason, the following section describes ways in which the conformity assessment for products made from materials and constituents manufactured on site can be simplified.

3.5 Preliminary assessment of intermediate and constituent products

The conformity assessment of individual products or construction works in accordance with the procedure described above involves a considerable amount of work. Preliminary assessments of products intended for use on the construction site can significantly facilitate the issuance of EU certificates for products manufactured on site.

Furthermore, a preliminary assessment can minimise the risk of it only being discovered after the construction has been completed or after final curing on site that the requirements under Implementing Decision (EU) 2024/368 have not been met.

The preliminary assessment of intermediate products or constituent products also takes the form of certification. However, the certificates issued in this way are not certificates under Delegated Regulation (EU) 2024/370, but are based on the relevant certification programmes of the individual certifying bodies. It is therefore not possible to label intermediate or constituent products certified in this way with the EU symbol. Instead, they may be labelled with the mark of the respective certifying body.

The various types of certificates are described in a supporting document⁴ accompanying the legal acts. For cementitious materials, constituent product certificates may be used for this purpose, and for organic materials, an intermediate product certificate may be used.

An accredited and notified certification body may therefore assess the intermediate or constituent product intended for use on the construction site prior to its on-site application. A test specimen made from the final material is required for the assessment test. The certification body supervises the production of this test specimen, as it is usually produced separately and it must be ensured that it is representative of the final materials produced on site. The certification body may commission an independent accredited testing laboratory to carry out the test. Following a positive assessment of the test results, the certification body issues a constituent product certificate or an intermediate product certificate. The manufacturer of the final product (e.g. the drinking water tank) may use this certificate or the certificates for the various constituent products as the basis for EU certification. This also applies to intermediate or constituent product certificates issued by notified certification bodies in other EU Member States. This significantly reduces the assessment and testing workload for the final product. This is explained in more detail for specific materials in the following chapters.

For products in risk groups 3 and 4 (small-area application), the constituent product and intermediate product certificates are sufficient for the conformity assessment of the product manufactured on site, provided that these certificates are available for all constituent products or intermediate products and the user confirms compliance with the application specifications in their declaration of conformity.

3.6 Material-specific – Organic materials

3.6.1 Typical on-site manufactured products made from organic materials

Typical products for on-site application made from organic materials are coatings which, for example, are applied in large water supply tanks or used for the internal rehabilitation of pipes. These also include coatings with an organic content exceeding 25% (m/m). The material cures through a chemical reaction following on-site application. The curing process is crucial to the suitability of the final material (coating). A product intended for on-site application is an intermediate product, as the final material is produced through a chemical reaction.

⁴ <https://circabc.europa.eu/ui/group/65764c73-4a57-45dc-8199-473014cf65bf/library/80f1e078-bf23-4f08-95ac-c64802090f04/details>

3.6.2 Drinking water hygiene requirements

For organic materials in contact with drinking water, the requirements under Implementing Decision (EU) 2024/368 are similar to the previously applicable national requirements under the KTW assessment framework.

The migration water must be analysed for the following parameters:

- Odour, taste, colour, turbidity and TOC
- all relevant substances identified as a result of the assessment of the entire formulation throughout the supply chain
- unexpected substances using GC-MS screening

Migration tests must also be carried out on chlorinated water.

In addition, a microbiological test in accordance with DIN EN 16421, Method 1 or 2, is required.

Only for products with a very small surface area, which are classified in risk group 4, is the formulation assessment waived and, consequently, the testing of the migration water for relevant substances. Accordingly, only the following parameters need to be determined in the migration water:

- odour, taste, colour, turbidity and TOC,
- unexpected substances using GC-MS screening.

However, testing in accordance with DIN EN 16421, Method 1 or 2, is also required for these products.

3.6.3 Conformity assessment

Conformity assessment can be carried out for the individual product manufactured on site without the intermediate product used being certified. In this case, a full formulation assessment is required for the individual product, which is very time-consuming as it usually involves a large number of suppliers. Furthermore, test specimens must be produced on site; for products in risk groups 1 and 2, their production must be supervised by the certification body. All tests, including the microbiological test (promotion of microbial growth), must be carried out. This microbiological test takes at least three months, which is why this type of conformity assessment for the product or construction is regarded as impractical.

Where an interim product certificate is available for the coating to be applied, the formulation assessment and the microbiological test are recognised for the certification of the product or construction made from the final material. Due to the significant influence of on-site application conditions on the curing of the coating, the remaining tests for products in risk groups 1 and 2 must be carried out again on test specimens produced on site under the supervision of the certification body. Provided that the specialist contractor carrying out the work holds a valid certification in accordance with Chapter 3.8, no further tests are necessary.

For products or repair work classified in risk groups 3 and 4, the user does not need to commission any further tests if an intermediate product certificate is available, but may refer directly to the intermediate product certificate in their declaration of conformity.

It is most appropriate for the manufacturer of the product, which is placed on the market for use on-site, to commission the interim product certificate. For this certificate, the certification

body supervises the production of the test specimens, which may, however, take place at the manufacturer's premises. No further supervision of the manufacturer's production site takes place, however.

Internal pipe rehabilitation

The in-situ coating of drinking water installations or water supply pipes is highly dependent on correct application, which in turn depends on the materials used, the pipework geometry and the condition of the pipes⁵. Consequently, the production of a test specimen on-site at the construction site cannot conclusively guarantee that the test specimen is representative of the rehabilitated section of pipework. Consequently, even where an interim product certificate is available and a test specimen produced on site under the supervision of the certification body has been retested, an additional analysis of the drinking water by the certification body responsible for the final coating is still required.

The analysis of the drinking water must be carried out at a representative sampling point on the rehabilitated section of the pipeline by an accredited testing laboratory, in accordance with the sampling guidelines⁶ issued by the Environment Agency. These drinking water samples must be analysed for:

- relevant substances in accordance with the formulation
- TON, TFN, colour, turbidity, TOC.

If all tests are successful, the certification body may then issue the EU certificate for the rehabilitated system constituents.

Chapter 5 sets out the possible procedures for the conformity assessment of products made from organically produced materials on site, using examples.

3.7 Material-specific – cementitious materials

3.7.1 Typical products manufactured on-site from cementitious materials

Typical products manufactured on-site from cementitious materials include constructions such as tanks. These are usually produced using ready-mixed concrete delivered to the site. Another application is the on-site application of a mortar coating (with an organic content of less than 25 per cent (m/m)), which is mixed on the building site.

Cementitious materials are produced from cement, aggregate, water and, where applicable, admixtures and/or additions. All these raw materials are considered constituents of the final cementitious material and are themselves products supplied by various raw material manufacturers.

3.7.2 Drinking water hygiene requirements

By analogy with the DVGW Worksheet W 347 currently in force at national level, the European regulation (Implementing Decision (EU) 2024/368) also sets out requirements for the constituents of cementitious materials. Under the European regulation, there are no general restrictions on the use of inorganic constituents, and they are not listed in the European positive lists. However, cementitious materials must always be tested for the

⁵ https://www.umweltbundesamt.de/system/files/medien/5620/dokumente/uba-information_rohrinnensanierung_rev01.pdf (available only in German)

⁶ <https://www.umweltbundesamt.de/en/document/evaluation-of-drinking-water-quality-respect-to-the>

migration of all elements subject to a restriction for cementitious materials as set out in Table 1 of Annex V to Implementing Decision (EU) 2024/367.

To determine the scope of the necessary tests, the product under assessment is assigned to a risk group based on its intended use.

The migration water (chlorinated/unchlorinated) must be tested for the following parameters:

- Odour, taste, colour, turbidity and TOC
- all elements subject to restrictions for cementitious materials listed in Table 1 of Annex V to Implementing Decision (EU) 2024/367
- relevant substances identified following the formulation assessment in accordance with Annex III to Implementing Decision (EU) 2024/367
- unexpected substances identified by GC-MS screening, if organic constituents are used

In addition, a microbiological test in accordance with DIN EN 16421, method 1 or 2, must be carried out if organic constituents are used.

3.7.3 Conformity assessment

In the case of cementitious materials, the hardened material constitutes the final product for which an EU certificate is to be issued. For the conformity assessment of on-site manufactured products made from cementitious materials, a formulation assessment is also required. This is more complex, particularly where organic constituents are involved, as the formulation must be disclosed and assessed accordingly throughout the supply chain. This identifies the relevant substances, that must be taken into account during the tests. For this reason, it is strongly recommended that at least the admixtures and additions be certified as constituent products.

The tests required for conformity assessment must be carried out on test specimens produced on site at the construction site. In the case of cementitious materials, it is possible for the test specimens to be produced and tested prior to the actual manufacture of the product or construction. The test specimens may be produced at the concrete batching plant. The prerequisite for this is that, for products or constructions in risk groups 1 and 2, the production of these test specimens must be supervised by the certification body. The certification body supervises the production of the test specimens using the same constituent products and the same proportions as those used in the product or construction to be produced on site at a later stage.

In principle, all constituent products can be tested and certified in advance in order to obtain a constituent product certificate. This is not necessary for the water used, as there are no corresponding test requirements for water. Constituent product certificates for cements may be issued for specific cements (products) from a cement manufacturer. Constituent product certificates may also be issued for specific aggregates from a relatively homogeneous quarry. Another option is to certify specific mortars or concretes as constituent products.

A distinctive feature of cementitious materials is that, provided all constituent products are certified, no testing of test specimens is required for the conformity assessment of the product or construction produced on site. In this case, the certification body's role is limited to monitoring the manufacturer of the final product quality assurance procedures regarding the exclusive use of the specified constituent products. This may also be carried out by means of a

document review (see 3.4). For products in risk groups 3 and 4, no certification body needs to be involved in this case.

If not, all constituents are certified, only the tests specific to the non-certified constituent need to be carried out on the test specimen of the final material. If, for example, the cement or aggregate used is not certified, a migration test is required, in which the migration water is analysed for the parameters TOC, TON, TFN, colour, turbidity and the 20 elements listed in Table 1 of Annex V to Implementing Decision (EU) 2024/367 (see the example at 5.2.3).

As part of the certification of constituent products, a test on a final material is required. The test specimens required for this must be prepared in accordance with Annex B of DIN EN 14944-2 or Annex B of DIN EN 14944-4, containing the respective constituent product in the maximum intended dosage. The preparation of these test specimens must be supervised by the certification body.

Chapter 5 sets out, with examples, the possible procedures for the conformity assessment of products made from cementitious materials produced on site.

3.8 Certification of specialist contractors

Some certification bodies also offer certification of specialist contractors. Such certification is regarded as equivalent to Module D certification in accordance with Annex II of Decision No 768/2008/EC for the respective individual product, provided:

- The specialized Companies's quality assurance system is monitored to ensure that only the specified intermediate products or constituent products are used in the manufacture of the product from finished materials. In the case of ready-mixed concrete, for example, this means that the quality assurance system must provide for the testing of each delivery with regard to the constituents used in the concrete.
- In the case of companies that apply organic coatings (referred to as "users" in this information), they must demonstrate their technical competence in applying a coating system, and the quality assurance system is monitored to ensure that the specialist company applies coatings of consistent quality.

An annual audit of the specialist contractor is carried out.

- The necessary test specimens are produced during the initial inspection or the annual monitoring under the supervision of the certification body, and the certification body carries out the relevant tests or has them carried out and evaluates the results. The scope of testing required for the test specimens is determined by the constituent products and intermediate products used, and the certificates already available for them (see 3.6 and 3.7). The annual inspection covers the tests that would otherwise be required for each product made from materials or substances produced on site. Only in the case of internal pipe refurbishment in drinking water installations is it necessary to test the drinking water following each refurbishment measure.

Given the combination of certification for the constituent products or intermediate products and the specialist contractor carrying out the work, the certification body for the end product need only verify the validity of the relevant certificates. No further tests are required.

4 Commissioning

A product or construction manufactured on site may only be put into service once it has been demonstrated that the requirements set out in the European regulations have been met. This

means that, from 31 December 2026, a product or construction may only be put into service if an EU certificate has been issued and following a declaration of conformity by the manufacturer of the final product. Through the preliminary assessments described in Chapter 3.5 , the general suitability of the relevant intermediate or constituent products for drinking water hygiene can be confirmed in advance. For products or repair measures in risk groups 3 or 4, these certificates, together with the user, who applies the coatings declaration of conformity, are sufficient to demonstrate compliance with the application requirements, to prove suitability for drinking water hygiene and to enable commissioning.

If interim or constituent product certificates are available for a product or construction manufactured on-site and classified in risk group 1 or 2, commissioning may be considered before the EU certificate for the product or construction made from the final materials or substances is available.

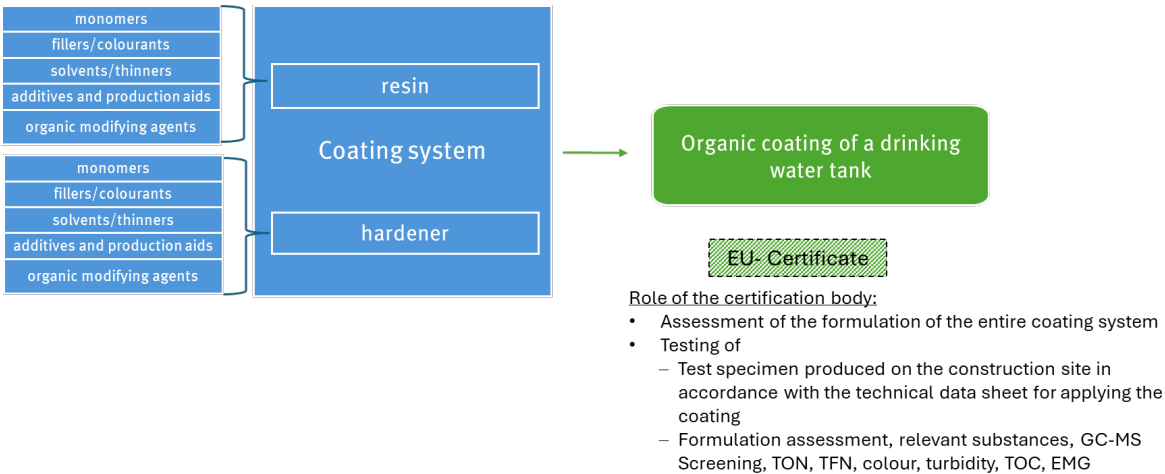
Certificates for intermediate and constituent products based on the European requirements may be issued even before 31 December 2026. This would make it possible to certify products or constructions manufactured on site in accordance with the new European requirements as early as January 2027. Due to the lack of transitional arrangements for these products or constructions, difficulties are anticipated when Delegated Regulation (EU) 2024/370 comes into force on 31 December 2026. This is also due to the fact that certification bodies can only be notified from that date onwards, and that this involves a new type of certification for on-site manufactured products or constructions. For this reason, it should still be possible to put on-site manufactured products or constructions into service after 31 December 2026, provided that a constituent or intermediate product certificate has already been issued, or at least compliance with the previous national requirements has been demonstrated. However, the conformity assessment procedure in accordance with Delegated Regulation (EU) 2024/370 must be carried out within one year.

5 Conformity assessment using examples

5.1 Organic materials

5.1.1 Coating of a tank without an intermediate product certificate

Figure 2 Flowchart for conformity assessment of an organic coating of a tank without an intermediate product certificate



Product example

The production of an organic coating for a drinking water tank is considered as an example. A coating system is used for this purpose, consisting of a resin and a hardener, which are produced from several raw materials. The two constituents are delivered to the construction site in tanks, mixed there and then applied. The manufacture of the coating system has provided specific instructions for mixing the two constituents and for application.

Available preliminary assessment

No intermediate product certificate is available for the coating system comprising resin and hardener.

Steps for certifying the end product

To certify the coating of the tank, the certification body must carry out a full formulation assessment of the resin and the hardener. This assessment then applies only to the specific coating produced on site, which must be considered on a case-by-case basis. Should the same coating process be applied to a different tank, a new formulation assessment would be required.

The certification body determines the scope of testing on the basis of the formulation assessment. When the coating of a tank is being applied, an inspection by the certification body is required, during which test specimens are to be coated. All specific tests required under Implementing Decision (EU) 2024/368 are carried out on the test specimen. This also includes the microbiological test, which takes at least 3 months.

Commissioning

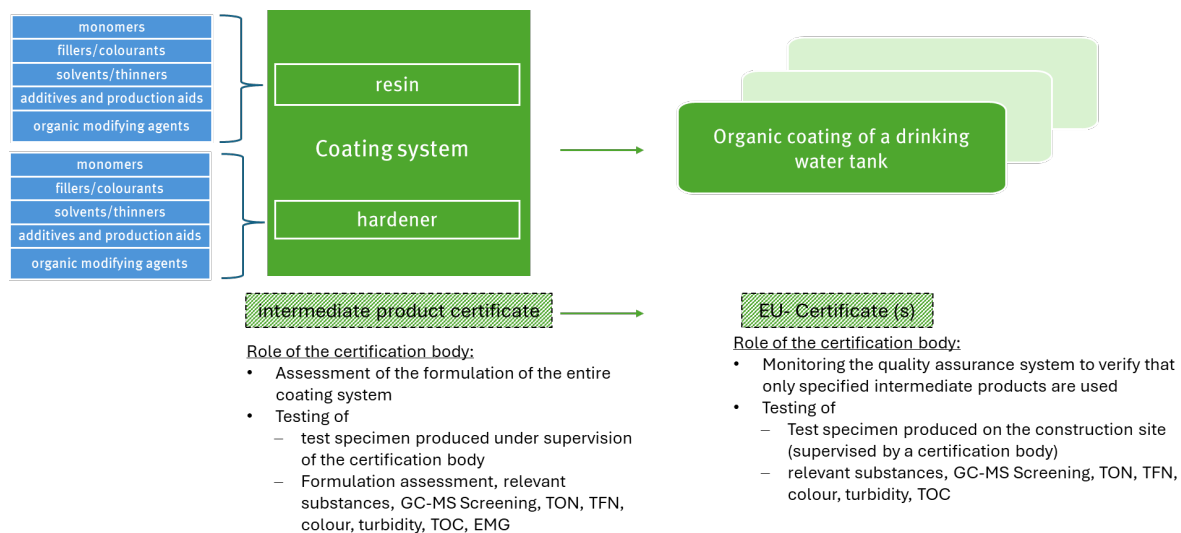
Upon successful testing, the certification body issues an EU certificate. On this basis, the user, who applied the coating issues its declaration of conformity. Only then can the tank be put into service.

Risks associated with this procedure

This procedure carries the risk that certification may not be possible after completion because the tank does not meet drinking water hygiene requirements. It is therefore advisable to carry out a preliminary assessment, as described in the examples below.

5.1.2 Tank coating with an intermediate product certificate

Figure 3 Diagram of the conformity assessment for an organic tank coating with an intermediate product certificate



Product example

This example corresponds to the previous example.

Available preliminary assessment

An intermediate product certificate is available for the coating system. The manufacture, who places the coating system, consisting of resin and hardener, on the market is the holder of the intermediate product certificate for the coating system. No further substances are added to the coating system on site.

Steps for certifying the intermediate product

For the certification of the intermediate product, the certification body has had test specimens produced under its supervision. This may take place at the premises of the coating system manufacturer, on a construction site or at a testing centre's technical facility. All tests and assessments relevant to the entire coating system are carried out in accordance with Implementing Decision (EU) 2024/368. The intermediate product certificate obtained in this way can be incorporated into the EU certification of several products manufactured on site.

Steps towards certification of the end product

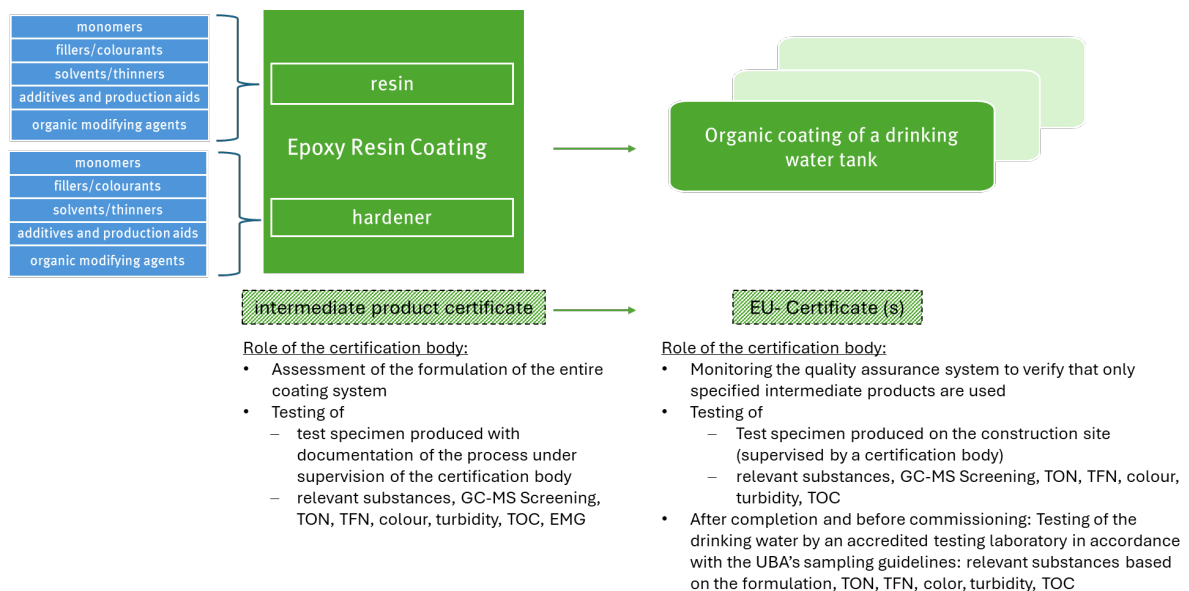
For the individual EU certification of an on-site application, the certification body's role is to monitor the user's quality assurance system to ensure that only the specified constituents have been used under the correct application conditions. If the coating system used has an intermediate product certificate, only a reduced test is required for the final product. To this end, test specimens are produced on site and the relevant tests and assessments are carried out in accordance with Implementing Decision (EU) 2024/368. The certification body for the end product must request the formulation-specific individual substances from the certification body for the coating system. A microbiological test in accordance with DIN EN 16421 is no longer necessary.

Commissioning

Upon successful testing, the certification body issues an EU certificate. On this basis, the user, who applied the coating issues its declaration of conformity. If an intermediate product certificate is available for the coating system, commissioning may be considered before the EU certificate for the product or construction made from the final material is available.

5.1.3 Internal pipe rehabilitation

Figure 4 Diagram of the conformity assessment procedure for internal pipe rehabilitation with an intermediate product certificate



Product example

As an example, we consider the application of an epoxy resin coating to a pipework system as part of an internal pipe rehabilitation project. A coating system consisting of resin and hardener is used for this purpose. The two constituents are delivered to the construction site in tanks, mixed on site and then applied to the pipework system. There are application specifications for mixing the two constituents, for application and for curing, as well as for the pre-treatment of the pipe system.

Available preliminary assessment

An intermediate product certificate is available for the coating system. The manufacture, who markets the coating system, consisting of resin and hardener, holds the intermediate product certificate for the coating system.

Steps for certifying the intermediate product

Test specimens are produced under the supervision of the certification body, and all assessments and tests required under Implementing Decision (EU) 2024/368 are subsequently carried out. This demonstrates the coating system's suitability in principle. This preliminary assessment can be incorporated into the individual EU certification of several products manufactured on-site.

Steps for certifying the end product

During the manufacture of the final product, a test specimen is also produced and the assessments and tests required under Implementing Decision (EU) 2024/368 are carried out. To this end, the certification body for the final product must request the formulation-specific individual substances from the certification body that issued the intermediate product certificate for the coating system. A microbiological test in accordance with DIN EN 16421 is no longer required. Furthermore, the certification body is responsible for monitoring the user's quality assurance system to ensure that only systems with an intermediate product

certificate are used and that the contractor complies with the specifications for applying the coating.

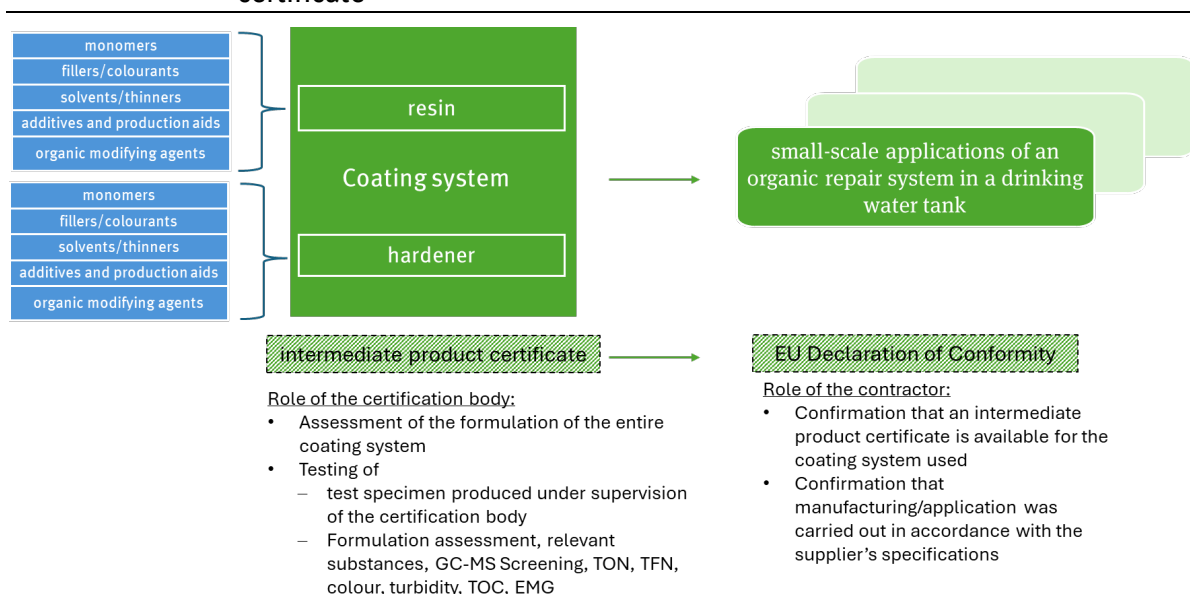
As described in Chapter 3.6.3, test specimens produced under supervision are not representative of the entire installation. Therefore, for the purposes of final certification, the certification body must also arrange for an authorised testing body to carry out an analysis of the drinking water at least one representative sampling point within the refurbished installation area, in accordance with the sampling guidelines⁷ issued by the Federal Environment Agency. The drinking water samples taken in this process must be analysed for the following parameters: relevant substances in accordance with the formulation, TON, TFN, colour, turbidity, TOC.

Commissioning

Upon successful testing, the certification body issues an EU certificate. On this basis, the user, who applied the coating issues its declaration of conformity. If an intermediate product certificate is available for the coating system, commissioning may be considered before the EU certificate for the product or construction made from the final material is available.

5.1.4 Small-scale application of a repair system with an intermediate product certificate

Figure 5 Diagram of the conformity assessment procedure for small-scale applications of an organic repair system with an intermediate product certificate



Product example

A small-scale application for repair work is considered as an example. The small-scale application of the repair system falls within risk group 3. The repair system consists of resin and hardener and is only mixed on site. There are application guidelines for mixing the two constituents, application and curing.

Available preliminary assessment

⁷ <https://www.umweltbundesamt.de/dokument/beurteilung-der-trinkwasserqualitaet-hinsichtlich>

An intermediate product certificate is available for the repair system. The manufacturer, who places the repair system, consisting of resin and hardener, on the market is the holder of the intermediate product certificate for the repair system.

Steps for certifying the intermediate product

For the certification of the intermediate product, the certification body has had test specimens produced under its supervision. This may take place at the premises of the manufacturer of the repair system, on a construction site, or at a testing centre's technical facility. All tests and assessments relevant to the entire repair system are carried out in accordance with Implementing Decision (EU) 2024/368.

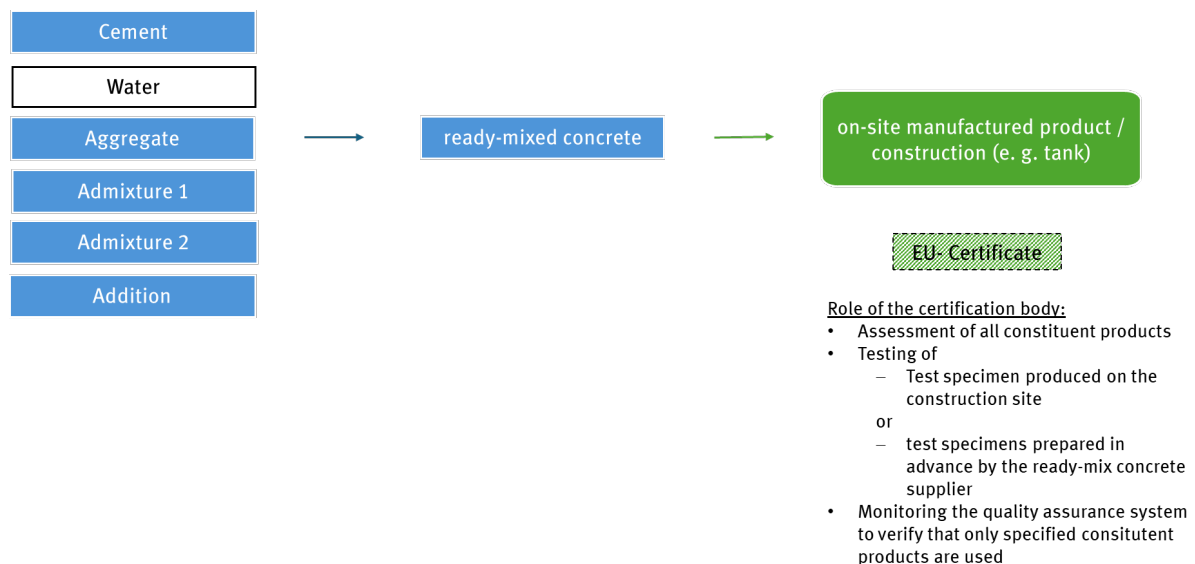
Steps for the conformity assessment of the end product

The user issues an EU Declaration of Conformity based on the intermediate product certificate, thereby confirming that the application on site has been carried out in accordance with the repair system manufacturer's specifications.

5.2 Cementitious materials

5.2.1 Drinking water tanks made of ready-mixed concrete without certificates for constituent products

Figure 6 Diagram illustrating the conformity assessment procedure for a concrete tank without constituent product certificates



Product example

Consider a drinking water tank made from ready-mixed concrete. The ready-mixed concrete, consisting of cement from a cement works, water, a specific aggregate from a supplier, two admixtures and an addition, is mixed at a concrete batching plant and delivered to the construction site in several consignments for the manufacture of the product or construction.

Available preliminary assessment

No preliminary assessments are available. There are no constituent product certificates available, either for the ready-mixed concrete or for the individual constituent products.

Steps for certifying the end product

If no certificates are available along the supply chain, a test specimen must be produced under the supervision of the certification body, either on site or in advance at the concrete batching plant. This specimen is then tested and assessed against all requirements in accordance with Implementing Decision (EU) 2024/368. This also includes microbiological testing, which takes at least 3 months if organic constituents are present.

Commissioning

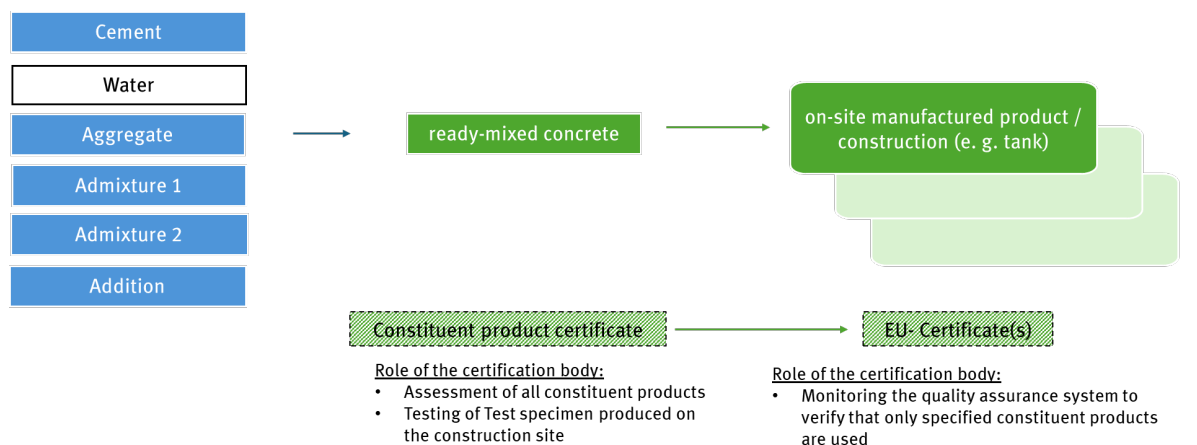
If the test is successful, the certification body issues the EU certificate, whereupon the company that manufactured the tank submits its declaration of conformity. Only then can the tank be put into service.

Risks associated with this procedure

This procedure carries the risk that certification cannot be granted after completion because the tank does not meet drinking water hygiene requirements. It is therefore advisable to carry out a preliminary assessment, as described in the examples below.

5.2.2 Drinking water tanks made of ready-mixed concrete with a constituent product certificate

Figure 7 Diagram of the conformity assessment procedure for a concrete tank with a constituent product certificate for ready-mixed concrete



Product example

This example corresponds to the previous example.

Available preliminary assessment

The concrete batching plant that produces the ready-mixed concrete holds the constituent product certificate for the ready-mixed concrete. However, the individual constituents do not have their own constituent product certificates.

Steps for certifying the constituent product

The aim is to obtain a constituent product certificate for ready-mixed concrete. To this end, a test specimen must be produced at the concrete batching plant under the supervision of the certification body. All tests and assessments relevant to ready-mixed concrete, in accordance with Implementing Decision (EU) 2024/368 (Annex II), will be carried out.

The constituent product certificate may be used as a preliminary assessment in the EU certification of several constructions or applications for which the same mix of constituent products is used at the same concrete batching plant.

Steps for the certification of the end product

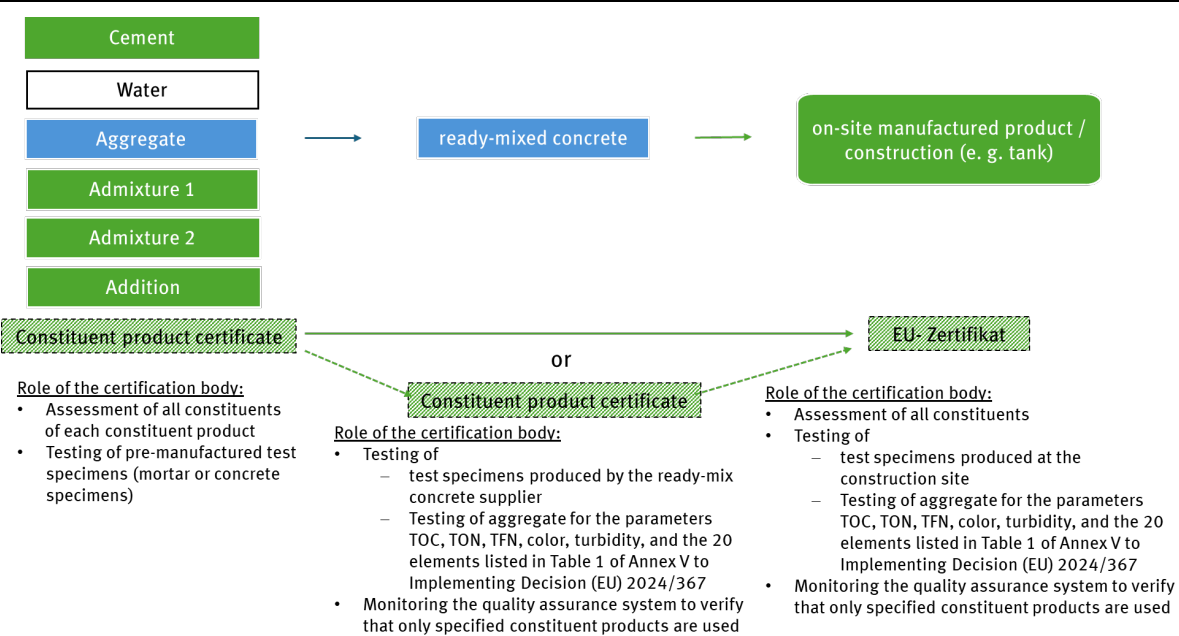
For EU certification, the certification body must monitor the tank manufacturer’s quality assurance system to ensure that the ready-mixed concrete supplied corresponds to the specified mix of constituent products. If further admixtures are used on site, either constituent product certificates must also be issued for these, or a further test specimen must be produced on site and tested against the additional requirements. If the ready-mixed concrete remains unchanged, no further tests are required on site for the final product.

Commissioning

Upon successful testing, the certification body issues the EU certificate, whereupon the company that manufactured the tank submits its declaration of conformity. If a constituent product certificate is available for the ready-mixed concrete, commissioning may be considered before the EU certificate for the tank is available.

5.2.3 Drinking water tanks made of ready-mixed concrete with constituent product certificates for individual constituents

Figure 8 : Diagram illustrating the conformity assessment for a concrete tank with constituent product certificates for individual constituents



Product example

This example corresponds to the two previous examples.

Available preliminary assessments

Constituent product certificates are available for all constituent products, with the exception of the mixing water and the aggregate. The mixing water does not require its own constituent certificate, as there are no requirements for mixing water.

Steps for certifying the individual constituent products

As part of the certification process, a test specimen is produced for each individual constituent product under the supervision of the certification body, and all relevant tests and assessments in accordance with Implementing Decision (EU) 2024/368 are carried out on. These preliminary assessments may be incorporated throughout the supply chain for a constituent product certificate for ready-mixed concrete or for EU certification, even where several products are manufactured on-site.

To avoid testing the products manufactured on site, the ready-mixed concrete may additionally be certified as a constituent product. If constituent product certificates are available for all constituents except the aggregate, a test specimen must nevertheless be produced at the concrete batching plant under the supervision of the certification body. For the issue of this constituent product certificate, only the tests relevant to the aggregate – specifically the migration water tests – must be carried out in accordance with Implementing Decision (EU) 2024/368 (Annex II).

Steps for certifying the end product

In this case, a distinction must be made:

If the ready-mixed concrete is certified, no further tests on test specimens are necessary. The certification body for the tank need only monitor the manufacturer's quality assurance system to ensure that the ready-mixed concrete supplied corresponds to the specified mix of constituent products.

or

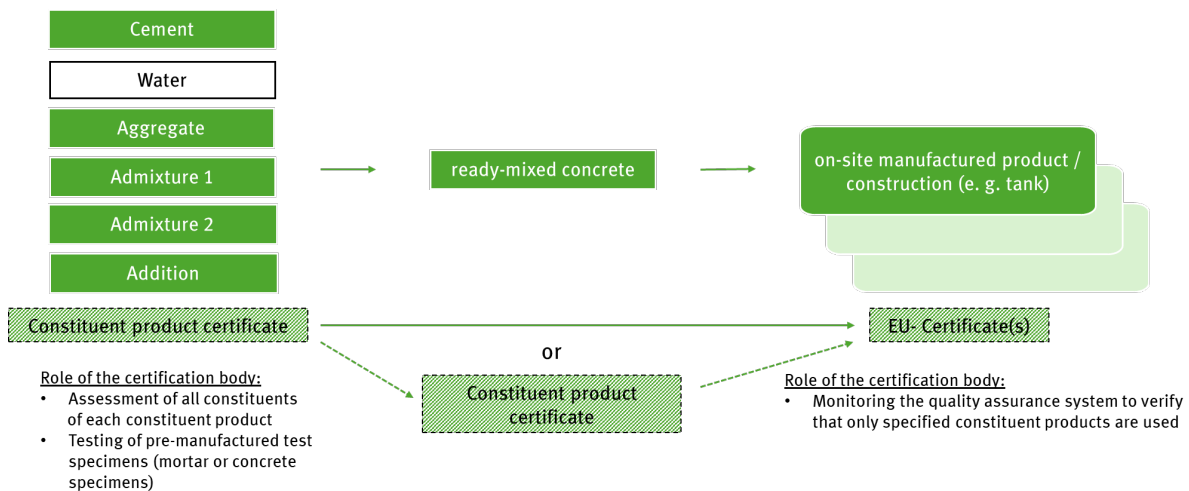
If no certificate is available for the ready-mixed concrete, a test specimen must be produced on site under the supervision of the certification body. All tests relevant to the aggregate, relating to migration water, are carried out on this specimen in accordance with Implementing Decision (EU) 2024/368 (Annex II). In addition, the certification body must monitor the quality assurance system of the container manufacturer to ensure that the ready-mixed concrete supplied corresponds to the specified mix of constituent products.

Commissioning

If the inspection is successful, the certification body issues the EU certificate, whereupon the manufacturer of the tank submits its declaration of conformity. If a constituent product certificate is available for the ready-mixed concrete, the commissioning of the tank may be considered before the EU certificate for the tank has been issued.

5.2.4 Drinking water tanks made of ready-mixed concrete with constituent product certificates for all individual constituents

Figure 9 Diagram illustrating the conformity assessment procedure for a concrete tank with constituent product certificates for all individual constituents



Product example

This example corresponds to the three previous examples.

Available preliminary assessments

Constituent product certificates are available for all constituent products except for the mixing water. The mixing water does not require its own constituent certificate, as there are no requirements for the mixing water.

Steps for the certification of the individual constituent products

As part of the certification process, a test specimen is produced for each individual constituent product under the supervision of the certification body, and all relevant tests and assessments in accordance with Implementing Decision (EU) 2024/368 are carried out. Each constituent product is then issued with a certificate. These preliminary assessments can be incorporated throughout the supply chain to form part of a constituent product certificate for ready-mixed concrete or, for EU certification, even where several products are manufactured on-site.

On the basis of the constituent product certificates, a constituent certificate may also be issued for the ready-mixed concrete. In this case, no tests are required and the certification body need only verify the validity of the constituent certificates submitted.

Steps for certifying the end product

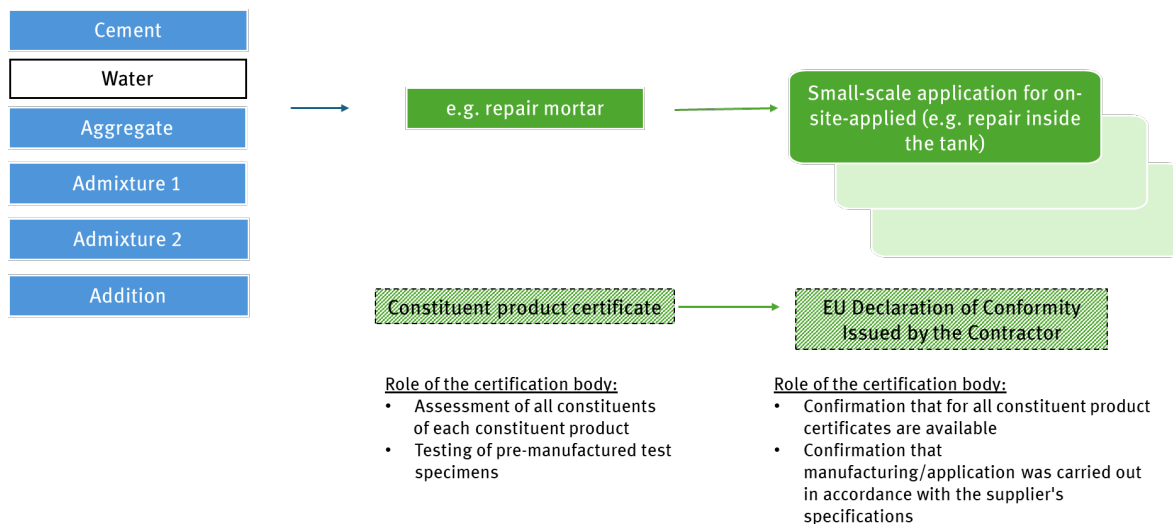
In this case, no further testing of test specimens is required. The certification body for the tank need only monitor the tank manufacturer's quality assurance system to ensure that the ready-mixed concrete supplied corresponds to the specified mix of constituent products.

Commissioning

Upon successful testing, the certification body issues the EU certificate, whereupon the company that manufactured the tank issues its declaration of conformity. If one or more constituent product certificates are available for the ready-mixed concrete or all its constituents, commissioning of the tank may be considered before the EU certificate for the tank is available.

5.2.5 Small-scale application of a repair mortar with a constituent product certificate

Figure 10 Diagram of the conformity assessment procedure for small-scale applications of a repair mortar with a constituent product certificate



Product example

A small-scale application for repair work is considered as an example. The small-scale application of the repair mortar falls into risk group 3. The repair mortar consists of cement, aggregate and admixtures or additions, and is mixed with water on site. There are application guidelines for mixing with water, application and curing.

Available preliminary assessments

The manufacturer of the repair mortar holds a constituent product certificate for the repair mortar. The water added does not require its own constituent product certificate.

Steps for certifying the constituent product

For the certification of the repair mortar, a test specimen is prepared at the repair mortar manufacturer's premises under the supervision of the certification body. On the test specimen all necessary tests and assessments are carried out in accordance with Implementing Decision (EU) 2024/368.

Steps for the conformity assessment of the final product

No involvement of the certification body is required for the conformity assessment of the final on-site repair. The user of the repair system must confirm, and be able to demonstrate, that a constituent product certificate is available for the repair mortar used and that the on-site application was carried out in accordance with the manufacture of the repair system specifications. The user issues an EU Declaration of Conformity based on the intermediate product certificate, thereby confirming that the on-site application was carried out in accordance with the manufacture of the repair system specifications.