



*Think Concrete, Go Precast*

## **POSITION PAPER**

26 February 2010

<p>Revision of the Construction Products Directive (CPD) The vision of Precast Concrete industry on the main principles of the revised Construction Products Directive</p>
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In general the precast concrete industry supports the position of the CEPMC (the horizontal Council of European Producers of Materials for Construction) on the revision of the construction products directive.

However, applied to our sector, the following main principles should be fixed:

1. Restatement of the **crucial role of harmonized standards** as the unique way to declare product characteristics in order to achieve the Basic Work Requirements
  - A declaration of performance shall be provided whenever a product is covered by a harmonized standard (hEN)
  - In the case of concrete, only “precast concrete products” manufactured in fixed plants and submitted to the relevant FPC and ITT can fully take profit from the special manufacturing provisions of precast concrete product standards and of specific design rules
2. The Declaration of Performance is the result of the application of harmonized standards’ provisions (submitted to a third party control where relevant) to **a specific product** (with an intended use) **in a specific country** (following the national building codes)
  - Following the intended use of the product, a list of relevant characteristics (to be identified in the full list of mandated characteristics) has to be determined;
  - this list is then entirely mentioned in the declaration of performance;
  - For each of these relevant characteristics, the manufacturer shall declare a value, a class of performance or NPD (no performance determined), in line with the provisions of the country where the product is placed on the market
3. The possibility of **using modern communication tools** for providing the declaration of performance in a legally defined framework should be encouraged
  - Electronic declaration of performance shall be authorized when there is agreement between the manufacturer and its client



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4. Accept the **coexistence of Voluntary marks** in the local/national markets
  - Voluntary marks should be authorized provided that
    - They are market-driven (and not made compulsory by regulation or dominant position)
    - They cover characteristics and specifications not already covered by the CE-marking
    - They certify performance levels when there is none in the standards
5. The use of Specific Technical Documentation (STD) should be linked to the **non-industrial activity** of the producer (craftsman). All other criteria (including the size of the company) would result in market distortion and safety concerns
  - The possibility of using STD for CE-marking shall be limited to craftsman
  - Only made-to-measure (or at most Very Small Series) should be covered
6. **Clear definition of "Making available to the market"**, thus ensuring that the conditions are the same for all the market players.
  - Support the definition "any supply of a construction product for distribution or use on the Community market in the course of a commercial activity, whether in return for payment or free of charge"
  - The place of manufacturing is not relevant in this definition
  - The question of "when" the supply takes place should also be defined
7. **Efficient market surveillance** is a mandatory condition for the whole system to function; Member States should set up the appropriate instruments for ensuring it.
  - Publicly available databases containing the manufacturers and the family of products bearing the CE-marking could be set up
  - A formal authority that has the power to control the market directly on job sites.

## CONTACT

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*BIBM is the European organisation representing the Precast Concrete industry, involved in the supply of sustainable solutions for the built environment. The sector employs more than 210.000 people in 8.000 production plants around Europe, generating more than 35 billion Euros of turnover.*