



CE MARKING FOR LIQUIDS: WHAT YOU NEED TO KNOW

Sarah Spink, CEO of the Liquid Roofing and Waterproofing Association (LRWA), explains CE marking for construction products, why it is different for liquids and what the future holds.

Everyone in the roofing industry will be aware of CE marking but it is a topic that still causes lots of confusion. This is primarily because a different product standard applies to liquids.

What a CE mark means

A CE mark is effectively a statement that a particular construction product complies with the relevant EU legislation, providing the manufacturer with free access to markets in all the different countries within the European Economic Area (EEA).

It also indicates that the product will perform to a certain standard in line with the data provided in the Declaration of Performance (DoP), which is issued by the manufacturer.

CE marking is not however, a quality mark and does not declare that the product conforms with national building regulations, so should not be seen as a replacement to British Board of Agrément (BBA) certificates or other alternatives.

What the law says

In 2013, the Construction Products Regulation 2011 (CPR) was updated, making it mandatory for manufacturers and suppliers to apply CE marking to their construction products.

The CPR aims to ensure that there is reliable information available on the performance of construction products and that it is of interest to designers, constructors, public authorities and consumers. This is achieved through harmonised European product

standards and European Technical Assessments, which use a common technical language and uniform assessment methods.

Construction products can be classed as those supplied individually or by a single manufacturer as a kit of at least two separate components that need to be put together to be incorporated in the construction works.

However, the CPR only applies to construction products for which a harmonised technical standard (hENs) or European Technical Assessment (ETA) exists.

To put this into context for roofing, the following products are covered by hEN standards, so it is mandatory to show a CE mark on the label and to make available a DoP detailing the performance of the product as stated in the hEN:

- Vapour Control Layers
- Carrier Membranes
- Insulation
- Rooflights

Companies that sell these products under their own brand names, are responsible for CE marking them.

CE marking for liquids

Liquid applied membranes are **not** covered by hENs, but they can achieve a CE mark if the product is ETA certified in accordance with a European Assessment Document (EAD), previously known as an ETAg - European Technical Approval Guideline.

An ETA is an approval based on testing carried out to agreed European levels.

CE marking through an ETA is voluntary, so it is up to the manufacturer whether they obtain an ETA certificate or not. The cost of ETA testing and certification can be significant, so some manufacturers may decide that the costs are prohibitive, especially as it is not mandatory for liquid applied membranes.

If they do decide to obtain an ETA certificate they must CE mark their product.

From a client's perspective, CE marking can be a key consideration when selecting a liquid waterproofing system but should not be seen as the only form of differentiation when comparing with other liquids or types of waterproofing. Other criteria must be considered including factors linked to product quality, building regulation compliance and durability.

Brexit and the future of CE marking

Post Brexit, any company which wants to continue to sell products in the EU single market will still need to comply with CE marking rules.

Although there have been updates to the law in recent times, the CE marking system has been accepted for more than 20 years throughout Europe. As there will always be a need for UK legislation to control the conformity of products, we expect that the UK will continue to adopt this system in the future to ensure we maintain free trade.

At the same time, it is important that industry leaders and trade associations lobby to keep the UK as a full member of CEN (the European Committee for Standardization) and maintain ties with the European Organisation for Technical Assessment (EOTA). Nationally, this will help us to continue to influence the setting of European and international standards.

To help keep track of legislation and how potential changes could affect your business, contractors and manufacturers are advised to join the LRWA.

For more information or advice, please contact us at technical@lrwa.org.uk