BELGIAN CONSTRUCTION CERTIFICATION ASSOCIATION npo

BCCA

Frequently Asked Questions

EUCEB certification

A. ADMINISTRATIVE QUESTIONS

A.1. CERTIFICATES

A.1.1 What is the validity of my current certificate?

This current certificate covers the transition period, corresponding to the first halfyear of 2017 during which the manufacturer has the opportunity to adapt to the new requirements and show compliance with the EUCEB certification scheme as laid down in the implementation rules. The end of the validity of the first certificate is 15 October 2017.

A.1.2 When will the manufacturer receive a new certificate valid for 3 years?

At the end of the transition period BCCA will evaluate if every dossier is complete and if it has been demonstrated that the requirements of the certification rules have been met. In case of a positive evaluation a new certificate with a regular validity period of three years will be issued by 15 October 2017.

In order to allow for this evaluation in due time, all manufacturers have to submit to BCCA all required documentation by 30 August 2017 at the latest.

A.1.3 What is the meaning of the code mentionned on the certificate?

Every certificate issued by BCCA receives a structured codification that immediately allows for a fast identification of the certificate's scope. For EUCEB certification this code is composed of the following five elements:

BEUC – 511 – CCCC – DDDD – EEEE.

With:

- BEUC: code of the certification system ('BEUC' for the *B*CCA-*EUC*EB system)
- 511: code of the technical field of the certification scheme ('511' for mineral wool products)
- CCCC: code of the client in BCCA's database (Legal entity)
- DDDD: code of the product given by BCCA (Certificate number)
- EEEE: identification code of the production unit given by BCCA

This codification is also mentioned in the annexes of the certification agreement defining the scope of certification. It will be used in all official communication from BCCA with the manufacturer.

A.1.4 Do I keep my certificate if I have not produced a certified fibre and not performed an external sampling within a period of 3 years?

If a certified fibre from a given furnace has not been sampled at least once in a period of three years, the certificate for that manufactured fibre and furnace combination will be withdrawn.

If for a given fibre the manufacturer wishes to reactivate a certificate that had been withdrawn for this reason, the rules for the initial assessment of a production site are applied. Those rules are described in *§ B.2.1.3 Initial assessmen at a (new or already certified) production site* of the EUCEB Implementation Rules.

The test results performed for the initial assessment of the reference fibre (Note Q test and chemical analysis) remain valid.

A.2. SAMPLING BODIES

A.2.1 What are the requirements for Sampling Bodies?

As stipulated in *§ A.3.3* of the Implementation Rules, Sampling Bodies must be accredited against ISO/IEC 17020. Accreditation against ISO/IEC 17065, ISO/IEC 17025 or ISO 9001-certification can also be accepted provided the scope includes inspection and/or sampling in relevant domains. Domains considered as being relevant are, amongst others, mineral wool products, thermal insulation products, construction products, ... coupled with experience in sampling and/or inspection thereof .

Background: The EUCEB certification scheme will be run by BCCA under accreditation against internationally recognised standards. All third party activities therefore have to meet the requirements from these standards. Sampling bodies working in the certification scheme under BCCA's responsibility have to comply with a number of requirements to show that accreditation standards can be met.

The manufacturer can choose the Sampling Body he wishes to use amongst the Sampling Bodies accepted by BCCA listed on the BCCA website. If the manufacturer wishes to use a Sampling Body that has not been listed, he can ask BCCA to start the evaluation of possible subcontracting to that body. No Sampling Body can be used for EUCEB certification prior to approval of that body by BCCA.

A.2.2 Which Sampling Bodies can operate until 15.10.2017?

BCCA has contacted all sampling bodies that have been active for the EUCEB trademark previously, to ask them to demonstrate how they comply with the requirements set for the EUCEB certification scheme and proposed them to sign a subcontracting contract with BCCA. After signing the contract, the Sampling Body is listed on BCCA's website.

A short transition period lasting till 15 October 2017 has been given to finalise this contractual relationship between the Sampling Body and BCCA. During this transition period the manufacturer is allowed to call upon the Sampling Body he has used previously in 2016.

After the transition period, only Sampling Bodies listed on the website of BCCA will be allowed to operate for the EUCEB certification scheme.

A.2.3 Which Sampling Bodies can operate from 15.10.2017?

Only Sampling Bodies that have been accepted by BCCA and have signed a contract with BCCA will be allowed to operate in the EUCEB certification scheme from 15.10.2017 onwards. The list of these Sampling Bodies is published on BCCA's website and is updated at every change.

A.2.4 Where can I find a list of approved Sampling Bodies?

A list of Sampling Bodies that signed a contract with BCCA is published on the BCCA website and is regularly updated.

A.2.5 Who should send the sampling form and visit report/check-list to BCCA and by when?

A signed copy of the sampling form and visit report/check-list shall be sent by e-mail to BCCA by the Sampling Body. This should happen as soon as possible after the sampling and within a maximum time span of 2 weeks.

A.2.6 Why are there questions about complaints handling and to what do they relate?

A certification body operating under accreditation must request from its certificate holders to have a system for complaints handling. Therefore a question related to complaints handling has been included in the checklist used by the Sampling Bodies.

This is aimed at complaints regarding the use of the EUCEB Trademark or other issues related to the EUCEB certification scheme. Handling of other complaints not related to EUCEB certification are not to be checked by BCCA or its Sampling Bodies.

A.2.7 Will the Sampling Bodies be audited by BCCA?

The Sampling Bodies operate under BCCA's responsibility and therefore BCCA must ensure that their functioning complies with the requirements. On top of the continuous surveillance and monitoring of the performance of the Sampling Bodies, BCCA will witness on site once in four years the operations of every Sampling Body during a visit at a manufacturing plant. (See § A.3.3 Sampling bodies of the implementation rules). The audit of the Sampling Bodies will start in the second half of 2017.

A.3. EXTERNAL LABORATORIES

A.3.1 What are the requirements for external laboratories?

As stipulated in § A.3.4 External laboratories of the Implementation Rules, the external laboratories must have an accreditation against ISO/IEC 17025 for one of the following test methods: XRF or ICP-OES/AES + Wet chemistry for testing on mineral wool products.

Background: The EUCEB certification scheme will be run by BCCA under accreditation against internationally recognised standards. All third party activities therefore have to meet the requirements from these standards. External laboratories performing audit testing in the certification scheme under BCCA's responsibility have to comply with a number of requirements to show that accreditation standards can be met.

A.3.2 Which are the external laboratories that can operate till 15.10.2017?

BCCA has contacted all external laboratories that have been active for the EUCEB trademark to ask them to demonstrate how they comply with the requirements set for the EUCEB certification scheme.

A short transition period, foreseen to last till 15 October 2017, is necessary to finalise this contractual relationship between the external laboratories and BCCA, and the manufacturer is allowed to call upon the external laboratory he has used until 2016.

After the transition period, only external laboratories approved by BCCA will be allowed to operate for the EUCEB certification scheme.

A.3.3 Which are the external laboratories that can operate from 15.10.2017?

From 15 October 2017 onwards, only external laboratories that have been approved by BCCA will be allowed to operate in the new certification scheme. The list of these laboraties will be published on BCCA's website and will be updated at every change.

A.3.4 Where can I find a list of approved external laboratories?

A list of external laboratories who signed a contract with BCCA will be published on the BCCA website and will be regularly updated.

A.3.5 Can the same external laboratory be used for the autocontrol testing and external audit testing?

As stipulated in § A.3.4.2 of the Implementation Rules for EUCEB certification: **"**If a laboratory performs tests for the autocontrol of a production site, it cannot be chosen for the external audit testing. In exceptional situations (lack of external laboratories, lack of internal laboratory for one or several production sites), an exception to this rule can be accepted, provided specific measures are taken and after having received a formal acceptance from the Certification Body."

Manufacturers who would happen to be in this situation are requested to send a well-founded file to BCCA explaining the situation. BCCA will examine this file and decide, case by case, under which conditions the situation could possibly be accepted or decide to make it mandatory to choose a different laboratory for the autocontrol and external audit testing, as foreseen by the Implementation Rules.

A.4. OTHER QUESTIONS RELATED TO THE CERTIFICATION SCHEME

A.4.1 How should nonconformities be reported?

There are different types of nonconformities:

- Nonconformity of the chemical composition of the autocontrol or external audit testing. The manufacturer has to report to BCCA about the nonconformity handling and the risk assessment outcome.

  The risk assessment should be performed according to the principles described in the EUCEB Implementation Rules. As mentioned in § B.3.5.2 of the Implementation Rules: "When a nonconformity occurs, the manufacturer has to assess the risk of putting a nonconforming product on the market"

  As soon as the risk for the end-user is evaluated, the manufacturer has to formally inform BCCA about the conclusion of the assessment. If the risk for the end-user is demonstrated or established, the manufacturer has also to inform BCCA about the measures planned and already taken.

- Nonconformities to one of the procedures of the Implementation Rules. BCCA will inform the manufacturer of the nonconformity and ask for a report and corrective actions.

A.4.2 How should a manufacturer report discontinuous production and technical stops?

For some expected or unexpected reasons (e.g: technical reasons, availability of the raw materials, product demand …), the production of a specific certified fibre can be discontinuous.

BCCA and the Sampling Body should be informed by e-mail when a certified fibre is not produced for a longer period.

Discontinuous production should also be mentioned (e.g.: no production) in the autocontrol result file that is sent periodically to BCCA.

For fibres subject to discontinuous production, the minimum autocontrol testing is defined in § B.1.4 of the Implementation Rules.

B. TECHNICAL QUESTIONS

B.1. AUTOCONTROL TESTING

B.1.1 How and when should I report my autocontrol test results?

Autocontrol test results are to be reported to BCCA by means of the Excel file BCCA provided for that purpose. All autocontrol test results of the chemical composition should be reported from each certified fibre produced on each furnace.

The autocontrol test results must be sent at least every 3 months to BCCA (see § B.2.2.4 Assessment of autocontrol test results of the implementation rules).

B.1.2 Should the manufacturer send autocontrol test results to BCCA after a visit from the Sampling Body?

Yes. One of the subsamples is analysed by the manufacturer and the results of the chemical analysis on this subsample must be sent to BCCA within the shortest delay possible.

§ B.1.4 Internal control schemes - Autocontrol testing mentions that autocontrol test results must be reported to BCCA within 1 week after the sampling by the Sampling Body.

It is important that BCCA receives the autocontrol results before the results of the external laboratory. Some manufacturers have reported to BCCA difficulties to meet this requirement because the autocontrol testing is not performed at the plant and the transmission of the sample and results requires more time. Upon request of the manufacturer, BCCA will examine this case by case and allow for a limited extension in this delay for transmitting results. It is important to note that, as a rule, autocontrol test results are to be transmitted before results from audit testing in the external laboratory are obtained.

B.1.3 To how many decimals should autocontrol and audit test results be reported?

The EUCEB certification relies on a comparison between the chemical composition of the manufactured fibres and the chemical range of a reference fibre.

Therefore autocontrol and external audit test results must be reported, for every component, to at least the number of decimals as expressed for the reference fibre. Components should be declared to the measurement accurancy if there is no declaration of an element in the reference fibre.

The sum of components is reported with the lowest number of decimals of a single component.

B.1.4 Iron is expressed as FeO in the reference fibre, but my autocontrol and external Iron results are expressed as Fe_2O_3. How should I proceed in order to ensure I am within the chemical range of the reference fibre?

The chemical range will be derived from the Iron oxide as expressed in the reference fibre.

In the autocontrol and external test results Iron may be reported as FeO and Fe_2O_3. In the evaluation reports of the autocontrol and external test results BCCA will use the the Iron as expressed in the reference fibre and make a conversion of the Iron towards FeO if required. The conversion factor that will be used is: 1 FeO = 1.1113 Fe_2O_3

Example:

In the reference fibre 6.0¨% FeO = Chemical range FeO = ±1.5%

Chemical range when expressed as FeO = 4.5 – 7.5 %

For the sum of components the concentration of Fe_2O_3 can be used.

B.1.5 Can I use a correlation factor for my autocontrol measurements?

EUCEB has approved for external laboratories 2 reference test methods for measuring the chemical composition of mineral wool:

- ICP-OES with combined gravimetric analysis of SiO_2
- XRF

The manufacturer can use his own autocontrol laboratory at the manufacturing site or at another location or can choose to subcontract the testing to an external laboratory.

In case the manufacturer uses a chemical analysis test method different from the reference test method (ICP-AES/OES - XRF) as used for the determination of the chemical range on the reference fibre, the manufacturer may use a correlation factor between the reference test methods and his own method. When sending autocontrol test results to BCCA, the manufacturer sends the raw results (as obtained with the method he applies) as well as the corrected results (using the correlation factors). The file used in order to establish the correlation must be up to date and sent to BCCA.

See also § B.1.5 The internal control laboratory of the EUCEB Implementation Rules.

B.2. SAMPLING FOR AUDIT TESTING

The sampling procedure for external sampling is described in Annex § B.2.2.2.1 of the Implementation Rules. We remind you the following notes:

Note 1: In case the manufacturer performs the chemical analysis on a sample form or type (e.g.: glass) different from the sample used by the external laboratory (e.g.: fibre with or without the binder), the sampling body takes 1 sample per type of sample and subdivides each into 2 subsamples (of which one serves as witness sample).

Note 2: It is not required to keep the witness samples in case the Certification Body gives a positive evaluation about the first external result and the first internal result performed on the audit sample.

B.2.1 How many samples must be taken by the Sampling Body?

The Sampling Body must take a sample from each certified fibre produced on each furnace, according to a normal frequency twice per calendar year.

B.2.2 Which sample form should the Sampling Body use?

A separate sample form must be filled in by the Sampling Body for each sample taken.

Case one: the fibre is only covered by EUCEB certification

The sample form is the standard sample form established by BCCA.

Case two: The fibre is covered by both EUCEB certification and GGM/RAL

The GGM/RAL – BCCA sample form should only be used when the fibres need to be tested for both GGM/RAL and BCCA.

B.2.3 What does "code sealing" means on the sample forms?

The Sampling Body should register the identification of the sealing that is used to ensure that the sample's integrity is maintained until in possession of the external laboratory or during the entire storage period of witness samples.

B.2.4 Who decides to which external laboratory the sample is sent to? Who sends the subsample for audit testing to the external laboratory?

The manufacturer choses an external laboratory amongst those listed on BCCA's website as approved by BCCA.

Basically it is the manufacturer who sends the samples to the external laboratory. If agreed between the parties, the sample can be transmitted to the external laboratory by the Sampling Body. In case the samples cannot be properly sealed, the samples *must* be sent to the external laboratory by the Sampling Body.

In any case, the sample must arrive at the external laboratory within 2 weeks after the visit of the Sampling Body.

Samples should NEVER be sent to BCCA.

B.2.5 Who should keep the 2 witness subsamples?

If the witness subsamples are properly sealed then they can be kept by either the manufacturer or the Sampling Body. If they are not properly sealed, then the Sampling Body has to keep them. Witness samples should be kept until the manufacturer has received a positive evaluation from BCCA.

B.2.6 Why should the Sampling Body fill in a check-list?

As BCCA is not performin an on-site inspection itself, the Sampling Body is asked to report to BCCA on a very limited number of topics that it can note during its sampling visits. The check-list used by Sampling Bodies allows BCCA to have confirmation that several requirements of the Implementation Rules are fulfilled by the manufacturer.

B.3. PLANT MANAGEMENT SYSTEM

B.3.1 How can the manufacturer demonstrate that the provisions of the EUCEB Implementation Rules are included in the Plant Management System?

The Implementation Rules stipulate that EUCEB certificate holders must have a Plant Management System in accordance with the minimal requirements set in Annex § B.1.3 of the Implementation Rules.

Additionally, the Plant Management System must be assessed by an independent and competent certification body and an English copy of the certificate submitted to BCCA.

The majority of manufacturers already have a Plant Management System audited by a third party and shall submit a copy of the certificate of the review of the Plant Management System to BCCA. However, it is possible that the EUCEB Implementation Rules still have not yet been fully addressed in the Plant Management System and reviewed in that state by a third party by the end of the transition period.

In order to ensure that BCCA can take a decision about issuing the final certificate based on fulfilment of the requirements, the following approach has been decided:

- Each manufacturer has been asked to confirm in a declaration that the EUCEB requirements have been addressed in the Plant Management System.
- If the EUCEB implementation rules are not yet (fully) addressed in the Plant Management System, the manufacturer has been asked by which date this will be done. BCCA shall take this into account when fixing the conditions and the period of validity of the new certificate to be issued at the end of the transition period.
- Additionally, the Sampling Bodies will be asked to report during their sampling visits (by simple check, not by audit) if the EUCEB Implementation Rules have been included in the Plant Management System.

This procedure will allow for a controlled follow-up of the introduction of EUCEB rules in the Plant Management System. It will compensate for the impossibility to have in all cases before the end of the transition period full proof that the Plant Management System including the EUCEB Implementation Rules has been assessed by the third party. Additionally, it will not be required to send to BCCA audit reports from the third party.

To formally confirm to BCCA the situation regarding the Plant Management System, BCCA has developed a template of a declaration that must be printed on company paper, signed by each manufacturer and returned to BCCA. This declaration can be obatained on request from BCCA.

By default, BCCA will not perform itself audits of the Plant Management System or visit the plants if the evaluation of the plants's Plant Management System is performed according to the requirements of the implementation rules.

Only if there is no acceptable certificate of a Plant Management System that can be provided, BCCA will perform the evaluation of the Plant Management System by itself.

B.3.2 Which EUCEB rules should be included in the Plant Management System?

The main topics from the EUCEB Implementation Rules to be included in the Plant Management System are:

§ B.1.4 Internal control schemes - Autocontrol testing

- The frequency of autocontrol sampling for continuous and discontinuous period of production (see table 2 and Table 3)
- The records of autocontrol testing must be kept for at least for 10 years.
- The autocontrol results from every production site, per certified fibre and per furnace, have to be sent to BCCA at least every three months (using a dedicated file format provided by the Certification Body).
- Autocontrol test results must be made available within a time delay adequate for correct evaluation and efficient non conformity handling. In normal conditions, this period should not exceed one week after external sampling.

§ B.1.5 The internal control laboratory

- Description of equipment for measuring the auto control measurements, calibration of equipment, … In case the manufacturer uses a chemical analysis test method different from the reference test method (ICP-AES/OES - XRF) as used for the determination of the chemical range on the reference fibre, the manufacturer has to demonstrate initially and periodically the correlation between the methods. When sending autocontrol test results to BCCA, the manufacturer sends the raw results (as obtained with the method he applies) as well as the corrected results (using the correlation factors). The file used in order to establish the correlation must be up to date and sent to the Certification Body.

§ B.2.2.1 Periodic evaluation of the Plant Management System

- During certification, the manufacturer must permanently maintain a Plant Management System that complies with the requirements of the EUCEB scheme.
- The manufacturer must periodically report to the Certification Body about the status of the existing certifications covering the surveillance of the Plant Management System and immediately inform BCCA about any changes.

§ B.2.2.2 Sampling visits

- Sampling visits should be organized with the Sampling Body in order to cover every certified fibre, including fibres which are not produced regularly.

§ B.2.2.3 Audit testing by the External Laboratory

- Chemical analysis performed on every certified fibre from every furnace used on the production site.
- Normal frequency of external audit testing is 2 per calendar year (see Table 4)
- Sampling procedure described in Annex B.2.2.2.1 applied. Each external sample is divided in 4 subsamples.
- The results of the chemical analysis performed by the manufacturer must be sent to BCCA within 1 week. In the same time, the results of the autocontrol are sent to the Certification Body.
- Another subsample is to be sent, preferably by the manufacturer, to the external laboratory within two weeks as from the moment the Sampling Body has realised the sampling.

§ B.3.1.1. Single results criteria

The conformity of test results, with regard to the chemical range, requires that *every test result* remains within the single result limit value fixed as a result of the initial assessment of a new reference fibre.

If one single result is nonconforming, the manufacturer has to take the following actions:

- Handle the nonconformity according to *B.3.2*.
- *From the day* the *result is known,* increase the autocontrol testing: the frequency of testing is doubled (2 samples per week per furnace) during one month).

§ B.3.2.2 Nonconformities regarding the autocontrol test results

- In case a nonconformity occurs, the manufacturer has to take actions to eliminate the causes of the nonconformity in order to prevent reoccurrence. He has to inform immediately the Certification Body on the evolution of this process when the statistical evaluation is not conform. Information sent to the Certification Body must include evidence of actions taken by the manufacturer in order to produce again the fibre within his chemical range.

§ B.3.2.5 Risk Assessment

- Whenever a nonconformity occurs, the manufacturer has submit a non-conformance report and assess the risk of putting a nonconforming product on the market. The certification body should receive a non-conformance report and be informed of the conclusions of the risk assessment.