

**1. Question:** Why have the KEYMARK fees increased since KEYMARK 2.0?

**Answer:** That is not the case. The fees are now lower for small companies

**Thermal Insulation for Buildings** since 2001

Same Product Type definition and costs

Same Sub Type definitions and costs

Change since 2016:

Costs per manufacturer -> Costs per legal entity and Certification Body

The fees are lower for small companies

**Thermal Insulation for Technical Insulation** Since 2016

VDI surveillance added to KEYMARK, VDI has a history of more the 35 years

Other agreements with the Certification Body about the fees are not possible.

The invoices will be issued by KMO and VDI/KEYMARK secretariat.

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**2. Question:** A CE-marked product shall be certified with KEYMARK for the first time. Is a KEYMARK Initial Testing necessary?

**Answer:** Yes

CE marking only refers to annex ZA-required actions for testing and certifying (depending the fire reaction classes), whereas KEYMARK all declared values certifies.

Results of KEYMARK testing can be used for CE-ITT if relevant.

KEYMARK Initial Testing:

- All declared properties of 4 test results per Product group (QAC discussion during next meeting possible to limit KEYMARK Initial Testing to 2 tests per Product group).
  - For new products (not only a new name for marketing reason) only 2 test results for all declared properties grouping in existing Product groups.
  - Exception only one test result for: RtF, ST(+), ST(-),  $\lambda(9)$  for flat products, Compressive Creep.
  - Historical data are possible if
    - independent sampling (organized by Certification Body)
    - registered lab testing
    - 3 years back
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**3. Question:** Is the frequency of annual audit testing synchronized with the frequencies of FPC according the relevant EN product standard

**Answer:** Partly, as far as the 'external activities of FPC'

Results of KEYMARK tests can be used for FPC if relevant.

KEYMARK annual audit testing:

- One test result for all declared values, steps and levels of the Property Groups, frequency = 1/year (as agreed during QAC meeting 2016)
- Exception RtF every second year
- no audit tests for Sound absorption and Compressive Creep and special characteristics without FPC requirements
- Evaluation of Thermal Conductivity with Limit values with second option

**4. Question:** What is the difference between CE-marking and VDI / KEYMARK ?

**Answer:**

CE (CPR)	VDI / KEYMARK
Notified Certification Body	Empowered Certification Body
Notified Laboratory	Registered Laboratory
AVCP 1+3 / 3 / 4	Voluntary Product Certification
EN 13172, CPR, SG 19	Scheme Rules, EN 13172 for Audit and FPC
Initial Audit	Initial Audit
Action by Notified Certification Body in case of AVCP 1	Sampling by Empowered Certification Body
Sampling by Manufacturer AVCP 3 only for declared ZA-required performances	–
Grouping: Property by Property	Grouping: Property by Property (Buildings) Products and Product families
Type Testing (ITT-PTD) AVCP 1+3/3/4	Initial Testing (IT)
FPC	FPC
– (use for FPC external activities)	Annual Audit Testing
DoP	Declared values (DoP and/or product data sheet)
Certificate of constancy of performance in case of AVCP1	KEYMARK Certificate
CE-mark	KEYMARK

↔ Exchange must be checked by the relevant certification body/ies if requirements in the relevant system are fulfilled

**5. Question:** What is the legal entity of a manufacturer?

**Answer:**

See CPR 305-2011 – Definitions:

- ‘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
- ‘distributor’ means any natural or legal person in the supply chain, other than the manufacturer or the importer, who makes a construction product available on the market;
- ‘importer’ means any natural or legal person established within the Union, who places a construction product from a third country on the Union market;
- ‘authorised representative’ means any natural or legal person established within the Union who has received a written mandate from a manufacturer to act on his behalf in relation to specified tasks;

In respect of the KEYMARK activities: The manufacturer, or the responsible (distributor, importer or the authorised representative), for bringing the product onto the EEA market, which sign up a contract with an KEYMARK empowered certification body so as to certify the declared values of a product according the KEYMARK procedures. As such the certified organisation is responsible for bringing the KEYMARK-certified product onto the EEA market as part of his product portfolio which is produced at one or more locations (plants) and for which the KEYMARK empowered certification body can perform surveillance onto the FPC and the necessary audit testing.

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**6. Question:** What Thermal Insulation Products can be certified?

**Answer:**

1) Product Certification

Single Products (brand name) / Product families

Product family = Several products with identical declared properties  
(except RtF for different facings)

2) Group Certification

A Product Group grouped property by property

Product Group = A huge number of products grouped property by property  
with the use of property groups.