

Guidance Manual for EUCEB Certification

How to obtain the right to use EUCEB Trademark for mineral wool products?

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1. SCOPE:

In order to provide information for the customers and consumers of mineral wool products with respect to the requirements for exoneration of a mineral wool product according to Regulation (EC) No 1272/2008 of the European Parliament and of the Council some member companies of EURIMA, the European Insulation Manufacturers Association, decided to create the EUCEB-Trademark.

This procedure describes the process to obtain the EUCEB Certification, which gives the right to use the EUCEB Trademark

This document contains decisions from the Quality Board and will be put on the member's section of the EUCEB web-site. It will be regularly updated. Procedures described in this document **OVERRULES** procedures mentioned in older contracts closed between EUCEB, Applicants, Sampling and Analysis Institutes. Applicants will be informed by e-mail of any changes in the procedures. Sampling and Analysis Institutes will be informed by regular mail of changes in the procedures.

2. Definitions:

Applicant: Company that wish to apply for the EUCEB Trademark

Observer: Applicant, which is not certified yet.

Secretary General: responsible for the administrative functioning of the association

Secretary: responsible for the day to day follow up of the EUCEB procedures

Scientific Expert – Short term biopersistence Testing: External expert for approving Short term biopersistence test

Scientific Expert – Chemical Analysis: External expert for approving Chemical Analysis testing, for approving Sampling and Analysis Institutes

Operating Report: Spreadsheet with the progress on all the EUCEB Certifications. File Name: <..\Progress Reports\Operating Report.xls>

Log Book: logbook where all communications between the Applicant and Secretary are noted. The most up to date version of the Logbook is kept in electronic format. File name: <..\Progress Reports\Log Book.xls>

CheckList: CheckList with the certification progress of each fibre, set up by plant. This checklist has been integrated by a mail merge in the Operating Report.

Management Board (Mgt Board): [26 The Management Board V01.doc](#)

Quality-Board: (Q-Board): [25 Quality Board V01.doc](#)

Production facility: Plant with no further differentiation among production lines.

Representative sample: sample either from the current production, or taken directly from the production line or stock

3. Background

The Commission Directive 97/69/EC amended with it's coming into force on the 16.12. 1997 for the 23rd time the Council Directive 67/548/EEC on the approximation of the laws, regulations and administrative provisions relating to the classification, packaging and labelling of dangerous substances. In particular, Regulation (EC) No 1272/2008 of the European Parliament and of the Council added Note Q to the foreword, which defines exoneration criteria for substances, so that the classification as a carcinogen need not apply, if it can be shown that the substance fulfils one of four conditions. The major objective of Note Q of the Regulation (EC) No 1272/2008 of the European Parliament and of the Council was mineral wool, which was defined as man-made vitreous (silicate) fibres with random orientation with alkaline oxide and alkali earth oxide (Na₂O + K₂O + CaO + MgO + BaO) content greater 18 % by weight. Since then, all Member States have transposed Directive 97/69/EC.

In order to provide information for the customers and consumers of mineral wool products with respect to the requirements for exoneration of a mineral wool product according to Regulation (EC) No 1272/2008 of the European Parliament and of the Council some member

companies of EURIMA, the European Insulation Manufacturers Association, decided to create the EUCEB-Trademark.

EUCEB stands for the European Certification Board for Mineral Wool Products, a not-for-profit association, whose general purpose is to voluntarily certify the conformity of mineral wool fibres with Note Q of the Regulation (EC) No 1272/2008 of the European Parliament and of the Council.

The EUCEB-Trademark stands for proven and reliable quality according to a precisely defined system of monitoring and controls. The Trademark is a confirmation for a high quality of products, which are manufactured in accordance with the requirements laid down in the EUCEB-constitution, which as core elements contain the exoneration criteria of Regulation (EC) No 1272/2008 of the European Parliament and of the Council enlarged by regulations for proceeding of the external third party controls.

The Trademark will provide security for those products, which are labelled with the Trademark, that the mineral wool product is exonerated from the classification as carcinogen category 3.

As a result, the customers and consumers of mineral wool products is given a tool with a high value of recognition: a Trademark, which may be placed on the packaging of mineral wool products and is, thus, visible at a single glance.

In the following, the information required and the necessary steps to obtain the right to use the EUCEB-Trademark are described.

4. Initial Application of the EUCEB-Trademark

The general procedure of admission of the EUCEB-Trademark for an Applicant consists of the Applicant providing the required information, the examination for completeness and accuracy by the Quality Board, followed by the recommendation to the Management Board, to grant the right to use the Trademark to the Applicant.

In order to maintain some consistency between the various applications in the process of their examination by the EUCEB Quality Board, any mail or documents used to establish the company qualification for EUCEB certification, including short term biopersistence test reports and any sampling/analysis reports, certificates of compliance or contracts will need to be written in or translated into **English**.

However, when the EUCEB certification system was set in 2000, documents in other languages were accepted. The requirement to have all documents in English is valid from September 2003 onwards.

A flow chart with a description of how to obtain the right to use the EUCEB Trademark has been made. Both the Initial Conformity Inspection and the Repetitive Conformity Inspection are described in the following file: [17 EUCEB Application Process V04.ppt](#)

In a first step a company has to apply for EUCEB certification (1)

When a company wish to apply for EUCEB certification it is the responsibility of the Secretary to send the Applicant a copy of the following documents:

- the EUCEB Constitution, [01 EUCEB Constitution V02.doc](#)
- the by-laws of EUCEB, [02 EUCEB By laws V02.doc](#)
- Exhibit 1 - the trademark, [03 EUCEB EXHIBIT 1 - The Trademark V02.doc](#)
- Exhibit 2 - the executive rules for use of the trademark, [04 EUCEB EXHIBIT 2 - The executive rules for use of the trademark V02.doc](#)
- Exhibit 3 – the chemical range, [05 EUCEB EXHIBIT 3 - The Chemical Range V02.doc](#)
- Exhibit 4 – the first Quality Board, [06 Exhibit 4 - The first Quality Board V01.doc](#)
- Appendix 1 - Legal Undertaking, [07 EUCEB APPENDIX 1 - Legal Undertaking V02.doc](#)
- Appendix 2 – Trials, [08 EUCEB APPENDIX 2 - Trials V02.doc](#)
- Special regulations for the use of the EUCEB-Trademark on Packaging and for further use in printing, [09 Regulations for the use of the Trademark V02.doc](#)
- Manufacturers Declaration, [10 Manufacturers Declaration Final V02.doc](#)
- Contract between Applicant and Sampling Institute, [11 Contract Sampling Institute – Client V02.doc](#)
- Contract between Applicant and Analysis Institute, [13 Contract Analysis Institute – Client V02.doc](#)
- Frame contract between EUCEB and Sampling Institute, [12 Frame Contract EUCEB - Sampling Institute V02.doc](#)
- Frame contract between EUCEB and Analysis Institute, [14 Frame Contract EUCEB - Analysis Institute V02.doc](#)
- Guidance Manual for EUCEB certification: A copy of the latest version of this manual
- Flow chart of the EUCEB Application Process: [17 EUCEB Application process V04](#)
- Regulation (EC) No 1272/2008 of the European Parliament and of the Council. - [.135 Abstract of European Regulation 1272-2008 of 16 December 2008.doc](#)

The application of the EUCEB-Trademark requires from each Applicant the following information.

4.1. Legal Undertaking

Acknowledgement of EUCEB-Constitution: Each Applicant must sign the Legal Undertaking (2), as it is settled out in Appendix 1 of the EUCEB-Constitution. By signature, the Applicant confirms his agreement to the constitution, by-laws and exhibits of EUCEB. The Legal Undertaking must be signed and dated (3).

An unsigned and not dated Legal Undertaking is not acceptable and the Applicant will be asked by the Secretary for corrective actions (4).

The Secretary will inform the Management Board of EUCEB that the Applicant wishes to obtain the EUCEB Certification. The Operating Report will be updated, the Logbook opened, a Check-List will be written and the Applicant will receive a password from the secretary giving him access to the EUCEB web-site, members section. (5).

The Applicant is considered as Observer until certification is obtained. The Observer is not a member yet and has no voting power. Payment of the fee is due from the moment the Legal Undertaking has been submitted.

Q-Board meeting: 29-6-2001

Even though the application procedure had been settled and sent out to potential members, additional details were brought up in order to proceed consistently towards the new applicants and especially:

- *To acknowledge receipt of each application*
- *To call for an Short term biopersistence test report to be sent to Secretariat*

Observation:

In the case of sub-contractors, they are due to provide to an Short term biopersistence test report from each producer concerned by their application.

- *To invoice the company once the Short term biopersistence tes is received*
- *To ask the company requiring a certificate in English from the laboratories.*
- *To contact the laboratories and establish a contract*

4.2. Manufacturers Declaration

Each Applicant has to sign the Manufacturers Declaration (6), by which the manufacturer formally declares that manufactured and marketed products comply with the acknowledged exonerated fibre type(s) in the production facilities mentioned. The standard form should be used for this declaration, dated and signed (7).

An unsigned or not dated Manufacturers Declaration, with no mentioning of Fibre type and Plant, is not acceptable and the Applicant will be asked by the Secretary for corrective actions (4).

The Secretary will update the Operating Report, the Logbook and CheckList (8).

Q-Board Meeting 09-08-2000:

- *Two signatures are required from the Company with mention of both name and title.*
- *Several product names can be mentioned in the declaration.*

In case of change (i.e. new brand name) the Manufacturer Declaration has to be renewed and the new brand name added.

Q-Board Meeting 30-11-2004:

The Management Board noticed that some members are making no progress on the certification of some fibres mentioned in the Manufacturers declaration. It was therefore decided that after a period of 2 years without any progress, these fibres would be removed from the EUCEB certification system. Prior in doing so the member will be informed by the Secretariat. The member will have a period of 1 month to reply on the notification of the secretariat that his fiber will be removed from the certification system.

Q-Board meeting of 13-02-2006:

From 01-03-2006 onwards the Legal Undertaking and the Manufacturers Declaration must be signed and dated by the responsible from the (National) Company on regulatory matters.

4.3. Short term biopersistence Testing

The Applicant has to provide information on the fibre type(s), which he wants to use. These fibre type(s) must have successfully passed one of the exoneration criteria (9), i.e. either Short-term biopersistence, Intratracheal, Chronic inhalation or Intraperitoneal Test. Each test should have been performed according to the respective EU testing method for man-made mineral fibres.

Each Short term biopersistence test Report of a fibre type has to be sent in for acknowledgement in two copies. One copy will remain at the EUCEB-secretariat as reference, the second copy will be passed to the Scientific Expert – Short term biopersistence Testing of the EUCEB-Quality Board for examination (10), which will lead to a positive (11) or negative (4) evaluation. No copy of the test report will be handed out to the Industry Representatives of the Quality Board.

The examination and valuation of the presented test report is especially crucial, if the test has not been performed by one of the institutes, which have been recognised by EUCEB as being appropriate. These Short term biopersistence test Laboratories are:

- Fraunhofer Institut Toxikologie und Experimentelle Medizin (ITEM), Hannover, Germany
- RCC Ltd., (Research Consulting Company) Füllinsdorf, Switzerland

In addition to the test report, the Applicant has to present 1 copy of the certificate of exoneration. This certificate must contain the following information:

- Title of the test report

- Details of the Manufacturer/Producer
 - Designation of the tested fibre type
 - Testing laboratory
 - Short term biopersistence test method
 - Time or period of the short term biopersistence test
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- Chemical composition of the tested fibre (this information may also be given on a separate sheet, the composition should be based on an external analysis, preferably, by the Analysis Institute, which is to perform the conformity inspection analysis of the material samples)
 - Result of the test (half-life for Intratracheal and Short-term Biopersistence test, no evidence of excess carcinogenicity for Intraperitoneal test, absence of relevant pathogenicity and neoplastic changes for Chronic Inhalation)

The copy remains as reference at the EUCEB-secretariat

The Chemical Analysis of an short term biopersistence test with a fibre type performed later than 1. January 2001 must be performed by one of the Analysis Institutes accredited by EUCEB. The Quality Board advice Applicants that the test should preferably be performed by the Analysis Institute foreseen for conformity inspection.

The sample for the Chemical Analysis has to be taken from the stock provided by the Applicant to the Short term biopersistence test Laboratory. The sample shall be taken by a Sampling Institute and directly send to the Analysis Institute.

The Secretary will update Operating Report, the Logbook and CheckList. The Applicant will be informed by the conclusions of the Scientific Expert – Short term biopersistence Testing whom has to approve the exoneration certificate and the Short term biopersistence Testing report (12).

Decision of Q-Board: 14-11-2001

Short term biopersistence test reviews of received applications

The Scientific Expert – Short term biopersistence Testing, checks how both the Short term biopersistence test procedure and studies are performed.

Due to some uncertainty regarding the current examinations and results, it was decided that in case of problem the Scientific Expert – Short term biopersistence Testing would:

- *Send the information to EUCEB secretariat*
- *Secretary inform the manufacturer*
- *The manufacturer inform his laboratory*
- *The Scientific Expert – Short term biopersistence Testing liase with laboratory*

On the other hand, and in order to avoid mistakes and confusion for both the Short term biopersistence test review by the Scientific Expert – Short term biopersistence Testing and the Scientific Expert – Chemical Analysis review, the following procedure was re-confirmed:

- Secretary to ask the manufacturer to send the Short term biopersistence test report
- Secretary to ask the manufacturer to send the **ORIGINAL or electronic copy in pdf-format of the Chemical Analysis**
- Secretary to send the Short term biopersistence test Report and the Chemical Analysis to the Scientific Expert – Short term biopersistence Testing
- The Scientific Expert – Short term biopersistence test Testing to send the Short term biopersistence test related chemical composition analysis to the Scientific Expert – Chemical Analysis
- The Scientific Expert – Short term biopersistence Testing to send the final report to secretary together with the Short term biopersistence test report.

Furthermore, as a code should be attributed on each composition reference, the Scientific Expert – Short term biopersistence Testing is required to provide a spreadsheet including data (i.e. company name, fibres, plants etc..) for double use by the Scientific Expert – Chemical Analysis and EUCEB.

4.4. Contracts with Sampling and Analysis Institute

The conformity inspection aims at a neutral, third party controlled supervision, that the Applicant produces in accordance with his Manufacturers Declaration a fibre type in his production facilities, which is in conformity with the exonerated fibre type(s) according to the range criteria for conformity settled in Exhibit 3 of the EUCEB-constitution.

The conformity inspection splits up in two steps:

- a) Sampling of the test material performed by the *Sampling Institute*
- b) Chemical Analysis of the test material performed by the *Analysis Institute*

Decision of the Q-Board: 04-07-2002, 08-03-2003 and 23-01-2003

To avoid any doubts about the capability of Sampling and Analysis Institutes to complete the sampling/analysis required by the certification, it has been decided to ask them to provide EUCEB with a copy of the adequate certification or alternatively with details on the internal quality management procedures. The Scientific Expert – Chemical Analysis, reported on the mandatory documents to be sent to the Secretariat for inspection as follows:

For Analysis Institutes:

- *DIN EN ISO/IEC 17025*
- *NS EN ISO / IEC 17025*
- *SFS – EN ISO / IEC 17025*

The Analysis Institute should be competent to carry out testing in the field of chemistry, for the types of tests XPS, ICP-AES or XFA, flame photometry, gravimetry, electrochemical test methods or Volumetric analysis. Most preferably some experience on the analysis of glass chemistry is available.

The Scientific Expert – Chemical Analysis will evaluate if this expertise is present and eventually approve the Institute.

For Sampling Institutes:

- *EN ISO 9001*
- *EN ISO/IEC 17025*
- *SS EN 45001*
- *ISO/IEC Guide 65*
- *UNE – EN ISO 14001*
- *National accreditation by SWEDAC; No. 02-625-51.1675*
- *Certification of GLP or,*
- *Certification showing to be an official national testing laboratory or,*
- *Any document which identifies an internal quality management system.*

The Sampling Institute should comply to general requirements for bodies operating product certification systems.

If none of the above mentioned requirements are fulfilled the laboratory should send in any document, which may back up the comparable technical experience available. In the future, every institution having applied to become a Sampling or Analysis Institute recognized by EUCEB, has to be approved by the Scientific Expert – Chemical Analysis, together with adequate documents for validation (18).

Regarding the Analysis Institutes cited by Applicants and which are not listed in the official list, it was decided that the Institute should be accredited and provide the necessary documents plus a short description on how they can make the analysis. Once the documents received, the Scientific Expert – Chemical Analysis would check whether the Institute could perform the analysis or not.

In addition, the Scientific Expert – Chemical Analysis, does insist on the fact that any given Chemical Analysis must contain a short description on how the analysis has been done.

a) Sampling of the test material performed by the Sampling Institute

The EUCEB rules require that one sample is taken per plant each six months. The sample needs to be taken randomly over the production lines and stock.

The samples to be tested shall be obtained from a production line or from the stock. Nevertheless, the test sample should represent the chemical composition of the fibre produced.

The collection shall be made by a Sampling Institute duly qualified as competent to act in this domain. For practical simplicity, it is recommended to engage those Institutes already in charge of monitoring and supervision of the technical properties of the products.

The Applicant has to announce the Sampling Institute to the Quality Board, which will evaluate the competence of the Institute. The Quality Board will conclude the Frame Contract “Sampling Institute” (13) with the very Institute, if the Institute has not already concluded this contract with EUCEB. Two original copies of the Frame contract are required. One copy for the Sampling Institute and one for the EUCEB Secretariat.

The frame contract serves as an “umbrella” contract, leading to comparable conditions for sampling, packaging and distribution for each Sampling Institute in any production facility of any Member Companies.

One signed and dated copy of the accreditation of the Sampling Institute is required, mentioning the validation date and the scope of accreditation. The copy can eventually be in the local language, but an English translation of the scope and validity date must be submitted. The Secretary will contact the Sampling Institute in case of non-conformance of the above requirements (15). The accreditation of the Sampling Institute has to be approved (18) by the Scientific Expert – Chemical Analysis.

Decision of the Q-Board: 07-02-2007

The Sampling Institute may name a subcontractor to obtain the samples or measures as described under § 2 item 2.1 lit. a and/or b) (Frame Contract), if the Sampling Institute has settled with legally binding effect in the contract with the subcontractor, that the subcontractor commits to the requirements of this contract. On request by EUCEB, the Sampling Institute shall immediately document the existence of such a contract. The Sampling Institute is responsible for the technical expertise of the subcontractor.

Sub-contractors of Sampling Institutes do not need to be approved by the External Scientific Expert – Chemical Analysis. A copy of the legally bonding contract between the Sampling Institute and the sub-contractor, and additionally a copy of the accreditation of the subcontractor, must be sent the EUCEB Secretariat

Decision of the Q-Board: 14-11-2001, 08-03-2002 and 23-01-2003

The Frame contracts between EUCEB and the Sampling/Analysis Institutes first have to be pre-signed by EUCEB and then signed by the Sampling/Analysis Institute. (Q-board meeting, 14-11-2001). The EUCEB Secretariat has to get into contact with the Sampling/Analysis Institute for the frame contracts signature. It was agreed that a national frame contract could be valid for several individual companies (Q-Board meeting, 08-03-2002).

The President of the Management Board or the Secretary General are entitled to sign the frame contract with the Sampling/Analysis Institute (Q-Board meeting, 23-01-2003).

Under this frame contract, the Applicant shall conclude individual contracts with the Sampling Institute for each production facility (14), which shall be admitted to the EUCEB-Trademark. These individual contracts shall in particular settle accounting directly between the Applicant and the Sampling Institute, in order to limit bureaucracy at EUCEB.

The Applicant has to set up per factory 3 original dated and signed copies of contract between the Applicant and the Sampling Institute. One copy for the Applicant, one for the Sampling Institute and one copy remains as reference at the EUCEB-secretariat. The Secretary will ask the applicant for corrective actions if contracts are not dated or signed (16).

Decision of the Q-Board: 08-03-2003

On the subject of Sampling Institute the following was decided: that a simplified contract (2 pages) with references to the frame contract will be drafted by the secretariat.

b) Chemical Analysis of the test material performed by the Analysis Institute

The Chemical Analysis of the samples provided by the Sampling Institutes is performed in the Analysis Institute.

The Applicant has to announce the Analysis Institute to the Quality Board, which will evaluate the competence of the Institute. The Quality Board will conclude the Frame Contract “Analysis Institute” (13) with the very Institute, if the Institute has not already concluded this contract with EUCEB. Two original copies of the Frame contract are required. One copy for the Analysis Institute and one for the EUCEB Secretariat.

As above, this frame contract serves as an “umbrella” contract, leading to comparable conditions for the Chemical Analysis at each Analysis Institute for each sample. In contrast to the frame contract with the Sampling Institutes, this frame contract settles a fixed price for each analysis.

One signed and dated copy of the accreditation of the Analysis Institute is required, mentioning the validation date and the scope of accreditation. The copy can eventually be in the local language, but an English translation of the scope and validity date must be submitted. The Secretary will contact the Analysis Institute in case of non-conformance of the above requirements (15). The accreditation of the Analysis Institute has to be approved (18) by the Scientific Expert – Chemical Analysis.

Under this frame contract, the Applicant shall conclude an individual contract with the Analysis Institute (14). This individual contract shall in particular settle accounting directly between the Applicant and the Analysis Institute, in order to limit bureaucracy at EUCEB.

The Applicant has to set up par factory 3 original copies of contract between the Applicant and the Analysis Institute. One copy for the Applicant, one for the Sampling Institute and one copy remains as reference at the EUCEB-secretariat.

The Secretary will update Operating Report, the Logbook and CheckList. The Applicant will be informed by the conclusions of the Scientific Expert –Chemical Analysis who has to approve the Sampling and Analysis Institutes (17).

4.5. Initial Conformity Inspection

The individual contract with the Sampling Institute shall in particular refer to the aspect of monitoring the self-control system installed as described under 2.1 c) in the frame contract with the Sampling Institute.

As an alternative, this aspect can be subject to a separate agreement. In this case, the Applicant has to present 1 copy of the agreement for each production facility concerned. The copy remains as reference at the EUCEB-secretariat.

The Applicant has to run through the procedure of Initial Conformity Inspection for each production facility, which shall apply the EUCEB-Trademark. One original of electronic copy in pdf-format of the sampling and analysis report has to be send directly from the Analysis Institute to the EUCEB-secretariat. A copy will remain for reference. The Secretary will send the Sampling and Analysis Report to the Scientific Expert –Chemical Analysis (19).

The Scientific Expert – Chemical Analysis will evaluate the Reports (20) and write an Approval Report (21). When the Scientific Expert – Chemical Analysis does NOT approve the reports, the Secretary will contact the Applicant for corrective action (4).

The Secretary will update Operating Report, the Logbook and Check-List. The Applicant will be informed by the conclusions of the Scientific Expert – Chemical Analysis who has to approve the Chemical Analysis Reports. The Quality Board will examine the presented documentation for completeness and accuracy. In case of a positive evaluation, the Quality Board will prepare the examination certificate “Initial Application for the right to use the Trademark”, which is the basis for the Management Board to grant the right to use the Trademark to the Applicant (22). The Quality Board gives a plant the right to use the EUCEB Trademark for the products made of the certified fibres.

Q-Board meeting, 1-12-2003

The Quality Board re-confirms that for Stone Wool all the analysis will be done on FeO. The limits for FeO stays +/- 1.5%.

For Glass Wool the analysis is done on Fe₂O₃, with limits +/- 1.5%.

Q-Board meeting, 10-03-2003

Should a Sampling/Analysis Institute receive its accreditation by the Scientific Expert – Chemical Analysis- the granting of the EUCEB Trademark can be agreed between the EUCEB Secretary and the Scientific Expert – Chemical Analysis without a formal conference call (Q-Board meeting, 10-03-2003)

Q-Board meeting of 13-02-2006:

A draft copy of the certificate must be sent to the EUCEB member for approval. After the approval of the draft certificate by the EUCEB member the Secretary will send the certificate to the Quality Board for signature

Q-Board meeting of 19-04-2006:

The date on the certificate is the date that the Secretary General sends the certificates for signature to the Quality Board. The Secretary should send a message to the Quality when a company has been certified.

Q-Board meeting of 09-12-2009:

The Quality Board approves that the members will receive from 09-12-2009 onwards an electronic copy of the initial and repetitive testing evaluation reports as submitted by the external expert. The members will not receive anymore a copy of the sampling and analysis reports as these documents should be sent directly to them by the test institutes. An original copy of the evaluation report will be kept by the EUCEB secretariat.

The Secretary should send a DRAFT of the certificate to the member for approval. After approval by the member the certificate may be sent to the Management Board for Signature.

The Secretary will set up a single copy of the certificates, sent them out to be signed by the President of EUCEB, the Chairman and Vice Chairman of the Quality Board of EUCEB [15 Examination Certificate Initial Application V02.doc](#). The original certificates will be sent to the Applicant and one confirmation copy will be kept in the files from the Secretary as a reference (23).

Labelling of mineral wool products with the Trademark is only allowed in the production facilities listed in the Manufacturers Declaration. The non-observance of this prerequisite is regarded as an infringement, which may be sentenced with a removal of the right to use the Trademark.

5. Repetitive Conformity Inspection

In order to ensure conformity that the chemical compositions of the fibres are within the acceptable range, cf. enclosure from the fibres tested in the report submitted to the European Certification Board for Mineral Wool Products, an external repetitive conformity inspection shall take place at least twice per calendar year (the first repetitive external conformity inspection should take place between January 1st and June 30th whereas the second repetitive external conformity inspection should take place between July 1st and December 31st). The

time between two repetitive conformity inspections should be at least 4 months. The inspection splits up into sampling and determination of the chemical composition of the sample. Additionally the Sampling Institute shall monitor the self-control system by checking that the chemical composition is measured and recorded at least twice per months.

The sampling date is the date, which defines the period of the year the sampling has been done (first half or second half).

Q-Board of 1-12-2003:

When the Sampling Institute took a sample the applicant will send an e-mail to the EUCEB secretariat, at the latest one week after sampling. This will allow the Secretary to better follow up the repetitive conformity inspections by the Sampling and Analysis Institutes. The first Repetitive Conformity Inspection must happen in the semester following the granting of the right to use the EUCEB Trademark.

The samples will be sent directly to the Analysis Institute, together with the sampling report. The Analysis Institute will send an original or electronic copy in pdf-format of the sampling and analysis report to the EUCEB Secretariat. The EUCEB Secretary will send a copy of the reports to the Scientific Expert – Chemical Analysis for evaluation (19).

Q-Board of 1-7-2004:

In order to shorten the delay time for the evaluation by the Scientific Expert – Chemical Analysis the following decision was taken by the Quality Board:

- *The analysis reports will be sent once a month to the External Scientific Expert for evaluation. He is expected to report back to EUCEB within a period of 2-3 weeks.*
- The EUCEB secretariat can make a **provisional** evaluation of the analysis results. In case of non-conformance the member will be informed immediately by the secretariat, so that corrective actions can be taken as quickly as possible. This non-conformance must always be confirmed by the External Scientific Expert when he writes his evaluation report. In case of conformance the analysis results will be sent to the Scientific Expert – Chemical Analysis for evaluation.

The Scientific Expert – Chemical Analysis will evaluate the Reports (20) and write an Approval Report (21). When the Scientific Expert – Chemical Analysis does NOT approve the reports, the Secretary will contact the Applicant for corrective action (4).

The Secretary will update Operating Report, the Logbook and CheckList. The Applicant will be informed by the conclusions of the Scientific Expert – Chemical Analysis who has to approve the Chemical Analysis Reports. The Quality Board will examine the presented documentation for completeness and accuracy. In case of a positive evaluation the Quality Board automatically extends the right to use the EUCEB Trademark (22).

Repetitive Conformity Inspection once per Semester is an absolute requirement in order to keep the right to use the EUCEB Trademark. The infringement procedure (section 9) will be started if no Repetitive Conformity Inspection has been performed.

Sampling and Analysis reports from repetitive testing should be sent to the Secretariat at the latest 3 months after the sampling date.

6. Specific Admission: New Fibre Type

The Trademark User may be interested in having a new fibre type acknowledged. In this case, the following information has to be presented:

- A revised Manufacturers Declaration (section.4.2.)
- Short term biopersistence test report and certificate of exoneration (section 4.3.)
- Confirmation of Scientific Expert – Short term biopersistence Testing that fibre type complies with EUCEB-exoneration criteria (section 4.3.)
- Confirmation of Scientific Expert – Chemical Analysis that fibre type complies with EUCEB-exoneration criteria (section 4.5.)

The Quality Board will examine the presented documentation for completeness and accuracy. In case of a positive evaluation, the Quality Board will prepare the examination certificate “Initial Application for the right to use the Trademark” [15 Examination Certificate Initial Application V02.doc](#), which is the basis for the Management Board to grant the right to use the Trademark to the Applicant (22).

7. Specific Admission: New Production Facility

The Trademark User may be interested in having a further production facility acknowledged. In this case, the following information has to be presented:

- A revised Manufacturers Declaration (section 4.2.)
- Contracts with Sampling and Analysis Institute (section 4.4.)
- Initial Conformity Inspection for the fibres manufactured in the production facility (section 4.5.)

The Quality Board will examine the presented documentation for completeness and accuracy. In case of a positive evaluation, the Quality Board will prepare the examination certificate “Initial Application for the right to use the Trademark” [15 Examination Certificate Initial Application V02.doc](#), which is the basis for the Management Board to grant the right to use the Trademark to the Applicant (22).

8. Simplified self-control for Trademark Users, who do not produce mineral wool, but exclusively use fabricated materials from an EUCEB-certified producer

The simplified self-control is described under item 2.1c of the frame contract with the Sampling Institute:

In the case of a Trademark User, who does not produce mineral wool, but exclusively uses mineral wool as a fabricated material from third party for his own mineral wool end-products, the self-control can be limited to continuous documentation in written or electronic form, if the Trademark User can prove that his supplier/manufacturer has the right to use the Trademark during the time period from delivery of the fabricated material to marketing of the mineral wool end-product.

9. Standard procedure in the case of an infringement due to a failure in the Repetitive Conformity Inspection

General rules in any case of an infringement are settled in Exhibit 2 Item 4 of the EUCEB-Constitution.

The most important infringement is the non-conformity of the chemical composition of the produced and marketed fibre with the exonerated fibre type(s), which have been acknowledged by the Quality Board for the specific company.

Non-conformity is present, even if the conformity inspection reveals, that conformity exists with an exonerated fibre type, i.e. a fibre type acknowledged to another producer, but not to the company in question.

Then the Quality Board usually requests a re-conformity inspection. The standard procedure of the Quality Board is, that the company in question is required to organise in the shortest time possible with the Sampling Institute a re-sampling up to a fixed date, which has to be documented by providing the sampling protocol. The sample must be representative of the current production. The sample is send as usual to the Analysis Institute. Alternatively, the Quality Board may directly engage the Sampling Institute for the re-conformity inspection. (Even in this case the manufacturer has to pay for the sampling.)

In special cases also an audit of the self-control documentation can be required. That would in particular apply, if the same non-conformity would appear several times at the same production facility.

The Management Board will ask the Trademark for an immediate halt in the use of the Trademark at the specific production facility. The trademark user must prove that non-use of the Trademark is enforced.

The specific production facility may re-apply for the right to use the Trademark after a withdrawal term of at least 3 months after the Quality Board decision. Re-application requires the same documents as for an initial application, i.e. in particular an Initial Conformity Inspection.

10. Complaints

Applicants will contact in written (regular, fax or e-mail) the EUCEB Secretariat in case of complaints on the functioning of the EUCEB procedures.

The Secretary will take actions in order to solve these complaints within a period of 1 month. If no satisfactory solution can be obtained between the Applicant and the Secretary, the Secretary will write (regular, fax or e-mail) a complaint letter to the Chairman of the Quality Board and the Applicant. The complaint will be put on the agenda of the next Quality Board meeting and the Secretary will inform the Applicant on the decision of the Quality Board.

Alain Herssens

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