

EAE appreciates the initiative – improvements needed

Members of EAE, the European Association for External Thermal Insulation Composite Systems (ETICS), have recognized the publication the European Commission's proposal for a revised Construction Products Regulation (CPR), dated 30 March 2022. We are pleased to contribute our views in the feedback period and stand ready for questions and to contribute to further improvements.

1. EAE welcomes initiative

EAE members appreciate the initiative of the European Commission to first overcome the problems with the current Construction Products Regulation (CPR) and second to align it with other important European policy initiatives - aiming to achieve the ambitions of the Green Deal.

EAE members welcome in particular:

- Establishing and **strengthening a Single Market** for construction products by providing a level playing field for all economic operators and removing barriers to trade – provided Member States will really refrain from additional requirements, which today is not always the case.
- **Fostering** aspects of **sustainability and circularity** and applying the same regulatory framework conditions for reuse or recycled products as for new products.
- Supporting **European standardisation and CE marking as key elements for harmonization** and making harmonized technical specifications binding for both economic operators and regulators in Member States.
- Supporting the **digitalization of the construction sector**, in particular by paving the way to making available product information only by electronic means.
- **Strengthening** the role of **market surveillance** authorities.
- **Clarification of procedures for European assessment documents**, especially the explicit possibility for groups of manufacturers or associations to initiate an EAD request and involvement in its elaboration as previously recommended by EAE.
- **Clarification of** the role and procedures of **product contact points for construction**.
- **Clarifying and simplifying procedures** for economic operators doing business in several European countries and thus the bureaucratic and financial burdens.

2. General comments

Analyzing the proposal EAE members identified some aspects of concern or in need of further clarification as follows and in the tabled overview under point 3.

Additionally, some of our national members reported about translation errors and incompatibility with the vocabulary of the current CPR in their national versions and would have appreciated a longer feedback period due to the complexity and relevance of the legislative proposal. Furthermore, the readability should be further improved to ensure that users easily understand the regulation.

Article 2: Scope

This regulation addresses construction products, characterized by essential characteristics and related properties. We doubt that including 3D-datasets and prefabricated houses can be treated as construction products and recommend reconsideration.

We recognized the inclusion of the new definitions such as “key parts” and “parts of materials” in the Scope as this obviously aims easing and aligning the procedures of surveillance and factory production control. However, in relation to kits it must be left solely to the kit manufacturer which components and ingredients comprise its construction product ETICS kit as by drawing up a declaration of performance and conformity the kit manufacturer takes the responsibility for the performance of the entire kit. For External Thermal Insulation Composite Systems (ETICS) this is essential to ensure reliable quality, safety in use, durability and finally the calculated energy-efficiency of buildings. In this regard we are concerned about the introduction of “assemblies” as this must not undermine that **ETICS are regarded one construction product placed on the market by one kit manufacturer (= system holder)**. Even if components are shipped separately to the construction site for logistic reasons to be incorporated in the construction works on site according to the installation guidelines of the kit manufacturer, the order for shipments and the obligations for maintaining the declared performance during production and the conformity with product requirements as laid down in Article 21 (4) lies solely with the kit manufacturer.

We appreciate the clarification that **for used or recycled construction products the same legislative framework** conditions apply as for new products. This will both help establishing a level playing field, avoiding market distortion and market uptake of reused products.

Article 3: Definitions

The proposal for a new CPR introduces numerous new definitions. Some appear necessary for clarification, to address newly introduced aspects such as environmental performances, circularity or to create links to other legislation. However, other terms are questionable as they either only appear once or twice in the following Articles and Annexes or the added value of their introduction is not obvious. We recommend checking which of the new definitions are really needed as otherwise instead of clarification the revised CPR might create additional confusion. This also applies in case the definitions have changed compared with the current CPR.

For example, we wonder if the definition of “key parts” applies to ETIC kits and what will be the added value. The new term “assembly” appears in the same context as the already established term “kit” with only little difference in its definition and must not undermine **ETICS regarded as one product under the responsibility of one manufacturer**.

In any case, definitions should appear in alphabetical order.

Article 5: Product requirements

We noticed the new concept not only to declare performances but also generic product requirements. We could imagine that this might support establishing minimum requirements for a safe use of construction products and to ensure a certain level of functioning and durability in relation to the intended use building owners will benefit from. However, the procedures how this should be done in practice is not clear at all.

The links to Annex I show the complexity of information that needs to be made available by manufacturers. As this approach is new, all standards and EADs need to be revised accordingly. **It must be ensured that** standardisation bodies and EOTA bodies will have sufficient time to elaborate such requirements and that,

once agreed and published, **manufacturers will be given sufficient time to adapt to these new requirements**. This applies especially to SMEs and companies doing business in numerous European countries because of the necessary translations. Considering the complexity, we suggest a period of at least 3 years after citation for such transition.

Article 7: Harmonized zone and national measures

EAE members support **strengthening the Single Market** for construction products by the detailed description of procedures and **underlining that Member States must not go beyond the harmonized zone in their national regulation**. We also appreciate that Member States are obliged to **actively communicate** essential characteristics and related requirements and to **actively contribute** to elaboration of harmonized technical specifications. It should be explained that in case Member States have implemented national assessment methods or classification systems for the same essential characteristic, standardisation bodies shall elaborate a unique European assessment method as only then costs for manufacturers will be reduced and barriers to trade be removed.

The same **support** to European standardisation bodies **is needed by CEN/CENELEC and the European Commission**. We are convinced that early identification of potential problems and **joint efforts of all stakeholders and authorities involved together with clear legal advice will help accelerating the elaboration of standards**. Sufficient budgets and capacities should be allocated – especially in view of the huge number of hENs and EADs that will require revision to adapt to the new CPR. Sufficient transition periods need to be considered enabling especially SMEs to adapt to any new or revised technical specifications, especially when considering that in future all declarations shall be registered to an EU database.

We have concerns that in the new CPR European Assessment Documents and ETAs are not automatically considered part of the harmonized zone. EAE members today widely use the EOTA route to CE mark their products and to benefit from the Single Market. Even if the current draft standard will be cited there will be a **need for EADs/ETAs** for those ETIC kits not covered by the scope of the standard. As we understand from Articles 38, 41 and 42, they will only be deemed harmonized technical specifications after their assessment by the European Commission and publication or publication with restriction in the OJEU.

Generally speaking, it should be clarified that Member States must accept making available and use of CE marked products in their territories **without additional obligations** for manufacturers. This does not contradict Member States establishing performance-based thresholds for use of CE marked products in their countries. However, it does not become clear how the European Commission will support overcoming existing barriers to trade.

Article 11: Content of the declaration of performance

We recognized that the declaration of performance in future shall include environmental performances as today typically addressed in separate Environmental Performance Declarations (EPDs) and further develops the declaration of performance towards a “one-stop-declaration” for really all product related performances, guidance for application, chemical content, etc. While we agree that this might be convenient for users (designers, planners) and technically feasible when **making the declaration available only via electronic databases in a machine-readable language**, we recommend leaving sufficient time for the transition as for ETICS today environmental performances are typically declared via generic EPDs elaborated by associations. Once becoming mandatory part of a declaration of performance, this information needs to be declared on product level. Hence, manufacturers will need to assess their products individually and register them in a database.

To foster the transition to a green and circular economy, we recommend accepting the **mass balance credit method** as chain-of-custody in EPDs. The approach enables manufacturers to process sustainable feedstocks in existing production networks. The added share of **sustainable raw materials** is mathematically assigned to the corresponding mass-balanced new product. The products have the same physical and chemical properties as products based on fossil raw materials. The mass balance approach would help to avoid shortages in construction material supplies, and - when applied to **recycling** - it will help reduce incineration and landfill. It has already been implemented in sectors like green electricity, biofuels, consumer products and a range of other products.

Regarding the other information requirements, we rise **strong concerns considering the complexity**. It should be reconsidered which information is really needed and generates added value, and which information should be left to either other existing legislation or manufacturers' documentation made available by electronic means.

Article 68: Complaint Portal

We raise strong concerns regarding the establishment of a complaint portal being accessible for everyone and without any pre-conditions on how to use it. This might open the door for misuse. Already today users can complain about non-compliance in front of national authorities.

Article 87: Delegated Acts

We noticed that the European Commission will be empowered following the conditions laid down in Article 87 to complement the CPR by delegated acts. This option is foreseen in a number of cases. On the one hand we can imagine that this will help unlocking barriers that might occur when implementing the new regulation. Furthermore, it might help avoiding situations of legal uncertainties and adaptation of new developments.

On the other hand, this **should be the exception from the rule**, and it must be **ensured that** in addition **Member States and relevant stakeholders will be involved** in the decision process. This applies especially when it comes to decisions related to specific product families as manufacturers' expertise is essential for a smooth implementation. They know all about the assessments, the production and the market procedures. A clear description of the procedures is lacking. Possibly, the concept of the CPR Aquis might act as an example.

Furthermore, we strongly recommend establishing a barrier-free database where delegated acts complementing the CPR can be easily identified by searching for delegated acts related to specific product families and providing the links to all valid not product-specific delegated acts in relation to the Articles and Annexes concerned. Else, over the years it might be difficult for economic operators, authorities and other stakeholders to keep overview of the latest legal requirements.

3. Additional comments

The following tabled overview includes specific comments and proposals for amendments as well as the request for further clarification in relation to single clauses of the proposal for a revised CPR. It complements the general comments before.

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CPR Articles	Key points	Remarks	Proposed change
Article 1 - Subject	Principles of new CPR; focus on environmental, functional and safety requirements of const. prod. including <i>“products that could be regarded as construction products whilst not being intended by their manufacturer to be construction products”</i>	The last sentence could be misleading, since manufacturers of goods which are not construction products can't be responsible for their use on job sites: it specifically targets distributors of products initially not dedicated to be construction products (ex. toys, film for food industry...), that could be finally used in buildings without any DoP (ex. film for food industry = smart vapor retarders in wooden frame houses).	Change “could be regarded as construction products whilst not being intended...” to “ distributed by an economic operator as construction products whilst not being intended...”
Article 3 – Definitions	(20) Key part	For kits clarification is needed that it lies with the kit manufacturer to define which parts are intended to be used in the kit.	...intended by the manufacturer of a construction product or a kit or...
Article 3 – Definitions	(22) Assembly	The definition is new and rarely used in the proposed regulation. As we understand the difference to a kit is that the items used are not placed on the market by one single economic operator. It must be avoided that the kit approach for ETICS (= one construction product under the sole responsibility of the kit manufacturer) is eroded.	Clarification needed or deletion
Article 3 – Definitions	(31) product type	Clarification needed.	‘product type’ means the abstract model of individual products, determined by the intended use and a set of characteristics which exclude any variation with regard to the declared performance or to the fulfilment of product requirements set-out in or in accordance with this Regulation, produced in a specific production process using a given

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		For ETIC kits the product type remains the same if components or items or different manufacturers or plants are used as long as the set of declared performances of the ETIC kit product type remains unchanged.	combination of raw materials or components, whilst identical items of different manufacturers also belong to different product types
Article 3 – Definitions	(58) own-brand-labeller	Clarification needed. The term does not appear in the text of the proposal. Therefore, it should be either deleted or revised as proposed. If a natural or legal person other than the manufacturer wishes to sell a product as his own, the same obligations as for manufacturers shall apply. The own label should not appear in addition to the original label of the manufacturer as by nature of own labelling the original manufacturer should not become visible. However, manufacturer and own-brand-labeler should by means of bilateral contracts agree on FPC etc. and how existing certificates might be used minimizing costs and efforts.	Deletion Or 'own-brand-labeller' means any natural or legal person other than the manufacturer who wishes to sell a product as his own and therefore affixes his name, trade-mark or label in addition to the mandatory inscriptions of other economic operators;
Article 3 – Definitions	(70) product presenting a risk	The term only occurs in the definitions and in the recital (77). We understand in principle the approach and that MS might refer to it in their market surveillance activities. However, a clear link in this regulation is missing.	Clarification or deletion.
Article 4 – Essential characteristics of products	3. (d) regulatory needs of Member States	To avoid such situations Member States shall actively contribute at the very beginning of standardisation processes by reporting their regulatory needs so that they can be considered in the standardisation request. After that a stand-still shall apply where MS cannot introduce new regulatory needs as this will prolong the standardisation process. See Article 7 (3).	the standards referred to in the first subparagraph of Article 4(2) are for other reasons considered not sufficient to cover regulatory needs of Member States or the needs of economic operators as laid down in the standardisation request;

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Article 6 – Assessment and verification systems and their product specific modalities	Delegated acts to change AVS criteria	Same remark as before: to avoid a permanent instability of criteria to be checked, leave at least 3 years for discussions in CEN WGs and 3 more years to apply it in our plants (ex. if the investment in a new big machine is required, taking 1 year delay to get it...)	Add at the end of paragraph 3: “if CEN WGs do not come to an agreement on these product requirements within three years after the citation of the harmonized technical specification. Then, all manufacturers will have at least three years to comply with the new requirements obligations.”
Article 10 – Exemptions from drawing up a declaration of performance	Clause 4	<p>The conditions described are not applicable for ETIC kits as due to the nature of a composite system (kit) the interaction of components needs to be assessed in combination.</p> <p>It seems questionable why different rules should apply for micro-enterprises and how the circulation of products can be limited to the territory of that Member State (one should consider online shops).</p>	We recommend deleting this Clause.
Article 15 – Supply of the declaration of performance and of the declaration of conformity	Making available the declarations by electronic means	<p>We appreciate that the standard way to supply a declaration of performance and of the declaration of conformity will be electronic. This should already apply to all products once the “ new CPR” comes into force even if product families still operate under the regime of the “old CPR”. However, it should be clarified that this does not mean to supply the declaration electronically (e. g. as PDF) but making the data available in a machine-readable format as this would allow for innovative ways towards digitilisation of the construction sector, e. g. using QR codes, apps and configurators (for complex kits with many variations leading to different performances).</p> <p>Considering the complexity of information intended to be included in the declaration we have doubts that the</p>	Clarify under number 2. Focus should be on “making available” rather than “supply” when it comes to databases.

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		supply of a paper copy upon request (see number 2, last Clause) is still feasible.	
Article 16 – General principles and use of CE marking	CE marking for key parts	Referring to our comment on Article 3 (20) we see difficulties to apply the CE mark to key components as components of an ETICS are not placed separately on the market. Therefore, no CE marking of any component is necessary. The only relevant CE mark for ETICS is the CE mark of the kit.	Clarification together with Article 3 (20) needed.
Article 19 – Obligations of all economic operators	Number 5: use of EU database or similar system	<ol style="list-style-type: none"> 1. Economic operators are required to register and to make available all product-related data in an EU database or system. While we understand the principal idea, we have concerns regarding the terms of ownership, maintenance, costs, who to what extent will have access, etc. 2. Considering the significantly increasing complexity of datasets that needs to be made available, the obligation to make available all data within two months after the database availability is not realistic. Even if the database will be filled subsequently per product family, manufacturers will have to handle hundreds of products in this short timeframe. A reasonable transition period needs to be foreseen. 	<ol style="list-style-type: none"> 1. First it needs to be clarified if and where product-related datasets will be stored, who is in charge, etc. Should the EU database become mandatory it is questionable if economic operators shall pay a fee. On the other hand, it must be prevented that such central database with a huge amount of product-related data will be misused by European as well as international competitors. 2. To fill in the new EU machine-readable database of construction products to come, it needs to be clarified which format to use, which templates to follow, etc, ... for the new DoP-DoC-EPD, to avoid having to enter manually one by one all documents. Some manufacturers indeed have several thousands of products in their portfolio. <p>This point is critical, since all manufacturers will have to update all their documents and will be responsible of what is published: they can afford only once to do submit all data or to make it available via own databases.</p>

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Article 21 – Obligations of manufactures	Number 2	It is questionable why manufacturers shall refrain from any claim beyond assessments in harmonized technical specifications as due to technical developments additional characteristics might occur after a hTS has been cited. Such properties/characteristics could then be added to hTS during revision.	Clarification and reconsideration. Check, if this number can be deleted.
Article 21 – Obligations of manufactures	Number 5 - Label “Only for professional use”	Clarification and avoiding overlap with other European legislation.	<p>Keep “only for professional use” only for construction products that could be made available to general consumers (e. g. professional real or online shops open to generic consumers), although intended to be used only by professionals.</p> <p>If products are deliberately sold to general consumers (e. g. DIY shops), RGPS (Regulation on General Product Safety) rules apply regarding marking on products.</p> <p>In general, it should be assessed if this declaration will generate added value. If not, the declaration of intended users should be deleted.</p>
Article 22 – Additional environmental obligations of manufacturers	General	We understand and agree in principle to the European Commission’s intention to guide manufacturers the way towards constantly reducing the environmental impact of their products and to foster a circular economy. However, we have strong concerns regarding such detailed descriptions in a piece of legislation. And we wonder how the obligations can be operationalized in practice.	We recommend reconsidering the text of the whole Article by focusing on highlighting the key principles and objectives that manufactures shall consider when developing new products. It should be left to manufacturers to achieve these objectives using their innovation potential.
Article 22 – Additional environmental	Number 2, 1 st sentence	Further clarification needed.	Unless product safety, or the safety of construction works, and the economic feasibility is thereby

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obligations of manufacturers			significantly negatively impacted, the manufacturer has the following obligations:
Article 22 – Additional environmental obligations of manufacturers	Number 2. (h)	Simplification by describing the key objective without pre-conditioning technical solutions. It should be left to the value chain to develop the best solution in terms of economic and ecological trade-off. Many construction products are composed by a mixture of ingredients to seize their performances exactly to the intended use and to meet very specific requirements. Easy separation of components and avoiding mixtures are possible solutions manufacturers are considering. Alternatively, processes and technologies might be developed and established for separation and recycling off-site, leading to economically feasible processes with a high degree of re-use or recycling, minimizing risks for safety of people and the environment.	design products in such a way that re-use, remanufacturing and recycling are facilitated, namely by facilitating the separation of components and materials at the later stage of recycling and avoiding mixed, blended or intricate materials, unless remanufacturing and recycling are risky for human safety or the environment. In this case the manufacturer shall refrain from such design and warn against remanufacturing and recycling in accordance with the following point;
Article 22 – Additional environmental obligations of manufacturers	Number 2. Last Clause	He highly appreciate that the “safety first” principle shall apply for both construction products and construction works and that manufacturers need to seek for a fair trade-off.	As this Clause is fundamental, it should be put in front of the list.
Article 22 – Additional environmental obligations of manufacturers	Numbers 5 and 6 – “traffic-light-labelling”	We have strong concerns applying a simple label to construction products indicating “environmental friendliness”. Such labels might work for consumer goods, e. g. the energy label for white goods or the “traffic-light-label” for nutrition properties of food. The construction sphere is much more complex as not only the composition of the single product is relevant but the entire design of the building and there are interlinks. A simple label might lead to misleading interpretations and conclusions, hence to sub-optimal	Delete „traffic-light-labelling” and replace it by giving reference to EN 15804. Consider in this regard our general comment on Article 11 regarding the use of the mass balance credit method for both renewable and recycled inputs.

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		solutions for the environmental performance of a building. Already established EN 15804 should be the core of any life-cycle-assessment, delivering relevant input for building designers to optimize new construction and to refurbish existing building stock towards circularity and sustainability.	
Articles 34 – Construction products standards	Number 2	Assessment procedures for new products under a new or revised published standard may take years (investments, tests in labs, ...) before being able to comply with all the new rules and to draw up a declaration of performance and conformity. Therefore, the requirement that new standards “shall be of mandatory application for purposes of this Regulation as of six months after the publication of their reference in the Official Journal” does not seem realistic.	The transition period should be kept flexible considering the complexity of amendments and be fixed in the OJEU when the new standard is cited. Manufacturer associations should be consulted before to set a realistic timeframe.
Article 78 – EU construction products database or system	General	See our comments on Article 19, number 5.	Without further clarification this Article cannot be adopted.
Article 87 - Delegated acts	General	Stakeholders are not included in the process of adoption of delegated acts. This creates a risk regarding the technical feasibility of proposals.	Add stakeholder involvement in the process of adoption of delegated acts. It is essential that manufacturers, in particular, are involved in the drafting of delegated acts in order to ensure, inter alia, the technical feasibility of the provisions.
Article 88 - Committee		The Commission is supposed to submit draft delegated acts to the Committee on Construction Products. The Committee has a consultative opinion but lacks technical expertise on the topics.	Make provision for industry representatives to be invited on an ad hoc basis to provide the Committee with technical input on draft delegated acts.
Annex I – Part C	Clause 2.2	Harmonized technical specifications shall, “as appropriate”, specify inherent product environmental requirements, inter alia a minimum recycled content,	It should be reconsidered if this clause is necessary. If so, clarification is needed.

		information about existing technical solutions avoiding negative impact on the environment. The operationalization seems questionable and may cause problems in practice. Will for example a product be incompliant with a hEN just because its recycled content is lower as the manufacturer suffered from unavailability of recycled input?	
Annex I – Part D	Clause 1.2 (g): key parts	The clause requires the declaration of key parts. In case of ETIC kits it should be left to the ETIC kit manufacturer. Declaration of “NA” (= non applicable or not announced) should be applicable.	(g) key parts (if applicable and intended by the construction product manufacturer) .
Annex I – Part D	Clause 1.3 (b): compatibility and integration into systems or kits	The clause requires the declaration of compatibility and integration into systems or kits, especially subclause (iv). For ETIC kits it is essential to ensure the performance and fulfilment of requirements that the ETIC kit manufacturer determines the components belonging to the ETIC kit. If component manufacturers declare generically the compatibility with ETIC kits, the information would be misleading and undermine the sole responsibility of the kit manufacturer.	Clarification is needed that for composite systems/kits only those components must be used which are specified by product name by the kit manufacturer.
Annex II – Declaration of Performance and of Conformity	Number 1 (a)	The introduction of batch numbers and serial numbers would require implementing constant changes and updates of Declaration of Performance. This would rise the costs and hinder the identification. There can be thousands of batch numbers per year. It is difficult to plan how many of them can be established in the future - this depends on the market. We recommend keeping the current system which functions well. We are afraid that the implementation	(a) unique identification code of the product type, and the ranges of batch numbers and serial numbers covered if already determined for the respective product type;

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		of the proposed system would worsen the proper and quick identification.	
Annex II – Declaration of Performance and of Conformity	Number 1 (e) – main materials or substances used	<p>It is unclear what the main materials mean and how exactly a product formulation would have to be stated. Such a recipe constitutes the manufacturer's know-how and disclosing it in such an open manner constitutes an activity that reduces the competitiveness of European producers and is devoid of any justification in the context of its performance (which is the essence of the declaration of performance). Based on other regulations, manufacturers of building materials declare the composition (e.g. hazardous ingredients), so it is not even related to the safety of use.</p> <p>In some cases, manufacturers of building materials use chemical ingredients of unknown composition (which is the supplier's proprietary know-how), distinguishing only hazardous substances, therefore, for this reason, it would not be feasible.</p> <p>For complex kits these aspects become even more questionable as theoretically all main materials and substances of all kit components would need to be listed ending up in a complexity that is neither feasible nor helpful for users.</p>	Deletion or limitation to safety aspects, like hazardous substances (REACH) as it does not create added value.
Annex II – Declaration of Performance and of Conformity	Number 1 (g)	See our comment on Annex I – Part D, Clause 1.2 (g)	(g) key parts (if applicable and intended by the construction product manufacturer) .
Annex II – Declaration of Performance and of Conformity	Number 10 (b)	Include the options to declare “no performance declared” (NPD) or “not applicable” (NA) for single	Include the options to declare “no performance declared” (NPD) or “not applicable” (NA) for single

		characteristics as for some products or variants thereof they might not make sense.	characteristics as for some products or variants thereof they might not make sense.
Annex V	Assessment and verification of systems	<p>Could a NB ask for 50 new measurements for extra performance assessment? Or is it purely documents and procedures check?</p> <p>For systems 1+ to 3, including 3+, the fact that the notified body can refuse to issue a certificate for one year prevents the product from being placed on the market during that period, which means that the product will disappear, with all the economic consequences that this may have for the manufacturer.</p> <p>We have strong concerns regarding the new AVS. On the one hand introducing additional schemes the complexity is increased (contradicts the idea of simplification). On the other hand, it is questionable why the regulation aims to establish rules that apply to all construction products as today FPC is found in harmonized standards and experts define appropriate measures per product family to ensure the constancy of performance.</p> <p>The “zero tolerance” approach is new and appears to be too restrictive. Manufacturers must be given the chance to take corrective measures after deviation has been identified. According to statistics there will always be single measurements below the tolerance in serial production. What needs to be achieved is that this only happens without intention and very low probability.</p>	Keep the current AVCP system or clearly justify why such significant changes are needed.

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References:

1. Proposal for a regulation of the European Parliament and of the Council laying down harmonised conditions for the marketing of construction products, amending Regulation (EU) 2019/1020 and repealing Regulation (EU) 305/2011, Brussels, 30 March 2022, COM(2022) 144 final.
2. Annexes 1 to 7 to the proposal for a regulation of the European Parliament and of the Council laying down harmonised conditions for the marketing of construction products, amending Regulation (EU) 2019/1020 and repealing Regulation (EU) 305/2011, Brussels, 30 March 2022, COM(2022) 144 final.
3. Enabling a circular economy for chemicals with the mass balance approach – A white paper from co.project mass balance, Ellen MacArthur Foundation, 2019.

About EAE

- EAE is the voice of the ETICS industry in Europe.
- EAE members represent more than 80 per cent of Europe's revenue from ETICS.
- EAE has been constantly working towards a "culture of sustainability" in the construction sector since its foundation 2008.

EAE members



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