

Construction products - review of EU rules

BIBM feedback

BIBM welcomes the European Commission's initiative to solve the issues linked with the implementation of the Construction Products Regulation and improve it. BIBM fully supports the views of Construction Products Europe, who is not in favour of major changes in the CPR and definitely rejects the option of repealing this Regulation.

In addition, we believe that there is a need to distinguish two objectives with the revision of the CPR: solve the legal issues on the short term and respond to the societal needs as defined in the Green Deal (and other upcoming policies) on the medium. Addressing both in the same process would delay the solution of the present standstill and mix these issues (mainly technical) with the new policy needs.

For the first objective (short term) - Option A

A proper functioning market for construction products is the main and common aim of all actors. Harmonised standards have today the double role of providing legal compliance under the CPR and including the state-of-the-art in shared technical development for a mutual understanding among stakeholders. Some of the specifications included in a hEN are common to the two mentioned roles, others not, but all of them respond to a clear need of the involved actors. A joint understanding of the CPR in its present format could address current legal barriers, with the aim of keeping the system stable, adaptable and able to secure the required compliance. The system is indeed well-known to all actors and malfunctioning linked to legal concerns and different interpretations can be corrected.

Waiting for the full revision is not an option on the short term; precast concrete products under mandate M/100 are identified as the first target family of products by National Authorities, showing the need for a quick solution. The focus should be in establishing clear requirements linked to the legal aspects in the standardisation requests, whilst leaving the definition of technical details to experts in the framework of CEN.

For the Second objective (medium term) - Option B

The inclusion of policy needs linked to the Green Deal, the new Circular Economy Action Plan and the upcoming Strategy for a Sustainable Built Environment could be achieved with a limited revision of the CPR. Standards developed by CEN/TC 350 (e.g. EN 15804 and EN15978 for sustainability assessment and the future work on circularity in construction expected under the same committee) shall be the basis for this work,



using a similar approach as for other BRCW.

Concerning sustainability, the recent amendment of EN 15804 to the product environmental footprint (PEF) methodology provides the best basis for going forward. The achieved alignment with PEF ensures that manufacturers providing products for both the construction sector and other sectors would have to deal with limited variances, whilst fully encompassing the specific needs of the construction sector where products develop their performances in the construction work they are integrated in.

Concerning the incorporation of circular economy principles in construction works, it is critical to ensure that construction products maintain their performance as long as possible (and therefore stay in the loop). The impact of the use phase should then be minimised (easy maintenance and repair, reuse of structures and reuse of products) before targeting end-of-life solutions, as demonstrated by several studies. The durability of a product (as already included in BRCW 7) is the key factor influencing the annualised environmental impact of the production, use and end-of-life phases.

BIBM is willing to actively contribute in further discussions with all involved stakeholders (European Commission, Member States Authorities, CEN and all other actors) to achieve both objectives in a quick and shared way, thus granting the required policy stability for the development of the construction sector in Europe.