



GUIDANCE DOCUMENT

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Guidance Document 005

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This EOTA Guidance Document has been endorsed at the 33<sup>rd</sup> meeting of the EOTA ExCom in October 1999.

## 0 Introduction

This paper sets out a number of concepts and defines the associated documents intended to address them.

### 0.1 Definitions

The documents are explained in more detail later, definitions are as follows:

- reference material in ETAGs:  
a document referenced in the body of an ETAG; usually in relation to a test method for a particular product characteristic. Not to be confused with documents quoted in the “background” description of the ETAG and which have been used as starting material for drafting an ETAG.
- EOTA Technical Report:  
a stand alone EOTA document on a technical matter (e.g. description of a test method developed by an EOTA WG)
- EOTA Guidance Document:  
a stand alone EOTA document on general issues, of relevance to EOTA in general or to all WGs in particular (e.g. the ETAG Format and this document...)
- Comprehension Document:  
an internal living EOTA document, explaining how to apply or interpret particular elements in an issued ETAG
- Updating of an ETAG:  
a process by which some parts of the ETAG are --adjusted to new circumstances
- Revision of an ETAG:  
the formal process of readjustment of an ETAG

## 1. Reference material in ETAGs

ETAGs have to contain the assessment methods (test, calculation etc.) for the evaluation of product characteristics stated in the EC mandates and in the relevant work programmes introduced to, and endorsed by, the EC.

These assessment methods might be described in full in the ETAG (Chapter 5). This will be usually the case when the assessment method is newly developed by EOTA.

In order to increase the readability of the ETAG, WGs might also propose to convert these assessment methods in to one or more separate annexes of the ETAG. These annexes form an integral part of the ETAG, when issued.

Assessment methods might however already exist elsewhere. In this case, the ETAG may make reference to the existing method, in as far as the document is publicly available. It is then sufficient to quote in the ETAG the correct references of the method and its source.

It should be remembered that EOTA is allowed to make reference in its ETAGs to various appropriate sources: EOTA Technical Reports (see clause 2), ENs, ISO standards, prENs and even national standards if there is an English translation available.

The agreed rule is to quote the document with title and reference date in the ETAG (see also updating process of ETAGs).

Where an existing external method is adopted in a modified form the WG should decide, on a case by case basis, whether it is easier to reference the document, indicating only the modifications in the ETAG, or to fully describe the method incorporating the changes. The usual choice of placing the test method in the body or an annex of the ETAG can be made. This will usually depend on the content and extent of the amendments introduced.

## **2. Technical Reports**

ETAGs can also make reference to EOTA Technical Reports.

EOTA Technical Reports are stand alone technical documents that find their origin in EOTA activities, normally as a result of the work in WGs.

Such Technical Reports may describe an extensive assessment method but might also be the result of activities developed as an aside to the ETAG. EOTA Technical Reports should always be originated either by the EOTA TB itself or by a WG, who proposes it to the TB for endorsement as an EOTA Technical Report (first step of acceptance). As such, a Technical Report can be of relevance to all ETAGs, to a set of ETAGs or just one.

In the end the aim is to assemble a library of technical documentation with a certain relevance to EOTA activities. Only when an ETAG references an EOTA Technical Report does that it become mandatory for use in an ETAG. If relevant, more than one ETAG might refer to the same Technical Report, in the same way as an EN, prEN or other material is referenced. The use of a Technical Report, developed by one WG, can however never be imposed on another WG, who remains solely responsible for analysing if it is relevant for its work.

The TB should, when endorsing the ETAG, analyse also the relevance and content of the Technical Reports referenced in it, in the same way as it has to judge all the other referenced material quoted in the ETAG (fully described methods in the ETAG or quoted ENs, prENs, ISOs ... or Annexes to the ETAG): second acceptance step.

The layout of these Technical Reports should be as neutral as possible, not referring for example to the name of the WG from which this originate, but rather indicating that a test method is used for a particular product family (rules to be elaborated by PT7). Technical Reports will be edited by the EOTA Secretariat centrally and made available in English.

## **3. EOTA Guidance Document**

In some cases either an individual WG or the TB or even the Ex.Com might come up with issues or findings of a more general nature, which should be consolidated at EOTA level and addressed as guidance to whom it concerns. This type of document should be available as an EOTA Guidance Document. Recent examples are the document on the "Assessment of working live of building products", developed by PT3 or the ETAG Format. Since they are mostly related to the WG activities in a general way, it is proposed that the issue of such Guidance Documents should be subject to EOTA TB endorsement.

The TB should, when endorsing the ETAG, analyse also the relevance and content of the EOTA Guidance Documents referenced in it, in the same way as it has to judge all the other referenced material quoted in the ETAG (fully described methods in the ETAG or quoted ENs, prENs, ISOs ... or Annexes to the ETAG): second acceptance step.

Similarly the Ex Com shall endorse Guidance Documents and consider them when referenced in an ETAG as with the TB.

## **4. Comprehension document of an ETAG**

As soon as ETAs begin to be drafted according to an existing issued ETAG, interpretation problems might occur, Approval Bodies interpreting various clauses differently due to their dissimilar technical expertise or cultural background as an approval body (e.g. interpretation of a test method, small corrections on never-experienced tests, statistical analysis of results, ...).

It is, in a spirit of European consensus-seeking process and harmonisation, imperative that Approval Bodies align their positions and interpretations to a commonly agreed basis (otherwise, the use of safeguard clauses by Member States might be tempting, undermining immediately the credibility of EOTA and its members).

Therefore it has been decided to draft, right from the beginning, for each issued ETAG, a comprehension document (previously called application or interpretation document) in which the interpretation and comprehension of the ETAG by some is consolidated by all.

To this end, each Approval Body which starts to issue an ETA and discovers an interpretation question should formulate a.s.a.p. its solution for it and address it to the Convenor of the WG which has drafted the ETAG. The Convenor of the WG should be the co-ordinator of this exercise, by collecting all these interpretation solutions.

If interpretation rules conflict with each other, he should consult the WG members, in particular those which have issued or are in the process of issuing ETAs as well and try to reach a consensus on these rules.

If the WG is no longer in existence, he could use hereto a written procedure and/or convey an ad hoc meeting.

In the end, it would always be his duty to present the interpretations to the TB for collective endorsement (in fact it should be the ExCom to endorse, since the ExCom has endorsed the ETAG, but in these technical matters, ExCom could delegate its technical competence to TB). When endorsed by the TB, the version of the Comprehension Document is internally binding for all EOTA members (i.e. it is mandatory for all the members to apply it).

A comprehension document should be a living document, meaning that it should be possible to update it continuously on the basis of the experience gained gradually with the issuing of ETAs.

It is important to keep all members of the TB advised, on a regular basis, of the development of such Comprehension Documents to avoid EOTA members carrying out unnecessary work whilst performing their assessments. Thereto the latest version of the Comprehension Document, once endorsed by the TB, will not be published but will always be available for consultation at the EOTA Secretariat and at the EOTA members.

As described above, the scope of the Comprehension Document is restricted to the interpretation of an ETAG or ETAG clauses, not for modifying the ETAG in a relevant manner.

In case of updating or revision of the ETAG, according to the updating procedure fixed hereafter in clause 5, the content of the Comprehension Document should always be analysed on its relevance for inclusion in the updated or revised ETAG.

Once the ETAG is revised or updated, the Comprehension Document should then be revised accordingly.

## **5. Updating of an ETAG**

The CPD has not envisaged any updating process for ETAGs. Nevertheless, as technology and experience evolve and innovation constantly occurs, ETAGs are not written for eternity.

An updating process for ETAGs has therefore to be worked out.

The need for updating can in fact have two sources, internally or externally.

Needs, internal to EOTA, would for example arise due to experience with the issuing of ETAs (see clause 4) or from case by case assessments performed just within the scope of the existing ETAG or originate from experience with 9.2 procedures which EOTA might wish to incorporate into the ETAG as such, be it as separate subfamily or separate ETAG parts.

Internal need for updating might also originate from the need for a profound amendment of a Technical Report.

Updating due to external needs can occur when for example one of the reference documents in the ETAG, external to EOTA, is modified e.g. a prEN becomes an EN.

As laid down in clause 4, the limited scope of the Comprehension Document and the legal implications of the updating process do not allow the Comprehension Document to play a role in this process.

Nevertheless, given the high numbers of reference documents quoted in an ETAG and its, by nature, innovative solving character, a high degree of flexibility is requested (an ETAG should not be revised formally every time a prEN changes to an EN!!).

There to the following updating procedure is envisaged:

Each ETAG contains from the beginning an "history file". This "history file", empty at the day of endorsement of the ETAG, is gradually build up with all updating material:

- reference to a new version of a Technical Report
- spotted editorial errors
- important clarification resulting from the Comprehension Documents
- prENs converted into ENs, provided it has been established that the EN is valid for the product considered as it was the case for the prEN previously
- other replaced reference material (ISO, ...)

This history file is worked out by the relevant EOTA WG and endorsed by the TB and ExCom. The latest endorsed version of this file is always distributed with the original ETAG and is binding to all EOTA bodies as soon as it is endorsed by ExCom.

When changes are introduced to the history file, the EC/SCC is kept informed so that Member States can be made aware of amendments occurred to the ETAG. Only the changes to the existing ETAG should be quoted.

Finally, there is of course the option of the explicit revision of the ETAG.

Such formal revision appears in particular to be necessary when the terms of reference of the EC mandate change (e.g. by a change of regulation in one or more of the Member States or when the ETAG scope of the product area and / or intended use is enlarged).

A formal revision would also become relevant due to fundamental modifications of the ETAG itself (outdated technical issues as revealed by a history file which becomes too large ...).

In any of the two cases, it seems logical that a new EC/EFTA mandate after SCC consultation is needed to introduce the formal revision process.

Within EOTA, the procedure would be as for the original ETAG:

- technical responsibility of TB, possibility by (re)creating a WG
- TB proposes the revision to the ExCom for voted approval
- Afterwards the voted revision should be submitted to the EC / Member States for consultation / endorsement / language publications (as for a first version of an ETAG according to Art. 11.3 of the CPD).