

- 1) Construction Products Europe supports the only use of validated test standards (EN) developed by CEN/TC 351 in product harmonized standards.

Construction Products Europe considers that Technical Specifications are not enough, and that a fully validated European Standard on test methods is required, in order to ensure repeatability and reproducibility, as well as to provide a tool in case of Court challenges to the results provided.

- 2) Only in cases where there is justification that these methods are not applicable for specific products on the basis of a technical assessment, product CEN/TCs should address to CEN/TC 351 for a solution.
- 3) Construction Products Europe will follow up the amendment of the mandates for the Basic Requirement for Construction Works 3. The Secretariat will also inform about the activities of the Expert Group Dangerous Substances of the European Commission (or any group / meeting organised by the European Commission to deal with this issue).

It is the under the responsibility of the product Technical Committees of CEN and/or associations to handle their documents. It would be interesting for the members of Construction Products Europe to be informed on the activities of the product Technical Committees of CEN concerned.

- 4) Construction Products Europe is in favour of the development at European level of classes of performance to categorise the test results on the assessment of release / emission of regulated dangerous substances. The process must be in line with the rules described in the Construction Products Regulation.
- 5) Construction Products Europe considers the Assessment and Verification of Constancy of Performance system 4 a sufficient and adequate level of attestation and verification of the performance of products with regards to the release / emission of regulated dangerous substances.

Our views are supported by the fact that in some countries (e.g. France-indoor air) self-declaration (Assessment and Verification of Constancy of Performance system 4) has been agreed as the way to provide such information. Moreover it is the best way to provide information on substances to the consumers while keeping the market free of barriers to trade.

Under REACH a self-declaration of the content of hazardous is sufficient. In fact for the most hazardous construction products REACH information according to Article 31 (for construction products which are mixtures) or Article 33 (for construction products which are articles) is required to be provided together with the Declaration of Performance.

- 6) Construction Products Europe considers the status of the Technical Reports developed by CEN/TC 351 as non-binding guidance to product CEN Technical Committees.
- 7) Construction Products Europe confirms the position concerning the non-inclusion of terms included in the Construction Products Regulation in the terminology standards developed by CEN/TC 351 WG 4.

Founded in 1988, Construction Products Europe is a Brussels-based international non-profit making association. The association is made up of national and European associations that represent Small and Medium-size Enterprises and world-leading companies. Construction Products Europe aims to promote the European construction industry, to share information on EU legislation and standardisation and to provide input in all European construction-related initiatives.