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## THE FUTURE OF THE CE MARKING IN THE DIMENSION STONE SECTOR: CONTRADICTIONS AND SOLUTIONS

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# INTRODUCTION



- **CE Marking: a powerful tool**
  - more **accuracy** in the information;
  - increased **sense of responsibility**;
  - more **transparency**;
  - change of **attitude**;
  - **competition** with the concurrent materials;
  - more **credits** for the professional indemnity;
- **→ EIP** (European Innovation Partnership) **Work Packages (WP3, WP4 “... .... improving Europe’s regulatory framework, knowledge and infrastructure bases.... ..... standardization data .... ..... best practices in defining policies .... .... will also apply product, standardization and certification policies ... ..... etc. etc.)**
- effective **meaningfulness, applicability** and **reliability** of the CE marking;

# BRIEF BACKGROUND

- **CPR** (**CONSTRUCTION PRODUCT REGULATION**) **305/2011**:
- stone products (covered by harmonized standards) can be placed on the EU market only:
  - with a Declaration of Performance (DoP);
  - and with a CE Marking;



# BRIEF BACKGROUND

- Declaration of Performance (DoP) = document elaborated by the manufacturer:
    - declares the performances of the stone;
    - assumes responsibility for the conformity of the stone with such declared performances;
- 
- 
- fundamental document accompanying the product;
  - **no** CE marking without it;
- 
- CE Marking = the conclusion of a specific *iter*
    - ➔ evaluating,
    - ➔ ascertaining,
    - ➔ guaranteeing
    - ➔ declaring the performance of the stone;
- **compulsory** for many stone products as early as 2003;

# CE MARKING: WHEN

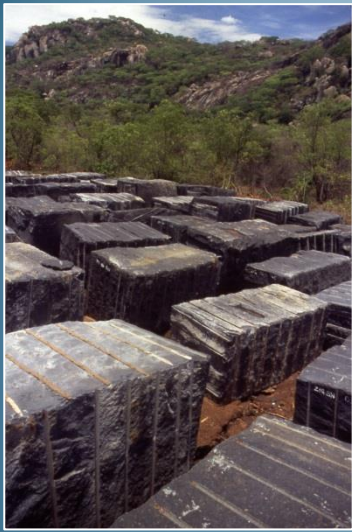
## WITH SEMI-FINISHED PRODUCTS

<i>standard</i>	<i>subject of the standard</i>	
EN 1467	Raw blocks	NO CE Marking
EN 1468	Slabs	NO CE Marking

## WITH FINISHED PRODUCTS

<i>standard</i>	<i>subject of the standard</i>	
EN 1341	Slabs for external paving	CE Marking
EN 1342	Setts for external paving	
EN 1343	Kerbs for external paving	
EN 1469	Slabs for cladding	
EN 12057	Modular tiles	
EN 12058	Slabs for floors and stairs	
EN 771-6	Specification for masonry units. Part 6. Natural stone for masonry units	
EN 12326-1	Slate and stone products for discontinuous roofing and cladding. Part 1: specification	

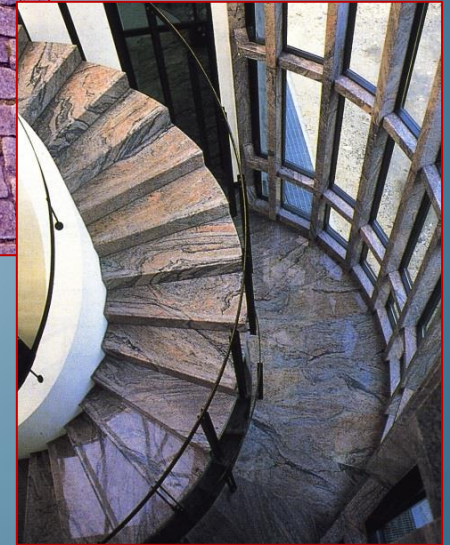




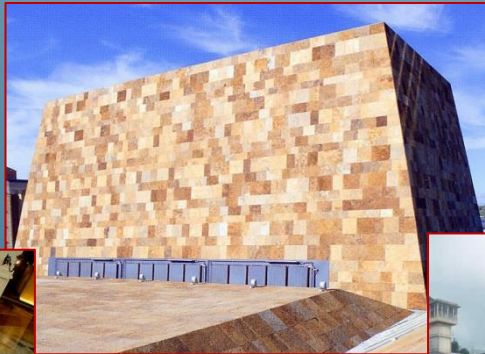
CE Marking: **NO**







CE Marking: **YES**







CE Marking: **NO**  
(not yet)





- after 13 years: difficulties for the CE marking application still exist;

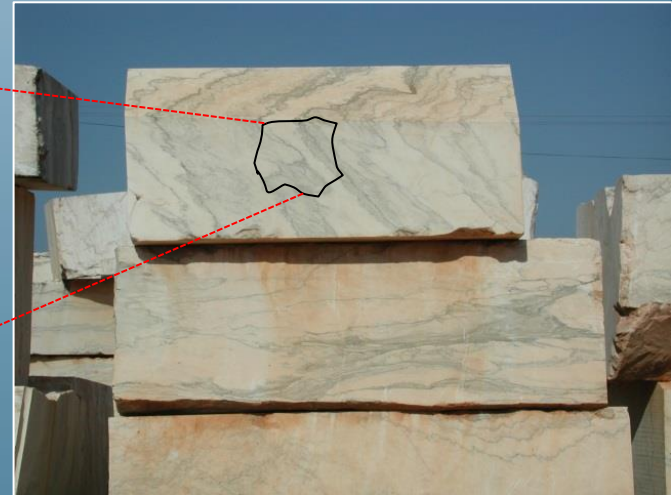


**SOME OBSERVATIONS**

# CRITIC POINTS: CRITERIA FOR TESTING PROCEDURES

(MEANINGFULNESS/RELIABILITY/FREQUENCY OF THE TT);

- anomalies in the TT (= Type Test) execution:
- tests performed **on the raw matter, not on the finished products;**



- even when the tests methods envisage **technological tests** (i.e. samples coming from the production), size of the specimens is a **standard one;**

# CRITIC POINTS: CRITERIA FOR TESTING PROCEDURES

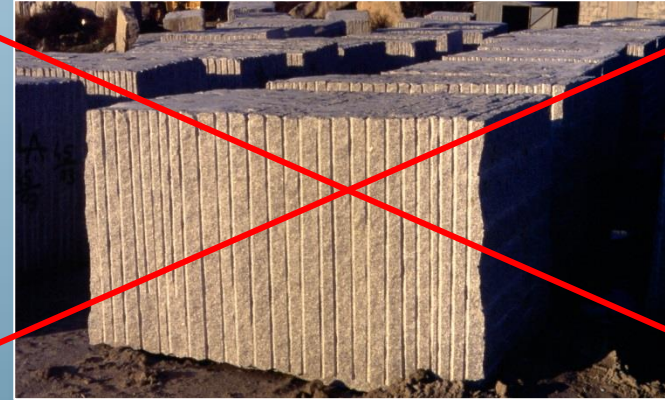
(MEANINGFULNESS/RELIABILITY/FREQUENCY OF THE TT);

- **inapplicability** of the testing methods (in particular circumstances):
  - tests methods do not take into account the commercial sizes; particularly the **thickness**;
- TT frequency is objectively too long;



# CRITIC POINTS: ECONOMIC ASPECTS FOR THE OPERATORS

- **exemption** for blocks / slabs;
  - products with a **not** specified final application (standards not harmonized);
  - **no** obligations for quarry owners and blocks/slabs producers/traders;
- **not negligible** economic commitment for the manufacturers;
- many companies:
  - several stones manufactured/traded;
  - no stock (or store in warehouse);
  - commissioned orders;
    - supply only after getting the job:
- economic incidence in small /small-medium jobs;



# CRITIC POINTS: FPC

- FPC (FACTORY PRODUCTION CONTROL) = a **documented, permanent** and internal control of production in a factory;
  - FPC concept **not completely clear / understood**;
  - different interpretations;

# WHAT HAPPENS:

- Is the manufacturer **guaranteed** by affixing the CE Marking ?
  - in disagreements/legal disputes, tests may be required/pretended;
  - samples ?? ➔ from the manufactures installed;
  - values declared (for the raw matter) **may not correspond** to the values of the manufacture supplied;
  - manufacturers fulfill their duties ➔ risk;
- is the final consumer **guaranteed** by receiving a CE marked stone product ?
  - declared values **may not correspond** to the values of the manufacture;
  - the product **may not respect** the basic requirements of the construction works (particular reference to health and safety);



# ADDITIONAL CONSIDERATIONS

- sampling for the TT **rarely** done by a specialist;
  - **no** sampling reports;
  - date of the sampling/extraction **unknown**;
  - laboratories often **compelled** to ratify statements of the client;
- **poor traceability** for the imported stone materials;
- limits of the **cascading** system:
  - a procedure which does not provide any effective guarantee on the declared values;
- difficult **establish accurate correlations** between TT-Lab and (eventual) alternative tests performed during the production;
  - the intrinsic concept of "verification of constancy of performance" fails;



## AS A CONSEQUENCE:



- Currently: **objectively difficult to respect** the Art. 4, § 3 of the CPR 305/2011:

*By drawing up the declaration of performance, the manufacturer shall assume responsibility for the conformity of the construction product with such declared performance. In the absence of objective indications to the contrary, Member States shall presume the declaration of performance drawn up by the manufacturer to be accurate and reliable.*

# FINAL REMARKS

- CE Marking, an extremely important instrument:
  - **in perfect synergy** with key EU programs and initiatives (→ work packages WP3, WP4);
  - capable to provide **more accuracy and transparency** in the information/procedures;
  - to develop an **increased sense of responsibility** and an important **change of attitude**;
- Currently:
  - perceived as an extra burden on the business for no extra benefit;
  - precision + accuracy (→reliability) **not completely guaranteed** in the CE Marking of the DS (anomalies of the testing methods; dichotomy raw matter-product; lacking of exact indications for a reliable verification of constancy of performance; etc. etc. etc... ...)



# FINAL REMARKS

- in order to play the role this important instrument could really play:
- ➔ **advisable to introduce technological tests** (➔ more reliable picture):
  - to be performed on the finished product;
  - on samples after any processing operation;
  - with the thickness effectively used in the construction work;
  - directly in the fabric, with simplified methods;
- ➔ also **advisable to promote a deeper discussion on some "basic guidelines" which rule the current standards products and test methods;**
- final target: to elaborate **a reliable procedure of evaluation of conformity;**
  - efficacious and efficient;
  - feasible for companies of any size;
  - not expensive;
  - in any case, in compliance with the CPR 305/2011;
  - producing declaration of performances "precise" and reliable;
  - defending both manufacturers and end-users of DS;

# FINALLY, REMEMBER !

## The CE Marking:

- **does not state the suitability** of a stone to the intended use;
- **is not a Mark**;
  - marks are **voluntary**; the CE Marking is **compulsory**;
  - **is not** a origin/provenance mark;
  - **is not** a quality mark;
- **does not state** that the production has been carried out within EU;
- **must not be confused** with “*Made in...*”
- does **not** exist for all products;
- **must be delivered** to the customer;
- is not intrinsically a product; it **cannot be acquired** and/or **sold**;



***Thank you for your attention***