



To: Nicholas Banfield

Cc:  
Marzena Rogalska  
Tapani Mikkeli  
Pavel Misiga

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Dear Mr Banfield,

Construction Products Europe, the European Association of Construction Products Manufacturers considers the Environmental Technology Verification scheme (ETV) as an ineffective initiative for construction products for the following reasons:

- Construction products are covered since 1<sup>st</sup> July 2013 by the Construction Products Regulation (EU) No 305/2011 (CPR). This regulation replaces the Construction Products Directive 89/106/EEC (CPD) and contains the harmonized conditions to put construction products on the European market.
- According to the CPR, construction products must fulfil the following seven Basic Requirements for Construction Works (BRCW):
  1. Mechanical resistance and stability
  2. Safety in case of fire
  3. Hygiene, health and the environment
  4. Safety and accessibility in use
  5. Protection against noise
  6. Energy economy and heat retention
  7. Sustainable use of natural resources

The tools to assess these BRCW are harmonised European standards developed by CEN under the mandate of the EC. Standards guarantee a common European technical approach when declaring the properties and performance of construction products. They also include type testing requirements, factory production control schemes, test methods and declaration procedures (CE marking and Declaration of Performance). Any assessment non consistent with

the CPR approach is not allowed when putting products on the European market.

- Some construction products are not covered by harmonised standards, such as innovative products or complex systems. CPR establishes a parallel route to assess the performance of these products. Technical Approval Bodies offer to manufacturers the possibility to CE mark and draw up the Declaration of Performance of their products following the European Assessment Documents (EAD) developed by EOTA within the CPR legal framework.

ETV for construction products is an option not included in the CPR and would be an additional certification for products covered and certified according to the CPR.

- The environmental performance of products is assessed now following the rules included in the standard EN 15804, this document was developed by the CEN/TC 350 under the Mandate of the European Commission and it is the reference document for this assessment.

The outcome of the application of the EN 15804 to construction products are Environmental Product Declarations (EPD). Currently, manufacturers declare product performance according to 22 environmental impact categories, based on third-party verified life cycle inventory data. Some Member States have set up or are setting up EPD data bases (B, D, NL, FR...). Performance declarations based on the ETV could not be used for this purpose.

- Unlike the CEN/TC350 standards, the ETV is not based on a holistic approach which enlarges the risk for burden shifting. The manufacturer should not be allowed to cherry-pick indicators where he believes he can provide a particular improvement. All environmental indicators must be taken into account.
- ETV opens the possibility for companies to set up new alternative testing methods. This could lead to testing methods which define requirements which are very similar to the ones under the BRCW of the CPR. Construction Products Europe believes that all performance characteristics should be tested using harmonised methods under the CPR and EN 15804. By declaring characteristics determined through other testing methods the ETV could therefore cause confusion in the market.
- ETV verification bodies will not specifically have a broad knowledge on the market of buildings and construction products which could lead to the validation of inadequate testing methods.

Based on this short analysis we are of the opinion that ETV would distort the level playing field for construction products. The ensuing market confusion would prevent users / consumers to make objective choices.