

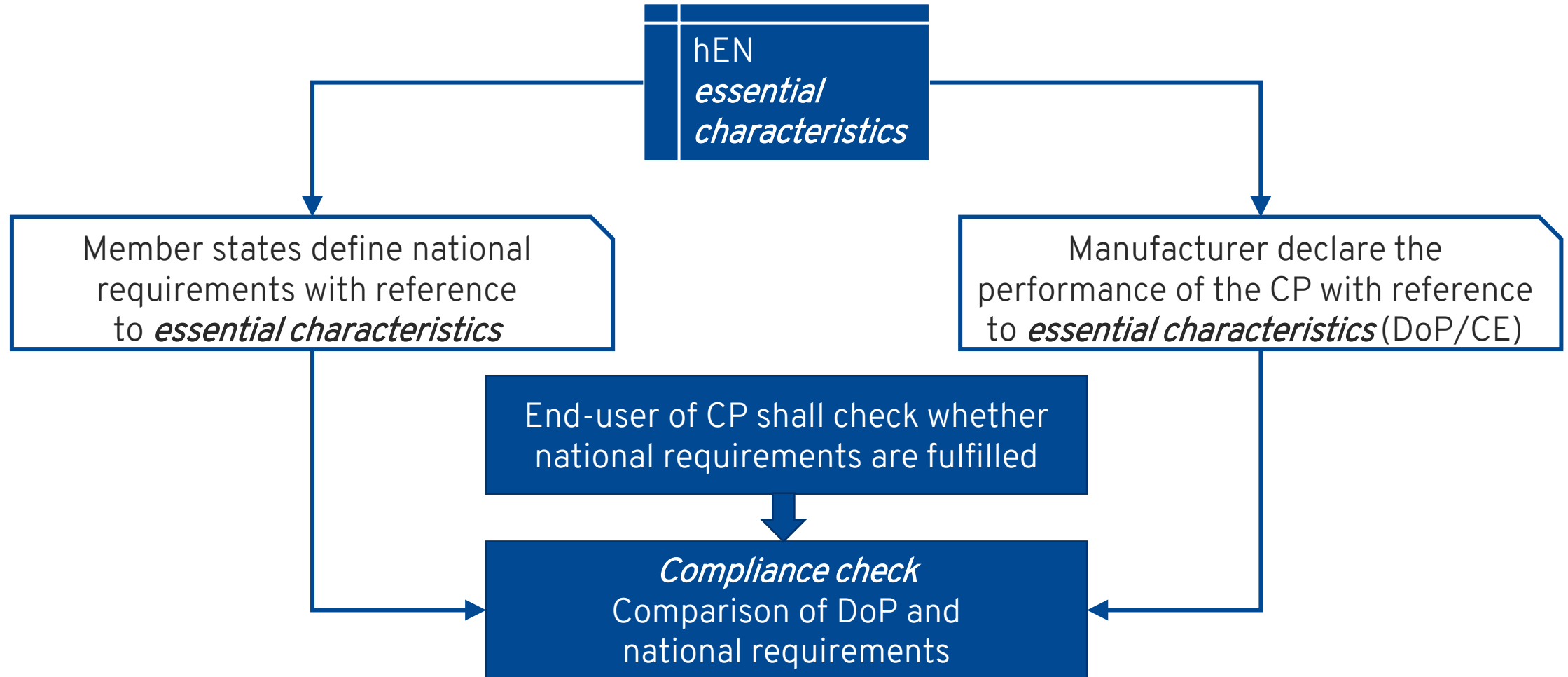


Comments to the proposal for harmonised emission classes

International Conference Limiting Health Impacts of
Construction Products Regarding VOC, 21.04.2021

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Essential characteristics of construction products 1



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
- Performance 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	<u>sum > 2.0</u>	
Class	CMR 0	CMR 1		
CMR _{VOC}	≤ 1 µg/m ³	<u>>1 µg/m³</u>		
Class	F0	F1	F2	F3
Formaldehyde	≤ 10 µg/m ³	≤ 30 µg/m ³	REACH limit	<u>>REACH limit</u>
Class	SUM 0	SUM 1	SUM 2	SUM 3
TVOC	≤ 200 µg/m ³	≤ 500 µg/m ³	≤ 1000 µg/m ³	<u>>1000 µg/m³</u>
Class index	A	B	C	
Σ without EU-LCI	≤ 100 µg/m ³	≤ 200 µg/m ³	<u>> 200 µg/m³</u>	



Comments on essential characteristics

- According to CPR it is needed to define essential characteristics for CE marking + DoP
 - essential characteristics 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})
 - ✗ Σ 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?

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