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**Internal Market and  
Consumer Protection**



**The Regulation on the Marketing of  
Construction Products  
Workshop Report**

**IMCO**





**DIRECTORATE GENERAL FOR INTERNAL POLICIES**  
**POLICY DEPARTMENT A: ECONOMIC AND SCIENTIFIC POLICIES**

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**INTERNAL POLICIES**

# **The Regulation on the Marketing of Construction Products Workshop Report**

## **Abstract**

The first part of the workshop on the Regulation on the marketing of construction products was devoted to presentations from experts on CE marking and on the European Technical Assessment procedures. In the second part, various stakeholders within the construction sector, discussed whether CE marking should be mandatory or not, debated the proposed derogations for the CE marking and safety and health issues.

This document was requested by the European Parliament's Committee on Internal Market and Consumer Protection.

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## **Table of Contents**

<b>Programme.....</b>	<b>1</b>
<b>Summary of Workshop proceedings .....</b>	<b>3</b>
<b>Vademecum of Experts.....</b>	<b>7</b>
<b>Presentations</b>	
<b>Mr Greg Cooper.....</b>	<b>13</b>
<b>Mr Giancarlo Bedotti.....</b>	<b>21</b>
<b>Mr Vicente Leoz-Argüelles.....</b>	<b>25</b>
<b>Mr Dr. David Moore.....</b>	<b>30</b>
<b>Mr Jan Coumans.....</b>	<b>41</b>
<b>Mr Prof. Dr. Ing. Bossenmeyer.....</b>	<b>48</b>
<b>Mr Michael Robert.....</b>	<b>54</b>





**DIRECTORATE GENERAL FOR INTERNAL POLICIES**  
**POLICY DEPARTMENT A: ECONOMIC AND SCIENTIFIC POLICIES**

**WORKSHOP:**  
**The Regulation on the Marketing of Construction Products**  
**-FINAL programme-**

5 October 2010  
European Parliament Brussels  
Room PHS A1002; 15:00 - 17:00 (during committee meeting)

**15:10 - 15:20 Opening and Introduction by**  
Mrs Catherine STIHLER, Rapporteur

**Session 1: The CE marking and the regulation on marketing of  
construction products**

**15:20 - 15:50 Issues to be discussed**

- Background information on the CE marking on construction products compared to other products - what are the differences and why?
- What should - and should not - be declared in the declaration of performances? Hazardous substances? Declaration of at least one essential characteristic relevant for the intended use - what does that mean in practice (Position of the Council of first reading Article 6)?
- What are the implications of the derogations proposed by the Council in the Position of the Council of first reading (Article 5)?
- Other issues related to the declaration of performance

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### **Guest speakers:**

Mr Greg Cooper, President, the European Technical Approval Organisation (EOTA)

Mr Giancarlo Bedotti, CEN consultant, Construction products

Mr Vicente Leoz-Arguelles, Head of Unit, European Commission, DG Enterprise.

### **15:50 - 16:15 Comments and questions from Members**

<b>Session 2: Exchange of views with stakeholders</b>
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### **16:15 - 16:50 Remarks by stakeholders**

#### **Issues to be discussed**

- Is the innovation of products secured via "the second route" (European Assessment Document) as it is proposed in the Position of the Council of first reading? Who shall finance innovation?
- How can the independency and transparency of the Technical Assessment Bodies (TABs) be secured?
- How to ensure no overload of administrative burdens? For contractors and other actors?
- How to ensure sustainability, health and safety in the construction sector?

### **Guest speaker(s):**

Mr Dr. David Moore, Director of Engineering, the British Constructional Steelwork Association

Mr Jan Coumans, European Construction Industry Federation (FIEC), Chairman, Directives, Standards and Quality Assurance.

Mr Prof. Dr. -Ing. Bossenmeyer, retired from Presidency of Deutsches Institut für Bautechnik, former Chairman of CEN/TC 250 - Structural Eurocodes and consultant on civil engineering.

Mr. Michael Robert, Technical officer, KAN Secretariat, KAN (Commission for Occupational Safety and Health and Standardisation)

### **16.50 - 17.10 Questions and comments from Members**

### **17:10 - 17:15 Concluding remarks by**

Mrs Catherine STIHLER, Rapporteur



## 1. SUMMARY OF WORKSHOP PROCEEDINGS

The Chair, Catherine Stihler, welcomed the invited speakers and stressed the importance of the workshop in relation to the second reading of the proposal for a Regulation on Marketing of Construction products. She emphasised that the discussions at the workshop could feed into the work on the amendments to the proposal.

### **Session 1: The CE marking and the Regulation on marketing of construction products.**

**Greg Cooper**, from EOTA emphasised that the European Technical Assessment (ETA) should be as specific as possible, and should reflect the European Assessment Document (EAD). He supported Council's definition of an EAD, and furthermore stressed that detailed financial models were needed for the development of EADs and ETAs. EADs should be financed by EOTA/European Union financing and ETAs by the manufacturer. The cost of the EAD was the key issue for Mr. Cooper and he therefore urged for a sound financial model in the Regulation. He emphasised the importance of understanding the needs of clients and of the manufacturers, and of involving stakeholders. He commented also that Appendix IV, Table 1 constituted a risk of delay for innovative products that do not fit in the categories and recommended a more flexible approach. He furthermore strongly emphasised the importance of improving Appendices II and IV, and stressed that the approach has to be multidisciplinary and transparency has to be improved.

**Giancarlo Bedotti**, a CEN consultant for Construction and Civil Engineering, emphasised the particularity of construction products in that they are not ready-to-use, but intermediate products. He argued that safety rules therefore apply differently, as safety is not connected to the product as such, but the way it is used. Mr. Bedotti emphasised that the CE marking only attests that the information accompanying the product has been obtained in accordance with the provisions of the Regulation and therefore can be considered accurate and reliable. He furthermore stated that the essential characteristics to be declared in the Declaration of Performance (DoP) should be those that are relevant for the different phases of the building process and those relevant for the intervening actors (building authorities, designers, contractors etc.). The Council's proposal saying that "at least one essential characteristic should be declared" did therefore not make sense for Mr. Bedotti – because who should decide which one to declare? He concluded by emphasising that the derogations proposed by the Council should be better defined and debated further.

**Vicente Leoz Arguelles**, from DG ENTR, also emphasised the difference between CE marking for construction products and other products. Products have to respect the basic requirement provided for in Appendix I before being placed on the market. Mr. Leoz Arguelles furthermore emphasised the fact that construction products are intermediate products aiming at being incorporated into construction works, and therefore, safety is not connected to the product as such. As a consequence, he advocated in favour of user's responsibility and the importance of putting relevant information on the products. He moreover debated the relevance of "declaring one

characteristic” (Council’s position), as he questioned which one it should be. He also recommended not to declare dangerous substances in the DoP, as it is already dealt with in other legal instruments (REACH). A solution could instead be to include further cross-references in the Regulation. He finally criticized Council’s Article 5a (regarding the derogations) due to the unclear definition and highlighted the importance of defining further the simplified procedures in the Council’s position.

Members’ questions were focused on the wording of the derogations in Article 5 and on the exemptions for micro enterprises.

**Greg Cooper** re-emphasised the role of the user in the final usage of the product. He also questioned the relevance of CE marking for some products.

**Giancarlo Bedotti** replied by asking why particular products made on demand should be CE marked (e.g. a special door for a cathedral).

**Vicente Leoz Arguelles** highlighted the importance of keeping the exemption for micro enterprises (Article 37), and stressed that the definition of micro enterprises is clear in the proposal.

## **Session 2. Exchange of views with stakeholders**

**David Moore**, from the British Constructional Steelwork Association, recalled that CE marking is already realised for steel products. He favoured a mandatory CE marking system, as it, according to Mr. Moore, improves the quality and professionalism of the construction industry, and it should be harmonised throughout the EU. Furthermore products made on demand should not be exempted from CE marking, Mr. Moore said. As life length of products varies, he also argued that the owner of the construction work should keep the documents during the whole life of the structure. He moreover emphasised the importance of authorities having sufficient resources to control the respect of the legislation, and advocated in favour of the creation of a system of anonymous “CE marking police” (whistle blower system) within the construction sector in order to help control the enforcement of the legislation.

**Jan Coumans**, from the European Construction Industry Federation (FIEC), stressed the importance of having detailed and reliable information on the products, and that the CE marking should be identifiable and visible. He called for a clarification of the Regulation, e.g. to make a clear distinction between placing a product on the market and producing elements for incorporating into one’s own works. Contractors should not be obliged to CE mark products they use in their own works, as they are already liable for the works, Mr. Coumans argued. He did therefore not support the Council’s derogations in Article 5, especially Article 5a, as it suggests an obligation for contractors to CE mark when they install pre-fabricated products. On the other hand, he supported Council’s Article 9 on rules for conditions for affixing the CE marking, as this provides for transparency for users when confronted with construction products arriving on site. Mr Coumans concluded by calling for a general clarification of the scope of the Regulation; and by saying that the Regulation should not reduce the information provided on a product under current legislation.

**Prof. Dr. -Ing. Bossenmeyer**, former Chairman of CEN/TC 250, raised the issue of construction products that are not harmonised and supported the second route for CE marking– the European Technical Assessment (ETA) route – as being important in securing innovation of construction products in a globalised world. The approval procedures of this route should however be simplified according to Mr. Bossenmeyer, and the financing of the European Assessment Documents should partly come from EU funds to guarantee independence. Mr. Bossenmeyer furthermore suggested that the exemptions for micro-enterprises should be deleted, the simplified procedures should be further defined and the provision on the requirement to prepare the declaration of performance in relation to where the product will be placed should be deleted.

**Michael Roberts**, from KAN (Kommission Arbeitsschutz und Normung), noted that the Regulation should contain provisions dealing with both safety and security of workers, and argued that quality and safety were not secured enough in the Council's position. He pointed to that construction products could be used in very different ways during their lifecycle, and that product safety has to be considered throughout a product's lifecycle (transportation, handling and assembly, use, maintenance, dismantling). He deplored that the Council's position only refers to the hygiene and health of occupants and neighbours during the use phase, whereas safety of workers should be considered *in all* life cycle phases. By mentioning the case with asbestos in ceilings, he argued that security before and after the usage should be included, and highlighted that products have to be safe also for people in charge of the maintenance and the reparation. He concluded by requesting the IMCO Committee to maintain its position on the inclusion of product safety requirements in the CPR.

**Mr. Vertessen**, from the Belgian Presidency, defended the derogations agreed in the Council's position of first reading and highlighted the difference of construction products and construction works in relation to safety. Safety should be seen in relation to the construction works and not in relation to the product itself, and it should therefore not be introduced in the Regulation, according to Mr. Vertessen, even though he agreed that it is an important issue. He moreover stated that the simplified procedures and the exemption for micro-enterprises could be further debated/clarified.

Members were concerned about securing a true European internal market - and not just a local internal market and wanted to debate the exemption for micro-enterprises further. Members also stressed the importance of safety and wanted to secure innovation of construction products, and to discuss the calculation of the carbon footprint of products for their whole lifecycle. Finally, questions on responsibility and liability were raised.

**Jan Coumans** replied that in general the contractor is responsible, unless he can prove a fault in the product. He stated however that in practice it is almost impossible to prove the responsibility of the manufacturer. He argued that manufacturers should be obliged to add information on the right usage/incorporation of the product.

**Greg Cooper** raised the issue of innovative products, and highlighted the importance of providing relevant information to users in the most effective way. He noted that due to constant innovation it is not possible to have a code for all construction products.

**Prof. Dr. -Ing. Bossenmeyer** referred to the mandate TC350 from the Commission concerning carbon footprint. He proposed the possibility of having “passports” for buildings, and argued that Article 6 point 3 is anti-European in the sense that the Council has replaced the "when" by "where" which favours a local and not a European market.

**Vicente Leoz Arguelles** replied that manufacturers should have a guide to place products on the market, and stated that the contractors are responsible for the use of the products. The manufacturers shall declare the intended use of their products in accordance with the harmonised technical specifications as they are the same for all Member States.


**Mr. Vertessen** replied in relation to Article 6 point 3e, that this concerns a specific place in the European market, ie a country. He noted that manufacturers should know the country, the market and the requirements therefore Mr. Vertessen thought that manufacturers were not concerned by the wording of that Article.


The Rapporteur, **Mrs. Catherine Stihler**, concluded the workshop by highlighting the key issues raised and by thanking the excellent panel for their presentations and participation in the debate.

# Vademecum of Experts

## Workshop on The Regulation on the Marketing of Construction Products

5 October 2010

	Photo	Member & Resume
1		<p><b>Greg Cooper</b></p> <p><b>Professional Experience</b></p> <ul style="list-style-type: none"> <li>• President of EOTA (a two year voluntary position carried out whilst continuing his full time role as Chief Executive of the BBA – the largest of the UK Approval Bodies currently part of EOTA.)</li> <li>• 2005 BBA over 20 years experience in the product supply sector of the construction industry where he was heavily involved in both technology development and the operation of SME sized operations across and outside the European Union.</li> <li>• He has first hand experience of the issues involved in developing and introducing new product technology to the construction industry as a manufacturer and those involved in supporting this process in Technical Approval Bodies</li> </ul>
2		<p><b>Giancarlo Bedotti</b></p> <p><b>Professional Experience</b></p> <ul style="list-style-type: none"> <li>• October 2008 - present - CEN Consultant for Construction and Civil Engineering. In the frame of the initiatives related to the Construction Products Directive 89/106/EEC, Giancarlo Bedotti took part in the PRAQ III Programme and in the PHARE Seminars for Candidate Countries and in several national and European seminars.</li> <li>• October 2003 - October 2007 appointed as National Expert Seconded at the European Commission DG Enterprise and Industry – Construction and Pressure Equipment .</li> <li>• 1999 Appointed as Chairman of the EOTA Technical Board in (re-appointed in the same function in 2001).</li> <li>• 1988 - Head of the Certification Department of the Institute, dealing with Technical Approvals for building products and serving on a number of international committees involved in the field of mutual recognitions of national approvals, such as European Organisation for Technical Approvals - EOTA, Union Européenne pour l'Agrément technique dans la construction – UEATC, World Federation of Technical Approval Organisations - WFTAO.</li> <li>• 1976 - Head of Laboratory for Internal Partitions at the Institute for Technologies in Constructions of the National Research Council as a researcher.</li> </ul> <p><b>Education</b> Graduated as Architect in 1975</p>

3		<p style="text-align: center;"><b>Vicente Leoz Arguelles</b></p> <p><b>Professional Experience</b></p> <ul style="list-style-type: none"> <li>• 2008- Present Head of the Construction Unit</li> <li>• 2006 - in charge of the preparation of the revision of the Construction Products Directive (CPD),</li> <li>• 1987 - 2008 European Commission Head of the Units “Row Materials and advanced Materials”, “Construction and Construction Products” and “Chemicals</li> </ul> <p><b>Education</b></p> <ul style="list-style-type: none"> <li>• Master in Economics by the University of Louvain (Belgium).</li> </ul>
4		<p style="text-align: center;"><b>David Moore</b></p> <p><b>Professional Experience</b></p> <ul style="list-style-type: none"> <li>• Director of Engineering at British Constructional Steelwork Association Limited (BCSA) -UK’s national organisation for the steel construction industry, whose member companies undertake the design, fabrication and erection of steelwork in all forms of construction in building and civil engineering. Support and represent the technical and process issues for the UK’s steel construction industry.</li> <li>• Experience of research, consultancy and management including:</li> <li>• The Calibration of national and European standards and the development of their associated National Application Documents and National Annexes</li> <li>• External Professor at the University of Glamorgan</li> <li>• Winner of the Institution of Structural Engineers Henry Adams Award three times in 1995, 1999 and 2000 for papers on the full scale testing of steel frames.</li> </ul>
5		<p style="text-align: center;"><b>Jan Coumans</b></p> <p><b>Professional Experience</b></p> <ul style="list-style-type: none"> <li>• 1997 - Present - Managing Director N.V. Albitum</li> <li>• 2010 - Present - Managing Director N.V. Cavisio</li> <li>• 2002 - Present - Member of the Direction Committee of the Construction Confederation of Belgium</li> <li>• 1994-1996 - General Manager of of N.V. Van Roey</li> </ul> <p><b>Education</b></p> <ul style="list-style-type: none"> <li>• Civil Engineering, University of Gent</li> <li>• Insead Executive Programme, Fontainebleau</li> </ul>
6		<p style="text-align: center;"><b>Prof. Horst Bossenmeyer</b></p> <p><b>Professional Experience</b></p> <ul style="list-style-type: none"> <li>• Prof. Dr. Horst- J. Bossenmeyer, born 30th September 1939, worked for more than 40 years as a civil engineer in many fields of the construction sector. For more than 25 years he gathered scientific and practical experience as a senior engineer and head of different departments in the building industry, at universities, engineering offices, ministries and as a consultant. For 7 years he was president of the Deutsches Institut für Bautechnik (German Construction Institute), the German member of the EOTA (European Organisation for Technical Approvals), which issued during his presidency the first European Technical Approval (ETA).</li> <li>• Prof. Bossenmeyer is experienced in the design and the supervision of most kinds of civil engineering works. Since more than 30 years he is in great demand as an expert in the international standardisation and product assessment work. He acted 7 years as Chairman of CEN/TC 250. Under his chairmanship CEN/TC 250 issued a complete set of the first harmonised European design codes, the Eurocodes, and, for the first time, CEN/TC 250 promoted these codes on behalf of the European Commission in China and the Emirates. On behalf of the Commission he was also engaged in the elaboration of Interpretative Documents according to Annex I of the present Construction Products Directive.</li> </ul> <p><b>Education</b></p> <ul style="list-style-type: none"> <li>• 1986 - University of Karlsruhe - Dr.-Ing. Doctor Thesis on Building Physics</li> <li>• 1959-1965 - University of Stuttgart - Dipl.-Ing. in Civil Engineering</li> </ul>



## Michael Robert

### Professional Experience

- 2002 to present - Technical officer at the Secretariat of the Commission for Occupational Health and Safety and Standardization (KAN). KAN pools the interests of all stakeholders in Germany on issues relating to occupational safety and health and standardization (employees, employers, State, statutory accident insurance, national standards body DIN); it is funded by the German statutory accident insurance institutions and the State.
- 1989 officer for environmental affairs at the city of Schleiden;
- 1993 sales management in the recycling sector;
- 1998 international logistics project manager at Danzas;

### Education

1980-1988 he studied geography and biology in Bonn





# PRESENTATIONS





## **IMCO Workshop 05/10/2010**

- **EOTA relevant background**
- **ETA content - policy**
- **Financial model - policy**
- **Process & Practicality - implementation**

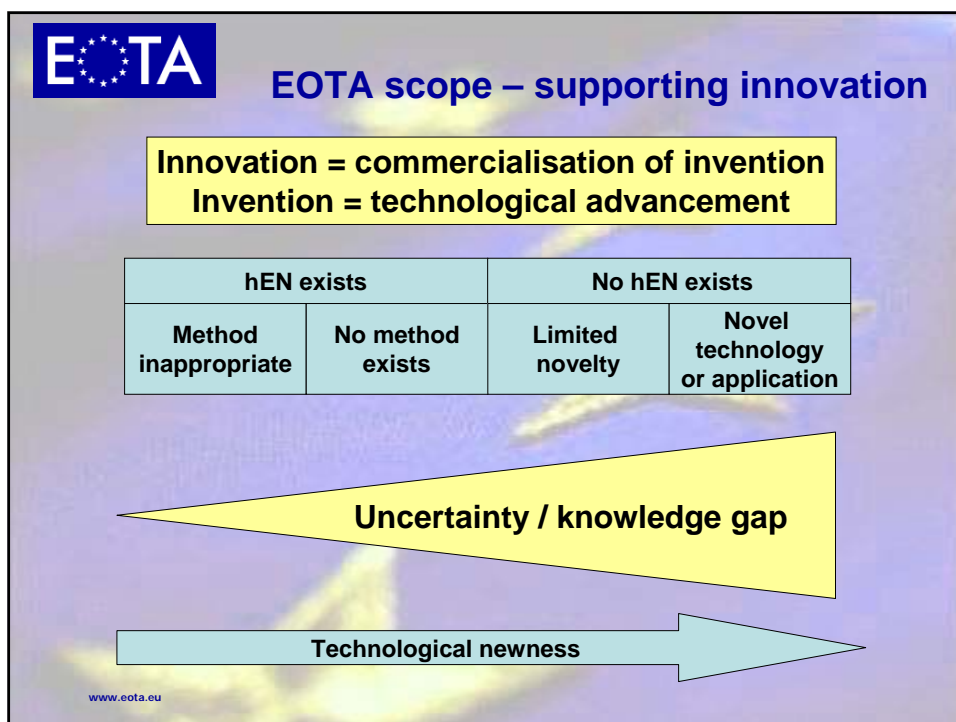
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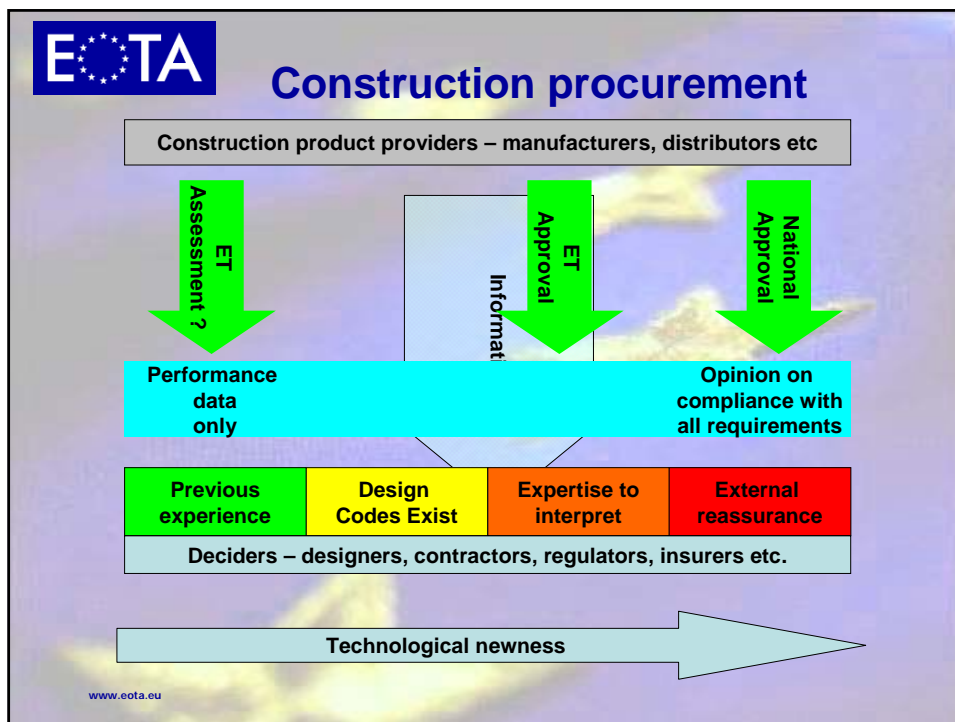


## **EOTA background**

- **45 member bodies**
  - many SMEs
  - mix of public, private (non-profit distributing) and private
- **2 full time staff in Brussels**
  - supported by voluntary input from members
- **Around 1800 issued ET Approvals**
  - increasing numbers per year (source EOTA statistics)
  - used within and outside EU (source EOTA survey)
  - 63% to SMEs (source EOTA survey)
- **Key issues from recent manufacturer survey**
  - Process – time being more important than cost
  - ETA - content and consistency
  - User awareness

[www.eota.eu](http://www.eota.eu)





**EOTA** **Key Point 1 – ETA content**

- In order to ensure responsiveness the European Technical Assessment should be as specific as possible.
- As such it should reflect it's EAD and contain at least
  - Product description and intended use
  - List of all relevant characteristics across the EU
  - Declared performances for all characteristics relevant to the Member States where the product will be marketed
  - Summary information of methods of assessment
  - Information to enable relevant factory production control

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## Possible Financial Model

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## Funding – relevant articles

- **CPR provisions**
  - **Art. 20 paragraph 2:**  
“The TABs shall, together with the organisation of TABs, bear the full costs of the development and adoption of European Assessment Documents “
  - **Art. 32 paragraph 1:**  
“Union financing may be granted to the organisation of TABs for the implementation of the tasks set out in Article 31(4)“

[www.eota.eu](http://www.eota.eu)



## Cost model - possible

- **Direct costs**
  - Time spent for the development of an EAD (possibly) x from EC (through EOTA)
  - Time spent for drafting ETA y from Manufacturer (through overhead)
    - Communication with manufacturer Manufacturer
    - Internal investigation and drafting work
    - Consultation with other TABs
- **Indirect costs**
  - Membership at EOTA Manufacturer (through overhead)
    - Fee
    - Meetings
    - Contribution to EADs/ETAs of other TABs (Member States ?)
- Costs of EOTA secretariat z% EC (reduces indirect costs born by manufacturer)
  - Part not covered by member fee

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## Key Point 2 – Financial Model

- Many EOTA bodies are either already self financing or moving in this direction
- EAD development costs are the key issue
- CPR implementation requires sound financial model
- Articles envisage some support but the detail yet to be developed

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## Process and practicality

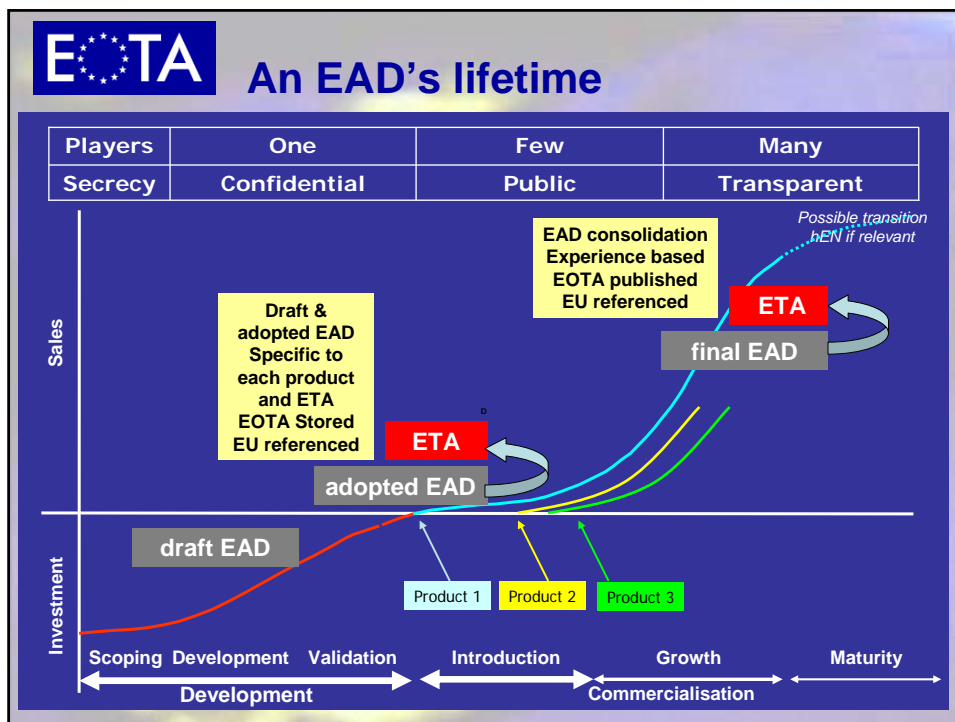
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## Annex II

- EOTA not engaged in development of Annex II
- Attempts a 'one size for all' approach
  - focus on minor variant products ?
- Impractical
  - e.g. contracting with manufacturer when assessment methods not developed
- Should focus on policy issues
  - e.g. end to end time frames
- Detailed process to be developed with stakeholders in transparent process
  - e.g. use multi-disciplined stakeholder group
- Opportunities to improve with EC under delegated powers

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**EOTA** Annex IV table 1

- Need for defined scopes accepted
- But table 1 – a backward looking categorisation of products
- Very innovative products do not fit proposed product areas
- Risk of time delays while TABs seek extended scope designation
- More flexible competence based approach needed
- Opportunity to develop with EC under delegated powers.

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### Key Point 3 – Process & Practicality

- Process aspects in Annexes II and IV impractical
- Process should be 'alive' and driven on continuous improvement grounds
- Annexes can be improved with EC under delegated powers
- Multi-disciplinary stakeholder group is a possible solution
  - Improved transparency can be addressed now
  - EOTA seminar in November

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**Thank you  
Any questions?**

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## Session 1

### The CE marking and the regulation for the marketing of construction products

Giancarlo Bedotti  
CEN Consultant for Construction and Civil Engineering

## Why construction products are different?

- **Intermediate** products to be permanently incorporated in construction works.
- The concept of “**safety**” apply to construction products only to the extent to which they contribute to the fulfilment of the basic requirements of the works in which they are incorporated.

A construction product is not safe or unsafe by itself. The concept of safety goes beyond the product properties or characteristics. The contribution to the fulfilment of the basic requirements of the work depends on how is incorporated in the work by those assuming the responsibility of doing so (designers, contractors, installers, users, ....).

2

## The CE marking and the construction products

The CE marking for construction products does not mean “conformity” to something (e.g. Basic requirements of works, European standards, ....)

The CE marking attests that the information accompanying the product has been obtained in according to the provisions of the CPR and, therefore, must be considered accurate and reliable.

3

## What to be declared in DoP?

### How many essential characteristics?

- Those relevant for the different phases of the building process (Design – Production – Construction – Use and maintenance – Recycling).

**And**

- Those relevant for the intervening actors: (Building Authorities, Designers, Contractors, Manufacturers, Suppliers, Installers, Insurance Companies, Final Users, ...).

different technical needs and different technical expectations of the intervening actors make impossible to establish any significant (even minimum) list of Essential Characteristics.

4

## What to be declared in DoP?

### Who should establish the list?

- The role and the competences of EC and MSs are different from what would be necessary to establish any list.
- The main feature of the DoP is not the number of characteristics, but:
  - ✓ the **assumption of responsibility** of manufacturers regarding what to include in DoP according to the needs of the market area of their interest.
  - ✓ the **conformity** of products with the declared performances
  - ✓ the **common technical language** established by the experts in the European technical specifications, used for expressing them.

5

## Scope of the CPR

- to lay down harmonized conditions for the marketing of construction products and not to establish rules governing the market.
- the Essential Characteristics to be declared when affixing the CE marking should be those needed by the intervening actors
- the market should be allowed to self-regulate as far as the choice of products is concerned.

6



**Thank you**

# **The CE marking and the Regulation on marketing of construction products**

**European Parliament, 05.10.2010**

**Vicente Leoz Argüelles  
Head of Construction Unit**



## **CE marking on construction products compared to other products**

**CE marking in New Approach  
Directives means :**

**Conformity of the product with the  
essential requirements of the  
Directive**



1

## CE marking in construction products means that :

- The declared performance has been evaluated in accordance with the methods (testing or calculation) provided by the applicable harmonised standard or EAD and,
- The manufacturer has fulfilled all applicable procedural obligations imposed by this Regulation  
⇒ the declared performance is accurate and reliable and the manufacturer takes the responsibility for that
- No limit values are, in principle, foreseen in the standards (only assessment methods); no limit values are imposed to the products to be placed on the market.

## Why?

- Construction products are intermediate products (not consumer products) to be incorporated in the works  
⇒ the concept of safety is relevant for works (not for products in this Regulation); other pieces of legislation take care of safety of construction products when necessary (ex. REACH);
- Obstacles to the free circulation of construction products are originated in the non recognition of performance declarations based on national standards, NOT in MS safety regulations. When they exist, these refer to requirements of the products for SPECIFIC USES;
- It is the responsibility of the “USER” (architect, contractor, ...) to chose, on the basis of the information provided with the product, the correct product for the specific use, amongst the products available on the market.



## What to be declared?

- The declaration should normally refer to an **INTENDED USE** because the relevant essential characteristics of the product depend on its use;
- The Council says that at least one essential characteristic relevant for the Intended Use must be declared but it says nothing about which one?  
That means that the Council understands that the market will in practice determine which characteristics will be declared, but, in that case, why to, arbitrarily, impose only one?

## Two logics could have been applied here :

- a. All characteristics relevant for the intended use must be declared
- b. The number of declared characteristics will be determined by the market. The DoP is then not compulsory.

# Hazardous substances

- The information obligations on the presence of hazardous substances in construction products should be consistent with the existing EU legislation on chemicals, without imposing unnecessary red tape on industry;
- Indeed, the REACH Regulation already provides for the obligation of suppliers to provide information on hazardous substances present in construction products. Overlappings add red tape. Cross-references could be the solution.  
“Good fences...”

## Derogation (Art. 5)

Paragraph 5(a) : it is difficult to evaluate in a precise manner, the scope of this derogation :

- What is the meaning of : “product individually manufactured”? “custom-made”? “non-series process”?
- Many of the construction products are manufactured following a “specific order” and are “installed in a single identified construction work”.

In addition,

It seems that there is some overlapping of responsibilities.

It seems not easy to understand to what extent the manufacturer is responsible and for what ?

⇒

- “the manufacturer is responsible for the safe incorporation of the product ...” but
- He is “... under the responsibility of those responsible for the safe execution of the constructions works...”

Who is responsible for what ? Some clarification should be useful.

Paragraph (b) & (c) seem more precise.

## Simplified procedures and the STD

Misleading interpretation and use of STD

The objective is to foreseen simplified procedures to decrease the red tape of enterprises, without reducing the level of safety.

What is needed for that ?

1. To precisely define the simplified procedure;
2. To precisely define the conditions under which each simplified procedure can be used;
3. To appropriately document the fact that these conditions are fulfilled.

⇒ The definition of STD is NOT needed. As it is in Art. 2.15, it is not consistent with Art. 36-38

## Constructional Steelwork

David Moore  
Director of Engineering



## Scope of this presentation

- Constructional Steelwork Industry
- Market
- Steel making, fabrication and erection
- Steel industry view of CE Marking
- Differences with other construction products
- Essential characteristics
- Article 5 – Derogation
- Sustainability
- Policing
- Key Points

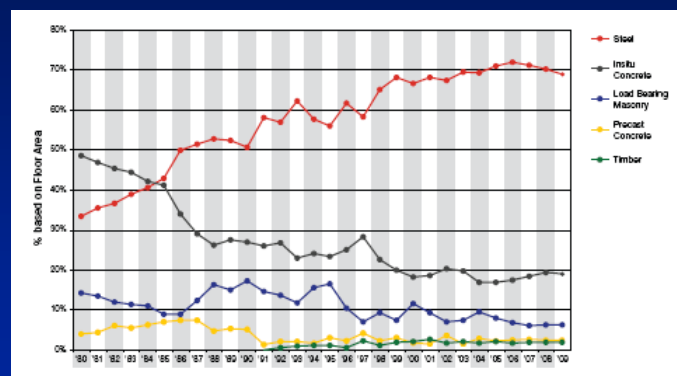


## European Constructional Steelwork Industry

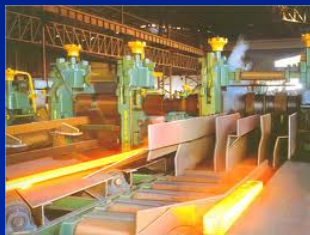
- European Construction Industry
  - 8% of European GDP
  - Employs approx. 20 million people
  - Uses approx. 8 million tonnes of steel
- Construction Products
  - From steel lintels to steel frames for houses, schools, hospitals, supermarkets, stadia, high-rise buildings, including bridges etc



## Steelwork Industry - Market



## Steelwork Industry - Rolling



## Steelwork Industry - Fabrication



## Steelwork Industry - Erection



## Steelwork Industry – Construction Products





## Steelwork Industry – Potumna road bridge, Galway

- Potumna bridge, Galway, Ireland
- Originally built in 1911
- First bridge in Ireland to be CE Marked
- Swing bridge – Machinery Directive



## Steelwork Industry – View of CE Marking

- Supports the introduction of mandatory CE Marking for Safety Critical Construction Products
- Improves the Quality and Professionalism of the Construction industry
- Steel products such as beams and bolts already CE Marked, fabricated steelwork will come into force later this year
- Steel industry is currently investing in the systems and training needed for CE Marking





## Differences with other products

Safety Critical, Bespoke, Large structures, long life

- Safety Critical, Bespoke
  - In the interest of Public safety must have FPC system
  - Exceptions – Farm buildings, Silos etc
- Where do you put the CE Mark?
  - On the product – where too big
  - On the packaging – what packaging
  - On the commercial documents – H&S documents



## Differences with other products cont.

- How long should the manufacturer retain documents?
  - Supermarket – design life – 25 yrs
  - Office – design life – 60 yrs
  - Bridge – design life – 125 yrs
  - Manufacturer – 10 yrs?
- Who should retain the documents?
  - Owner – for the life of the structure



## Essential Characteristics

- Limited to:
  - 1. Mechanical resistance and stability
    - Material properties
    - Tolerances
    - Load bearing capacity
  - 2. Safety in case of fire
    - Generation and spread of fire
    - Fire resistance period
  - 3. Hygiene, health and the environment
    - Emission of dangerous substances
  - 7. Sustainability of natural resources
    - Recyclability
    - Durability



## CE Marking – Article 5 – Derogation

- The vast majority of structural steelwork products are bespoke, one-off components installed by the manufacturer
- These products are safety critical (Attestation Level 2+ (1))
- Public Safety requires the manufacturer to have a FPC system certified by a notified body
- This degree of independent certification will be lost
- If public safety is critical for series manufactured products, it is equally important for bespoke products



## Sustainability

- Embodied energy
  - Steel section – 0.73 tonnes CO<sub>2</sub>/Tonne steel
  - Steel fabrication – 0.30 tonnes CO<sub>2</sub>/Tonne steel
- Target Zero ([www.targetzero.info](http://www.targetzero.info))
  - £1million project to develop design guides for low and zero carbon buildings
    - Schools
    - Warehouses
    - Supermarkets
    - Offices
    - Mixed-use
  - Operational energy, Embodied energy, BREEAM
- WellMet2050
  - UK Government funded
  - Re-use of structural steelwork



## Sustainability – Target Zero ([www.targetzero.info](http://www.targetzero.info))



## Sustainability – Re-use & CE Marking

### Re-using existing steel sections

- Section size (geometrical properties)
- Steel material properties largely unknown
- Testing required – frequency to convince the market
- Protective paint system
- Paint system may contain banned substances
- Can re-used steel be CE Marked?
  - Can't CE Mark reclaimed steel sections (manufacturer's standard doesn't apply, sections on the market before CPD in force)
  - Can CE Mark fabricated steelwork (fabrication standard applies, new construction product)



## Sustainability – Re-use



## Steelwork Industry – Policing of CE Marking

- Concern that some manufacturers will supply without CE Marking
- Concern that authorities do not have sufficient resources
- Industry willing to set up an anonymous 'whistle-blowing' system
- Central register of CE Marking manufacturers required



## Summary

### Key Points:

- The Steel Industry supports CE Marking
- Mandatory CE Marking of safety critical products needed for public safety
- Manufacturer to retain documents for 10yrs
- Owner to retain documents for the life of the product
- Sustainability – needs consideration
- Policing – need a central register of CE Marking manufacturers



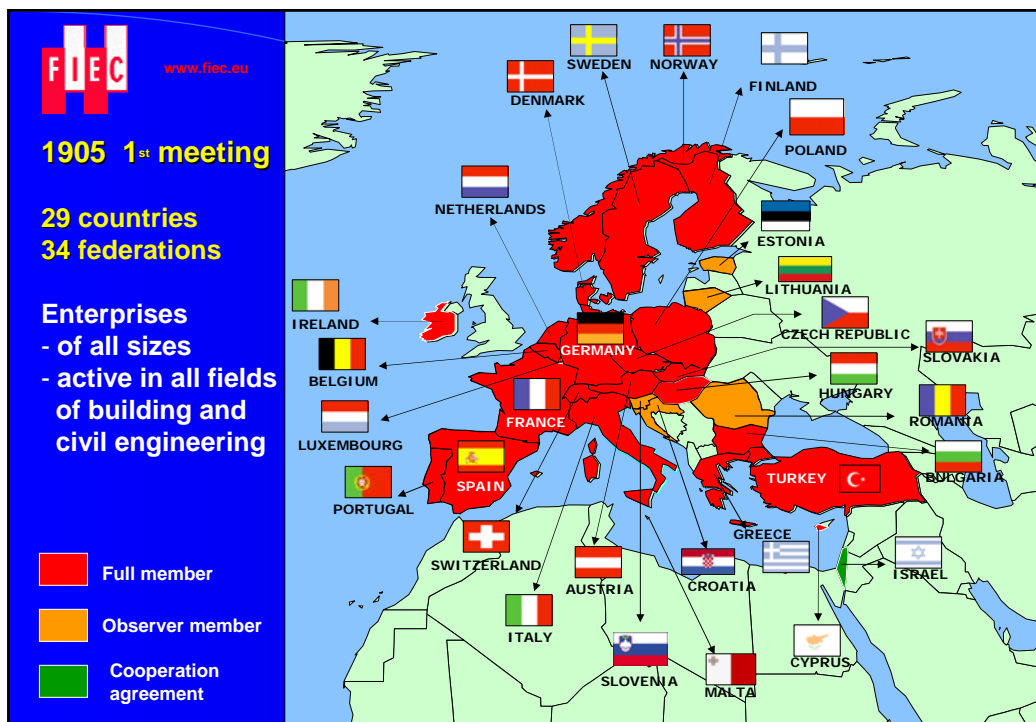
The Regulation on the Marketing of Construction Products  
5<sup>th</sup> October 2010

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## Constructional Steelwork

David Moore  
Director of Engineering





## THINK SMALL FIRST!

Summary data on number and size of enterprises in the construction industry

Size of enterprise	No. of enterprises			Turnover €billion		
	Manufacturers	Designers	Contractors	Manufacturers	Designers	Contractors
self-employed	n.a.	400,000	5,000,000?	n.a.	25	n.a.
small/micro	60,000	36,500	2,570,000	200	29	560
med/large	5,000	3,490	89,000	200	44	520
multinationals	100	10	1,000	100	2	200
<b>TOTAL non-self-employed</b>	<b>65,100</b>	<b>40,000</b>	<b>2,660,000</b>	<b>500</b>	<b>75</b>	<b>1,280</b>

Reference: Commission Staff Working Document accompanying the Proposal for a Regulation of the European Parliament and of the Council laying down harmonised conditions for the marketing of the construction products  
IMPACT ASSESSMENT (COM(2008) 311 final) (SEC(2008) 1901)



## FIEC Position: Construction Products Regulation- 2<sup>nd</sup> Reading

### What do contractors need?

1. Clarification of the regulation's scope
2. Reliable and detailed product information



### Detailed and reliable product information (1/5)

- Contractors need sufficient information linked to the CE marking on the product itself.
- It is essential that contractors can identify a product arriving on a works site without any ambiguity.





## Detailed and reliable product information (2/5)

- Contractors should not have to compare a code to a website in order to identify a product.
- Products arriving with no information increase the risk of errors in their incorporation into buildings and civil engineering works.



## Detailed and reliable product information (3/5)

A photograph of a white rectangular label with black text and a grid layout. The label contains technical specifications for ceramic tiles, including manufacturer information, standards, and performance characteristics. The CE marking is visible in the top left corner.

<b>CE</b> 10	Characteristics:
BAHAG AG GUTENBERG STR. 21 D-68167 MANNHEIM GERMANY	Reaction to fire: Class A1
Reference standard: EN 14411	Breaking strength: Thickness < 7.5 mm: $\geq 200$ N Thickness $\geq 7.5$ mm: $\geq 600$ N
Type of tile: Dry-pressed ceramic tiles (Group III)	Modulus of rupture: Thickness $\leq 7.5$ mm: $\geq 15$ N/mm <sup>2</sup> Thickness > 7.5 mm: $\geq 12$ N/mm <sup>2</sup>
Uses: Internal walls	Bond strength: $> 0.5$ N/mm <sup>2</sup> with mortar adhesives
	Thermal shock resistance: Passed

Example of CE Marking information on product today



#### Detailed and reliable product information (4/5)



- Would you choose this yoghurt without knowing its ingredients?



#### Detailed and reliable product information (5/5)

- FIEC supports the Council proposal for article 9 as a fair regime that provides transparency for users when confronted with construction products arriving on site.



### Clarification of the regulation's scope (1/4)

- Throughout, the CPR addresses manufacturers and products placed on the market
- Only in article 5, the CPR goes beyond manufacturing by addressing installation as well



### Clarification of the regulation's scope (2/4)

- By introducing a derogation for on-site produced products, article 5 suggests a CE marking obligation for contractors installing pre-fabricated products
- There was no CE marking obligation for contractors under the CPD, since contractors are liable for the works



### Clarification of the regulation's scope (3/4)

- There is need for a clear distinction between placing a product on the market and producing elements for incorporation into one's own works.
- The CPR should not create an obligation to CE mark the building elements they produce as contractors are already liable for the works. This would be a double burden.



### Clarification of the regulation's scope (4/4)

- Article 5 should not address the economic activity *contracting* that is not covered by the Regulation's scope.



## CONCLUSION

- FIEC calls for clarity in the scope of the regulation. Contractors are not manufacturers and should not be obliged to CE mark products they use in their own works.
- The regulation should not reduce the information provided on a product under the current legislation. This information is essential for the correct identification of a product and right installation.



[www.fiec.eu](http://www.fiec.eu)



**Workshop:**  
**The Regulation on the Marketing of Construction Products**  
**05th of October 2010**  
**EP, Brussels**

Remarks by Prof. Dr.-Ing. Horst J. Bossenmayer, Stuttgart

As a rule construction products are only intermediate products for the construction of a building. Subsequently, there are numerous necessities for specific provisions which are considering the placing on the market and the use of the products as well as the basic works requirements for the building as the final product.

The "Position of the Council at first reading with a view to the adoption of a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL laying down harmonised conditions for the marketing of construction products (Doc. Nr. 10753/3/10 REV 3)"

adopted by the Council introduces some amendments compared to the initial proposal of the Commission (KOM(2008) 311 final), not least by inclusion of a relevant number of amendments from the 1<sup>st</sup> Reading in the European Parliament of 23.04.2009.

Relevant improvements have been made in the context of preserving

- the suitability of products to guarantee public safety of the buildings they are used for,
- fair competition rules and
- the responsibility of the Member States for the use of construction products.

However, some relevant deficits are still not overcome. These are located mainly in the following areas:

- Extent and content of the declaration of performance as basis for CE marking (Articles 3 to 6)
- Derogations from drawing up a declaration of performance (Article 5) in connection with the Simplified Procedures (Articles 36, 37 and 38)
- Elaboration and adoption of European Assessment Documents (Article 19, Annex II) and of European Technical Assessments (Article 26) as well as the Organisation of Technical Assessment Bodies (Article 31).

In the following, the main critical items are described and amendments proposed.

The focus is thereby put to the aspects of meeting the Basic Requirements according to Annex I, fair competition, the maintenance of the European innovation strength, the simplification of rules and thus reduction of administrative and testing burdens without endangering the credibility and consistency of the system, the **product safety** und the **safety of works**, the **protection of users and consumers** and the **European harmonisation** as a result of the foreseen regulation.

## 1. Basic requirements for construction works and essential characteristics of construction products (Articles 3 to 6)

The Commission's approach to the Council's position in Doc. 10753/3/10 REV 3 of 13.09.2010 presented in the Communication COM(2010) 500 final does not present a solution to the problems still inherent in the current Council position.

First, it is welcomed that the Commission stated that the objectives of the CPD do still prevail and should be achieved also by means of the new regulation. That means that **simplification** cannot be achieved without respecting the main objectives of the CPD, i.e. ensuring the free circulation of construction products in the Common Market and their contribution to the **safety of works** by means of meeting all relevant Basic Works Requirements (BWRs). That does not mean that the member states are not responsible for the safety of works any more, but the member states must be enabled to keep their safety levels. This is only possible if **all** essential characteristics and their performances are declared in order to provide **full information** for the user of the products according to the relevant technical specifications. The real way to simplification should be the application of the NPD-rule ("no performance determined") within the respective specification based on the respective mandate given by the Commission.

Not only expressing "the performance of the product in an accurate and reliable way" is crucial for the safety of works, for the workers building the works and for the later users of the works. Also the ability to use/apply the product in a safe and correct way must be an indispensable aim of the regulation. The safe application of the product is not possible without full information for the relevant market participants on the user side (consultants, designers, workers, owners). As a consequence, only a safe and correct application of products is leading to safe works. Thus, the safety aim of the CPD and the CPR can only be achieved by providing full information for all participants in the construction process.

Apart from the unsolved safety problem, the Commission's road to simplification should not mean **simplification for only one group** in the European economy – i.e. some of the product manufacturers - at the expense of complicating things for most of the other groups – manufacturers of innovative products, consultants, designers, workers, owners. This would signify not only a distortion of competition but also contain a severe problem of equal treatment of all market participants. Actually, the Commission's proposal and the Council's position do not foresee a simplification for holders of a European Technical Assessment (ETA), since ETA holders have to declare all essential product characteristics whereas manufacturers of standardised products could reduce their Declaration of Performance to only one essential characteristic.

Moreover, the Commission's proposal and the Council's position would also privilege some of the **65000 product manufacturers** in Europe against **2.7 Million contractors and designers** in Europe, the vast majority of them SMEs and micro-enterprises.

Secondly, the Commission stating that the Articles 3-6 of the Council's position "could impose unnecessary administrative and testing burdens on enterprises" is not only unfounded. The opposite is true: Both, the Commission's proposal and the Council's position would increase the administrative burdens on the member states whose administrations will face an enormous increase of product checks in the context of **market surveillance** if the Declaration of Performance will not contain the full information described above. As a consequence, again one group in the European economy – the manufacturers – are privileged against another part of the society and economy – the European taxpayers.

**Therefore, some important amendments to the Council's position are suggested, allowing the European Parliament to improve the draft regulation:**

Products must allow for structures to meet the basic requirements for construction works according to Annex I.

Therefore, for a given construction product, **all relevant characteristics as well as the performance values** for these characteristics have to be given, depending on the intended use and the legal provisions at the construction site. Because the national requirements for use are different, performance values have to be classified in a way that enables the end user to select products according to the specific local requirements.

A manufacturer should not be allowed to issue a Declaration of Performance for product characteristics according to his own choice and nevertheless use the CE mark for this product, as defined in **Art. 6, paragraph 3c**.

In the common market for construction products, which is intended or already existing, products may, related to their characteristics, differ by the **requirements for use at the construction site (Art. 6, paragraph 3e)**, but not by the place where they are placed on the market. Usually, construction products are not manufactured and placed on the market where they are finally used. In most cases the manufacturer can not control, in which countries his products are sold and later used.

The essential characteristics and performances of products, which are based on the same specification and are used at the same building site, must have equal characteristics, even if they stem from different manufacturers. If not, this would lead to distortions of competition and even safety risks, because the products used seem to be identical, but are technically different. Therefore it must not be upon choice of the manufacturer, for which characteristics he uses the option **“no performance determined”** (see **Art. 6, paragraph 3f**).

Moreover, such products can also not be judged reliably by the **market surveillance (Art. 56)**.

**Paragraphs 3c, 3e and 3f of Article 6** have to be amended accordingly.



## 2. European Technical Assessments – important “second route” (Articles 19, 26, 31 and Annex II)

The procedure of **Technical Assessment** has an inestimable value for innovative European manufacturers of construction products. In practice, Technical Assessments are considered as equivalent to standards as **alternative route** to CE marking. They are also a necessary basis for competent standardisation in future. In any case, the procedure of Technical Assessment should be maintained as important way of market access of specialised manufacturers in the world wide competition.

Without any question, ways have to be found, to simplify today's assessment procedure and to make it more effective. This instrument is only valuable for the industry, if it comes to high quality results as fast as possible. One basic prerequisite for this is a sufficient involvement of the manufacturers into the procedure. This has been already practiced successfully during the elaboration of European Technical Approval Guidelines under the present Construction Products Directive.

Because of the new kind of requirements, the Organisation of TABs (**Article 31, paragraph 1**) should define in European Assessment Documents (EADs) the generally applicable rules for the factory production control and the rules for the applicable system for the assessment and verification of constancy of performance.

In the medium term, EADs have to be adapted to the technical progress and have to be reduced by number and extent for reasons of economy and the easier and faster adoption of Technical Assessments.

**Article 19** has to be amended accordingly.

The validity period of a European Technical Assessment should be limited to 5 years. ETAs are technical rules for new construction products, which are not yet commonly used and practically proved and could therefore not be standardised yet. Therefore an adaptation to the current state of technical knowledge after a reasonable time is necessary in the interest of public safety.

**Article 26** has to be amended accordingly.

Since EADs/ETAs are technical rules for novel construction products, technical working groups have to be established for their elaboration. In these working groups, manufacturers have to be represented adequately, to give sufficient focus on practical aspects. In the past, this cooperative work between construction surveillance, science, industry and consultants enabled the inclusion of all available knowledge into the process of development of European Technical Approval Guidelines (ETAGs, now: EADs). This principle has been proved also during the development of standards and should not be left without compulsory reason.

In **Article 31** should be amended accordingly.

### 3. Derogations and Simplifications

Simplifications are strongly needed – however, they must not **endanger the safety** of workers building the works and the end users of the works as well as the consistency of the system nor should they lead to a **distortion of competition** in the European Single Market.

The proposed derogations in **Article 5** allow manufacturers to refrain from drawing up a declaration of performance for a construction product individually manufactured or custom made in a **non-series process** in response to a specific order, and installed in a single identified construction work based on a harmonised standard and incorporate it into the construction works. The derogations are applicable as well if the construction product is manufactured and incorporated on the construction site, or in a non-industrial process for adequately renovating construction works.

These derogations reduce burdens especially for micro-enterprises significantly. They are as **well in line with the day-to-day practice**, and experience shows that they would not lead to higher safety risks or distortions of competition.

The same is true for the proposal for simplification according to **Article 36**, if a reliable evaluation of construction products can be verified without new or additional tests based on the experience with equivalent products.

Therefore it is proposed to limit the procedure according to **Article 36** to products which are manufactured and placed on the market according to a **harmonised standard**. For safety reasons, for innovative construction products the procedure may not be used.

**Articles 37 and 38**, regulating the use of simplified procedures by micro-enterprises and other simplified procedures for general application should be deleted completely, because their scope is **already covered by Article 5**. According to **Article 5**, construction products need not a declaration of performance. As a consequence, the micro-enterprises could make use of the derogations of **Article 5** and would not be burdened by the complicated rules of CE-marking at all, which would mean much **less administrative bureaucracy** for them.

Additional simplified procedures as foreseen in **Article 37**, create advantages for a single group of manufacturers only and thus mean serious system discontinuities without any justifiable reason.

Products covered by this procedure are not at all in accordance with products according to **Articles 3-6**.

This would lead to

- distortions of competition,
- problems for end users, who cannot clearly identify and evaluate the product and its performance which will generate safety problems
- possibly unsafe construction works and
- severe problems for the market surveillance.

The regulation of **Article 38** is technically also completely **covered by Article 5**, with the difference, that products according to Article 5 do not need a declaration of performance and therefore may not be CE marked. The special and justified aim of this regulation, which seems to be aiming at **craftsmen** as manufacturers, is **counterproductive to the usual practice** and would **overburden** the manufacturers because of **bureaucratic and technical requirements** they are not familiar with, and they would **increase their costs** significantly.

#### 4. European harmonised design rules for the evaluation of the Basic Requirements according to Annex I

It is proposed to create harmonised European proof and application (design) rules – **“Eurocodes”** - preferably **for all basic requirements according to Annex I** and to enable their use in the framework of the CPR. This is especially necessary for the new Basic Requirement 7, for which harmonised application rules from CEN/TC 350 will be available soon, based on a mandate of the Commission.

This would clear the way for **further steps towards a harmonisation** of the construction sector. A complete and consistent system of technical rules for the European and global market could be a significant **advantage in competition** for European manufacturers and enterprises providing services.

Above all, this would be very important, because a relevant **number of characteristics** and performances of construction products can be evaluated only on the **basis** of these **design rules**.

E.g. the harmonised standards for the evaluation of the load-bearing capacity - as the most relevant product characteristic - concerning readymade concrete elements refer to the calculation methods of Eurocode 2.

Simplified evaluation rules are also **needed for the type calculation of products according to Annex V**.

Because of the lack of a complete set of European application rules, such product performances have to be derived until today from national application rules. This means for the manufacturers, which serve several or all national markets in the EU, to take into account a **large number of different national parameters** for the manufacturing of their products.

The Commission proposal as well as the position of the Council, which do not support this harmonisation, bear the **risk of a de-harmonisation** in the future. On the basis of the Commission's and the Council's approach, in the future the member states will also be forced to maintain their existing national (and therefore not harmonised) design rules for construction works or even to create new rules. As a consequence, in each member state a huge number of **different national adaptation rules** are necessary for the use of construction products, because these products have been placed on the market based on harmonised specifications, which are usually not compatible to the nationally different design rules for works. It is clear, that this would miss the intention of a European harmonisation of the sector or even turn it into its opposite. The achieved harmonisation success of the last 20 years will be lost.

With the **Eurocodes** for the basic requirements 1, 2 and 4, such rules are available already today. Their use is required in the Commission Recommendation of 11.12.2003<sup>1</sup>. Now the next step should be made by including the political aim of harmonisation into the current legislative process. This would reduce the risk that new technical **barriers to trade are developed at the level of the application of construction products**. The adoption of the current proposal for the regulation without change would also run contrary to the intended aim of the Commission in its programme for the Lead Market Initiative<sup>2</sup>.

<sup>1</sup> COMMISSION RECOMMENDATION of 11 December 2003 on the implementation and use of Eurocodes for construction works and structural construction products (2003/887/EG), Official Journal of the European Union L 332/62 19.12.2003

<sup>2</sup> BT/WG 206: „CEN contribution to the EC lead market initiative on sustainable construction“ – CEN/TC 250 Doc. N 813 and CEN/BT WG 206 N 62.

# Product safety for construction products — A topic on the move

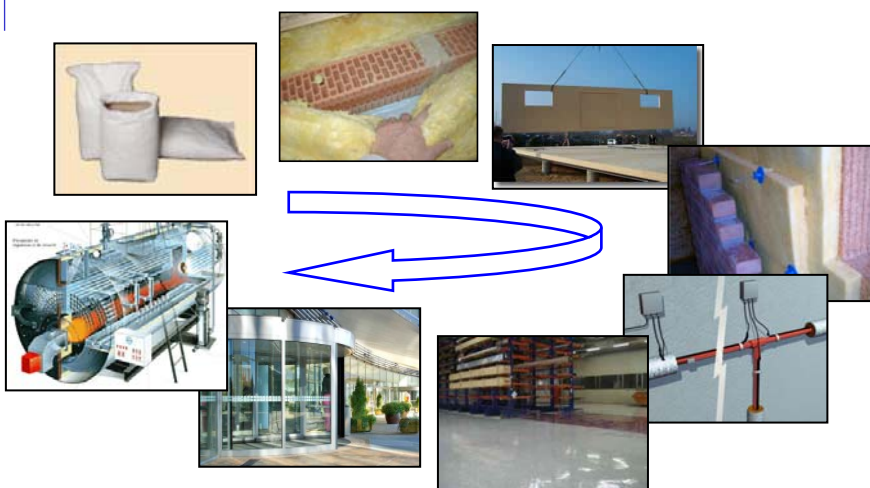
Angela Janowitz, Commission for Occupational Safety and Health and Standardization

IMCO Hearing CPR, 05 October 2010

1

**KAN** Kommission  
Arbeitsschutz und  
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## ■ Construction products

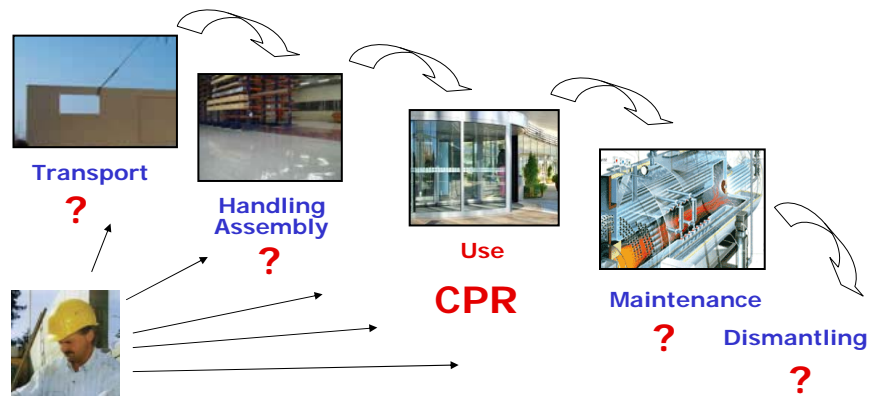


2

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## ■ Life cycle of a construction product

Only one relatively safe phase (**use**) is covered by the CPR



3

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## ■ Safe construction products? – CPR Council Position

The **Council position** concerning the CPR only refers to the hygiene and health of **occupants** and **neighbours** during the **use phase**.

**Product safety**, which greatly affects the safety of **workers** in all life cycle phases, is not considered in the Council Position.

4

**KAN** Kommission Arbeitsschutz und Normung

## ■ CPR needs a broader approach

**Safe products** are one key to reducing the accident rates, which are particularly high in the construction sector.

The safety of construction products must therefore be considered in **all life-cycle phases**.

5

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## ■ CPR needs a broader approach

**The safety of construction products must therefore be considered**

**prior** to the use phase (e.g. transport and handling)



e.g. Inserts for lifting and handling



e.g. Mason's itch

6

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## ■ CPR needs a broader approach

The safety of construction products must be considered

during the use phase (e.g. maintenance)



7

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## ■ CPR needs a broader approach

The safety of construction products must be considered

after the use phase (e.g. dismantling)



8

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## ■ Objectives

- The existing **legal gap** in the CPR (TFEU, Art. 114) must be closed!
- Adding product safety to the CPR will **not automatically** lead to new safety requirements for all construction products.
- It constitutes an “**entrance ticket**” to the standardization process, where product safety can be defined in detail where appropriate.
- Clear product safety specifications would also contribute to the **fairness of competition** in the EU.

9

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## ■ Conclusion

- Product safety for all life-cycle phases **is included** in
  - Position of the **European Parliament** adopted at first reading on 24 April 2009
  - Draft recommendation for second reading on the Council position at first reading (C. Stihler)
- The **Council position** does currently not include any product safety aspects.

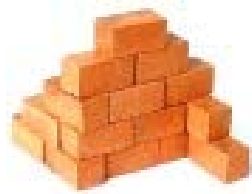
**We ask IMCO to maintain its position on the inclusion of product safety requirements in the CPR.**

10

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Arbeitsschutz und  
Normung



**Thank you very much  
for your attention!**



**Angela Janowitz**

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DIRECTORATE-GENERAL FOR INTERNAL POLICIES

## POLICY DEPARTMENT ECONOMIC AND SCIENTIFIC POLICY **A**

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