



Rules for issuing test principles of VdS

1 Preamble

- (1) An important area of work at VdS is that of loss prevention. In this connection, test principles are developed by VdS in cooperation with interested parties such as the police and the fire-fighting forces, based on experience with losses and research. These test principles contain technical or quality-related requirements relating to products, facilities and equipment, production processes, services and methods in the field of loss prevention.
- (2) The aim of these test principles is to avoid loss of and damage to life, health and property of the consumers (protection of goods/property). They also serve to support insurance companies with risk management and with the acceptable evaluation of risks. These test principles are created in order to achieve these safety objectives only when no standards already exist that satisfy the quality requirements, both according to the latest state of the art in safety technology and in line with the latest technical findings.
- (3) The drawing up of test principles by VdS is based on voluntariness, uncommittedness, transparency, openness, freedom from discrimination and necessity.
- (4) The term "test principles" is subsequently used to cover all VdS documents, irrespective of their actual designation, in which (at least) technical or quality-related requirements/recommendations on products/facilities, production processes, services and methods are listed and recommended. These include
 - requirements on products and testing methods for these products,
 - procedural guidelines for the certification of products, firms and skilled staff, and
 - requirements on planning, installation, operation and maintenance of safety-related facilities and equipment.
- (5) Test principles can be published in line with the procedure described below also as drafts (yellow prints) if adequate experience does not yet exist on the product / safety installations to be tested. Drafts must be upgraded to definitive VdS guidelines at the latest after two years, or withdrawn.

2 Purpose and scope

This guideline is a basis for creating and publishing test principles by VdS. Furthermore, the guideline aims to increase the transparency of the procedure when creating test principles and to make them more understandable for interested parties in Germany and abroad.

3 Initiation of a project

- (1) The initiative to draw up a test principle can come from VdS, e.g. through a VdS product manager, or from external sources (e.g. an association of producers or installers).
- (2) Where a need exists for achieving the given targets of test principles, and where the necessary resources are available, VdS may decide on the creation of new test principles, whereby the economic, legal and political circumstances must also be assessed.
- (3) If the decision is taken to draw up new test principles, an employee will be charged with carrying out the project. As a rule, he or she will form a project group to process the project further.
- (4) The project group will, as a matter of principle, consist only of VdS employees. The VdS product manager must be involved in the creation/revision. If required, experts may be called in from the field of science, the authorities, employers liability insurance associations, industry or other federations and associations.

4 Creation of test principles

- (1) A draft of the test principles is drawn up in the project group. When creating test principles, the generally accepted codes of practice and the state of the art of science and technology must be observed. The demands made on the test principles must be precise, technically justified and commensurate with the respective safety objectives.
- (2) The requirements must be free of discrimination. In particular, they must not unjustifiably put individual producers of safety precautions, service providers or approved experts at a disadvantage. This also applies to foreign producers/service providers/experts.
- (3) There must be no specific recommendation to use products of a certain brand, obtain certification by a specific service provider or engage a specific approved expert.
- (4) The requirements must be deemed necessary when measured against the safety objectives. The test principles should, on principle, therefore not go beyond agreed mandatory European standards¹. Exceptions are only possible if all the subsequent requirements are met:
 - Significant material reasons exist for deviating from the European standards.
 - The European standardisation organisations (CEN/CENELEC) are informed early about the project (at the start of any such project).
 - A legal examination of the project has previously been carried out.

¹ An overview of the agreed mandatory European standards can be found under:
<http://ec.europa.eu/enterprise/newapproach/standardization/harmstds/reflist.html>

5 Uncommittedness

All VdS test principles are non-binding. They therefore also bear the following noncommittal statement:

The present [...] are only binding if their use is agreed in each individual case between VdS and its customers. Otherwise, consideration of this [...] is not binding; the agreement on use of the [...] is purely optional. Third parties may, in individual cases, also accept other safety precautions or installer or maintenance companies under conditions laid down at their own discretion, which do not conform to these technical specifications.

6 Publication of a draft of the test principles

- (1) Before the final decision is taken on a test principle, a draft version must be published on the Internet. Drafts must be expressly labelled with the word "draft" on the first page or with watermarks on each page.
- (2) Together with the draft, a brief description of the project (in German and English) must be published.
- (3) Through its publication, every interested party with a justified interest in the project as well as affected associations are given an opportunity to submit comments within a reasonable period of time (also in German/English). As a rule, the deadline for this is two months and at least four weeks.
- (4) Wherever practicable as part of the relevant project, the draft is sent, in parallel with its publication on the Internet, to the national and European associations that represent the producers, service providers etc. affected by the project. The associations should be made aware of the possibility to submit comments within the deadline.

7 Treatment of comments

- (1) Comments should be sent in written form, preferably by e-mail, to the project managers at VdS. A comments form is provided on the Internet for downloading.
- (2) Should objections be raised to all or part of the test principle, an effort will be made to initiate a process of consensus. The aim should be to reach agreement with the party lodging the objection/appeal. For this, the party concerned may also be invited personally to attend a meeting to put forward his or her objections.
- (3) If, within the project group, no agreement can be reached with the third party about the objection, the relevant regional manager and the management of VdS should be called in to clarify the matter. They will also make the final decision about the objection. Such decisions must be made objectively. Where both technical solutions are equally objective, compromise solutions, e.g. via escape clauses, should be found.
- (4) Every person submitting an objection is informed of the result of the appraisal. The result is sent in writing but may simply be in the form of an e-mail.



- (5) In justified individual cases, especially with substantial changes to the content, the publication of a further draft and the renewed possibility to comment on the changes may be necessary before final approval by VdS. This must be decided after examination of the matter by the VdS management.

8 Publication of test principles

Test principles approved by VdS are sent to any interested parties on request. They can either be downloaded free of charge from the Internet site or purchased in return for a small fee through the VdS publishing house.

9 Revision / Documentation

- (1) The requirements must be checked at the latest every five years to see whether they are still valid in their present form or whether they need to be revised or withdrawn. If revision or modification is required, the rules set out in this guideline apply.
- (2) Furthermore, the relevant projects should be documented with the main project steps (including the treatment of objections/appeals).

10 Deviations

Should any deviations be made from this guideline, they must be approved in advance with the VdS management.

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