

GNB-CPR GNB-AG	Co-ordination of the Group of Notified Bodies for the Construction products Regulation (EU) No 305/2011	NB-CPR/23-936r3 Issued: 23 August 2024 Approved INFORMATIVE GUIDANCE
--	---	--

GNB-CPR Position Paper - INFORMATIVE: Reporting the results of *Assessments of Performance* in AVCP system 3

1 Introduction

CPR Annex V defines for AVCP system 3 that the notified laboratory shall carry out the Assessment of Performance of the construction product, but it does not define how the results shall be documented or communicated.

This informative position paper is intended to provide guidance to notified bodies on the reporting of the *Assessments of Performance* in AVCP system 3.

If the assessment of performance is carried out on the basis of testing conducted by the notified laboratory itself, the test report may serve as evidence of the assessment of performance. Similarly, calculation reports and classification reports on fire performance may serve as evidence of the assessment of performance.

However, if the assessment of performance is carried out, fully or partially, on another basis than mentioned above, a different form of evidence than a test report would be helpful.

This position paper contains guidance on the form and content of *Assessments of Performance Reports* issued in AVCP systems 3. In annex 1 of this position paper, is found a model for the Assessments of Performance Report, which notified bodies may use on a voluntary basis.

Even if the assessment of performance is carried out on the basis of testing conducted by the notified laboratory itself, a notified laboratory may choose to apply the model report provided by this position paper and thereby make a distinction between the test report, which may be subject to accreditation rules, and the reporting of the assessment of performance, which normally would fall outside the scope of an accreditation to ISO/IEC 17025.

The model report provided by this position paper is intended to provide clarity regarding the basis for the manufacturer's references to the notified laboratory (or laboratories) in the declarations of performance for products in AVCP system 3, irrespective of the methods used for the assessment of performance.

The model report may also be useful for the updating of an already made assessment of performance to include information that was not available at the time when the assessment of performance was originally made. Such new information may include, but would not be limited to, changed names of construction products or manufacturers, or data shared by other economic operators. Updating the Assessment of Performance Report should not per se

necessitate any updating of the test reports on which it is based, if it is found that the existing test report would form a suitable basis for the updated Assessment of Performance.

It is emphasised that the Assessment of Performance Report is only intended as a means for the notified laboratory to unambiguously inform the manufacturer of the result of the assessment of performance of the specified essential characteristics. The Assessment of Performance Report is not intended as a document to accompany the construction product, or as a means to strengthen the market's confidence in the DoP.

It is further emphasised that the use of the Assessment of Performance Report does not allow for departing from the methods of assessing the performance defined by the harmonised standard. For instance, "expert opinions" cannot serve as basis for the assessment of reaction to fire performance,

An Assessment of Performance Report shall only be issued by notified laboratories and only for products and essential characteristics covered by their scope of notification under AVCP system 3. Notified certification bodies shall not issue Assessment of Performance reports under AVCP system 3.

2 Basic considerations

- 1) CPR Annex V defines under AVCP System 3 that *the notified laboratory shall 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.* Differently from AVCP systems 1+, 1, and 2+ under which it is defined that the notified body shall issue a certificate, the CPR does not define what kind of document(s) the notified laboratory shall issue under AVCP system 3.
- 2) Several common report formats may be used for the reporting of the assessment of performance. When the assessment of performance is based on testing, a test report in compliance with ISO/IEC 17025 may serve as evidence of the assessment of performance.
For instance, for the assessment of performance in relation to reaction to fire, or fire resistance, a classification report (including EXAP reports where relevant) may serve as evidence of the assessment of performance.
Similarly, if the basis is calculation, a calculation report may serve as evidence of the assessment of Performance.
- 3) When the assessment of performance is carried out on another basis than testing or calculation, i.e. tabulated values or descriptive documentation of the construction product, no common formats have been defined. That would also be the case if the assessment of performance is based on Appropriate Technical Documentation in accordance with CPR Article 36, on Historical Assessment Data (see GNB position paper NB-CPR 19/792), or on testing carried out by another laboratory. Irrespective of the format of the reporting, assessment of performance shall be done in accordance with the pertinent harmonised standard.
- 4) For the cases mentioned in the above paragraph 3), for the purpose of achieving an equivalent/converging practice of notified bodies, the Group of Notified bodies should offer a common format for the reporting of the assessment of performance.
- 5) In certain circumstances, manufacturers may request updated assessments of performance, for instance if the trade name of the construction product has been changed, or if the name of the manufacturing organisation has changed. In such cases, it

would seem disproportionate and create an unnecessary burden for the manufacturer if the notified body had to repeat the testing. Therefore, in line with the operational obligations defined for notified bodies, the report format should allow for the updating of a report, without any repetition of the testing forming basis for the assessment of performance. In that connection, it is recalled that though the CPR does not require manufacturers to have test reports or other kinds of reports of the assessment of performance updated to indicate the current trade names, manufacturers may request updated reports.

- 6) The European co-operation for Accreditation (EA) has taken a resolution (TMB Resolution 2021 (03) 01) according to which accredited laboratories shall reissue test reports only for the correction of errors and the inclusion of omitted data. Though no legal basis has been identified for imposing that resolution on the operations of notified bodies under the CPR, notified laboratories have experienced that accreditation bodies have required them to comply with the said resolution.
- 7) Generally, testing carried out by notified laboratories will fall under ISO/IEC 17025 and may be covered by an accreditation forming basis for the designation of the notified bodies for which the Member States' notifying authorities are responsible. Additionally, calculations as well as the classification of fire performance on the basis of testing may be considered as falling under ISO/IEC 17025. However, the assessment of performance as such would not fall under ISO/IEC 17025 and neither would the activities mentioned under the above paragraph 3).
- 8) As a report on the assessment of performance should serve as evidence that the assessment of performance has been correctly carried out by a notified laboratory under the CPR, such a report should include a reference to the CPR as well as the 4-digit notified body ID number assigned in accordance with CPR Article 49(1). However, as the assessment of performance as such would not fall under ISO/IEC 17025, a report of the assessment of performance should not include any accreditation references.
- 9) As notified laboratories are not responsible for the determination of product-type, and as the manufacturer is free to request different notified laboratories to assess the performance of the construction product in relation to different essential characteristics, the format for reporting should allow for clarity with regard to which essential characteristics the reporting covers. The reporting should not be misconstrued as a product certificate or a kind of document to accompany the construction product.

3 Content of Assessments of Performance Reports

Assessments of Performance Reports should have the content identified below in sub-clauses 2 a) through 2 l).

Assessments of Performance Reports should not contain any information likely to disturb the information required. In particular, *Assessments of Performance Reports* shall not refer to any private or national measures, or to any other legislation than the CPR.

3 a) Name and address of the notified body

The name and the registered address of the notified laboratory should be indicated.

3 b) Headline

“Assessment of Performance Report”^{T1}

3 c) Number of the Assessments of Performance Report

The number should be in the form:

nnnn-AoP- -zzzz

Where:

nnnn is the identification number of the notified laboratory

AoP is the acronym of Assessment of Performance

zzzz is the individual unique number or alphanumeric code given by the notified Laboratory. The notified laboratory is free to decide the number of characters.

Example:

The first Assessments of Performance Report issued by Notified Body number 0987 might be number

0987-AoP-CPR-0001

3 d) Reference to the Construction products regulation

Reference to CPR should be made by the sentence:

For the purposes of Regulation (EU) No 305/2011 of the European Parliament and of the Council of 9 March 2011 (the Construction products Regulation or CPR), this Assessments of Performance Report under AVCP system 3 applies to the construction product(s)

3 e) Scope of the Assessments of Performance Report

The scope of the Assessments of Performance Report should give a brief description of the products.

The description may include the product name as provided by the manufacturer. It should clearly appear that the product name is only included as information for which the manufacturer is responsible, e.g. by a phrase like:

“According to the manufacturer, the product is made available on the market under the name “XXXXXXXXXX”.

The description should only relate to the construction product and its intended use(s) – not to the internal matters of the manufacturer, e.g. production processes, personnel, subcontractors or suppliers to the manufacturer¹.

¹ To indicate information on internal matters of the manufacturer may be contrary to CPR article 43(10).

However, the description of the product should prevent any misleading/fraud. If relevant, the description may include a reference to a document providing further details, e.g. drawings, components descriptions etc.

3 f) Manufacturer

The manufacturer² to whom the *Assessments of Performance Report* is issued should be identified by the phrase “*placed on the market under the name or trademark of*” followed by the name and the registered address of the manufacturer, cf. CPR article 9(2).

3 g) Reference to the harmonised standard³

Harmonised standards should be referenced exactly as they are cited in the Official Journal of the European Union (OJEU).

The reference to a harmonised standard should be to the CEN document (EN number), and not to a national implementation of the standard⁴. It shall refer to the version of the harmonised standard to which the assessment of performance has been carried out, which shall be version of the standard cited⁵ as current in the OJEU at the time of issuance of the *Assessments of Performance Report*.

Annex 3 gives guidance on the format of references to harmonised standards

3 h) Statement of compliance

The *Assessments of Performance Reports* should contain the below statement of compliance

This Assessment of Performance Report attests that the performance of the above-mentioned construction product has been assessed in accordance with the harmonised standard:

[reference to the harmonised standard]

under AVCP system 3 with regard to the essential characteristics listed below

3 i) Table of performance

A table of performance shall be included to express the performance of the construction product.

² The manufacturer would not necessarily be the physical producer of the construction product. As manufacturer may also be indicated an importer or a distributor placing the product on the market under its own name or trademark. If shared test results, cf. CPR Article 36(1), form basis for the assessment of performance, the consent of the manufacturer originally owning the data is required.

³ Referring to an EAD/ETA is irrelevant as the ETA is considered as the assessment of performance (CPR articles 2.13 and 26)

⁴ Notwithstanding the fact that a harmonised standard is only published by the national standardisation bodies with a national prefix, e.g. “DIN EN XX XXX”, the reference to the harmonised standard should only be to the CEN document (EN reference without any national prefix)

⁵ During the coexistence period for amendments and corrections to a harmonised standard, more than one version will be applicable.

Column No. 1 – Essential characteristics

For each essential characteristic, the number(s) of the requirement clause(s) and the name of the essential characteristic should be indicated.

Essential characteristics for which the report does not indicate any performance should not be mentioned.

Column No. 2 – Performance

In this column, the performance should be expressed in terms of levels or classes in accordance with the harmonised standard.

Levels of performance should be indicated using the units defined by the harmonised standard.

Statements like “No performance assessed” or similar should be avoided.

Column No. 3 – Basis for the assessment of performance

In Column No. 3, it should be indicated on what type(s) of basis the assessment of performance is carried out. For each type of basis, reference(s) should be made to the documents in which the performance is documented.

The possible types of references are:

- Test report(s)
- Calculation report(s)
- Tabulated values document (s)
- Descriptive Documentation
- Appropriate Technical Documentation (ATD)
- Document(s) on the validation of historical data (see NB-CPR 19/792, section 4)

Only the types of documents actually forming basis for the assessment of performance should be mentioned.

For instance, if the assessment of performance is only based on calculation, the number of the calculation report(s) may be indicated by the words “Calculation report(s) No(s) xxxxx”. The other possible types of documentation, test report(s), tabulated values document (s), descriptive documentation, Appropriate Technical Documentation (ATD), and document(s) on the validation of historical data would not be mentioned.

If information in documents forming basis for the assessment of performance is altered, e.g. if the name of the product and or the manufacturer is not the same as indicated in a referenced test report, that shall be mentioned together with the reference to that document.

If the assessment of performance is based, fully or partially, on test results obtained by another manufacturer or system provider⁶, replacing testing or calculation, a reference to the Appropriate Technical Documentation (ATD) should be included. The number of the ATD should be indicated.

If the assessment of performance is based, fully or partially, on historical assessment data, reference should be made to a validation document drawn up by the notified laboratory..

⁶

Notified laboratories should only base the assessment of performance on test results obtained by another manufacturer or system provider if they have ensured that the manufacturer does have the authorisation of the other manufacturer or system provider

3 j) Statement of applicability

The notified laboratory should not limit the period of validity to a specified period.

The below sentences should be included:

This Assessment of Performance Report has been drawn up in accordance with the GNB Position Paper NB-CPR 23/936 and covers only the above-mentioned essential characteristic(S). It is not an exhaustive statement of the performance of the product. The manufacturer is responsible for the Declaration of Performance of the product and can declare the performance of other essential characteristics than those mentioned above.

This Assessment of Performance report is not considered a product certificate or a document to directly accompany neither the product nor the Declaration of Performance. See CPR Article 4(3).

This Assessment of Performance Report will remain applicable, under the manufacturer's responsibility, as long as neither the harmonised standard, the construction product, nor the AVCP methods are modified significantly.

Optionally, the notified laboratory may indicate a reference to a website or a telephone number where the origin of the Assessment of Performance Report may be confirmed:

The origin of this Assessment of Performance Report may be confirmed at the web address <web address>

or

The origin of this Assessment of Performance Report may be confirmed by contacting <name of the notified laboratory>, telephone number <telephone number> or e-mail address <e-mail address>.

3 k) Date of issue

The date when the report is issued

3 l) Signature

Title(s) or function(s), name(s), and signature(s) of the person(s) dully authorised to sign the Assessment of Performance Report on behalf of the notified laboratory shall be indicated.

4 Report layout

The sequence of the content of the Assessment of Performance Report should follow the model given in annex 1 of this Position Paper.

The notified laboratory should use a report layout which ensures that the above described content appears legible and undisturbed.

The notified laboratory may apply its own logo on the Assessment of Performance Report. Logos of other organisations, including accreditation logos, should not be applied.

It is expected that normally the Assessment of Performance Report will only be one page. However, if the report covers the performance with regard to a multitude of essential

characteristics it may be relevant to have the table of performance (see clause 2i) in an annex which should then be an integral part of the Assessment of Performance Report.

5 Translations of Assessment of Performance Report

The CPR does not specify the language to be used for the report, and so the report may be in any language.

Notified bodies may translate the model in annex 1 of this Position Paper. Where words and phrases derived from CPR are used in the models, translators are requested to use the equivalent words and phrases taken from the official translation of the CPR into the target language.

In annex 2 is found a list of references to the articles of CPR where the keywords and phrases are used.

ANNEX 1 Template for the Assessment of Performance Report to hENs at AVCP 3

< Name and address of the notified laboratory^{T2} >

Assessment of Performance^{T1} Report

< nnnn-AoP -zzzz >

For the purposes of Regulation (EU) No 305/2011 of the European Parliament and of the Council of 9 March 2011^{T3} (the Construction products Regulation or CPR), this Assessment of Performance Report under AVCP system 3 applies to the construction product^{T5}

< CONSTRUCTION PRODUCT(S) ^{T4} >

< description of the construction product (identification, e.g product name according to information provided by the manufacturer, and intended use(s), as the manufacturer intends for their declaration of performance); >

placed on the market^{T19} under the name or trademark^{T10} of

< Name of the manufacturer^{T5} >
< Full address >

This Assessment of Performance Report attests that the performance of the above-mentioned construction product has been assessed in accordance with the harmonised standard^{T8}

< EN AAAA:yyyy (+An:yyyy)/(+AC:yyyy) >

under AVCP system 3^{T6} with regard to the essential characteristics listed below

Essential characteristic Clause No. - Description	Performance ^{T7} Level or class ^{T11} , unit(s)	Basis for the assessment of performance
x.xx. – Name of essential characteristic No. 1	Level or class of performance – including units, where relevant	[Test report(s) No(s).] [Calculation report No.] [Tabulated values- document No.] [Descriptive Documentation No.] [ATD No.] [Validation of historical data – Doc. No.]
x.xx. – Name of essential characteristic No. 2	Level or class of performance – including units, where relevant	[Test report(s) No(s).] [Calculation report No.] [Tabulated values- document No.] [Descriptive Documentation No.] [ATD No.] [Validation of historical data – Doc. No.]

This Assessment of Performance Report has been drawn up in accordance with the GNB Position Paper NB-CPR 23/836 and covers only the above-mentioned essential characteristic(S). It is not an exhaustive statement of the performance of the product. The manufacturer is responsible for the Declaration of Performance of the product and can declare the performance of other essential characteristics than those mentioned above.

This Assessment of Performance report is not considered a product certificate or a document to directly accompany neither the product nor the Declaration of Performance. See CPR Article 4(3).

This Assessment of Performance Report will remain applicable, under the manufacturer's responsibility, as long as neither the harmonised standard, the construction product, nor the AVCP methods are modified significantly.

< Date >

< Authorised signature >
< Title, Name, Position >

Annex 2: References to key words and phrases from CPR

Note	Key word / phrase	CPR reference
T1	“Assessment of Performance”	Annex V* 1.4 (b)
T2	“Notified laboratory”	Annex V* 1.4 (b)
T4	“construction product”	Article 2(1)
T5	“manufacturer”	Article 2(19)
T6	“AVCP System 3”	Annex V 1.4
T7	“performance”	Article 8 (4)
T8	“harmonised standard”	Article 2(11)
T9	“Placed on the market”	Article 2(17)
T10	“under the name or trademark of”	Article 2(19)
T11	Level or class	Article 27

*The current CPR Annex V is found in delegated regulation No. 568/2014.

ANNEX 3: FORMAT OF REFERENCES TO HARMONISED STANDARDS IN THE OJEU

The original harmonised standard is normally cited in OJEU using the form:

EN AAAA:yyyy

where

<i>EN AAAA</i>	<i>is the number of the harmonised standard</i>
<i>yyyy</i>	<i>is the year of publication of the harmonised standard</i>

Amendments to harmonised standards are normally cited in OJEU using the form:

EN AAAA:yyyy/An:zzzz

where

<i>EN AAAA</i>	<i>is the number of the harmonised standard to which the amendment applies</i>
<i>yyyy</i>	<i>is the year of publication of the harmonised standard to which the amendment applies</i>
<i>An</i>	<i>is the number of the amendment</i>
<i>zzzz</i>	<i>is the year of publication of the amendment</i>

Amendments and corrections to harmonised standards are normally cited in OJEU using the form:

EN AAAA:yyyy/AC:zzzz

where

<i>EN AAAA</i>	<i>is the number of the harmonised standard to which the “amendment and corrections” apply</i>
<i>yyyy</i>	<i>is the year of publication of the harmonised standard to which the “amendment and corrections” apply.</i>
<i>zzzz</i>	<i>is the year of publication of the “amendment and corrections”</i>

Sometimes a consolidated standard is cited in OJEU to give a reference both to the original harmonised standard and amendments to it:

EN AAAA:yyyy+An:zzzz

where

<i>EN AAAA</i>	<i>is the number of the harmonised standard to which the “amendment and corrections” apply</i>
<i>yyyy</i>	<i>is the year of publication of the harmonised standard to which the “amendment and corrections” apply.</i>
<i>zzzz</i>	<i>is the year of publication of the “amendment and corrections”</i>

Combined references

If one or more amendments and/or amendment and corrections apply⁷ to the harmonised standard, each amendment and/or amendment and corrections shall be referenced using the form:

EN AAAA:yyyy

and

EN AAAA:yyyy/A1:zzzz (if relevant)

and

EN AAAA:yyyy/A2:zzzz (if relevant)

and

EN AAAA:yyyy/AC:zzzz (if relevant)

⁷ Amendments are applicable only when cited as current in OJEU