

**Position Paper: Use of simplified labels under the Construction Products Regulation (CPR)**

*The principle*

“Simplified labelling” consists in splitting the information and physically affixing the CE-marking on the product (directly or on a label attached to it) with a limited amount of **key information**<sup>1</sup>, the other relevant information being provided in the accompanying documents.

*The history*

So called “simplified labels” have been used by the precast concrete industry for years under the Construction Products Directive (CPD), following the conditions defined in annexes of harmonised standards (ZA 3.1.1). This approach provides several advantages for all actors in the construction chain, including users, notified bodies and market surveillance authorities besides the manufacturers:

- easy communication of the product properties and characteristics through the construction value chain, e.g. at the negotiation and design stage;
- easy identification of the CE-marked products;
- possibility to access the information during the installation phase and at its end;
- reduced administrative burden for the manufacturer.

*The issue*

A strict reading of the article 9.2 of the Construction Products Regulation could lead to the **impossibility of applying the simplified labels** system. This would happen if the harmonised standards, once revised, would have to be modified and do not offer the possibility anymore.

*Rationale*

“Splitting” the information to be provided under art. 9 of the CPR is not in contradiction with the text of the CPR: the required information is indeed provided, but not in one single place or document<sup>2</sup>.

A strict reading could lead to a situation where it would become “not possible or not warranted on account of the nature of the product” to affix the whole CE-marking required information on the product anymore. Everything would then be affixed on the packaging (for products produced in very high quantities with equal properties) or in the accompanying documents (for custom made products for specific construction works where, e.g., reference to drawings is made). This situation in our opinion would lead to **weakening the role of CE-marking**, against the initial purpose of the CPR.

*POSITION*

*So called “Simplified labels” shall be allowed under the CPR and therefore implemented in the revision of the harmonised product standards*

*FACTS*

*Simplified labels allow for the key information to be found easily and directly on the product*

*Simplified labelling allows for traceability and transparency*

*The availability of full information in the accompanying documents will allow it to be available once the product is installed*

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<sup>1</sup> information provided on the simplified label: name or identifying mark and registered address of the producer, identification number of the unit (to ensure traceability), the last two digits of the year in which the marking is affixed, the number of the EC factory production control certificate and reference to the relevant European Standard

<sup>2</sup> **CEN** has the same reading of the article 9.2; in its guidance document "Template for annex ZA" (TF N 530 Rev. 2), on page 19 it is written: *in addition to the above, clause ZA.3 of Annex ZA of the standard could include provisions to be followed where it is intended to split the information accompanying the CE marking and to place them in different locations.*