

Position of the European Insulation Platform on CE marking for ETICS Components

The Construction Products Regulation establishes a harmonised framework for marketing construction products in the European Economic Area, with CE-marking as a crucial step for market access. It stresses the role of harmonised Product Standards (hENs) in defining product performance for specific uses. Specifically for External Thermal Insulation Composite Systems (ETICS), it highlights the assessment of kits as whole systems and the necessity for updated hENs to accurately reflect their performance, ensuring component quality and system safety.

The Construction Products Regulation is the legal system where construction products can be brought to the European Economic Area based on a harmonised system of assessment and a given structure on how to communicate the product's performance. Harmonised Product standards (hENs) provide Technical Specifications for the assessment of the specific characteristics that fit a specific or general application. CE-marking is therefore the basic position for construction products for the European open market and the stepping stone to avoid legal and performance discussions.

The hEN allows the manufacturer to declare the performance of its construction product according to the clauses and given test methods linked to the general and/or specific application. By the Declaration of Performance (DoP), the CE-marking ensures the legal obligation of the manufacturer to the performance of the construction product to the declared level of conformity by a harmonised assessment method and by the system of Attestation and Verification of the Constancy of Production (AVCP). Customers can rely on the performance of the product as once tested in an Initial Type Testing for which a third-party control was performed on the most significant characteristics of the complete system.

An ETICS kit is a specific set of components in a configuration that fits the requirements of the special application. On the market, ETICS offer a variety of very specific configurations with differences in insulation products, insulation thickness and products like adhesives, base coats, meshes, mechanical devices, and products for the finishing layer like render or brick slabs. The performance of an ETICS kit is assessed only on the total system and therefore not based on the cumulated declared performances of its components.

CE-marked ETICS systems follow the AVCP-system 1 where the Notified Body/certification body issues the certificate of constancy of performance of the product based on the determination of the product type by type testing, initial inspection, continuous surveillance of the factory production, and audit testing of samples before placing the product on the market. While the performance of the ETICS kit is assessed on the ETICS system, CE-marked products support the declaration of performance of the ETICS kit in the visibility of the declared performance, traceability, and warranty.

To ensure that the declared values for the CE-marked insulation products have the closest fit to the DoP of the ETICS kit, the harmonised Product Standards (hENs) for insulation as used for ETICS kits have to be updated (in clauses and levels and classes and Factory Production Control description) to match the required declaration(s) in relation to the requirements of the ETICS kit. This is in line with the expected Standardisation Request which would include requirements on the intended use and will give the best technical and legal information to the customer. Today, product standards only allow very wide and/or conservative declarations that do not represent the right information for the ETICS kit.

The quality of an ETICS system is directly determined by the precisely defined property profile and the quality of each individual component. The quality protection of the components based on the specific properties required for the ETICS system therefore plays a central role.

Test standards, test frequencies, initial tests, and classes are generally valid, binding, and clearly defined in the harmonised European standards. The hENs therefore offer an established quality assurance system that has been tried and tested over many years. By selecting the AVCP system, testing and monitoring obligations can be defined individually for each component and each property depending on the safety relevance.

At the same time, the hENs offer the possibility of precisely and clearly defining and presenting the property profile of each individual CE-marked component. CE labelling makes the performance of each component transparent and comprehensible for the building inspection body. If individual requirements are placed on ETICS components that go beyond the classes regulated in the hEN, the hEN must be adapted in parallel with the ETICS standardisation process.

The sum of suitable, quality-protected components manufactured with hEN ensures the quality of an ETICS system. At the same time, the quality requirements for each individual component can be clearly mapped by the hEN.

Diverging from the above-mentioned approach, the CE marking of ETICS components would require the creation of a separate quality protection and labelling system.

Contact:

Jakub Stefaniak - +32 476 96 87 08 – j.stefaniak@eumep.org

About the European Insulation Platform:

The **European Insulation Platform** is a gathering of 4 European associations EUMEPS, EXIBA, PU Europe, and EURIMA, united in their mission to promote the interests of the building and construction industry across Europe. By showcasing the industry's alignment with sustainable practices and regulatory standards, the European Insulation Platform plays a role in advancing the construction and building industry's contribution and commitment to the European Union's energy objectives.