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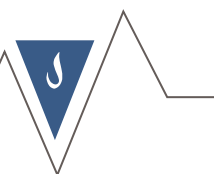
REQUIREMENTS FOR FACTORY PRODUCTION CONTROL OF CONSTRUCTION PRODUCTS PLANNED FOR NATIONAL CERTIFICATION OF CONSTANCY OF PERFORMANCE

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Scope

This document is used for the purpose of carrying out the inspection of factory production control of construction products subject to national certification referred to in Art. 5 sec. 2 of the Construction Products Act (construction mark), where the process of national assessment and verification of constancy of performance is carried out on the basis of Polish Standards¹ of a product which do not include requirements related to factory production control* and where the requirements related to factory control are not set out in the national technical assessment of the product or in a situation where the manufacturer declares, directly before or during the inspection, an interest in covering the scope of the inspection with additional products for which no national technical specification will be available on the day of the inspection (Polish Standard which does not have the status of a withdrawn standard or national technical assessment).

This document was developed on the basis of the requirements of factory production control set by standards harmonized with the Regulation (EU) No 305/2011 of the European Parliament and of the Council of 9 March 2011 establishing harmonized conditions for the marketing of construction products and repealing Council Directive 89/106/EEC (Official Journal of the European Union No. L 88 of 4 April 2011).

1.1 Factory Production Control (FPC)

1.1.1 General provisions

The manufacturer should establish, document and maintain the FPC system in order to ensure that the products placed on the market comply with the established essential characteristics.

The FPC system should include written procedures, regular inspections and tests and/or assessments, as well as the use of the results for the control of raw materials and other incoming materials or components, equipment, of the production process and the product.

All the elements, requirements and provisions adopted by the manufacturer should be systematically documented in the form of written policies and procedures.

This documentation of the production control system should provide a general understanding of the conformity assessment and enable the achievement of the required product characteristics as well as the checking of the effective operation of the production control system.

Therefore, factory production control combines operational techniques and all measures to maintain and control the compliance of the product with this technical specification.

1.1.2 Requirements

1.1.2.1 General provisions

The manufacturer is responsible for organizing the effective implementation of the FPC system.

The roles and responsibilities in the organization of production control should be documented and the documentation should be kept up to date.

At each manufacturing plant, the manufacturer may entrust the activities to a person holding the required qualifications to:

- identify the procedures for demonstrating product conformity at relevant stages;
- identify and record any non-conformities;
- identify procedures to correct instances of non-conformities.

The manufacturer has to draw up and constantly update the documentation describing the factory production control he applies.

The manufacturer's documentation and procedures should be appropriate to the product and the manufacturing process.

An appropriate level of trust in the FPC system should be achieved with regard to product compliance. This includes:

¹ m. in. PN-EN 54-31, PN-EN 13565-1, PN-EN 50291-1, PN-EN 60947-1, PN-EN 60947-3

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- a) development of documented procedures and instructions relating to the operation of factory production control, in accordance with the requirements of the technical specification on which the references are made;
- b) effective implementation of these procedures and instructions;
- c) recording these activities and their results;
- d) using these results to correct any discrepancies, repair the effects of these discrepancies, corrective actions for any cases arising as a result of non-conformities and, if necessary, review the FPC to remove the cause of the non-conformities.

In the event of subcontracting, the manufacturer should maintain complete control over the product and ensure that he receives all information necessary to fulfil his obligations in accordance with these requirements.

If the manufacturer's product is partially designed, manufactured, assembled, packaged, processed and/or labelled under subcontracting, the FPC of the subcontractor may be considered for the product in question, where applicable. A manufacturer who subcontracts all his activities may under no circumstances transfer responsibility for them to the subcontractor.

1.1.2.2 Personnel

Responsibilities, powers and interdependencies among the personnel who manage, perform and verify work affecting product compliance should be specified.

This applies in particular to the personnel, who should initiate actions preventing the occurrence of non-conformities in the product, actions in the event of non-conformities, and identify and record problems related to product compliance.

Personnel performing work affecting product compliance should be competent thanks to appropriate education, training, skills and experience, which should be documented in the form of records.

1.1.2.3 Equipment

1.1.2.3.1 Testing

All equipment used for weighing, measuring and testing should be calibrated or checked, and regularly inspected in accordance with documented procedures, frequencies and criteria.

1.1.2.3.2 Production

Any equipment used in the production process should be regularly inspected and maintained to ensure that use, wear and tear or damage will not result in a discrepancy in the production process.

Control and maintenance activities should be carried out and documented in accordance with the manufacturer's documented procedures, and the records should be kept for the period defined in the manufacturer's FPC procedures.

1.1.2.3.3 Materials and components

Technical specifications of all accepted materials and components should be documented, and the control program should be documented to ensure their compliance.

If subassemblies are used in a kit, the conformity assessment level of this subassembly should be as specified in the relevant technical specification for this subassembly.

1.1.2.4 Design process

The system of factory production control should document the stages of designing the product, identifying the verification procedure and persons responsible for all stages of the design.

During the design process itself, records of all checks, their results and any taken corrective actions should be kept.

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These records should be sufficiently detailed and accurate to demonstrate that all stages of the design phase and all checks have been completed successfully.

1.1.2.5 Controls during the production process

The manufacturer should plan and implement the production under appropriate control conditions.

1.1.2.6 Product testing and evaluation

The manufacturer should establish procedures to ensure that the specified performance declared by the manufacturer is maintained.

1.1.2.7 Non-compliant products

The manufacturer should have written procedures for dealing with non-conforming products.

Any such incidents should be recorded after their occurrence, and these records should be retained for a period specified in the manufacturer's written procedures.

1.1.2.8 Corrective actions

The manufacturer should have documented procedures that define actions to eliminate the causes of non-conformities in order to prevent their re-emergence.

1.1.2.9 Handling, storage and packaging

The manufacturer should define the procedures to ensure the methods of handling the product and should provide a suitable storage place to prevent damage or deterioration of the product value.

1.1.3 Special requirements for the product

The FPC system should:

- ensure that the products placed on the market comply with the established performance characteristics.

The FPC system should include the FPC of a given product, which indicates the procedures for demonstrating product compliance at appropriate stages, i.e.:

- controls and tests that should be carried out before production and / or during production, in accordance with the frequency specified in the FPC test plan,

and/or

- checks and tests that should be carried out on finished products in accordance with the frequency specified in the FPC test plan.

If the manufacturer uses only finished products, the activities specified in b) should lead to a product compliance level equivalent to that if FPC was performed during production.

If the manufacturer carries out part of the production process himself, the activities referred to in b) may be limited and partially replaced by the activities referred to in a). Generally, the greater part of the production process is carried out by the manufacturer, the more activities in b) can be replaced by activities specified in a).

In each case, the activities should lead to the product conformity level equivalent to the one if FPC was performed during production.

NOTE Depending on the specific situation, it may be necessary to carry out the activities in a) and b), only the activities in a) or only the activities in b).

The activities specified in a) focus both on intermediate states of the product as well as on the production machines and their regulation and on the measuring equipment, etc.

These inspections and tests and their frequency should be selected on the basis of the product type and composition, the production process and its complexity, the sensitivity of the product performance to changes in the production parameters, etc.

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The manufacturer should establish and maintain records to prove that samples have been taken and the production tested. These records should clearly show whether the production meets the established compliance criteria and should be available for at least three years.

These records should be available for inspection.

If the product does not meet the compliance requirements, provisions relating to non-compliant products should be applied, necessary corrective actions should be taken immediately, and non-compliant products or batches should be separated and properly labelled.

As soon as the defect has been removed, the appropriate test or evaluation must be repeated.

The results of inspections and tests should be properly recorded. The description of the product, date of production, adopted test method, test results and compliance criteria should be entered into the registers and signed by the person responsible for this control/test.

For each control result that does not meet these requirements, the records should indicate corrective actions taken to remedy the situation (e.g. performing additional testing, modification of the production process, product rejection or repair).

Individual products or batches of products and the associated production documentation should be clearly identified and identifiable.

1.1.4 Initial inspection of the manufacturing plant and FPC

Initial inspection of the manufacturing plant and FPC should be carried out when the production process has been started and is functioning.

The plant and the FPC documentation should be assessed in order to verify that the requirements of point 1.1.2 to 1.1.3 are met. During the inspection, the following elements should be checked:

- whether all the resources necessary to achieve the product characteristics required by this documents are available and have been properly implemented and
- whether the FPC procedures in accordance with the FPC documentation are applied in practice, and
- all plants where final assembly or at least final testing of the product in question is carried out should be assessed to verify that the above conditions a) to b) are available and implemented.

If the FPC system covers more than one product, production line or production process, and during the evaluation of one product, production line or production process, it has been checked that the general requirements are met, then there is no need to reassess the general requirements during the FPC inspection conducted for another product, production line or production process.

All assessments and their results should be documented in an initial inspection report.

THE END