



Comments of BING on the revision of mandate M/103 (Thermal insulation materials) in the context of Essential Requirement n° 3

BING is the European association representing the manufacturers of rigid polyurethane foam insulation materials in Europe.

BING has learnt that DG Enterprise and Industry and the EU Expert Group on Dangerous Substances (EGDS) intend to revise product mandate M/103 (thermal insulation products) to include requirements for ER 3 of the Construction products directive (see EGDS document DS 073).

BING wishes to make the following comments on the proposed revision:

- The European Commission must be committed to keeping administrative burdens and test requirements to the lowest possible levels. New initiatives should only be launched if the context is fully known so as to avoid duplication and corrections at a later stage. Most of the BING members are small and medium-sized enterprises. They are particularly vulnerable to the effects premature decisions.
- Mandate M/103 should not be revised before the establishment of clear procedures on WT/WFT. The administrative document, prepared by the EGDS, and its technical counterpart, prepared by CEN/TC351, are not compatible at this stage and may therefore cause significant confusion. Furthermore, tests may be required from manufacturers which turn out to be unnecessary in the end. Such a situation must be avoided.
- The European Commission and the EGDS should involve the product TC concerned (CEN/TC88) and the relevant trade associations in all phases of the revision process relating to mandate M/103. This is the only way to benefit from the specific product-related experience of these organisations and, hence, identify workable solutions from the start.
- The revision of the mandate must strictly stay within the scope of the Construction products directive (CPD). More specifically, guidance paper H (“A harmonised approach relating to dangerous substances under the Construction Products Directive”) and mandate M/366 (“Development of horizontal standardised assessment methods for harmonised approaches relating to dangerous substances under the Construction Products Directive”) must be used as a reference with regard to:
 - the definition of dangerous substances (regulated dangerous substances according to M/366);
 - the scope of essential requirement No. 3.



- ER3 must clearly relate to end-use applications. Thermal insulation products in end-use applications often bear facings of different materials and / or are part of composite panels made with aluminium, gypsum or other materials. In addition, if integrated in cavity walls, floorings or the outer side of roofs, emissions from the insulation material to the indoor air are irrelevant. However, TC351 has not yet adopted a calculation method or conversion factors to take account of this peculiarity. Furthermore, the emission behaviour of these facings or coverings is not known. It therefore seems inappropriate to change mandate M/103 at this stage.

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