



Position Paper on CPR Implementation

Brussels, 26 January 2016

The European Commission is currently reviewing the implementation of the Construction Products Directive EU 305/2011 (CPR) on national level. Representing more than 100 production sites for construction materials in Europe, the European Autoclaved Aerated Concrete Association (EAACA) would like to contribute to the discussion by highlighting four concrete recommendations for improving the Directive and addressing existing shortcomings.

1. The Declaration of Performance System has to be revised

The current system of Declaration of Performance (DoP) for construction products creates overlaps and unnecessary administrative burden on manufacturers. For example, producers of prefabricated concrete assemblies and AAC reinforced panels are required to prepare both a DoP for the product itself as well as for its application on the construction site. In addition, for every construction site a new and tailored DoP is required.

Furthermore, according to own statistical surveys, only a minority of customers actually makes use of the DoP document as intended. Most customers use only top line data from the DoP and rely instead on compliance with the existing standards or European Technical Assessment (ETA) for more in-depth information.

- ***We ask the Commission to limit the DoPs to material properties only and remove the calculation of construction assemblies from the DoP requirements.***

2. Simplifying the CE Marking

Experience in the field has shown that not all categories of the Marking, such as information on the product performance, are relevant for the customer. Specific stakeholders including specifiers, purchasers, or architects will rather consult the DoP before the product is ordered, so the CE Marking is less relevant here. However, purchasers increasingly expect that products carry the CE marking. This makes an EAD/ETA de facto mandatory for products that are not covered by a harmonised European standard, with the related high cost for the industry in obtaining them.

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- ***We ask the Commission to reduce the required information for the CE Marking to only the product identification code and a reference to the DoP and clarify when the Marking is needed.***

3. Harmonised rules for market surveillance

Currently Member States apply different rules for market surveillance that adds administrative burden on companies operating in different national markets. It also impedes the free movement of construction products and is therefore not in line with the EU single market.

- ***We ask the Commission to develop a common EU market surveillance system or harmonise national surveillance rules.***

4. Address unjustified and burdensome national and quality marks

National application and quality marks in several Member States require additional testing and documentation before a CE compliant product can be placed on the market. This is the case for example in France (application marks) and Germany (Bauregelliste), adding administrative burden and impeding the free movement of construction products.

- ***We ask the Commission to systematically investigate whether national and quality marks are permissible under the CPR or actually represent unjustified market barriers for construction products.***
- ***Article 8.5 CPR should be amended to provide greater clarity on when national marks are justified.***

About EAACA

The European Autoclaved Aerated Concrete Association was created in 1988 to promote the interests of producers of autoclaved aerated concrete (AAC) and their national associations across all of Europe.

EAACA's members operate more than 100 production sites in 18 countries producing around 15 million m³ of AAC per year. From this quantity about 300.000 homes can be built.

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