

24 October 2024

RESPONSE TO:

Additional Technical Contract Conditions for Civil Engineering Works [Zusätzliche Technische Vertragsbedingungen für Ingenieurbauten – ZTV-ING] Part 4 Steel construction, steel composite construction - Section 3 Corrosion protection of steel structures (ZTV-ING 4-3)

Notification Number: 2024/0468/DE (Germany)

The European General Galvanizers Association (EGGA) is the federation of the national galvanizers associations within Europe. The industry comprises about 700 general galvanizing plants (mostly SMEs) employing an estimated 40,000 people in Europe. EGGA monitors and responds to issues affecting the general galvanizing industry in Europe, in particular environmental, technical and regulatory matters.

The general (batch) galvanizing industry provides the most effective long-term corrosion protection for steel products, through the application of a metallurgically-bonded coating of zinc metal. It is a service that is applied after manufacture of the product and normally on a sub-contract basis.

EGGA objects to the technical contract conditions notified by Notification Number 2024/0468/DE because these conditions contain requirements that are incompatible with the principles of free movement of goods within the European Union. These objections are summarised as:

- Application of requirements that are inconsistent with the requirements of EN ISO 1461: 2022 that sets requirements for application of batch hot dip galvanized coatings within the framework of the extended Factory Production Control systems of steelwork fabricators/manufacturers that are CE-Marking their products to EN 1090-1
- Inclusion of specific requirements for personnel to apply repair materials according to qualifications and competencies that are incompatible with the normal qualifications and competencies of factory personnel in the batch hot dip galvanizing industry.

DETAILED OBJECTIONS - Application of requirements that are beyond the requirements of EN ISO 1461: 2022 and EN 1090-2

Reference - ZTV-ING Part 4	Objection
4.2 (6)	Requires all steelwork to be manufactured to preparation grade 'P2' according to DIN EN ISO 8501-3, prior to galvanizing.
4.2 (7)	Requires removal by grinding of all thermally cut free edges prior to galvanizing.
4.2 (11)	Limits the preparation method for application of paint coatings to galvanized steel substrates solely to 'sweep blasting'. European standards allow alternative methods of preparation.
4.2 (12)	Limits the amount of galvanized coating to be removed during sweep blasting to 15 microns – a limit that is not set by European standards and may be impractical to achieve.
5.3.4.1 (5)	Requirements are cited that form part of a German National Annex to EN ISO 1461 that are not implemented elsewhere within the EU
5.3.4.3 (2); (3); (4); (5)	<p>The methods of repair of defects on galvanized surfaces arising during factory production are beyond those cited in EN ISO 1461 Clause 6.3.</p> <p>The imposition of the specific manufacturers cited in 'Sheet 100' is unnecessarily restrictive. The requirement to apply intermediate and top coats according to 'Sheet 100' imposes requirements on applicator personnel that cannot be implemented in the factory production setting of the galvanizing plant – because the requirements of 6.2 (Requirements for Staff) become applicable.</p>
6.1 (13)	Limits the use of rollers for application of paint coatings to galvanized steel substrates.
6.2 and general	This section is written with the aim to place requirements on the application of <u>paint</u> systems for corrosion protection of steelwork. The imprecise use of terminology implies that these requirements may apply for the application of galvanized coatings in factory-applied settings. This clause and the entire document should be edited to make clear that many sections refer solely to paint coatings and not to galvanized coatings.

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