GNB-CPR **GNB-AG**	**Guidance from the Group of Notified Bodies for the Construction Products Regulation (EU) No. 305/2011**	**NB-CPR/17/722r11** Issued: 25 June 2025 **APPROVED GUIDANCE**

Revised Position Paper

Guidance to notified bodies on the Assessment and Verification of Constancy of Performance under the Construction Products Regulation

1 INTRODUCTION

To draw up a declaration of performance in accordance with Articles 4 and 6 of the Construction Products Regulation, a manufacturer must apply the system of Assessment and Verification of Constancy of Performance (hereinafter “system of AVCP”, “AVCP system” or “AVCP”) assigned to his product.

The AVCP systems are defined in CPR Annex V, which has been revised by the Commission Delegated Regulation (EU) No. 568/2014 and amended by Commission Delegated Regulation (EU) No. 2769/2024. All references in this document to CPR Annex V shall be understood as references to that set of regulations.

Under AVCP systems 1+, 1, 2+, 3, and 3+, a specific level of intervention by a notified body is specified to support the declaration of performance.

AVCP system 4 does not involve notified bodies at all. Consequently, this paper does not provide any guidance on AVCP system 4.

As many of the AVCP activities described by CPR Annex V are common to two or more of the AVCP systems, this document will describe the activities across the AVCP systems rather than describing the systems separately.

Depending on the system of AVCP, the relevance of the sections of this document is indicated in the below table:

System of AVCP	**1+**	**1**	**2+**	**3**	**3+**
Sections 1-6	X	X	X	X	X
Section 7	X	X		X	
Sections 8-10	X	X	X		X
Section 11	X	X	X		
Section 12	X				
Section 13	X	X	X		
Sections 14-15	X	X	X		X
Section 16	X	X	X	X	X

The present document is intended as general guidance to notified bodies. Together with other documents issued by the Group of Notified Bodies, it may also serve as a reference for notifying authorities and national accreditation bodies for their assessment and monitoring of notified bodies.

Moreover, together with other documents issued by the Group of Notified Bodies, the present document may also be useful for the training of the assessment personnel of notified bodies.

2 CONTENT

3 DEFINITIONS

The definitions of NB-CPR 18/875 apply.

4 GENERAL

4.1 GENERAL UNDERSTANDING OF AVCP

AVCP is an acronym of *Assessment and Verification of Constancy of Performance*.

Basically, AVCP consists of two separate parts:

- The *Assessment of Performance*

  In systems 1+,1,2+, and 3 the assessment of performance is carried out on the basis of the initial testing, calculation, use of tabulated values and descriptive documentation by which the performance of the construction product is determined.

In system 3+, the assessment of performance is carried out on the basis of data collection for input values, assumptions and modelling;

- The *Verification of Constancy of Performance* is the set of on-going activities to ensure that the continuingly manufactured construction products have the performance declared.

The validation activities of a notified assessment validation body may not fit naturally into any of the two categories.

- Obviously, the validation by the notified body cannot be part of the assessment of performance, as the assessment of performance is subject to the validation.
- As, the validation does not concern the effectiveness of manufacturer's FPC and does not involve any surveillance to ensure that the product will achieve the declared performance, it may seem questionable if the validation by the notified body will fit well into the category "verification of constancy of performance.

However, for the purpose of this position paper, the description of the validation by notified bodies is found to fit best into the section 8, Initial Inspection.

Based on the entire set of *assessments and verifications,* the manufacturer declares the performance of the construction product.

Whereas the *Assessment of Performance* is a one-time activity, the *Verification of Constancy of Performance* is an on-going process.

The Assessment of Performance shall be repeated only in case of changes which could affect the conformity of the product with the declared performance. Such changes would include but would not be limited to:

- Changes to the construction product, its constituents, the manufacturing equipment or the manufacturing process
- Changes to the harmonised specification with regard to methods and criteria for the assessment of performance, including changes to supporting standards called up by the harmonised specification.

However, whether or not particular changes will necessitate the repetition of the Assessment of Performance will be assessed case by case.

4.2 RESPONSIBILITIES FOR AVCP TASKS

Each of the parties, the manufacturer and the notified body, are responsible for the correct conduct of the tasks assigned to them by the relevant system(s) of AVCP.

Irrespective of responsibilities for the AVCP tasks, the manufacturer remains solely responsible for the conformity of the construction product with the declared performance and for the compliance with any other requirement defined by CPR.

However, in case of misconduct by the notified body the notified body may be held liable[1] both by the manufacturer and others, e.g. clients of the manufacturer, suffering a loss caused by the notified body's misconduct.

Hence, the notified bodies should assess their risks and ensure that their liability insurances are appropriate taking into account the risks identified.

---

[1] *Liabilities fall under national law. If held liable by other parties than the manufacturer with whom the notified body has an agreement, limits to the liability agreed with the manufacturer may not apply.*

4.3 CHOICE OF AVCP SYSTEM

The AVCP systems are determined by the Commission in accordance with CPR Article 28(2).

AoC decisions made under CPD are applicable until replaced by delegated acts under CPR.

The AVCP/AoC decisions are referenced by Annex ZA of the harmonised standards in which the AVCP systems are also indicated.

In case of any discrepancy between the harmonised standard and the AVCP/AoC decision the latter applies.

4.4 DISTRIBUTION OF AVCP TASKS

The task for manufacturers and the notified bodies under the various AVCP systems are described in CPR Annex V. The tasks for notified bodies are further described in this document.

The harmonised standards are also indicating tasks for the manufacturers and the notified bodies and may provide more detailed descriptions than the AVCP decisions forming basis for the descriptions in the harmonised standards.

In case of any discrepancy between the descriptions of AVCP tasks provided by the harmonised standards and the CPR Annex V the latter applies.

4.5 CUMULATIVE AVCP

The AoC/AVCP decisions may assign different AVCP systems to different essential characteristics. Hence, the same product may be subject to two or more systems of AVCP at the same time.

For instance, the reaction to fire performance of suspended ceilings may fall under AVCP system 1 whereas the mechanical performance normally falls under AVCP system 3.

4.6 APPLICATION OF AVCP SYSTEM(S)

It is the responsibility of the manufacturer on the basis of the applicable AoC/AVCP decision to apply the correct AVCP system(s)[2] to each of his construction products.

When a manufacturer has determined that one or more of his construction products fall under one or more of the AVCP systems involving notified bodies he will need to approach one or more notified bodies.

When approached by a manufacturer a notified body shall satisfy itself that the construction product concerned actually does fall under the AVCP system(s) applied by the manufacturer for the essential characteristics for which the notified body is requested to take part in the assessment and verification of constancy of performance.

If the notified body finds that the manufacturer does not apply the correct AVCP system, it shall inform the manufacturer and shall not accept to carry out the AVCP task requested until the correct system of AVCP is applied.

---

[2] *Essential characteristics of the same construction product may be subject to different AVCP systems*

If it turns out during the process, e.g. during the initial inspection, that the system of AVCP has been determined incorrectly, the manufacturer shall be informed thereof and the process changed accordingly.

4.7 OPERATIONAL OBLIGATIONS

CPR Article 52 defines operational obligations for notified bodies. Article 52 consists of 5 parts of which the two first, Articles 52(1) and 52(2) apply to all activities of notified bodies.

Article 52(1) states:

> *Notified bodies shall carry out third party tasks in accordance with the systems of assessment and verification of constancy of performance provided for in Annex V.*

This means that notified bodies shall follow the descriptions found in CPR Annex V for the AVCP applicable systems. The notified bodies can neither extend nor limit their tasks.

This also emphasises that in case of any discrepancy between the harmonised standard and CPR Annex v the latter applies.

Article 52(2) states:

> *Assessments and verifications of constancy of performance shall be carried out with transparency as regards the manufacturer, and in a proportionate manner, avoiding an unnecessary burden for economic operators. The notified bodies shall perform their activities taking due account of the size of the undertaking, the sector in which the undertaking operates, its structure, the degree of complexity of the product technology in question and the mass or serial nature of the production process.*

Articles 52(3), 52(4), and 52(5) apply only to the systems of which certification form part, i.e. systems 1+, 1, and 2+.

4.8 THE CLIENT OF THE NOTIFIED BODY

Irrespective of the AVCP system applied, the client of the notified body shall always be the manufacturer of the construction product as defined by CPR Article 2(19):

> *'Manufacturer' means any natural or legal person who manufactures a construction product or who has such a product designed or manufactured, and markets that product under his name or trademark;*

This means that a notified body can only operate as notified body when its client actually is the manufacturer in the sense of CPR and notified body services can only be made available to manufacturers.

If the construction product is a system made of components, which the manufacturer assembles duly following precise instructions given by the provider of such a system or of a component thereof, for the purpose of testing under AVCP system 3, the client of the notified testing laboratory may be a *system provider*.

For instance, notified body services cannot be supplied to importers, distributors, business confederations, authorities (including market surveillance authorities), competitors or clients

of the manufactures. Only the manufacturer[3] of a construction product can be the client of the notified body.

4.9 REFERENCE STANDARDS FOR NOTIFIED BODIES

CPR gives preference to notified bodies accredited to harmonised accreditation standards within the meaning of the 'New Legislative Framework'. However, CPR does not make accreditation obligatory, but CPR Article 44 provides for a presumption of conformity with the requirements of CPR Article 43 insofar the requirements are covered by the harmonised accreditation standards.

In principle, a notified body may choose accreditation to any harmonised standard as evidence of conformity with (parts of) CPR article 43. However, to obtain a uniform level of performance, irrespective of their accreditation status, a notified body shall comply with relevant parts of the following standards:

- For testing activities: EN ISO/IEC 17025:2017, and
- For certification activities: EN ISO/IEC 17065:2012
- For validation activities: EN ISO/IEC 17029:2019 or EN ISO/IEC 17065:2012

4.10 SUBCONTRACTING NOTIFIED BODY TASKS

Notified bodies may subcontract any part of their tasks, e.g. sampling, testing, inspection and surveillance to other organisations, in accordance with CPR Article 45. However, a notified certification body cannot subcontract the decision whether or not to issue a certificate, or to restrict, suspend, or withdraw an already issued certificate.

Any subcontracting requires the written agreement of the manufacturer.

The notified body shall ensure that all of its subcontractors meet the requirements of CPR Article 43.

The notified body shall take full responsibility for the tasks performed by its subcontractors.

Written agreements between the notified body and its subcontractors shall be drawn up.

Notified bodies cannot subcontract any part of their tasks to the manufacturer as the manufacturer would not meet the independence requirements of CPR Article 43.

More elaborate guidance on subcontracting of work of notified bodies is found in the Position Paper No. NB-CPR 17/744.

5 OVERVIEW OF THE AVCP SYSTEMS

In Annex 1, the systems of AVCP are summarised.

---

[3] *As manufacturers are also considered importers and distributors who in accordance with CPR Article 15 are considered manufacturers.*

6 AGREEMENT WITH THE MANUFACTURER

6.1 GENERAL

As basis for a notified body's AVCP activities it shall have a written agreement with the manufacturer.

The agreement shall be drawn up under the relevant national legislation. Irrespective of the AVCP system, the agreement shall at least specify the following:

- That the notified body is conducting its work in accordance with CPR and the rules and conditions for notified bodies for the CPR
- The construction products concerned and their intended use
- The harmonised specification(s) to be applied
- The system(s) of AVCP
- Subcontractors of the notified certification bodies conducting (part of) the tasks of the notified body, e.g. testing laboratories and inspection bodies.
- If (part of) the testing is to take place outside the facilities of the notified bodies (see CPR Art. 46), the request from the manufacturer

Sections 6.2, 6.3, and 6.34 indicate additional information to cover depending on the type of agreement.

It is recommended that the agreement should also define limits to the potential liabilities between parties.

6.2 CERTIFICATION AGREEMENT (AVCP SYSTEMS 1+, 1, AND 2+)

Certification agreements shall meet the requirements of EN ISO/IEC 17065 clause 4.1.2.

Agreements are normally established by means of an application for certification submitted by the manufacturer and the reviewed and accepted or declined by the notified certification body.

The application shall meet the requirements of EN ISO/IEC 17065 clause 7.2.

To ensure the availability of all necessary information for the review, the notified certification body should make an application form[6] available to applicant manufacturers.

The application review conducted by the notified certification body shall meet the requirements of EN ISO/IEC 17065 clause 7.3.

As basis for its decision to accept or decline the application the notified certification body shall have the below information available:

- the relevant harmonised standard(s) or European Assessment Document and European Technical Assessment.
- the construction product(s) and/or product families to be covered by the certification
- the manufacturing plant(s) to subject to inspections,
- for structural products, if relevant, the CE marking method(s), and;
- for construction products to a European Technical Assessment, additionally:
    - the confidential control plan, and any other relevant documentation

- full documentation regarding the assessment of performance conducted by or on behalf of the Technical Assessment Body (TAB).

6.3 AGREEMENT REGARDING ASSESSMENT OF PERFORMANCE (AVCP SYSTEM 3)

Notified testing laboratories shall review requests, tenders and contracts in accordance with EN ISO/IEC 17025. As part of such review, testing laboratories are supposed to clarify if the customer is a manufacturer requesting the assessment of performance of a construction product in accordance with CPR. Only when requested by a manufacturer to work to CPR the testing laboratory shall indicate its notified body ID number in the report (see section 7.4). Without such request, the testing laboratory shall not make any references to CPR.

NOTE: If the construction product is a system made of components, which the manufacturer assembles duly following precise instructions given by the provider of such a system or of a component thereof, for the purpose of testing under AVCP system 3, *a system provider* may be considered as a manufacturer.

In addition to the general information mentioned in section 6.1, the agreement shall cover the below:

- Product description
- Information supplied by the manufacturer to be referenced in the report of the assessment of performance.
- The assessment methods to apply

6.4 AGREEMENT REGARDING VALIDATION (SYSTEM 3+)

Agreements are normally established by means of an application for validation submitted by the manufacturer and the reviewed and accepted or declined by the notified assessment validation body.

To ensure the availability of all necessary information for the review, the notified assessment validation body should make an application form available to applicant manufacturers.[4]

As basis for its decision to accept or decline the application the notified assessment validation body shall have the below information available:

- the relevant harmonised standard(s) or European Assessment Document and European Technical Assessment.
- the construction product(s) and/or product families to be covered by the validation
- the manufacturing plant(s) to subject to initial inspection,
- information about methodology and software applied for the assessment of performance

for construction products to a European Technical Assessment, additionally:

- the confidential control plan, and any other relevant documentation
- full documentation regarding the assessment of performance conducted by the Technical Assessment Body (TAB).

---

[4] *Before the submission of an application form, a dialogue would normally have taken place between the manufacturer and the notified body on the process, conditions and prices.*

The validation agreement shall not define

- any obligation for the manufacturer to inform the notified assessment validation body about changes occurring after the issuance of the validation report.
- any continuing surveillance or monitoring by the notified assessment validation body.

7 ASSESSMENT OF PERFORMANCE (SYSTEMS 1+, 1, AND 3)

7.1 GENERAL

In AVCP systems 1+, 1, 2+, and 3, the assessment of performance is to be carried out *"on the basis of testing, calculation, tabulated values or descriptive documentation of the construction product".* Sampling for testing is considered part of the assessment of performance. In AVCP systems 1+ and 1 the notified product certification body shall carry out the sampling. In system 3 the manufacturer shall carry out the sampling for testing.

In AVCP systems 2+ and 3+, the manufacturer is responsible for carrying out the assessment of performance. Assessment of performance under AVCP systems 2+ and 3+ is not covered by this document.

In AVCP system 3+, the assessment of the performance is to be carried out by the manufacturer on the basis of data collection for input values, assumptions and modelling;

For products covered by ETAs, the assessment of performance is the responsibility of the TAB. Therefore, this section is only related to products covered by harmonised standards.

7.2 SAMPLING FOR TESTING (AVCP SYSTEMS 1+ AND 1)

Guidance on sampling is found in the position paper NB-CPR 15/639.

7.3 ASSESSMENT METHODS (AVCP SYSTEMS 1+, 1, AND 3)

The assessment methods to apply are found in the harmonised product standard. The methods described by standards may comprise one or more of the categories testing, calculation, tabulated values or descriptive documentation of the construction product. Only the methods described by the standard can be applied.

For each essential characteristic for which the notified body is requested to assess the performance, the notified body shall satisfy itself that the assessment method provided for in the harmonised standard is appropriate for the construction product.

If the notified body finds that the assessment method provided for in the harmonised standard would not be appropriate it shall inform the manufacturer and shall not carry out the assessment of performance.

If the harmonised standard allows for two or more assessment methods the manufacturer may decide which method(s) to apply, provided that the notified body finds the method(s) chosen by the manufacturer suitable for the construction product concerned.

7.3.1 TESTING

Test samples are sampled either by the notified product certification body (AVCP system 1+ and 1) or the manufacturer (AVCP system 3).

On receipt of the samples, the laboratory[5] shall satisfy itself that the samples are in conformity with the description in the sampling report or written requisition received from the notified product certification body or the manufacturer. In case of any discrepancy, the notified product certification body or the manufacturer as relevant shall be informed.

Testing shall be managed in accordance with EN ISO/IEC 17025. Tests shall be done in accordance with the harmonised standard and where relevant following guidance provided by GNB.

If testing is done outside the facilities of the notified body, further guidance is found in the position paper NB-CPR 14/594.

7.3.2 CALCULATION

If the harmonised standard allows for assessment of performance by means of calculation, the notified product certification body (AVCP system 1+ and 1) or the notified testing laboratory (AVCP system 3) shall conduct the calculation in accordance with the methods described by the harmonised standard.

As basis for the calculation, as relevant, the notified body should use:

- A product sample sampled by the notified product certification body (AVCP systems 1+ and 1) or supplied by the manufacturer (AVCP system 3)
- Input data for the calculation supplied by the manufacturer
- Drawings and technical descriptions of the construction product supplied by the manufacturer.

The notified body shall have internal procedures in place to ensure

- that the personnel conducting the calculations is suitably qualified,
- that equipment and related software is appropriate and verified
- that all calculations are reviewed internally before reporting.

The harmonised standard may have more specific provisions and specific GNB guidance may provide further guidance on calculations.

7.3.3 TABULATED VALUES

If the harmonised standard allows for assessment of performance by means of tabulated values, the notified product certification body (AVCP system 1+ and 1) or the notified testing laboratory (AVCP system 3) shall determine the tabulated value(s) in accordance with the methods described by the harmonised standard.

As basis for the determination of tabulated values, as relevant, the notified body should use:

- A product sample sampled by the notified product certification body (AVCP systems 1+ and 1) or supplied by the manufacturer (AVCP system 3)

---

[5] *In this context, the term "the laboratory" covers both the notified testing laboratory in AVCP system 3 and the section, subsidiary or subcontractor of the notified product certification body in AVCP systems 1+ and 1.*

- input data supplied by the manufacturer
- Drawings and technical descriptions of the construction product supplied by the manufacturer.

The notified body shall have internal procedures in place to ensure

- that the personnel determining the tabulated values is suitably qualified,
- that all tabulated values are reviewed internally before reporting.

The harmonised standard may have more specific provisions and specific GNB guidance may provide further guidance on tabulated values.

7.3.4 DESCRIPTIVE DOCUMENTATION OF THE PRODUCT

If the harmonised standard allows for assessment of performance by means of descriptive documentation, the notified product certification body (AVCP system 1+ and 1) or the notified testing laboratory (AVCP system 3) shall draw up the descriptive documentation in accordance with the methods described by the harmonised standard.

As basis for the descriptive documentation, the notified body should use:

- A product sample sampled by the notified product certification body (AVCP systems 1+ and 1) or supplied by the manufacturer (AVCP system 3)
- Input data supplied by the manufacturer
- Drawings and technical descriptions of the construction product supplied by the manufacturer.

The notified body shall have internal procedures in place to ensure

- that the personnel drawing up descriptive documentation is suitably qualified,
- that descriptive documentation is reviewed internally before reporting.

The harmonised standard may have more specific provisions and specific GNB guidance may provide further guidance on descriptive documentation.

7.4 REPORTING

The assessment of performance shall be reported by means of a report issued to the manufacturer.

The report shall include the below information:

- The manufacturer to whom the report is issued
- The identification of the notified body[6]
- Reference to CPR and the conditions for the assessment of performance of the construction product
- Description of the construction product

[6] *A laboratory acting as a subcontractor to a notified product certification body in systems 1+ or 1 shall **not** indicate its notified body identification.*

- Reference to the harmonised standard[7]
- Reference to the assessment method (e.g. testing standard) and reference to the relevant clauses of the harmonised standard
- For reports on calculation, tabulated values, and descriptive documentation, the report shall provide comprehensive detail of:
    - Any data provided by the manufacturer or the notified product certification body forming basis for the assessment of performance
    - Any assumptions forming basis for the assessment of performance
- Reference to sampling report or requisition drawn up by the notified product certification body (AVCP system 1+ and 1) or by the manufacturer (AVCP system 3).

Additionally, test reports shall meet the requirements of EN ISO/IEC 17025 clause 5.10.

Harmonised standards and/or supporting standards may have more specific requirements to observe for the reporting.

Specific GNB guidance may exist for some harmonised standards.

Notified laboratories may on a voluntary basis use the Assessment of Performance report defined by NB-CPR 23/936.

NOTE: If the construction product is covered by two or more harmonised standards with identical methods and criteria for the assessment of performance, these harmonised standards may all be referenced by the report. However, all harmonised standards referenced must be included by the scope of notification of the notified body, unless covered by a horizontal notification.

8 INITIAL INSPECTION (AVCP SYSTEMS 1+, 1, 2+, AND 3+)

8.1 GENERAL

In systems 1+, 1, and 2+, the Initial Inspection is part of the verification of constancy of performance. The overall purpose of the initial inspection is to verify that the manufacturer has established the manufacturing plant and conducts an appropriate factory production control effectively ensuring the constancy of performance of the construction product.

In System 3+, the purpose of the initial inspection is described as "*to validate any company-specific data".*

CPR Article 52(3) states:

> *Where, in the course of the initial inspection of the manufacturing plant and of factory production control, a notified body finds that the manufacturer has not ensured the constancy of performance of the manufactured product, it shall require the manufacturer to take appropriate corrective measures and shall not issue a certificate.*

There are two basic prerequisites for the verification of constancy of performance:

---

[7] *The applicable harmonised standard shall always be indicated in the reporting. This applies also to notified laboratories operating on the basis of a horizontal notification.*

- The manufacturer has indicated for which essential characteristics he declares (or wishes to declare) the performance and the levels and classes to be declared
- The assessment of performance has been correctly carried out with results better than or equal to the levels and classes (to be) declared.

8.2 INSPECTION METHODOLOGY

Inspections shall be carried out as on-site audits[8].

All locations at which *significant manufacturing processes* take place shall be subjected to the initial inspection.

For the initial inspection multisite sampling[9] is not an option.

8.3 VALIDITY OF THE ASSESSMENT OF THE PERFORMANCE OF THE CONSTRUCTION PRODUCT

8.3.1 VALIDATION UNDER SYSTEMS 1+, 1, AND 2+

As basis for the verification of constancy of performance, the notified certification body shall satisfy itself that the assessment of performance is (or was) carried out correctly and forms a valid basis for the verification of constancy of performance.

The initial inspection shall verify that:

- Sampling is documented, and that it is justified that the samples taken are representative of the current production;
- The correct methods, as specified in the harmonised technical specification, are used to perform the assessment of the performance of the construction product;
- The assessment of performance is documented in accordance with the requirements of the harmonised technical specification;
- That all mandatory threshold levels are being met;
- The relevant personnel appear suitably qualified and competent to perform the assessment of the performance of the construction product;
- Suitable practices are in place for calibrating and maintaining equipment, including evidence of correct calibration of the equipment used to perform the assessment of the performance of the construction product;
- Where the assessment of the performance of the construction product is (was) subcontracted by the manufacturer, the manufacturer provides a justification of the competence of the testers/calculators/assessors;
- The manufacturer has the competence to assess the field of application of the test report;
- That the manufacturer has processes defined to ensure that assessment of the performance of the construction product shall be repeated in case of changes, which could affect the conformity of the product with the declared performance. Such changes would include but would not be limited to:

---

[8] *EN ISO 19011 provides guidelines for conducting audits.*

[9] *See section 11.4*

- Changes to the construction product, its constituents, the manufacturing equipment or the manufacturing process
- Changes to the harmonised specification with regard to methods and criteria for the assessment of performance, including changes to supporting standards called up by the harmonised specification.

However, whether or not particular changes will necessitate the repetition of the Assessment of Performance will be assessed case by case.

In AVCP systems 1+ and 1, the notified product certification body is responsible for carrying out the assessment of performance (including sampling) and the notified product certification body is required to have its own internal procedures for the assessment of performance including sampling. Therefore, with regard to the validity of the assessment of performance the initial inspection may be reduced accordingly to avoid unnecessary repetition of work.

8.3.2 VALIDATION UNDER SYSTEM 3+

In AVCP System 3+, the assessment of performance in relation to environmental sustainability characteristics of the product is carried out by the manufacturer. The notified assessment validation body shall validate the assessment of performance in terms of compliance with the data, methods and criteria laid down in the applicable harmonised technical specification, and with regard to the objective described in section 9.2.

The validation shall include a document review, including a review of the manufacturer's assessment of performance, including life cycle assessment and all other underlying documentation covering all relevant aspects, including but not limited to:

- The appropriateness of the data collection methods,
- The accuracy and reliability of the data collected,
- The correctness of the information provided in the submitted documents,
- The impacts of manufacturing processes,
- The usage of the LCA-software.

The notified assessment validation body shall report in writing its findings, including any finding that would require clarification or correction by the manufacturer. The notified validation body shall not indicate how the findings requiring clarification or correction should be resolved.

On the basis of documented clarifications and corrections submitted by the manufacturer, the notified assessment validation body shall assess if the reported findings have been sufficiently clarified and corrected.

More detailed guidance on the validation is developed by the horizontal sector group on environmental sustainability, SH03.

8.4 INSPECTION OF THE MANUFACTURING PLANT AND OF FACTORY PRODUCTION CONTROL – SYSTEMS 1+, 1, AND 2+

In CPR, factory production control (FPC) is defined as „the documented, permanent and internal control of production in a factory, in accordance with the relevant harmonised technical specifications".

It should be emphasised that FPC does not only consist of the documented system of the manufacturer but also the practical implementation including personnel, equipment and other resources used for the controlling of the production.

8.4.1 EFFECTIVENESS OF FACTORY PRODUCTION CONTROL

The objective of the FPC conducted by the manufacturer is to ensure the constancy of performance of the manufactured construction products.

Notified certification bodies shall assess the effectiveness of the FPC of the manufacturer with regard to that objective. If the FPC effectively ensures that the construction products are in conformity with the declared performance the FPC is considered effective, provided that the FPC also meets the requirements of the harmonised specification.

8.4.2 EXTENT OF ASSESSMENT OF FPC

The notified FPC certification body shall assess the FPC (as implemented) in its entirety for the initial inspection with regard to its effectiveness as described above.

This implies that all parts of the documented system and the operational practices of the manufacturer with relevance to the conformity of the construction product with the declared performance shall be subject to assessment.

In some harmonised technical specifications, the „FPC-clauses to apply" referenced by the annex ZA may not be particularly detailed. This should not be seen as a limitation or restriction of the notified FPC certification body responsibility.

Sector groups may develop specific guidance regarding the extent of assessment of FPC related to individual harmonised specifications.

The notified FPC certification body shall still assess the effectiveness of the FPC and may use appropriate tools and references for the interpretation of the harmonised technical specifications.

8.4.3 FPC REQUIREMENTS OF HARMONISED SPECIFICATIONS

A manufacturer is obliged to comply with the FPC requirements of the harmonised technical specification(s) applicable to their construction product(s).

In principle, the FPC requirements defined in harmonised technical specifications should be sufficiently detailed to serve as a comprehensive reference for the manufacturers' FPC.

However, it is well-known that some harmonised technical specifications do not go into sufficient detail with regard to FPC requirements.

In such cases, "Commission Guidance Paper B" may serve as a useful interpretative tool; as may CEN guidance for drafting AVCP clauses in harmonised standards.

Irrespective of how detailed the FPC clauses are in the harmonised technical specification, the notified FPC certification body shall satisfy itself that the FPC as implemented and operated by the manufacturer is *effective* (see section 8.4.1).

The manufacturer is supposed to implement and operate FPC related to all essential characteristics for which he declares a performance.

Only FPC clauses related to essential characteristics falling under AVCP systems 1+, 1 or 2+ and for which the manufacturer declares or intends to declare a performance shall be applied by the notified certification body.

8.4.4 COMPLAINTS

Complaints are generally considered a very important source of information[10].

CPR Article 11(3) requires the manufacturer, when deemed appropriate, to keep a register of complaints. The CPR does not address how a manufacturer should respond to complaints.

Notified certification bodies should request manufacturers to make their records of complaints available. Notified certification bodies should use complaints as a source of information on the effectiveness of the FPC[11]

8.4.5 DECLARATIONS OF PERFORMANCE AND CE MARKING

The tasks of notified certification bodies do not include assessment of the manufacturer's Declaration of Performance (DoP), CE marking or other declarations/markings of construction products.

Nevertheless, the Declaration of Performance is one of the starting points for understanding the scope of the FPC and knowledge of the content of the DoP is necessary when assessing the effectiveness of the FPC.

Notified certification bodies are not expected to assess neither the DoP nor the CE marking for which the manufacturer is solely responsible. Nonetheless, the certification body should inform the manufacturer if it becomes aware of any error or omission in the DoP or the CE marking.

The correction or such errors or omissions in the DoP or CE marking would be the sole responsibility of the manufacturer, and their correction should not be a prerequisite for the issuance or the maintenance of the certificate.

It should be clear to the manufacturer that the notified certification body neither has authority to officially approve nor validate the declarations or markings.

However, if a notified certification body becomes aware of any misleading references to the certification, e.g. if the manufacturer is using the ID number of the notified body in connection with products not covered by the scope of the certificate the notified body shall require the manufacturer to remove the misleading references. EN ISO/IEC 17065 does require the notified certification body to take appropriate action in case of misleading references to certification.,

8.5 DURATION OF INITIAL INSPECTION

Notified Bodies shall have a documented process for the determination of audits/inspections.

No typical/general audit durations can be defined because the time required for the audit depends upon the construction product(s), process(es) and manufacturing location(s) assessed.

---

[10] *Complaints regarding product costs, late delivery etc. would normally be irrelevant to the effectiveness of the FPC.*

[11] *According to EN ISO/IEC 17065, the certification body shall require the manufacturer to record complaints and make these records available to the certification body. That requirement is not considered enforceable in a CPR context.*

However, Sector Groups may develop guidance related to harmonised specifications in their field of work.

8.6 INTERPRETATION OF HARMONISED TECHNICAL SPECIFICATIONS

Harmonised technical specifications that give inadequate, unclear or incorrect guidance need to be corrected by the relevant Technical Committee of CEN or EOTA. To assist in their amendment and correction there should be regular communication between the relevant Technical Committee and the relevant GNB-CPR Sector Group regarding problems with harmonised technical specifications. As an interim measure, the GNB-CPR sector group can draft a position paper for approval by Advisory Group, clarifying how NBs should implement the harmonised technical specification until it is improved by CEN or EOTA. A position paper should not contradict a harmonised technical specification unless serious errors have been found in the technical specification, and the relevant technical committee has agreed that the position paper conforms to an anticipated revision of the technical specification.

8.7 NON-CONFORMITIES

If during the initial inspection the notified certification body detects non-conformities, the notified certification body shall inform the manufacturer and require the manufacturer within a specified time to report to the notified certification body

- The cause of the non-conformity (based on the manufacturer's own investigation and/or analysis).
- A description of the corrective measures the manufacturer intends to implement and the time frame for their implementation.
- The notified certification body shall assess the manufacturer's report. The assessment shall include:
- If the cause determined by the manufacturer appears to be adequate
- If the corrective measures described by the manufacturer appear to adequately address the cause of the non-conformity.
- The notified certification body shall decide how it will verify that the manufacturer has effectively corrected of the non-conformity.
- Methods of verifying the implementation of corrective actions may include but is not limited to:
- Assessment of documentation submitted by the manufacturer
- Additional inspection at the manufacturing plant.

The notified certification body shall choose a method of verification which will give a reasonable level of evidence that the non-conformity is resolved without placing unjustified burdens on the manufacturer.

For all non-conformities raising doubts with regard to the conformity of construction products with the declared performance the corrective measures shall be verified by the notified certification body before a certificate can be issued.

8.8 INITIAL INSPECTION OF THE MANUFACTURING PLANT TO VALIDATE ANY COMPANY-SPECIFIC DATA – SYSTEM 3+

The initial inspection shall be planned and conducted with the aim to verify the consistency between what can be observed in the manufacturing plant and all information used as basis for the assessment of environmental sustainability performances.

In that regard, the validation of any company specific data shall concern all circumstances that can be observed in the manufacturing plant that would be relevant for the validation.

In the planning of the initial inspection, on the basis of the document review (see section 8.3.2) the notified assessment validation body shall identify the significant manufacturing process to inspect for the purpose of ensuring that the assessment of environmental sustainability performances is accurate and reliable.

As described in section 8.2, all locations where significant manufacturing processes take place shall be subject to the initial inspection. “Significant manufacturing process” is defined as “process of which the controlling is likely to have a significant influence on the conformity of the construction product with the declared performance”.

Hence, depending on the supply chain, the manufacturing plant to inspect may not be limited to a single address. The manufacturing plant may also not be limited to locations owned or controlled by the manufacturer. Also locations of suppliers to the manufacturer may be part of “the manufacturing plant”. However, if at a later stage of the supply chain, the manufacturer’s verification of incoming components and materials adequately ensures the conformity of those incoming components and materials with the environmental sustainability parameters defined, the processes carried out by the suppliers of those components and materials may not be “significant manufacturing processes”.

More detailed guidance on the initial inspection is developed by the horizontal sector group on environmental sustainability, SH03.

9 CERTIFICATION DECISION (AVCP SYSTEMS 1+, 1, AND 2+) AND VALIDATION DECISIONS (SYSTEM 3+)

9.1 CERTIFICATION DECISIONS (AVCP SYSTEMS 1+, 1, AND 2+)

As basis for the certification decision, the notified certification body shall conduct a review in accordance with EN ISO/IEC 17065 clause 7.5.

The review shall be conducted by one or more persons who have not been involved neither in the assessment of performance nor the initial inspection or other evaluation activities forming basis for the certification.

The decision whether or not to issue a certificate shall be made in accordance with EN ISO/IEC 17065 clause 7.5. and shall be made by the notified certification body itself.

The review shall confirm that during the initial inspection evidence has been established that

- the constancy of performance is effectively ensured by the FPC operated by the manufacturer for all essential characteristics under the scope of the certification
- the FPC operated by the manufacturer meets all applicable requirements of the harmonised specification

In AVCP systems 1+ and 1, the review shall additionally confirm that the assessment of performance has been correctly completed and substantiate all performance indicated by the certificate of constancy of performance to be issued.

The certification decision cannot be subcontracted.

9.2 VALIDATION DECISIONS (SYSTEM 3+)

As basis for the validation decision, the notified assessment validation body shall conduct a review.

The review shall be carried out on the basis of the documented validation process and shall be conducted by one or more persons who have not been involved neither in the validation activities nor the initial inspection.

The decision whether or not to issue a validation report shall be made by the notified assessment validation body itself.

The objective of the review is to confirm the adequacy of the validation and that during the validation process, including the initial inspection, it has been found that the manufacturer's assessment of performance:

- conforms to the applicable harmonised technical specification, and
- is technically sound, and
- adequately accounts for the environmental impact of the assessed construction product with regard to the essential characteristics for which the manufacturer has assessed the performance.

Furthermore, the review shall confirm that

- the results of the assessment of performance are conservative and provide a high level of confidence that actual environmental impacts are not worse than declared, and
- no circumstances have been found that would give rise to doubts as to the accuracy and reliability of the assessment of performance.

Regarding the conduct of the validation process, the review shall confirm that

- all validation/verification activities have been completed,
- sufficient and appropriate evidence is available to support the decision;
- significant findings have been identified, resolved, and documented.

10 ISSUANCE OF CERTIFICATE (AVCP SYSTEMS 1+, 1, AND 2+) AND VALIDATION REPORT (SYSTEM 3+)

10.1 ISSUANCE OF CERTIFICATE (AVCP SYSTEMS 1+, 1, AND 2+)

Guidance is found in the position paper NB-CPR 14/612.

10.2 ISSUANCE OF VALIDATION REPORT (SYSTEM 3+)

Guidance is under development.

11 CONTINUING SURVEILLANCE (AVCP SYSTEMS 1+, 1, AND 2+)

11.1 GENERAL

The overall purpose of the continuing surveillance is to verify that the manufacturer conducts a factory production control that effectively ensures the constancy of performance of the construction products, i.e. that the products placed on the market continue to be in conformity with the declaration of performance.

CPR Article 52(4) states:

> *Where, in the course of the monitoring activity aiming at the verification of the constancy of performance of the manufactured product, a notified body finds that a construction product no longer has the same performance to that of the product-type, it shall require the manufacturer to take appropriate corrective measures and shall suspend or withdraw its certificate if necessary.*

The *monitoring activities* mentioned by CPR Article 52(4) consist primarily of the periodic surveillance inspections (aka. surveillance audits) and cover also the readiness of the notified certification body to evaluate and react to any information received regarding the constancy of performance of the construction products. Such information may be submitted by the manufacturer or from any other source, e.g. in the form of complaints or information received from a market surveillance authority about non-compliant construction products.

11.2 METHODOLOGY FOR THE ASSESSMENT AND EVALUATION OF FACTORY PRODUCTION CONTROL

As for the initial Inspections, periodic surveillance inspections shall be carried out as on-site audits at the locations where significant manufacturing processes physically take place[12].

The notified certification body shall plan its inspections/audits to provide evidence that the FPC operated by the manufacturer

- Effectively ensures the conformity of the construction products with the declared performance for all essential characteristics covered by the scope of certification.
- Continues to be in conformity with the requirements of the harmonised specification applied.

11.3 DURATION AND FREQUENCY OF INSPECTIONS

Notified Bodies shall have a documented process for the determination of audits/inspections.

No typical/general audit durations can be defined because the time required for the audit depends upon the construction product(s), process(es) and manufacturing location(s) assessed.

However, Sector Group may develop guidance related to harmonised specifications in their field of work.

For the frequency of audits, reference is made to the position paper NB-CPR 16/684

---

[12] *EN ISO 19011 provides guidelines for conducting audits.*

11.4 MULTIPLE SITE SAMPLING[13] (REDUCTION OF THE NUMBER OF MANUFACTURING SITES TO INSPECT)

For the continuing surveillance, notified bodies should be aware of the extensive risks related to multisite sampling, as failing to audit each of the manufacturing plants could reduce the credibility of the certification. Therefore, multisite sampling shall only be applied when provided for by an approved GNB-CPR position paper.

Multisite sampling shall not be applied without a properly documented justification specific to the individual manufacturer.

11.5 NON-CONFORMITIES

If during a surveillance inspection the notified certification body detects non-conformities, the notified certification body shall inform the manufacturer thereof.

If the notified certification body finds that a detected non-conformity has the effect that the manufacturer does not ensure that the construction products to be placed on the market have the declared performance, the notified body shall take appropriate action in accordance with section 14.2.

The notified certification body shall require the manufacturer within a specified time to report to the notified certification body the following:

- The cause of the non-conformity (based on the manufacturer's own investigation and/or analysis)
- Remedial measures related to products manufactured under (potential) influence of the detected non-conformity.
- A description of the corrective measures the manufacturer intends to implement and the time frame for their implementation.
- The notified certification body shall assess the manufacturer's report. The assessment shall include:
- If the cause of the non-conformity determined by the manufacturer appears to be adequate
- If the corrective measures described by the manufacturer appear to adequately address the cause of the non-conformity.

The notified certification body shall decide how it will verify that the manufacturer has effectively corrected of the non-conformity.

Methods of verifying the implementation of corrective actions may include but is not limited to:

- Assessment of documentation submitted by the manufacturer,
- Verification at the next surveillance inspection,
- Extraordinary inspection (see section 13)

---

[13] *Multisite sampling is a method of reducing the number of audits when an organisation has a number of similar sites conducting identical production of similar product (i.e. same harmonised technical specifications) under the same unique management system. For certification of management systems, rules are described by International Accreditation Forum in the document IAF MD 1.*

The notified certification body shall choose a method of verification which will give a reasonable level of evidence that the non-conformity is resolved without placing unjustified burdens on the manufacturer.

11.6 NON-CONFORMING PRODUCTS

The notified certification body shall satisfy itself that the manufacturer has appropriate processes in place to prevent the placing on the market of construction product which do not have the declared performance.

For products already placed on the market and for which the manufacturer considers or has reason to believe that they do not have the declared performance, the manufacturer shall take appropriate action in accordance with CPR Article 11(7). However, it is not part of the responsibilities of the notified body to verify that the manufacturer meets his obligations in that regard.

If relevant, the notified certification body shall inform the manufacturer that it has no authority neither to approve nor reject the manufacturer’s actions in accordance with CPR Article 11(7).

12 AUDIT TESTING (AVCP SYSTEM 1+)

12.1 GENERAL

For essential characteristic subject to AVCP system 1+, the notified product certification body shall conduct audit testing.

Audit-testing of samples taken by the notified product certification body at the manufacturing plant or at the manufacturer's storage facilities.

12.2 SAMPLING

Samples shall be taken by the notified product certification body at the manufacturing plant or at the manufacturer's storage facilities.

Sampling shall be done in accordance with the position paper NB-CPR 15/639.

12.3 TESTING

Testing shall be carried out as described in section 7.3.1.

Reporting shall be done in accordance with section 7.4.

If testing is done outside the facilities of the notified body, further guidance is found in the position paper NB-CPR 14/594.

12.4 EVALUATION OF AUDIT TEST RESULTS

The notified product certification body shall evaluate the test results with regard to compliance with the declared performance and/or other applicable requirements in accordance with the harmonised technical specification.

In the absence of more specific provisions in the harmonised specification the below applies.

The notified product certification body shall inform the manufacturer about the results of the evaluation.

12.5 NON-CONFORMING AUDIT TEST RESULTS

In case of non-conforming test results, i.e. the result of an audit test does not meet the applicable requirements, the notified product certification body shall require the manufacturer within a specified time to report to the notified product certification body the following:

- The cause of the non-conforming test result (based on the manufacturer's own investigation and/or analysis)
- Remedial measures related to (potentially) non-conforming products manufactured
- A description of the corrective measures the manufacturer intends to implement and the time frame for their implementation.
- The notified certification body shall assess the manufacturer's report. The assessment shall include:
- If the cause determined by the manufacturer appears to be adequate
- If the corrective measures described by the manufacturer appear to adequately address the cause of the non-conforming test result.

When the corrective measures have been implemented by the manufacturer the notified product certification body shall repeat the sampling and testing.

If the notified product certification body finds that one or more non-conforming test results give rise to concerns as to whether the manufacturer ensures the conformity of the construction products with the declared conformity, the notified body may decide to conduct an extraordinary inspection in accordance with section 13

If the notified product certification body finds that one or more non-conforming test results indicates that the construction products to be placed on the market do not have the declared performance, the notified body shall take appropriate action in accordance with section 14.2.

If the result of a repeated sampling and testing is non-conforming, section 14.3 applies.

For products already placed on the market and for which the non-conforming results of audit testing give reason to believe that they do not have the declared performance, the manufacturer shall take appropriate action in accordance with CPR Article 11(7). However, it is not part of the responsibilities of the notified body to verify that the manufacturer meets his obligations in that regard.

13 EXTRAORDINARY INSPECTION

Extraordinary inspections are only conducted if considered necessary by the notified certification body and with a clearly defined reason and objective of which the notified certification body shall inform the manufacturer.

Examples of objectives are:

- To verify the effectiveness of the FPC if a surveillance inspection has not provided sufficient basis for the notified certification body to conclude whether or not the FPC is effective.

- If the notified certification body has received information about significant deficiencies or changes to the manufacturing plant or the FPC, to verify the continuous effectiveness of the FPC
- Upon detected non-conformities, to verify the effective implementation of corrective measures taken by the manufacturer.
- Upon one or more non-conforming audit test results, to verify the continuous effectiveness of the FPC.

Only if justified by the concrete circumstances, extraordinary inspections may be conducted without previous announcement. In such cases, the notified certification body shall inform the manufacturer of the reason for conducting the inspection unannounced and about its procedures for complaints.

14 RESTRICTION, SUSPENSION OR WITHDRAWAL OF THE CERTIFICATE OR VALIDATION REPORT (SYSTEMS 1+, 1, 2+, AND 3+)

14.1 GENERAL

Suspension means that the certificate or validation report ceases to be valid for a period of time.

Any suspension or withdrawal shall be declared in writing to the manufacturer. The notified certification body or notified assessment validation body shall provide the manufacturer with written information about the following:

- The time from which the suspension or withdrawal becomes effective,
- The effects of the suspension, including that no DoPs may refer to the notified certification body on the basis of the certificate or validation report,
- That during the suspension period, it may not be permissible for the manufacturer to place on the market the construction products covered by the certificate or validation report.
- The reason for the suspension or withdrawal,
- The information the notified certification body or notified assessment validation body intends to submit to the notifying authority about the suspension or withdrawal.
- The appeal procedures of the notifying certification body or notified assessment validation body.
- The possibilities for the manufacturer to complain to the notifying authority and/or the national accreditation body if the manufacturer considers that the notified certification body or notified assessment validation body does not comply with the applicable rules.

As the conditions for restriction, suspension or withdrawal of validation reports are very different from the conditions for the restriction, suspension, or withdrawal of a certificate, the two are described separately below.

14.1.1 RESTRICTION, SUSPENSION OR WITHDRAWAL OF CERTIFICATES (SYSTEMS 1+, 1, AND 2+)

For certificates, the basis for restriction, suspension, or withdrawal would generally be that the manufacturer has not ensured the constancy of performance.

(Typically, the notified certification body will agree a date with the manufacturer when it is expected that the problem(s) causing certification to be suspended will be corrected. When appropriate the notified certification body will verify that the corrective measures have been implemented effectively, and the certificate will be declared valid again.)

In both cases, during the suspension or following the withdrawal of certification, the certificate will not be valid and cannot form basis for references to the notified certification body in any DoPs.

14.1.2 RESTRICTION, SUSPENSION OR WITHDRAWAL OF VALIDATION REPORTS (SYSTEM 3+)

For validation reports, the basis for restriction, suspension, or withdrawal may be that the notified assessment validation body has found that an already issued validation report did not - at the time it was issued - represent a correct validation.

Possible reasons could be:

- Indications that information forming basis for the assessment of performance was incorrect and that the incorrectness has significantly affected the assessment of performance.
- Failure by the notified assessment validation body itself to conduct a correct and reliable validation.

14.2 SEVERE NON-CONFORMITIES (SYSTEMS 1+, 1, AND 2+)

CPR Article 52(4) states:

> *Where, in the course of the monitoring activity aiming at the verification of the constancy of performance of the manufactured product, a notified body finds that a construction product no longer has the same performance to that of the product-type, it shall require the manufacturer to take appropriate corrective measures and shall suspend or withdraw its certificate if necessary.*

If one or more detected non-conformities or non-conforming audit test results lead the notified certification body to the conclusion that the manufacturer has not ensured that construction products have the declared performance, and if considered necessary to avoid the manufacturer placing non-conforming construction products on the market, the notified certification body shall suspend the certificate.

Only if the notified certification body finds it unlikely that the conditions for reinstating the certificate will be met the certificate shall be withdrawn.

14.3 FAILURE TO CORRECT NON-CONFORMITIES (SYSTEMS 1+, 1, AND 2+)

CPR Article 52(5) states:

> *Where corrective measures are not taken or do not have the required effect, the notified body shall restrict, suspend or withdraw any certificates, as appropriate.*

Examples of failure to correct non-conformities are

- After the notified certification body has reported about one or more non-conformities, the manufacturer does not report as required (see section 11.5)

- The manufacturer does not implement the corrective measures reported to the notified certification body (see section 11.5)
- The manufacturer cannot demonstrate to the notified certification body, e.g. at an extraordinary inspection, that the corrective measures implemented by the manufacturer have the required effect.
- The result(s) of a repeated audit test is non-conforming (see section 12.5)

In accordance with the principles of proportionality, the notified certification body shall choose the least onerous of the below possibilities which would serve the purpose of avoiding non-conforming product being placed on the market.

- Restriction of the certificate
- If the failure to correct non-conformities only concerns part of the scope of the certificate, a limitation of the scope should be considered. It should also be considered if a restriction to the use of the certificate would be sufficient.
- Suspension of the certificate If it is considered that until the manufacturer has effectively implemented corrective measures the certificate should not be valid; the notified certification body shall suspend the certificate.
- Withdrawal of the certificate
  Only if the notified certification body finds it unlikely that the conditions for reinstating the certificate will be met the certificate shall be withdrawn.

14.4 VOLUNTARY SUSPENSION (SYSTEMS 1+, 1, AND 2+)

A manufacturer may – for any reason - request the notified certification body to suspend the certificate for a period of time.

Typical reasons of the manufacturer would be that for a period of time he does not intend to place the construction products concerned on the market, or that the manufacturer realises that for a period of time he will not be able to comply with the certification requirements.

During the period of suspension, the manufacturer is not obliged to comply with the certification requirements and the notified certification body shall normally not conduct any surveillance activities.

Depending on the duration of the suspension and other circumstances, the notified certification body may need to conduct a new inspection before the certificate is made valid again.

The notified certification body shall declare the suspension in writing to the manufacturer and provide the information indicated in section 14.1

Information to authorities shall be provided in accordance with section 14.5.

14.5 INFORMATION TO AUTHORITIES AND OTHER NOTIFIED BODIES (SYSTEMS 1+, 1, 2+, AND 3+)

The notified body shall inform its notifying authority about any restriction, suspension, or withdrawal (See CPR Article 53(1)).

The notified body shall inform the manufacturer about the information to the notifying authority and provide the manufacturer with the same information.

Moreover, if a restriction, suspension, or withdrawal is the result of a negative assessment or verification by the notified body, the notified body shall provide information to other notified bodies. Further guidance is found in the position paper NB-CPR 24/949.

15 SUPERSEDED GUIDANCE

This position paper supersedes the below previously issued documents:

- NB-CPR/AG/03/002r3
- NB-CPR/13/568r8

16 REFERENCES

EN ISO/IEC 17025:2017	General requirements for the competence of testing and calibrating laboratories
EN ISO/IEC 17029:2019	Conformity Assessment – General principles and requirements for validation and verification bodies
EN ISO/IEC 17065:2012	Conformity assessment - Requirements for bodies certifying products, processes and services
EN ISO 19011:2018	Guidelines for auditing management systems
Guidance Paper B	The Definition of Factory Production Control in Technical Specifications for Construction Products (Revision Sep 2002)

ANNEX 1:

Table of systems of AVCP

AVCP system	1+	1	2+	3	3+
Type of Notified Body	Product certification body		FPC certification body	Testing laboratory	Assessment validation body
Agreement with the manufacturer	Certification agreement (section 6.2)			Agreement regarding assessment of performance (section 6.3)	Agreement regarding validation (section 6.4)
Assessment of performance[14]	an assessment of the performance of the construction product carried out on the basis of testing (including sampling), calculation, tabulated values or descriptive documentation of the product; (Section 7)		(Assessment of performance carried out by the manufacturer)	Assess the performance on the basis of testing (based on sampling carried out by the manufacturer), calculation, tabulated values or descriptive documentation of the construction product. (Section 7)	(Assessment of performance carried out by the manufacturer)
Initial inspection	initial inspection of the manufacturing plant and of factory production control; (Section 8)			(No initial inspection)	Initial inspection of the manufacturing plant to validate any company-specific data (Section 8.8)
Validation	(No validation)				Validation of - input values, assumptions made and compliance with applicable generic or product category specific rules; - manufacturer's assessment; - process applied to generate that assessment; - correct usage of software appropriate for the assessment; (Section 8.3.2)
Certification/validation decision	The notified certification body shall decide on the issuing, restriction, suspension or withdrawal of the certificate on the basis of the outcome of the following assessments and verifications carried out by that body: (Section 9.1)			(No certification/validation decision)	The notified assessment validation body shall decide on the issuing, restriction, suspension or withdrawal of the validation report of constancy of performance of the construction product on the basis of the outcome of the

[14] *For construction products for which an ETA has been issued, the assessment of performance is the responsibility of the Technical Assessment Body*

AVCP system	1+	1	2+	3	3+
					following assessments and verifications carried out by that body: (Section 9.2)
Type of document to issue	Certificate of constancy of performance (Section 10.1)		Certificate of conformity of FPC (Section 10.1)	Test report (may be completed with a Classification report) or Report of assessment of performance (Section 7.4)	Validation report of constancy of performance of the construction product (Section 10.2)
Continuing surveillance	continuing surveillance, assessment and evaluation of factory production control; (Section 11)			(No continuing surveillance)	
Audit testing	Audit-testing of samples taken by the notified product certification body at the manufacturing plant or at the manufacturer's storage facilities. (Section 12)	(No audit testing)			