

**Public consultation on the draft opinion of the
Committee of Socio-economic Analysis (SEAC)
Ammonium salts**

EFCC COMMENTS

The European Federation for Construction Chemicals has read with interest both the RAC and the SEAC opinions, and would like to seize the opportunity of this public consultation to present the following technical comments:

- The European Technical Specification CEN/TS 16516:2013 **method is applicable to volatile organic compounds, semi-volatile organic compounds, and volatile aldehydes.**
 - CEN/TS 16516:2013 does **not** include in its scope the testing of **inorganics.**
 - The CEN/TC 351 has hosted a specific event on 4 May 2015 to evaluate the issue, and has agreed that although the ISO16000-9 chamber method seems suitable, **specific** sampling methods and conditions of the test chamber are to be used for ammonia emissions measurements.
 - This implies that a **new standard on testing emissions of ammonia**, with its corresponding proficiency testing, should be developed (by the CEN Technical Committee CEN/TC 351) **before this restriction could be enforceable** (at the very least 2-3 years). Under these circumstances, we cannot help but wonder the adequacy of issuing a restriction which cannot, in its current drafting, possibly be enforced.
- Although the work for CEN/TS 16516:2013 to become European Standard EN16516 is well advanced (publication expected by 2016), the testing method CEN/TS 16516:2013 is currently only a Technical Specification, and **not yet a European Standard**
 - We firmly support the “*CEN Guide 13 Validation of environmental test methods*”, and believe that only European standards (ENs) should be referenced in legislation, as they have been submitted to interlaboratory comparison (reproducibility and repeatability) to check both
 - whether the analytical method performs well and is fit for its intended purposes, and
 - the ability of laboratories to deliver accurate testing results to their customers
- We would like to seize the occasion to point out that the CEN/TS 16516: 2013 represents **laboratory conditions** which are far from real-life conditions. In our experience, high moisture levels is a major factor for high emissions of ammonia, which could also be due also to other factors, like, for example, high temperatures or even unsuitable product combinations.

The European Federation for Construction Chemicals (EFCC) represents construction chemical companies and associations in Europe. Construction chemicals are typically mixtures of substances (in liquid, paste or powder form) which are used or applied on the construction site.