

CE marking, declarations of performance and product certification of cements

Introduction

In the UK, MPA Cement's Members have been CE marking their common cements conforming to European standard BS EN 197-1 since its implementation in April 2001, noting that the standard was revised in 2011. Some twelve years on, and CE marking of a wide range of cements, and related products, has, under the former Construction Products Directive (CPD), become established throughout the European Economic Area (EEA). On 1 July 2013, however, the Construction Products Regulation (CPR) came fully into force and its CE marking provisions, and requirement for declarations of performance (DoPs), replaced those of the CPD. The CE marking of cements, and provision of related information, is now facilitated via the procedures outlined below.

What is CE marking and what does it signify?

CE marking is the culmination of a process which leads to the affixing of the CE symbol (a regulatory mark) which indicates 'fitness for intended use' in the sense that it signifies, visibly, that appropriate, reliable information about performance, as required by relevant (generally EU Member States' national) legislation, has been declared in a DoP for the product. Accordingly, the CE mark is not a quality mark because the actual level of performance to be achieved for most construction products is permitted to vary across EU Member States. Only in a few cases - such as for cements - does the European standard set threshold, regulatory minimum/maximum levels of performance for mandated *essential characteristics* (i.e. legally required properties).

Since 1 July 2013 CE marking has become mandatory throughout the EEA (including in UK where it was considered by the authorities to be voluntary under the CPD) for products which conform to a *harmonised* European standard (or a European Technical Assessment), with just a few exceptions (*derogations*). In expectation that this would be the likely course of events, the UK cement manufacturers embraced the challenges of CE marking many years ago. Even so, the full implementation of the CPR has brought some changes to terminology and new documentation (see next sections) but no changes in practice for the conformity of cements.

What is a declaration of performance (DoP)?

When a construction product, in this case a cement, is covered by a harmonised European standard the manufacturer has to draw up a declaration of performance (DoP) when the product is placed on the market. The DoP, the content of which is prescribed in the CPR and codified in a cement standard, comprises detailed information about the product plus a list of its essential characteristics against which performance has to be declared by *level, class or in a description*. A copy of each DoP which is drawn up for a cement/product manufactured by an MPA Cement Member is made available on its website.

By drawing up a DoP, the manufacturer assumes full responsibility for the conformity of the cement with the declared performances. The CE mark on a bag of cement, or a delivery document, is the visible sign that the product conforms to its declaration of performance, and hence to the requirements of its European standard. The EEA Member States' authorities are required to presume that the information in the DoP is accurate and reliable... but see the next section to see what underpins that presumption.

What is a Certificate of Constancy of Performance?

In respect of the accuracy and reliability of declared performances in the DoP, the appropriate level of scrutiny required for a product is established by the European Commission (EC) in the form of a *System for the Assessment and Verification of Constancy of Performance (AVCP)*. The System of AVCP sets out the degree of involvement of an independent third party in the AVCP (formerly, *Evaluation of Conformity*) procedures. In the case of cements, the highest System, 1+, was required because of the critical role that cements play in construction works. The detailed scheme for the AVCP is specified in BS EN 197-2 and includes requirements for assessment/surveillance of Factory Production Control (FPC) and independent Audit Testing of samples under the control of the third party - an EU *Notified Product Certification Body*. When the third party has reached a certain point within its (ongoing) tasks, it issues a *Certificate of Constancy of Performance* which enables the manufacturer to affix the CE mark. This 1+ level of scrutiny provides independent verification that cements conform fully to both their technical specification and regulatory requirements.

How has CE marking affected MPA Cement's Members' product marking policies?

As a consequence of the System 1+ AVCP required for regulatory purposes, and its rigorous evaluation procedures for product certification, MPA Cement's Members have considered it unnecessary to continue with any voluntary product certification in respect of cements covered by a harmonised European standard. Such additional certification would only be considered where it is deemed necessary to address properties that are not yet within the scope of the product standard, or are covered by other legislation [for example, see Fact Sheet 10.7 for information specific to chromium (VI) and the REACH Regulation].

Which cements are covered by harmonised European standards?

BS EN 197-1	Common cements, now including sulfate-resisting Portland cements and low early strength blast furnace cements
BS EN 413-1	Masonry cement
BS EN 14216	Very low heat special cements
BS EN 14647	Calcium aluminate cement
BS EN 15743	Supersulfated cement

What publicly available documentation is available?

A current declaration of performance for each cement manufactured by an MPA Cement Member is available on its website. *Certificates of Constancy of Performance* are available on request from Members for the cements they manufacture to the appropriate harmonised standards identified above.

Where can I find out more?

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