9th March 2011: the European Parliament and the European Union Board adopt the Regulation (UE) N.305/2011, published on 4th April 2011 on the European Union Official Gazette and effective 20 days later.

The regulation of building products – the so-called CPR, acronym for Construction Products Regulation – is currently completing its transition period. As from 1st July 2013 it will be fully operating.
Among the innovations comparing to the Directive, we have the definition and use of the **declaration of performance** (replacing the compliance declaration). The change is not just about the terms, yet it involves a greater completeness and clarity of information matching the product.
Before entering the matter, it's better to clarify that European EN Standards remains those already operating and issued for CPD Directive purposes.
The Commission will instruct CEN through a task for their revision and adjustment according to the basic requirements, as reported within enclosure no. I of CPR.

The table summarises the main differences between the former provisions and the new regulation.

Directive 89/106/CEE	Regulation n. 305/2011 (UE)
It's a Directive	It's a Regulation
Systems 1, 1+, 2, 2+, 3, 4	Systems 1, 1+, 2+, 3, 4
Compliance Declaration	Performance Declaration
CE Compliance Certificate	Certificate of Constant performance of the product
European Technical Approval (ETA)	European Technical Judgement (ETA)
6 essential requirements about work	7 essential requirements about work

The European Union regulations are over-national laws and become operative in all Union Member Countries without being acknowledged by the single Countries (as it is for directives).

The main task of CPR is the removal of all technical barriers to free circulation of building materials in order to achieve the proper functioning of inner market within this field. Such barriers used to exist and still do because of the different product and testing rules, besides different certificate systems and compliance proof for the same product within Members of the European Union.

CE marking stands for compliance of the building product with the declared performance about the essential features of the product and for fulfilment of applicable requirements of the harmonized legislation within the Union.

Clearer information

When reading CPR articles one can see how the aim of the regulation is giving clarity and completeness to product information data.
It is believed that this care comes from the fact that, so far, there have been many compliance declarations (according to CPD) supplying useful info but, at the same time, giving a general responsibility on the supplied product (which means without info on its features, useful for the project and following installation and managing).
Information can be classified in two groups. The first category is for info about product (description, final use, characteristics) and refers to project stage and tender specifications.
The second category refers to instructions for use and management stage (therefore from installation onwards).

Artt. 8-9: CE Marking

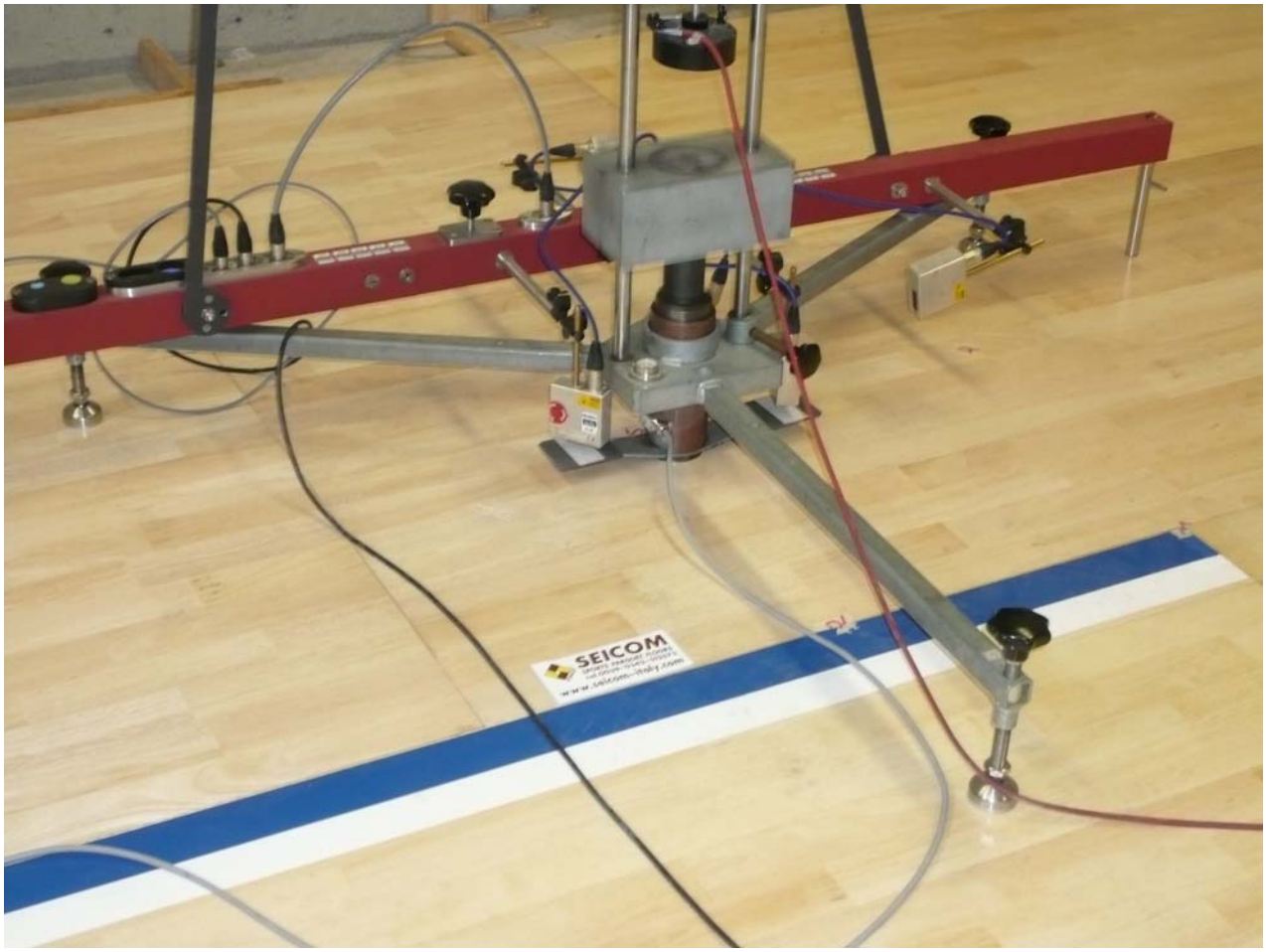
CE Marking:

- It's appended **only** on products supplied with DoP;

- It must be visible, legible and permanent;

- It's appended to the product or on a label attached to it. If that's not possible, it's affixed either on the package or on delivery documents;

- It's followed by the last two digits of the year in which it was put for the first time, by name and address of the Manufacturer's **legal office** or by identifying mark, by unique identification code of the product-type, by DoP reference number, by declared performance, by identification number of Notified Authority (if relevant), by intended use.



MANUFACTURERS' OBLIGATIONS *(from art. 11)*

1. Manufacturers issue a declaration of performance according to art. 4 and 6 and put CE mark according to art. 8 and 9.
As basis of the performance declaration, manufacturers prepare technical documents describing all elements, relevant to the required evaluation and checking system of the constant performance.

2. Manufacturers keep all technical documents and performance declaration for ten years, starting from when the building product entered the market.

3. Manufacturers ensure procedures to grant that mass production keeps the declared performance. It's taken into due account of changes made on product-type and of applicable harmonized technical specifications.

4. Manufacturers ensure that all products bear a number for type, lot, series or any other identification element or – if dimension and nature of the product do not allow it – that the required info are provided either on the packaging or on a delivery note for the building product.

5. Manufacturers indicate on the building product or, if that's not possible, either on the packaging or on the delivery note: name, registered trade name or trade mark and contact details. Address must provide a single point where to contact the manufacturer.

6. When putting a building product on the market to make it available, manufacturers ensure that the product comes with instructions and safety info issued in a language that can be easily understood by final users, according to what has been set.

Representatives (from art. 12)

1. The manufacturer can appoint, through written mandate, a Representative. The preparation of the technical document is not included in the Representative's task.

The manufacturer issue a performance declaration (DoP) when a product **enters** the market, when the product falls within the scope of a **harmonized standard** or of a European Technical Assessment.

ENCLOSURE III

PERFORMANCE DECLARATION

n. .....

1. Unique identification Code of the product-type: .....

2. Type number, lot, serial or any other element allowing identification of the building product according art. 11, section 4:

3. Intended use or uses of the building product, in accordance with the applicable harmonized technical specification, as provided by the manufacturer:

4. Name, registered name or trade mark and address of the manufacturer according art. 11, section 5:

5. If proper, name and address of the representative whose mandate includes the task as per art. 12, section 2:

6. Assessment system or systems and verification of constant performance of the building product as per enclosure V:

7. In case of performance declaration relevant to a building product falling within the application of a harmonized standard:

(name and identification number of the notified authority, if relevant)

Has carried out ..... in accordance with the system.....

(description of third party tasks as per enclosure V)

And has issued (constant performance certificate, compliance certificate of factory manufacture control, testing/calculation report — depending on the case)

8. In case of performance declaration relevant to a building material for which a European technical assessment has been issued:

(name and identification number of the notified authority, if relevant)

Has issued (European technical assessment reference number)

According to (reference number of European assessment document) IT 4.4.2011 European Union Official Gazette L 88/37

Carried out ..... in accordance with the system.....

(description of third party tasks as per enclosure V)

And has issued (constant performance certificate, compliance certificate of factory manufacture control, testing/calculation report — depending on the case)

9. Declared performance

Notes on the table:

1. Column 1 includes a list of the essential features set by the harmonized technical specifications for intended use or uses as per point n. 3;

2. For each characteristic listed in column 1 and in accordance with requirements set by art. 6, column 2 includes the declared performance, classified by level, class or described, with reference to the relevant essential features. Letters «NPD» (no performance determined) in case no performance is declared;

3. For each essential characteristic listed in column 1, column 3 includes:

a) the dated reference of the relevant harmonized standard and, if relevant, the reference number of the European technical specification or of the appropriate technical documentation used;

or

b) the dated reference of the relevant European assessment document, if available, and reference number of the European technical assessment used; Essential features (cfr note 1)

Performance (cfr. note 2)

Harmonized technical specification (cfr. note 3)

If specific technical documents have been used, in accordance with art. 37 or 38, the requirements fulfilled by the product:

10. The performance of the product as per point 1 and 2 complies with performance declared at point 9.

The present performance declaration is issued under the sole responsibility of the manufacturer mentioned at point 4.

Signed in the name and on behalf of:

(name and position)

(place and date of issue) (signature)

Artt. 4-7: Performance Declaration

DoP contains:

- The identification of the product-type for which it's issued;
- Assessment system and constant performance verification (AVoCP);
- Reference number and date of harmonized provisions or European technical evaluation used;
- Intended use ore uses of building product;
- The list of essential requirements set by harmonized standards;
- Performance of at least one of the essential features;
- The acronym «NPD» for features that are not declared within performance.

The DoP:

- It is provided together with each product supplied on the market (in case of a supply of whole lot of the same product, a single copy can be provided);
- It is either in paper or electronic form (if requested by the receiver it has to be paper);
- It can be provided through web site;
- It has to be provided in the language/s required by the member country where the product is supplied.

Artt. 8-9: CE Marking

CE marking:

- It is appended **only** on products supplied together with DoP;
- It has to be visible, legible and permanent;
- It's appended to the product or on a label attached to it. If that's not possible, it's affixed either on the package or on delivery documents;
- It's followed by the last two digits of the year in which it was put for the first time, by name and address of the Manufacturer's **legal office** or by identifying mark, by unique identification code of the product-type, by DoP reference number, by declared performance, by identification number of Notified Authority (if relevant), by intended use

Example of CE label

CE 0123	*CE marking, consisting of the "CE"-symbol*
AnyCo Ltd, PO Box 21, B-1050, Brussels, Belgium **13** 00001-CPR-2013/05/12	*Identification number of the product certification body* *name and the registered address of the manufacturer, or identifying mark* *Last two digits of the year in which the marking was first affixed* *Reference number of the DoP*
EN 123 - 5: 2009 Product A intended to be used in (e.g. curtain walling, fire compartmentation, etc.) **essential characteristic 1:** 50N/cm^2 **essential characteristic 2:** Pass **essential characteristic 3:** Class A1 **essential characteristic 4:** RE 60 **essential characteristic n:** xxx **Durability of essential characteristic 1:** expressed as indicated in the DoP **Durability of essential characteristic n:** expressed as indicated in the DoP **Dangerous substance X** : Less than 0,2 ppm	*No. of European standard applied, as referenced in OJEU (see note 14)* *Unique identification code of the product-type* *Intended use of the product as laid down in the European standard applied* *Level or class of the performance declared* *[see note 15]*

Art. 11: Manufacturers' obligations

- They issue a DoP and put CE mark;
- They prepare the technical document;
- They keep technical document and DoP for ten years after placing the product on the market;
- They grant performance keeping by manufacture;
- They ensure products have lot number, serial number or any other element allowing identification;
- They provide name and address on the product as contact info. Address must provide a one and only point;
- When placing the product on the market, they provide either instructions and safety information, issued in the language set by the interested member country;

- If they think a product does not comply with DoP, they adopt all necessary measures to conform, withdraw or recall it;
- If the product shows risks, they immediately inform National Authorities of the member state where the product is available;
- Following a reasoned request by relevant National Authorities, they provide all info and documents showing compliance of the product with DoP.

Any importer or distributor placing a product on the market under his own name or modifying a building product already placed on the market in order to influence its DoP is subject to manufacturer's obligations.

2 Economic operators – duties and responsibility

2.1 Manufacturers' duties and responsibility

Manufacturers are either individuals or body corporate who manufacture a building product or have it designed or manufactured under their own name and sell it with their trademark. Manufacturers' obligations are set in details by art. 11 del CPR.
As a general rule the manufacturer is obliged to issue the Performance Declaration (DoP In English Declaration of Performance) for each of his building products, before placing it on the market, provided that the product is covered by a harmonized standard (for products) or that a European Technical Assessment is issued for that product (ETA = European Technical Assessment). The exceptions to this general rule are few and defined by Art. 5 of CPR. When the general rule is applied, the manufacturer (or an authorized representative) must also affix CE mark on those products having a performance declaration.
The importance of the performance declaration (DoP) within CPR context is underlined by art. 4.2 which states that **info on the performance of the product** referring to **essential features**, stated by the harmonized technical standard or within applicable ETA, **can be provided only when included and specified in the DoP**; this is valid also for their advertising, even through other forms, i.e. technical or advertising brochures or web sites. The importance of CE marking is underlined by art. 30 of the regulation (UE) n. 765/2008 which states that CE marking must be the only one stating the compliance of the product with requirements set by the community harmonized standard who requires the affixing. Markings and marks other than CE can be used as long as they help improving protection on users of building products and provide additional info, not covered by CE marking.

WHAT IS FACTORY PRODUCTION CONTROL "FPC"
FOR CE MARKING OF SPORTS PARQUET FLOORS
AND WOODEN FLOORS
Multi-sports indoor surfaces (EN14904)

TARGET

Within CE marking procedures on wooden and parquet floors, there's a need in the Company to implement a production Control Plan, mentioned in product standards with the English acronym FPC, which stands for Factory Production Control.

The main goal of such verification and control, beyond their sophistication level, is always only to ensure the maintenance of quality standards of the product, especially to reassure Customers and final Users about compliance of the supply with the standards and, consequently, the ability of wooden and parquet floors to meet the need and essential requirements set by relevant Standards and Guidelines.

In a few words, therefore, production controls shall be (at least) scheduled and applied in order to monitor over time the compliance of the manufactured and supplied products with those initially tested.

Therefore it's all about minimum requirements every company can adopt in several ways, more ore less deeply, within their own strategies and programs.

Moreover, to refute several common opinions, such checks can be made without specific problems even in case of small or craft companies, obviously when specifically made for these kinds of business entities.

We want to put the accent on the fact that, in most cases, companies already carry out (maybe unconsciously) production control, although not so systematically and very often informally.

So, it is clear that every company shall check whether control regularly carried out over the whole manufacture process (from raw material to product release on the market) can fulfil the requirements set by relevant standards (UNI EN 14904), if such control is made periodically and if there's necessary and appropriate record and filing. After that, we try to give a general scheme for preparation of production quality control, hoping that each operator can find consideration and work input for daily activity.

FPC documentation purposes

The whole documentation that makes up FPC system has, in a few words, the following purposes:

- Set rules for systematic control on products
- Set rules for staff and procedures qualification

• Set procedures for records management
• Set the regulatory framework

To unequivocally and properly support the compliance of building products with declared performances in relation to essential features and fulfilment of applicable requirements of European Union harmonized standards.

FACTORY PRODUCTION CONTROL (F P C)

ABSTRACT FROM UNI EN 14.342: 2005 STANDARD Section 6.6

6.3.1 Generalities

The Manufacturer must:

- Install;
- Document;
- Keep

A production control system, ensuring that products placed on the market comply with the declared performance features.
The control system must include:

- Procedures;
- Regular inspections;
- Testing
- And/or assessments.

Results have to be used for control on:

- Raw materials;
- Other materials or incoming components;
- Equipment;
- Manufacture process;
- Finished products;

And must be:

- Enough detailed to properly ensure the compliance of the product.

If a manufacturer declares compliance with requirements as per production control (FPC) adopting a quality system EN ISO 9001, EN ISO 9001 has to be fully adapted to requirements of this standard.
The performance features relevant to the intended application must be checked in accordance with section 6.3.4

6.3.2 Procedures in case control criteria are not met
The procedures to be carried out in case values and control criteria are not met must be set by the manufacturer.

6.3.3 Document registration
The results of inspections, testing or assessment requiring an action must be recorded.

Records must be kept for at least 10 years but they also have to satisfy the regulatory system and/or legal requirements of the involved State.

6.3.4 Testing Factory Production Control (FPC)

6.3.4.1 For Factory Production Control (FPC) purposes in accordance with the present provisions, indirect evidence and documentary control can be used as an alternative to testing methods used for Initial Type Tests, provided that the manufacturer can demonstrate a connection between the method and such characteristic.
6.3.4.2 For Fire Reaction (expressed according to classes)
6.3.4.3 For formaldehyde content (expressed according to classes)
6.3.4.4 For Pentachlorophenol content (expressed according to classes)
6.3.4.5 For crash resistance (expressed according to classes). Not applicable on veneered surfaces.
6.3.4.6 Slipperiness (expressed according to values or classes)
6.3.4.7 Thermal performance (expressed according to values)
6.3.4.8 Biological Durability (expressed according to classes and use).

AND BESIDES: ALWAYS REMEMBER …
…Abstract from UNI EN 14.342:2005 Standard Appendix ZA. 3:
" …The manufacturer or an authorized representative based within eea are responsible for CE marking… ")
therefore:

1. No one else can affix CE mark; those who do without being the manufacturer or its authorized representative within EEA commits a crime.
2. It is forbidden to affix markings or inscriptions that might deceive third parties as to the meaning and graphic form of CE marking.
3. On the product or on the name plate once can affix any other marks – i.e. marks of conformity to National or European standards, or the quality mark of the authorized certification body – as long as this does not restrict visibility and legibility of CE marking.
4. In case of reduction or enlargement of CE symbol, the proportions must be those given by the image of CE mark.

SUMMARY

- Sports parquet floors must comply with UNI EN 14904 Standards – Indoor surfaces for multi-sports use
- In order to be sold, the product must be CE marked
- As from 1st July 2013, it is mandatory to provide DoP – Declaration of Performance – which replaces the former Declaration of Compliance
- Modify Company's FPC documentation.
- It's therefore necessary to identify and correct all references within FPC Documentation System still referring to CPD.
- Modify and update the document part referring to Declaration of Performance of building products.
- Modify and adapt CE marking of building products to CPR specifications

Seicom has implemented EN 14904 Standard since the first edition of July 2006 (replacing former National standards).
In October 2007 we have prepared the manual for FPC management within the company; all products are inspected and tested according the procedures and documents referring to finished products supplied to customers are kept for 10 years, to guarantee traceability of the product.
All our suppliers must respect procedures and must supply and guarantee products in compliance with performance requirements.

SEICOM
SPORTS PARQUET FLOORS

CERTIFIED APPROVED ACCORDING EN 14904

Aldo Cammarata
Sales & Technical Manager
a.cammarata@seicom-italy.com
Tel. office +39 0342 512573
Mobile +39 340 6758368