Construction Products Regulation

CEPMC opinion

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CPD was a great success, supported by Manufacturers

- Establishment of a “Common (European) Technical language”
  - Almost 420 European harmonised standards and 3000 ETAs
  - Including
    - Definition of the essential characteristics for each family of products
    - Assessment (test) method for each characteristic
    - Implementation and assessment of Factory Production Control rules, to check the maintenance of performance along the production phase
  - CE marking already affixed in the correspondent families of products

Result:

- Improvement of the free circulation of product across Union,

But

- some barriers to trade still survive (local or national protectionism)
- Sometimes manufacturers do not fulfil (even do not know) their obligations (lack of clarity linked to the obligation, limited efficiency of market surveillance)
After 10 years of experience (first CE marking = 2001), need to take into consideration the lesson of experience

New CPR

- Level playing field for the construction products market (all the manufacturers are subject of the same obligations everywhere in Europe – article 4.1), reinforcement of market surveillance
- Reliable information on the product, manageable by the users (article 6.2)
- Clarification (importance of the Declaration of Performance, meaning of CE marking, role of the various actors, ETA approach)
- Simplification: legal basis for simplified procedures (shared product type determination, cascading, WT/WFT), specific procedures for non series product, contact points.
Still some concerns

- Obligation to provide twice similar information with each product (DoP, information accompanying the CE marking)
- Necessity to use electronic communication tools to supply the information to the users (DoP supplied using the web, other electronic tools)
- Concrete conditions to apply derogations (article 5), specific procedures for micro-enterprises (article 37), simplified rules for non series products (article 38),
- Find the right balance between consistency and flexibility to determine the presentation of DoP and information accompanying CE marking.
Other concerns

- To be ready for the 1/07/2013: let us apply (and thanks for it) article 66 on transitional provisions (do not accelerate the revision of hENs, beyond what is technically justified)

- Need to examine the scope of voluntary marks and certifications with a view to avoid overlapping with CE marking

- Do not introduce new requirements or new obligations via new regulations at the national or European level without having checked consistency with the CPR (need to maintain a clear and consistent framework to determine all the applicable rules to place a construction product on the market).
More information

- Info@cepmc.org
- http://www.cepmc.org
- http://ec.europa.eu/enterprise/construction
- www.cen.eu/cenorm/
- www.eota.be