

GNB-CPD SG17	Guidance from the Group of Notified Bodies for the Construction Products Directive 89/106/EEC	NB-CPD/SG17/08/057 Issued: 5 August 2008 APPROVED – GUIDANCE
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GNB-CPD position paper from SG17 EN 10210-1:2006 and EN 10219-1:2006

Guidance for the assessment of FPC of hollow structural sections of non-alloy and fine grain steels

General scope, limitations and aim of this guidance for Notified Bodies (NBs)

This position paper contains guidance for Notified Bodies (NBs) involved in the attestation of conformity of FPC of hollow structural sections of non-alloy and fine grain steels according to EN 10210-1:2006 and EN 10219-1:2006. The purpose is to help NBs work equivalently and come to common judgments. This guidance contains informative material (which NBs should or may follow) and/or normative guidance (which NBs shall follow or at least work equivalently to as circumstances demand).

This guidance is thought necessary to provide clarity and completeness for NBs so that they can work equivalently. It **supplements and makes practical for NBs** the harmonized standards EN 10210-1:2006 and EN 10219-1:2006, approved AG guidance, and Standing Committee guidance in the form of GPs, which also apply - unless otherwise explicitly stated in this guidance. This position paper should **not** contradict nor extend the scope of the work and role of a NB, nor impose additional burdens on the manufacturer, beyond those laid down in the CPD and EN 10210-1:2006 and EN 10219-1:2006.

This guidance should be considered valid until the relevant standards are amended to include the guidance (as thought fit by the CEN/TC); or until guidance from Commission, SCC, and AG has changed on relevant matters. Whereupon, the paper should be considered for withdrawal/revision and be replaced by new guidance as necessary.

This position paper was considered approved by SG17 on 11 October 2007 and by Advisory Group (AG) on 26 July 2008.

1 Initial type testing (ITC/ITT)

During the initial inspection of factory and FPC the NB shall take into account the Initial Type Testing (ITT) carried out by the manufacturer (Annex D of EN 10210-1 and EN 10219-1).

The NB shall check that the results of the ITT procedure are consistent with the scope of product types, materials and manufacturing process covered. For hot finished welded sections according to EN 10210-1 and cold formed welded sections according to EN 10219-1, the ITT shall include testing of the weld based on the welding manufacturing process.

2 Initial inspection of the factory and factory production control (FPC)

2.1 General

The FPC shall cover all the production lines, units or departments, from at least hot rolling or cold forming to the finished product placed on the market, including those outsourced or operated by subcontractors¹.

For testing and number of tests/samples the FPC shall consider the requirements of table D.1 of Annex D of EN 10210-1 and of EN 10219-1. All tests of the mechanical properties must be carried out on samples taken from the hollow section. Use of mechanical property test results certified by the raw material supplier (see the following paragraph) is not permitted as a substitute for testing of the hollow section either for the ITT programme or during FPC.

Semi-finished products used for the manufacturing of EN 10210-1 and EN 10219-1 products (e.g. ingots or billets for seamless hollow sections or flat products for welded hollow sections) shall be regarded as raw materials. The manufacturer shall document the raw materials specification as necessary in order for the finished product to conform to EN 10210-1 or EN 10219-1 requirements as appropriate.

The factory covered by a single FPC may comprise several production units, production lines and/or departments. The notified body shall define the scope of certification in terms of units, lines and departments in all records issued to verify that the FPC has been certified.

The testing facilities shall be included in the assessment.

The capability of the laboratory shall be demonstrated to the notified body according to one of the following possibilities:

- direct check of the performance of the manufacturer's own laboratory within the scope of the FPC;
- accreditation of the laboratory under ISO/IEC 17025 or equivalent accreditation; the accreditation shall be specific for the tests carried out;
- assessment of an external laboratory by the notified body.

For hot finished welded sections according to EN 10210-1 and cold formed welded sections according to EN 10219-1, the capability of the inspection equipment of the weld and the qualification of the personnel shall be assessed.

After a new ITT program has been undertaken, the manufacturer shall inform the notified body. The notified body does not need to undertake a supplementary assessment visit if the method of production is covered by the existing certified FPC.

In all cases the notified body shall assess the FPC according to EN 10210-1 or EN 10219-1 and this document. If the notified body has issued an EN ISO 9001 certificate for the quality management system of the manufacturer, any information from that certification may be used in support of the FPC.

¹ *A check-list made by the Notified Body and specific to EN 10210-1 and EN 10219-1 and to this document is strongly recommended as a tool for the assessment.*

2.2 Initial inspection of factory and FPC

During the initial assessment of the factory all units, lines and departments covered by a single FPC, shall be inspected individually. This shall include those outsourced or operated by subcontractors unless their FPC is certified by a notified body for the scope of the work being undertaken.

The initial inspection shall check that the factory has the necessary process equipment to achieve conformity of products.

For all welded hollow sections (products) quality control of the seam shall be assured in accordance with the manufacturer's own documented procedures.

Initial visits to packaging and warehouse units shall check that the FPC used for identification and packaging ensures that products retain their traceability. Unless the product is being CE marked again under the CPD then trans-shipping storage facilities such as transport yards, rail terminals and docks are not within the scope of the certification.

2.3 Continuous surveillance, assessment and approval of FPC

Surveillance visits of the FPC shall generally be undertaken at least once a year. The duration and extent of surveillance visits may be undertaken according to the usual procedures of the notified body, but the operation of the FPC in every unit, line and department covered by a single FPC shall be included in a surveillance visit at least once every three years.

Packaging and warehouse units, other than trans-shipping storage facilities identified in the final paragraph under "Initial inspection of factory and FPC", above, used to receive and store products from one or more production units, production lines and departments shall be visited as often as the units, lines and departments that they serve.

If the FPC has been certified by the notified body as conforming to the requirements of EN ISO 9001 then, provided the operation of the FPC in every unit, line and department covered by a single FPC is included in a surveillance visit at least once every three years, the extent and/or duration of the surveillance visits may be reduced but not their frequency.