Important Information Regarding the Transition from the UBA Guidelines on "Recommendation for attestation of conformity relating to suitability of products in regard to drinking water hygiene" (KTW-BWGL)

The Federal Environment Agency (UBA) published the KTW-BWGL on 21. March 2019 in the federal gazette (Bundesanzeiger) and on its homepage (https://www.umweltbundesamt.de/themen/wasser/trinkwasser/trinkwasser-verteilen/bewertungsgrundlagen-leitlinien#textpart-1)

Test certificates issued pursuant to

- **KTW-Guideline**
- **Coating Guideline and**
- **Lubricant Guideline**

will expire 21 March 2021.

What is the background for this change?

In accordance with Article 17 (3) of the Drinking Water Ordinance, UBA has the task of creating a basis for the assessment of the various materials that come into contact with drinking water. These evaluation principles determine drinking water hygiene requirements. **These evaluation principles are legally binding two years after their publication. At that time, the above mentioned guidelines will be withdrawn and the certificates issued in accordance with these guidelines will become invalid.**

Currently not covered by the scope of the evaluation basis:

- cement-bound materials
- silicones,
- elastomers and
- thermoplastic elastomers as well as
- multilayer products whose drinking water contact layer consists of one of the three aforementioned materials.

The testing of drinking water hygiene suitability of these products can, as before, be carried out by means of certificates based on DVGW worksheet W 347, the Elastomer Guideline, the TPE transitional recommendation or the future Silicone transitional recommendation.

Based on the KTW-BWGL only test reports are issued. Certificates for drinking water hygiene suitability can be issued with the commencement of the KTW-BWGL according to the UBA "Recommendation for attestation of conformity relating to suitability of products in regard to drinking water hygiene". The procedure for the confirmation of conformity according to the aforementioned recommendation is not legally binding. However, it implements the decision of the EU (2002/359/EC), which provides for the conformity of construction products in contact with drinking water under the 1+ system. The UBA recommendation for conformity confirmation complies with this system. It provides for three variants of explanations of drinking water hygiene suitability by the manufacturer / supplier:

- Variant A: conformity confirmation based on the 1+ system
- Variant B: conformity confirmation on the basis of a simplified procedure (only possible for very small area products with a conversion factor Fc < 0.5)
- Variant C: self-declaration of conformity

More detailed information about these three variants can be found at the end of this text.

The Hygiene-Institut des Ruhrgebiets has set up the certification center **HyCert**, which has already applied to DAkkS (German accreditation authority) for accreditation as a certifier in accordance with the UBA recommendation on the conformity confirmation of the drinking water hygienic suitability of products. **The HyCert is starting operations immediately and is ready to carry out a pre-certification /certification of products according to the basis of the KTW-BWGL**. HyCert will work with inspectors, which already has extensive nationally and internationally auditing and sampling experience. In addition, the institute's own staff will carry out audits.

Of course, the testing center of the Hygiene-Institut will carry out tests on behalf of third parties in accordance with the KTW-BWGL, which may be the basis for a certification.

What to do now?

The consequences of this new regulation are briefly summarized below:

All test certificates issued to date that fall under the scope of the KTW-BWGL (test certificates in accordance with the KTW, Coating and Lubricants Guideline) will remain valid until February / March 2021 at the latest (unless the validity of the test certificate expires prior to this date).

- Test certificates in accordance with the KTW, Coating and Lubricant Guidelines, which are due for renewal, can be extended until February / March 2021.
- For test certificates that do not fall under the scope of KTW-BWGL, nothing changes (initially). However, UBA will also publish for an evaluation basis for these material groups.
- Hygiene-Institut test reports that were used as a basis for the issuance of test certificates in accordance with the KTW, Coating and Lubricants Guidelines can serve as the basis for the issuance of certificates in accordance with the UBA recommendation on the conformity of drinking water hygiene suitability of products, as long as the test was conducted within the last 5 years and the manufacturing details (recipe and production process) have not changed.
  This means that the test reports issued by the Hygiene-Institut remain valid (if they are not older than 5 years) and thus can form the basis for an initial certification.
- The KTW-BWGL and the recommendation for conformity confirmation provide for a graduated risk-based concept with regard to the drinking water hygiene requirements for materials. Components / products of the risk group P1 with a conversion factor Fc $\geq$ 0.5 (for example pipes, equipment) are, as before, tested as a construction part / product. Small-area components / products (risk group P2) with a conversion factor Fc <0.5 (components of equipment with a water-wetted surface fraction < 10% e.g. seals) represent a lower risk. Therefore, these components / products, if they are from the same recipe but are produced at different locations or by different manufacturers, do not need to be tested and assessed again. Here, if necessary, the certificate of the sub-supplier is sufficient.

On the following pages the three variants of explanations of the drinking water hygiene suitability of components / products by the manufacturer / supplier are explained in more detail (according to UBA):

Conformity declaration of manufacturer/provider
variant A: group P1; conversion factor $F_C \geq 0,5$

Year		Player	Action	Addressee
1	1.	Client	commission to carry out a conformity approval process	Certification body
	2.	Client + Certification body	developing a concept for • product categorization • test protocol • test samples • Aim: approval according to the "1+ -system"	
	2.1	Client	developing and continuation of an effective factory production control (WPK)	
	3.	Certification body	first audit • of the factory's production control • of the production conditions • picking up of test samples	Client
	3.1	Certification body	sampling and sample transport for testing	Testing body (internally or externally)
	4	Testing body	full examination of the test samples according to the requirements of the KTW-BWGL and issuing of a test report	Certification body
	5	Certification body	preparation of a Conformity confirmation based on: • positive test report and • positively assessed WPK	Client
	6	Client	preparation of a declaration of conformity according to the 1+ system based on the conformity confirmation	
2-4	7	Client	continuously monitoring WPK: • incoming goods inspection (testing the conformity of raw materials) • migration testing of the product and determination of TON or of another suitable parameter	
	8	Certification body	annual third party monitoring • review of the used raw materials • verification of WPK • picking up of test samples	
	8.1	Certification body	sampling and sample transport for testing	Testing body (internally or externally)
	9	Testing body	examination of the test samples: • testing of the basic requirements and selected parameter(s) of the additional requirements • issuing of a test report	Certification body
5	10	Certification body	auditing of • factory production control • production conditions • picking up of test samples	Client
	11	Certification body	sampling and sample transport for testing	Testing body (internally or externally)
	12	Testing body	full examination of the test samples according to the requirements of the KTW-BWGL and issuing of a test report	Certification body

Conformity confirmation of manufacturer/provider
Variant B: group P2; conversion factor 0,05 ≤ F_C < 0,5

Year		Player	Action	Addressee
1	1.	Client	commission to carry out a conformity approval process	Certification body
	2.	Client + Certification body	developing a concept for • product categorization • test protocol • test samples • selection of the testing body Aim: confirmation of conformity according to the simplified procedure	
	2.1	Client	developing and continuation of an effective factory production control (WPK)	
	3	Client	sampling and sample transport for testing	Testing body (external)
	4	Testing body	full examination of the test samples according to the requirements of the KTW-BWGL and issuing of a test report	Client and eventually Certification body
	5	Certification body	preparation of a conformity confirmation based on: • positive test report	Client
	6	Client	preparation of a declaration of conformity according to the simplified procedure based on the conformity confirmation	
2-4	7	Client	continuously monitoring WPK: • incoming goods inspection (testing the conformity of raw materials)	
5	8	Client	sampling and sample transport for testing	Testing body (external)
	9	Testing body	full examination of the test samples according to the requirements of the KTW-BWGL and issuing of a test report	Client and eventually Certification body
	10	Certification body	preparation of a conformity confirmation based on: • positive test report	Client
	11	Client	preparation of a declaration of conformity according to the simplified procedure based on the conformity confirmation	

Variant B: group P3; conversion factor 0,005 ≤ F_C < 0,05
Same as group P2 but reduced test scope and formulation requirements

Conformity confirmation of manufacturer/provider
Variant C: <u>self-declaration</u>

Year		Player	Action	Addressee
1	1.	Client	commissioning with the implementation of product tests to determine the drinking water hygiene suitability	Testing body
	2.	Testing body + Client	preparation of a concept for • product categorisation • test steps • test samples to be taken	
	2.1	Client	sampling and sample transport for testing	Testing body (external)
	3	Testing body	full examination of the test samples according to the requirements of the KTW-BWGL and issuing of a test report. Statement about compliance with the requirements of KTW-BWGL	Client