

TALKING TIMBER



IT'S NOT ROCKET SCIENCE!

Wood Technology Society chairman John Park questions why so many in the timber trade cannot get a grip on the EU Construction Products Regulation



It's not wood science either, but it does appear to be something of a mystery to many in the trade when it should, by now, be routine. I am talking about the CPR, the EU Construction Products Regulation – or Regulation (EU) No 305/2011 of the European Parliament and of the Council of 9 March 2011 laying down harmonised conditions for the marketing of construction products and repealing Council Directive

89/106/EEC – a legal instrument which places obligations on importers and distributors as well as on manufacturers.

Those obligations, in short, can be boiled down to one word – information – and a short phrase – included with commercial documentation. The long version, which should be read and ought to be complied with, can be found by simply typing construction products regulation into your search engine and then if you are an importer read Article 13 or a distributor then Article 14. And in both cases it does not take long to read so “I don't have the time” is really no excuse!

It is a legal obligation because the UK is in the EU single market. What will happen once Brexit is signed, sealed and delivered, be that in or out of the single market, is anyone's guess as currently no-one seems to know. But either way the UK will become a “third country” thereby losing notifying authority/notified body (CPR, Chapter 7) status although it would seem likely that the UK will retain the CPR together with all attendant construction products European Standards (EN) developed over the last 40 years and which replaced conflicting national standards.

The information mentioned above is the declaration of performance (DOP) (CPR, Article 4 to Article 7) which a manufacturer must raise before applying the CE marking (CPR, Articles 8 and 9). Harmonised standards (hEN) set out (in Table ZA.1) the essential characteristics for the declared end use or uses of the products covered, but it should be noted that many current hENs are out of date with regard to DOPs and CE marking, and that all examples of same in the Annex ZA (which invokes CE marking) should be disregarded; DOP and affixing of CE marking must be in accordance only with the CPR.

Another thing about hENs is that although they may have been published (e.g. BSI has already published EN 14081-1:2016 for strength-graded softwood) they cannot be used for the purpose of CE marking until they have been cited in the *Official Journal of the European Union* (OJEU). EN 14081-1:2015+A1:2011 remains current as EN 14081-1:2016 has not yet

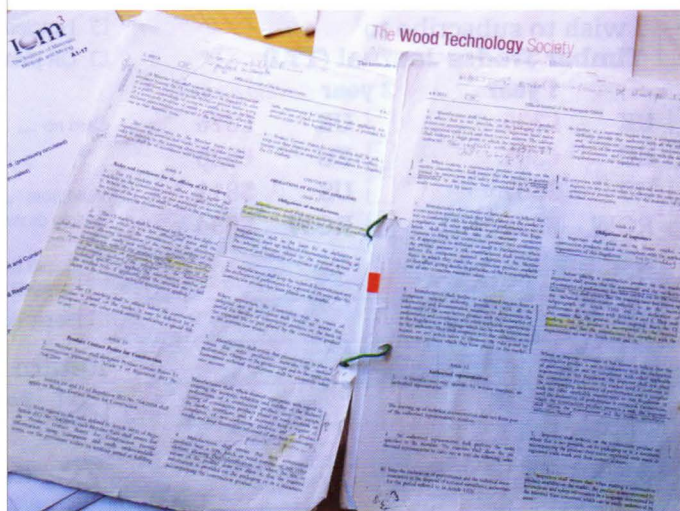
John Park – Wood Technology Society chairman and manager of Canada Wood UK

been cited in the OJEU. The CE marking, in one form or another (Article 9.1), must accompany the construction product at each change of ownership and shall be followed by what is indicated in Article 9.2 which, as noted by the Commission, “Under a flexible interpretation of Article 9.2 could contain only the critical information and refer to the DOP for other information”.

For that reason one item which must accompany the CE marking is the DOP number. For CE marking affixed to products, that approach simplifies things greatly for manufacturers, but when employing that approach then CE marking as per Article 9.2 should be “included with commercial documentation”.

As for the DOP, that does not need to be included with commercial documentation unless the importer or distributor requests it. It is permitted for the manufacturer to make it available via a website in which case the CE marking must be accompanied additionally by the website address. If the products you handle are covered by a hEN, all of that applies to you. ■

Below: A well-used CPR hard copy with six-year-old annotations!



The Wood Technology Society

A Division of the Institute of Materials, Minerals and Mining