

GNB-CPR GNB-AG	Co-ordination of the Group of Notified Bodies for the Construction products Regulation (EU) No 305/2011	NB-CPR/18-772r2 Issued 13 August 2019 Approved Guidance
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GNB-CPR position paper

Reissuance of test reports

1 FOREWORD

It frequently happens that manufacturers request notified bodies to reissue a test report because something has changed after the issuance of the original report, e.g. a change to the trade name of the product or to the name of the manufacturer.

Resolution 2014 (33) 31 of the European Accreditation (EA) states that accredited laboratories should only be permitted to reissue test reports *for the correction of errors and the inclusion of omitted data available at the time of test*. Reissuance because of subsequent changes e.g. to the trade name of the product should not be permitted.

It is well known that national accreditation bodies have implemented the said resolution differently; in fact, some national accreditation bodies have not at all implemented the resolution.

It seems doubtful if national accreditation bodies would have any legal basis for enforcing the said resolution for test reports issued by notified bodies, i.e. test reports for the purpose of assessment of performance or audit testing in accordance with CPR.

Accordingly, the EA resolution is not considered applicable to notified bodies for the CPR.

Construction Products Europe (CPE) has identified that notified bodies have different practices and requested the GNB to provide guidance for notified bodies on the matter.

Notified Bodies should always strive at avoiding unnecessary repetition of work. Therefore, any refusal to reissue a test report should not have the intent to encourage new testing, if the already existing test results are suitable to express the performance of the construction product concerned.

2 DEFINITIONS

For the purpose of this guidance, the below definitions apply:

- *Reissuance of test report*
Issuance of a test report on already performed and reported testing.

3 BASIC CONSIDERATIONS

- 3.1 CPR does not require test reports to indicate the name of the construction product tested.
As a notified testing laboratory would have no authority to verify product names, test reports may indicate product names as “information provided by the manufacturer”. The notified testing laboratory may not assume any responsibility for the correctness of such information.
- 3.2 In a CPR context, a manufacturer is permitted to continue the use of test reports even if the name of the product is different from the product name stated in the test report. Under certain conditions (see CPR Article 36), CPR also allows manufacturers to use test reports issued to other manufacturers. Hence, normally the need to comply with CPR would not necessitate reissuance of test reports.

However, the manufacturer may have other reasons for requesting the reissuance, e.g. a wish to use the test report as part of the documentation provided to (potential) clients.
- 3.3 Member States, including national accreditation bodies, are expected neither to require test reports to indicate the same product name as the name of the product placed on the market nor to require test reports to be issued to the manufacturer placing the product on the market.
- 3.4 Resolution No. 2014 (33) 31 of the European Accreditation is not considered applicable to notified bodies under CPR. Hence, notified bodies should not indicate that resolution as the reason for any refusal to reissue test reports.
- 3.5 Reissuance of a test report should not reduce the integrity or the accuracy of the test report and should not compromise confidentiality. It should remain clear what was tested, where and when the test took place, what method was used, and what test results were obtained.

4 GUIDANCE ON REISSUANCE OF TEST REPORTS

- 4.1 Notified bodies being requested by a manufacturer to reissue a test report because of any subsequent change, e.g. in order to indicate a new name of the product tested or a new name of the manufacturer, shall make the manufacturer aware that CPR does not require new test reports in such cases, cf. section 3.
- 4.2 When issuing a new test report, the notified body shall take all measures necessary to ensure that the integrity and the accuracy of the test report is not compromised.
- The new test report shall include all the information required by the position paper NB-CPR 17/722 section 7.4.
 - The notified testing laboratory shall keep records allowing for the identification and recall of re-issued test reports if errors are identified after the issuance.
 - ISO 17025:2017, clause 7.8.8 shall be complied with, including
 - any change of information to be identified
 - the new report to include a reference to the original report

- 4.3 A Notified body rejecting a request to reissue a test report shall inform the manufacturer of its reasons.