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CONSTRUCT 05/729

Treatment of cumulative attestation of conformity systems

1 Introduction

This document is a discussion paper resulting from discussions that took place during the 1st SG Officials meeting and the 17th Advisory Group meeting and subsequent consultation of Notified Bodies.

The aim of the document is to present an overview of specific issues which are being interpreted differently by Notified Bodies and the arguments supporting those interpretations, without judging whether they are correct or not.

The principle behind the document is to present all interpretations used with accompanying guidance to allow the European Commission's Construction Unit and the Member States to take an informed decision. We request that this issue is discussed in the (Preparatory Group of the) Standing Committee on Construction and that clear decisions are made as regards the interpretations that notified bodies are required to respect.

In this document, different interpretations by notified bodies (NBs) are presented leading to different behaviour by notified bodies in cases where several attestation of conformity (AoC) systems apply. This situation needs to be resolved, since it prevents the achievement of a level playing field.

Unjustified deviations from guidance agreed upon by the EC and Member States may lead to substantial attestation cost differences, which cannot be permitted in a competitive market between notified bodies, and may lead to reduced confidence in the activities of the notified bodies, which is detrimental to the credibility of CE Marking.

Throughout this document, it should be borne in mind that notified bodies shall always attest conformity with the (published) technical specification, even in those cases where those documents may specify tasks that deviate or that are contrary to the attestation procedures¹ that the EC and the Member States agreed upon, documented in EC Guidance papers A and K or in Group of Notified Bodies (GNB) position papers.

Specific products or product families and specific production related issues may require notified bodies to act differently from what are considered to be the procedures that the EC and the Member States agreed upon. The decision to do so can be considered to be covered by NB's competence which is ensured through the notification procedures. However, the EC and the Member States should specify what they consider to be the agreed upon attestation procedures. Justified deviations from those procedures can then be documented by notified bodies, ensuring transparency towards their notifying authorities and a more level playing field.

When reviewing the interpretation issues addressed in this document, reference should be made to article 13(4), specifying that the choice of the attestation of conformity procedure, laid down in the harmonised technical specifications has been specified by the Commission, after consultation of the Standing Committee on Construction (SCC), choosing the least onerous possible procedure consistent with safety. Therefore, attestation activities should not be more onerous than foreseen by the EC and the SCC when they took the AoC decision, but it should still be consistent with the safety level envisaged by the EC and the SCC, i.e. attestation work should still ensure confidence in safety.

The meaning of "least onerous" as referred to in article 13(4) is open for interpretation. It could apply to the overall attestation of conformity system applied, but does it also and necessarily mean that the (interpretation of the) system should also be applied in a least onerous way?

¹ Technical specifications should never be contrary to the provisions of the CPD or EC Decisions. Should this occur, the technical specifications writers and the relevant EC consultant should be informed as soon as possible.

When considering interpretations being made today, it should be borne in mind that the EN 45000-series of standards (meanwhile being converted into the EN ISO/IEC 17000-series of standards) was an important reference as regards terminology and procedures in the framework of the New Approach at the time of development of mandates and attestation decisions under the Construction Products Directive.

2 Cumulative attestation of conformity systems

2.1 General

A number of EC Decisions laying down attestation of conformity systems present one system that applies for one product and one intended use for all product characteristics. In those cases, no particular interpretation issues arise or they have already been dealt with in GNB position papers.

However, other EC Decisions specify a combination of possible different Attestation of conformity systems for one product depending on the:

- intended uses and/or
- characteristics for which performances are being determined.

In particular, the influence of the attestation of conformity systems related to reaction to fire, laid down in EC Decision 2001/596/EC, which amends many existing EC Decisions, specifying three possibilities, depending on the class claimed by the manufacturer and the means of determining that class, causes differences of opinion between Notified Bodies.

Similarly, EC Decision 2002/359/EC, on the procedure for attesting the conformity of construction products in contact with water intended for human consumption, specifies AoC system 1+. A footnote indicates that the performance of the products, other than that related to the sanitary properties of the product (fitness for contact with water intended for human consumption), are to be assessed following the provisions of EC Decision 1999/472/EC.

2.2 Examples of cumulative attestation of conformity systems causing interpretation difficulties

Below, three examples of cases are presented that lead to a combination of AoC systems.

Note: Most recent harmonised technical specifications add further detail that may prevent some of the interpretation difficulties covered in this document.

Case A: Example of cumulative AoC systems, where AoC system 2+ might apply together with AoC system 1, 3 or 4, and where the system 2+ applies to the product as a whole².

Intended use(s)	Levels or class(es)	Attestation of Conformity system(s)
In building works		2+
Products subject to reaction to fire regulations	(A1, A2, B, C)*	1
	(A1, A2, , B, C)**, D, E	3
	(A1 to E)*** and F	4
<p>* Products/materials for which a clearly identifiable stage in the production process results in any improvement of the reaction to fire classification (e.g. an addition of fire retardants or a limiting of organic material)</p> <p>** Products/materials not covered by footnote (*).</p> <p>*** Products/materials that do not require to be tested for reaction to fire (e.g. Products/materials of Classes A1 according to Commission Decision 96/603/EC).</p> <p>Note: Footnote *** is usually limited to those classes permitted by the standard, e.g. only Class A1 or that/those class(-es) allowed by CWFT</p>		

² Example: EC Decision 2003/640/EC for Kits for exterior wall claddings

Case B: Example of cumulative AoC systems, where AoC system 4 might apply together with AoC system 1, 3 or 4, and where the system 4 applies to the product as a whole³.

Intended use(s)	Levels or class(es)	Attestation of Conformity system(s)
In building works		3 or 4
Products subject to reaction to fire regulations	(A1, A2, B, C)*	1
	(A1, A2, , B, C)** , D, E	3
	(A1 to E)*** and F	4
<p>* Products/materials for which a clearly identifiable stage in the production process results in any improvement of the reaction to fire classification (e.g. an addition of fire retardants or a limiting of organic material)</p> <p>** Products/materials not covered by footnote (*).</p> <p>*** Products/materials that do not require to be tested for reaction to fire (e.g. Products/materials of Classes A1 according to Commission Decision 96/603/EC).</p> <p>Note: Footnote *** is usually limited to those classes permitted by the standard, e.g. only Class A1 or that/those class(-es) allowed by CWFT</p>		

Case C: Example of cumulative AoC systems, where AoC system 1 might apply together with AoC system 3 or 4, and where the individual systems apply to (an) identified characteristic(-s)⁴

Intended use(s)	Levels or class(es)	Attestation of Conformity system(s)
Products subject to reaction to fire regulations	(A1, A2, B, C)*	1
	(A1, A2, , B, C)** , D, E	3
	(A1 to E)*** and F	4
Products subject to fire resistance regulations	See EN 13501-2	3
Products subject to regulations on dangerous substances		3
Products subject to safety in use requirements		3
Products for end uses except those mentioned above		4
<p>* Products/materials for which a clearly identifiable stage in the production process results in any improvement of the reaction to fire classification (e.g. an addition of fire retardants or a limiting of organic material)</p> <p>** Products/materials not covered by footnote (*).</p> <p>*** Products/materials that do not require to be tested for reaction to fire (e.g. Products/materials of Classes A1 according to Commission Decision 96/603/EC).</p> <p>Note: Footnote *** is usually limited to those classes permitted by the standard, e.g. only Class A1 or that/those class(-es) allowed by CWFT</p>		

3 Interpretation issues

3.1 Relationship between ITT and FPC and their meaning under the CPD

EC Guidance paper K explains ITT and FPC in §3.1 and §3.3. However, this does not prevent different meanings may apply:

- A. ITT can be regarded as the means to determine product performances of samples. The results of ITT are the performance declarations accompanying the CE Marking. The FPC system should comply with the requirements of the technical specification and should be adapted ensuring that the product achieves the performances determined through ITT.

³ Example: EC Decision 2003/656/EC for Surface water repellent product, hydrophobic agents based on organometallic substances (EOTA ref. 06.05/02)

⁴ Example: EC Decision 98/437/EC for suspended ceiling kits

This approach suggests that the:

- technical specification takes into account the production variability, ensuring that ITT results take into account performance tolerances (e.g. through characteristic values)
- use of the technical specification may lead to changes of the production process and the product, if the technical specification does not take into account the production variability, ensuring that ITT results take into account performance tolerances

B. ITT can be regarded as a means to verify conformity of on-going production. The results of ITT are the basis of the performance declarations accompanying the CE Marking. The FPC system should comply with the requirements of the technical specification ensuring that the product continues to meet the performance declarations accompanying the CE Marking.

This approach suggests that the:

- technical specification may not take into account the production variability and that manufacturers may be required to further substantiate performance declarations accompanying the CE Marking (e.g. by taking into account tests performed previously and/or FPC data, by declaring lower performances than those achieved in ITT)
- use of the technical specification does not necessarily lead to changes of the production process and product, except through thresholds that need to be met

With regards to the interpretations above, the meaning that can be given depends on the content of the technical specification. If that document foresees ITT leading to statistically substantiated results, based on a statistically significant number of samples, the ITT results might correspond with product behaviour and might therefore also be the performances accompanying the CE Marking. If on the other hand, ITT is based on few samples (e.g. fire behaviour), chances are considerable that product behaviour, taking into consideration production variability, does not correspond with the ITT result (see figure below). In such cases, trying to modify the product to meet the ITT result is impossible, unless the number of samples is increased.

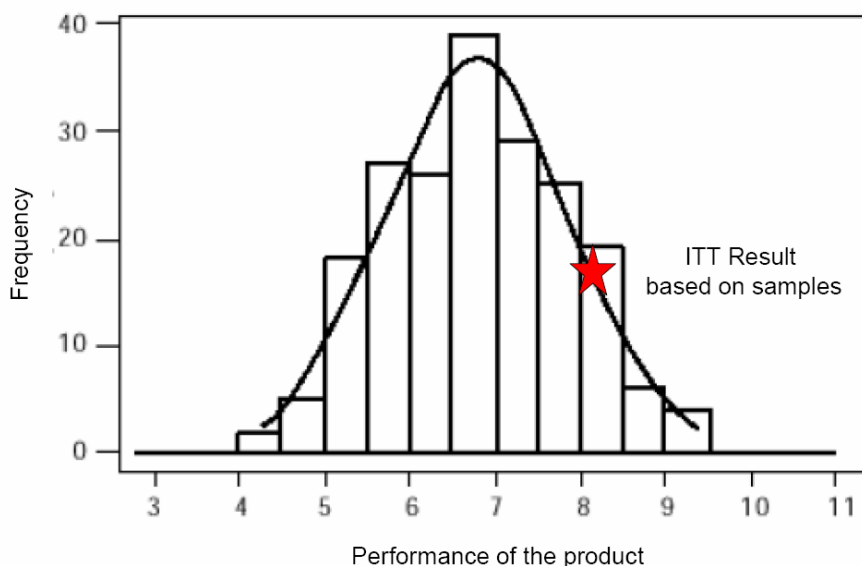


Figure 1: If the number of samples subjected to ITT is limited, ITT results may not correspond with product performances.

Technical specification writers should, where possible, use statistical requirements, although a statistical approach will not always be possible, but should in all cases specify how performance declarations are to be expressed (characteristic values, manufacturer's specification limit, ...).

This would facilitate market surveillance procedures and permit Member States to adopt measures (e.g. add safety factors, require higher performance declarations, etc.) to cover the absence of statistically based performance declarations.

3.2 Limitation of tasks in initial and surveillance inspections

3.2.1 Involvement of notified bodies in AoC systems 1 (or 1+) in FPC inspection

Several EC Mandates specify that for initial inspection of the factory and of FPC and for continuous surveillance assessment and approval of the factory production control the tasks of notified bodies are limited to parameters related to specific characteristics (e.g. reaction to fire) which are covered by the AoC system 1 (or 1+).

Systems 1 or 1+ Tasks Notified body in the mandate	All characteristics, focussing on the characteristic referred The characteristic referred in the mandate only	
Sampling	Interpretation A	Interpretation B
Initial Type Testing		
Inspection of FPC		
Surveillance of FPC		
FPC certification		
ITT assessment		
Product Certification		
Audit testing		

In practice harmonised standards refer in this case to “parameters related to all characteristics of table ZA.1 in particular reaction to fire”.

Different interpretations exist amongst notified bodies:

- A. Notified bodies verify the FPC system in general, as required by the harmonised specification, and focus on parameters that may influence reaction to fire behaviour. Such parameters (specification of incoming material, ignition loss, density, ...) may be, but are usually not, specified in harmonised technical specifications.
- B. Notified bodies refrain from inspecting the FPC system in general and inspect only those parameters that may influence reaction to fire behaviour since these are covered by the AoC System 1 (or 1+). In order to follow this interpretation, the technical specifications should specify which parameters influence reaction to fire.

There are good arguments to support either interpretation:

- EC Guidance paper K, §4.1, says that under systems 1 and 1+, responsibility for the certification of the conformity of the product (on the basis of tasks by the producer and the notified body) is given to a third party and is considered to be an umbrella activity. If the NB's tasks regarding FPC are limited to reaction to fire, the NB does not certify the product, but a product characteristic.
- On the other hand, products to which only fire retardants are added would go from system 3 to system 1, increasing the tasks of the NB significantly. Reference to article 13(4) is made, indicating that the least onerous possible procedure consistent with safety should apply, to defend this interpretation.

Technical specification writers should, as far as possible⁵, in any case specify which parameters influence reaction to fire behaviour, since this knowledge is necessary in either case.

3.2.2 Involvement of notified bodies in AoC systems 2+ (or 2) in ITT

The CPD itself does not link ITT and FPC in any way. Both are elements of attestation of conformity, which are tasks given to manufacturers or NBs, depending on the applicable system. In systems 2 and 2+ (applicable to all product characteristics and all intended uses for the product under consideration), ITT is the task of the manufacturer.

Systems 2 or 2+ Tasks Notified body having been performed and being credible	No responsibility related to ITT Verification of FPC coinciding with declared performances	Verification of ITT	
Sampling	Interpretation A	Interpretation B	Interpretation C
Initial Type Testing			
Inspection of FPC			
Surveillance of FPC			
FPC certification			
ITT assessment			
Product Certification			
Audit testing			

⁵ Technical specifications sometimes cover product families, in which case it is difficult to be exhaustive. In such cases, NBs should establish the influencing parameters.

In the cases where systems 2 or 2+ apply to some product characteristics and/or some intended uses for the product under consideration and some characteristics (e.g. reaction to fire) and/or some intended uses are covered by AoC system 3, ITT is the task of a NB for the characteristics under system 3, while ITT for other characteristics and/or some intended uses may be the task of the manufacturer.

However, in practice, ITT and FPC are connected which has already been indicated in 3.1 of this document. In addition, all technical specifications foresee that ITT needs to be performed when the product, the production process or the FPC system changes, if these changes might lead to differences in product performances. That requirement and the actions caused by the availability of ITT results will need to be embedded in the FPC procedures.

NBs do not question the relationship between ITT and FPC, but differences of opinion exist regarding the tasks that are caused by this link. It is obviously important that system 2+ does not turn into a "hidden" system 1 through this link.

There is agreement in the Advisory Group that at the time of initial inspection (systems 2 and 2+), the NB has no tasks regarding ITT, since ITT results will not necessarily be available and since CE Marking is not possible before the initial inspection, the declared performances are not necessarily known at that time

Note: If, under 3.1 of this document, interpretation A is used, ITT will have been performed before FPC is adjusted and an inspection by a Notified body becomes possible.

At the time of surveillance visits (system 2+ only), ITT has been performed and CE Marking is ongoing. Although sampling and ITT are not part of FPC and although ITT has been carried out under the responsibility of the manufacturer, it is the Advisory Group's position that under AoC system 2+, during surveillance inspections, either:

- A. The NB has no responsibility for checking that ITT has been done, nor that it has been done correctly. The manufacturer needs to demonstrate that he complies with the technical specification's provisions on FPC;
- B. The NB should verify that ITT for all declared performances has been performed and that FPC results are similar and credible;
- C. The NB should verify that ITT for all declared performances has been performed and that FPC results conform to the declared performances.

Note: The above starts from the presumption that FPC tests are identical (or similar) to ITT tests and/or that FPC results correlate with ITT results. This does not always apply for all technical specifications or for all characteristics and in cases where it does not, the task of the NB in the framework of surveillance inspections in AoC system 2+ will necessarily be limited to verifying that ITT for all declared performances has been performed and that FPC results are similar (possibly) and credible (in all cases).

3.3 Sampling

3.3.1 Responsibility of the notified certification body

EC GP K, §4.1 (4), specifies that "Under systems 1 and 1+, responsibility for product sampling for the ITT, in accordance with the rules laid down in the technical specification, lies with the certification body (often delegated to an inspection body), rather than the producer."

Systems 1 or 1+ Tasks Notified body characteristic under system 1 or 1+	All characteristics covered by the mandate	Only the
Sampling	Interpretation A	Interpretation B
Initial Type Testing		
Inspection of FPC		
Surveillance of FPC		
FPC certification		
ITT assessment		
Product Certification		
Audit testing		

Different interpretations exist amongst notified bodies, understanding the above as meaning that the notified certification body is responsible for product sampling:

- A. all characteristics for which ITT is to be performed (incl. characteristics under other AoC systems)
- B. only for characteristics under AoC system 1 and 1+

EC Guidance paper K, §4.1, specifies that, under systems 1 and 1+, responsibility for product sampling for the ITT, in accordance with the rules laid down in the technical specification, lies with the certification body (often delegated to an inspection body), rather than the producer. The principle of NBs verifying that identical samples are used for all characteristics, preventing manufacturers from "tailoring" products to achieve high performances for different characteristics, is also foreseen in AoC system 3, by allowing only one NB per essential requirement and permitting NBs to exchange data verifying that they performed ITT on identical samples (the "*Bleiman principle*").

The document "Guidance to notified bodies on the attestation of conformity under the Construction Products Directive" (NB-CPD/AG/03/002), §1.3.3, 2nd paragraph ("*When the CE-certificate is issued for a product for which some characteristics are under system 1/1+ and other under system 3 or 4, the notified certification body is responsible for the sampling of all samples necessary for the performance of the tests of all characteristics*"), emphasises this principle for AoC systems 1 and 1+.

However, not all AG members agree that interpretation A applies for all products, especially complex kit products, where applying this rule could significantly increase costs.

3.3.2 Taking responsibility

3.3.2.1 Samples for evaluation

EC Guidance paper K, §4.1, specifies that, under systems 1 and 1+, responsibility for product sampling for the ITT, in accordance with the rules laid down in the technical specification, lies with the certification body (often delegated to an inspection body), rather than the producer.

Systems 1 or 1+
Tasks Notified body
marking them
Sampling
Initial Type Testing
Inspection of FPC
Surveillance of FPC
FPC certification
ITT assessment
Product Certification
Audit testing

Taking samples, marking and shipping
Verification of manufacturer's sample taking
Interpretation A Interpretation B Interpretation C

EC Guidance paper K, §6.1 also specifies that all tests shall be carried out on the same batch of samples, although §4.1.2, permits identification testing to allow the results for an individual characteristic to be compared with the other parts of the testing.

However, notified certification bodies have been faced with practical problems when wanting to apply the above:

- "representative" samples are not frequently produced and several visits may be necessary to collect all necessary samples
- "representative" samples are from several batches, since the production process does not permit producing all desired "representative" samples from one batch
- The use of historic data does not allow actual "sampling" by the notified certification body, or its subcontractor.

Therefore, "taking responsibility" for sampling and the use of samples from the same batch is being interpreted in different ways:

- A. The certification body, or a subcontractor thereof, is responsible for taking samples at the manufacturer's premises, marking them and for physically shipping them to the notified laboratories and other laboratories (including, possibly, the manufacturer's laboratory);
- B. The certification body, or a subcontractor thereof, is responsible for taking samples at the manufacturer's premises and marking them, enabling manufacturers to ship them to the notified laboratories and other laboratories (including, possibly, the manufacturer's laboratory);

- C. The certification body permits the manufacturer to sample, assuming responsibility by verifying that sample batch codes (or alike) are traceable in the manufacturer's FPC system and/or by verifying identification tests.

We note that for the time being, few (if any) technical specifications consider "identification tests", permitting NBs to verify that samples used from different batches or production dates are identical. Pragmatic solutions are used pending provisions in the technical specifications.

3.3.2.2 Historic data

Taking responsibility in case of historic data is also being interpreted in different ways:

- A. The certification body accepts historic data if the test report refers to (not notified) third party sampling
- B. The certification body accepts historic data if the manufacturers provide evidence that the samples are traceable in the manufacturer's FPC system.

3.4 Initial type testing

Systems 1 or 1+ combined with other systems	Tasks Notified laboratory All characteristics covered by the mandate		Only the characteristic under system 1 or 1+
Sampling			
Initial Type Testing	Interpretation A		Interpretation B
Inspection of FPC			
Surveillance of FPC			
FPC certification			
ITT assessment			
Product Certification			
Audit testing			

The cumulative application of attestation of conformity systems depending on characteristics for which performances are claimed, including AoC systems 1 (or 1+) (case C in 2.2), means that:

- A. All characteristics, incl. those under AoC systems 2, 2+ and 4, are to be determined by notified laboratories, i.e. since AoC system 1 (or 1+) applies, all characteristics are treated under AoC system 1 (and 1+) for ITT, meaning that the notified certification body is responsible for sampling and that samples are sent to notified laboratories for all characteristics claimed.
- B. Only those characteristics under AoC systems 1 and 1+ (and 3 if applicable) are to be determined by notified laboratories, i.e. since AoC system 1 (or 1+) applies to one (or some) characteristic(-s), only that/those characteristic(-s) are treated under AoC system 1 (and 1+) for ITT, meaning that the notified certification body is responsible for sampling and that samples are sent to notified laboratories for those specific characteristic(-s).

The Advisory Group considers only the second interpretation to be correct.

3.5 Scope of the assessment of initial type testing

3.5.1 Characteristics to be covered

Systems 1 or 1+ Tasks Notified body and 3	All characteristics	Only characteristics under systems 1, 1+ Only characteristics under systems 1 or 1+		
Sampling				
Initial Type Testing				
Inspection of FPC				
Surveillance of FPC				
FPC certification				
ITT assessment	Interpretation A	Interpretation B	Interpretation C	
Product Certification				
Audit testing				

Once ITT has been performed, the ITT results need to be assessed. NBs consider that the cumulative application of attestation of conformity systems depending on characteristics for which performances are claimed, including AoC systems 1 (or 1+) (case C in 2.2), means that:

- A. All characteristics, incl. those under AoC systems 2, 2+, 3 and 4, are to be assessed by notified certification bodies
- B. Only characteristics under AoC systems 1, 1+ and 3, i.e. those where notified laboratories were involved are to be assessed by notified certification bodies
- C. Only those characteristics under AoC systems 1 and 1+ are to be assessed by notified certification bodies

NBs defend either the 1st or the 3rd option. The reasons for positions taken are those presented in 3.2.1.

3.5.2 Extend of the assessment

Systems 1 or 1+ Tasks Notified body	Responsibility limited to verification ITT performed Verification of ITT having been performed and being credible Verification of FPC coinciding with declared performances		
Sampling Initial Type Testing Inspection of FPC Surveillance of FPC FPC certification ITT assessment Product Certification Audit testing	Interpretation A	Interpretation B	Interpretation C

Having established the characteristics to be covered by the NB (3.5.1), notified bodies have different opinions as to the extend of the assessment for those characteristics for which the attestation of conformity system is not system 1 or 1+ (case C in 2.2). The NB should verify:

- A. that ITT has been performed
- B. ITT results, to check whether FPC results are similar and credible
- C. ITT results, to check whether they conform to the declared performances

Systems 1 or 1+ Tasks Notified body credible performances	Verification of ITT having been performed and being Verification of FPC coinciding with declared	
Sampling Initial Type Testing Inspection of FPC Surveillance of FPC FPC certification ITT assessment Product Certification Audit testing	Interpretation A	Interpretation B

At the time of surveillance visits, ITT has been performed and CE Marking is on-going. Although sampling and ITT are not part of FPC, it is the Advisory Group's position that under AoC systems 1 and 1+, during surveillance inspections, either:

- A. The NB should verify that ITT for all declared performances has been performed and that FPC results are similar and credible;
- B. The NB should verify that ITT for all declared performances has been performed and that FPC results conform to the declared performances.

Note: The above starts from the presumption that FPC tests are identical (or similar) to ITT tests and/or that FPC results correlate with ITT results. This does not always apply for all technical specifications or for all characteristics and in cases where it does not, the task of the NB in the framework of surveillance inspections in AoC systems 1 and 1+ will necessarily be limited to verifying that ITT for all declared performances has been performed and that FPC results are similar (possibly) and credible (in all cases).

3.6 Certificates

3.6.1 Time of issuing of certificates

The CPD foresees several tasks for Notified Bodies in the AoC systems 2+, 1 and 1+:

Task	Description	AoC Systems		
		2+	1	1+
1	Initial type-testing of the product;		X	X
2	Initial inspection of factory and of factory production control;	X	X	X
3	Continuous surveillance, assessment and approval of factory production control;	X	X	X
4	Audit-testing of samples taken at the factory, on the market or on the construction site.			X

Different approaches apply as to when certificates can be issued:

- A. Certificates are issued when all tasks, i.e. 1, 2, 3 and 4 (as far as relevant) have been completed;
- B. Certificates are issued when the tasks 1, 2 and 4 (see table above and as far as relevant) have been completed. Task 3 is part of continuing conformity assessment once certification is on-going;
- C. Certificates are issued when the tasks 1 and 2 (see table above and as far as relevant) have been completed. Tasks 3 and 4 (as far as relevant) are part of continuing conformity assessment once certification is on-going;

3.6.2 Number of certificates

Depending on the above, cases may arise where NBs are working under various AoC systems for the same product simultaneously. If AoC systems 1 or 1+ and 2 or 2+ apply simultaneously, 2 approaches are possible:

- A. The NB (or NBs) issue(-s) a product certificate (AoC system 1 or 1+) and an FPC certificate (AoC system 2 or 2+)
- B. The NB issue one certificate, combining both, i.e. a product certificate for specific uses or characteristics and an FPC certificate for other uses.

The AG agreed NBs should issue one certificate only.

3.6.3 Content of certificates

3.6.3.1 Systems 1 or 1+

Systems 1 or 1+			
Tasks Notified body and 3	All characteristics	Only characteristics under systems 1, 1+	
Sampling	Only characteristics under systems 1 or 1+		
Initial Type Testing			
Inspection of FPC			
Surveillance of FPC			
FPC certification			
ITT assessment			
Product Certification	Interpretation A	Interpretation B	Interpretation C
Audit testing			

When all NB's tasks have been performed, the EC Certificate of (product) conformity is to be issued. NBs consider that the cumulative application of attestation of conformity systems depending on characteristics for which performances are claimed, including AoC systems 1 (or 1+) (case C in 2.2), means that:

- A. All characteristics, incl. those under AoC systems 2, 2+, 3 and 4, are to be referred to in the certificate
- B. Only characteristics under AoC systems 1, 1+ and 3, i.e. those where notified laboratories were involved, are to be referred to in the certificate
- C. Only those characteristics under AoC systems 1 and 1+ are to be referred to in the certificate.

3.6.3.2 Systems 2 or 2+

Systems 2 or 2+ Tasks Notified body	All characteristics Only reference to FPC being covered	Only characteristics under system 3	
Sampling			
Initial Type Testing			
Inspection of FPC			
Surveillance of FPC			
FPC certification	Interpretation A	Interpretation B	Interpretation C
ITT assessment			
Product Certification			
Audit testing			

When all NB's tasks have been performed, the EC Certificate of (FPC) conformity is to be issued. NBs consider that the cumulative application of attestation of conformity systems depending on characteristics for which performances are claimed, including AoC systems 2 (or 2+), means that:

- A. All characteristics, incl. those under AoC systems 3 and 4, are to be referred to in the certificate
- B. Only characteristics under AoC system 3, i.e. those where notified laboratories were involved, are to be referred to in the certificate
- C. Only reference to the fact that FPC is being certified is mentioned in the certificate.

4. Suggested actions

- Except for those issues where the Advisory Group found consensus, the EC and the Member States are being asked to specify what they consider to be the agreed upon attestation procedures.
- Rather than issuing yet another EC Guidance paper, it is suggested to integrate the results of that consultation in the already existing GNB position paper "Guidance to notified bodies on the attestation of conformity under the Construction Products Directive" (NB-CPD/AG/03/002), available on Nando, or to integrate both in the EC Guidance paper K, the latter being the preferred solution.
- When the agreed upon interpretations have been laid down, the following actions should be initiated:
 - Notified bodies should work according to the agreed upon interpretations, as far as technical specifications allow them to do so
 - Specification writers should be asked to
 - Modify, where necessary, the specifications, in line with the agreed upon interpretations.
 - To prevent different interpretation by notified bodies, technical specifications should be precise in specifying the activities of notified bodies, the verifications to be performed and the characteristics to be covered.