



Think Concrete, Go precast

BIBM calls against policy overlapping and double regulation

BIBM¹, the European Federation for Precast Concrete, have previously expressed its serious concerns with the numerous, uncoordinated construction-related EU initiatives having direct or indirect impact on the construction product sector.²

BIBM took note of the several policy initiatives issued in the course of 2013, which aimed at areas already addressed by previous regulations.

First, the **Product Environmental Footprint** methodology allows one to calculate the environmental footprint of a *product*. BIBM agrees that LCA approach is the appropriate tool for sustainability assessment for construction works, however in the construction context, the product in question is the *building* or the structure.

In other word, construction products are intermediate products, so it makes no sense to assess them outside the building context. Furthermore, CEN/TC 350 environmental assessment methodology is already in place and it should be considered as the valid reference document for the Product Environmental Footprint assessment of Buildings.

These voluntary horizontal standardized methods have been developed as a result of a mandate of the European Commission, and they assess the sustainability aspects of construction works.

Second, BIBM believes that **Product Safety and Market Surveillance** are areas already regulated by the Construction Product Regulation (305/2011 (CPR)) therefore no inclusion of construction products is necessary when it comes to the Regulation on Consumer Product Safety (COM(2013)78) and a proposal for a single Regulation on Market Surveillance of Products (COM (2013)75).

If they are included, when satisfying the relevant provision of the CPR, they should be deemed to satisfy the provisions of the proposed new regulations (COM (2013)78), (COM (2013)75) as well.

Third, BIBM is concerned about the possible creation of a **secondary route to get CE marking**. The already mentioned Construction Products Regulation has provisions on how to grant CE marking and it requires the declaration of the so-called 'essential characteristics'. Therefore, the implementation of both the CPR and Ecodesign on the same product could lead to two parallel routes to CE marking. In order to avoid the illegal placement of products on the market, the double regulation of the CE marking has to be prevented consequently; construction products should be excluded from the scope of Ecodesign directive.

Fourth, we would like to remind the European Commission that precast concrete is traditionally a family business and it consists of almost 100% small and medium business. Double regulations and policy overlapping are costly and confusing, therefore should absolutely be avoided.

¹ BIBM (from the French acronym "Bureau International du Béton Manufacturé") is the European Federation of Precast Concrete Industry, established in 1954, represents the interest of precast concrete industry of 17 European countries with a combined industry turnover of 26 billion Euro, directly employing approximately 160,000 European citizens.

² November 2011, the Construction Product Industry sent a Joint Letter to Commissioner Tajani

Secretariat: Rue d'Arlon 55 – 1040 Brussels - Belgium

T : +32-2-738.74.32 – F : +32-2-735.60.69 – email: zt@bibm.org