

Transition of Gas Appliance Directive 2009/142/EC (GAD) to Gas Appliance Regulation EU/2016/426 (GAR)

Proposed procedure

For bringing products falling within the scope of GAR onto the market from 21st of April 2018 onwards a certificate referring to GAR is necessary. Previous GAD certificates will not be valid for those products after 21st of April 2018.

The Test Laboratory Gas offers to acknowledge the new requirements already now in the upcoming test reports. Since January 2017 DVGW CERT GmbH can issue the new GAR-certificates based on that test reports with consideration of actual requirements by GAD and upcoming requirements of GAR. The reference date for the start of maximum validity period for the GAR certificates is the certificate release date.

How can you get the GAR-certificate?

For receiving the GAR-certificates, a new positive assessment of the requirements for the product needs to be performed. A new test report is necessary covering at least:

- a. the GAR essential requirements
(based as far as possible on existing standards and taking into account previous test reports)
- b. the state of the art (current standards, if applicable)
- c. Manufacturers documentation on risk assessment (OJ, 26.07.2016 – 2016/C 272/39)

For new products the GAR requirements can be included in the testing procedure. For appliances with a valid GAD-certificate in most cases the new report taking into account GAR can be based on the last GAD testing report and evaluation of the extended documentation on risk assessment. Old measurement results on unchanged products remain valid and can be taken into account for assessing GAR-requirements.

How can you start the process?

To start the process, the manufacturer is asked to provide the signed application form from DVGW Cert GmbH indicating GAR certification. Together with the manufacturer's information, especially his documentation about the risk assessment, and depending on the basis of the tests (new approval or supplementary tests, current state of the art, applicable standards existing previous test reports) it will be decided whether a test based on the supplied documentation is sufficient or if further requirements need to be assessed by further testing.

How can you prepare the risk assessment documentation?

At least the full risk assessment documentation according GAR is to be supplied to the test laboratory by the manufacturer. This documentation will be added as Annex to the test report and assessed by the notified body before issuing the GAR-certificate.

For preparing the risk assessment the following guidelines can be used:

1. the risk assessment and analysis shall cover all potential risks addressed by the GAR.
2. a schematic procedure should be used:

- a. this can be done by a tree diagram starting with the main essential risks/harms as (as far as applicable) proceeding for each essential risk with the respective Hazards and Causes.
- b. the risk assessment for GAR shall be based on deduction and testing and not on calculation of probabilities.
- c. if a specific risk is addressed by a measure described in a respective standard (describing the state of the art) and the relevant requirements for this measure are fulfilled, this risk can be considered as covered.
- d. further description can be found in relevant standards for risk assessment and risk analysis (e.g. ISO/IEC guide 51:2014).

Which test specification can be used?

Even as currently no harmonised standards are cited in the official Journal for GAR the standards available can be used to show conformity by comparing the essential requirements with the Annexes ZA of the relevant standards. Where requirements are not covered by ZA additional assessment is performed.

What is the validity period of GAR certificates?

The GAR defines 10 years as maximum validity period for GAR certificates. This period starts with this issuing date even if the issuing date is before the date of validity the 21st of April 2018.

What needs to be considered further?

The safety devices, controlling devices or regulating devices also need to be certified according GAR and have to bare a CE mark.

Where can you find further information?

-<http://www.dvgw-ebi.de/prueflaboratorium.htm>