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adhesive and **sealant industry**



Brussels, 12 July 2022

Detailed Statement of **FEICA and Deutsche Bauchemie** on the Proposal of the European Commission for a Revision of the Construction Products Regulation (Regulation (EU) No. 305/2011)



FEICA, the Association of the European Adhesive & Sealant Industry, is a multinational association representing the European adhesive and sealant industry. Today's membership stands at 16 National Association Members (representing 17 countries), 25 Direct Company Members and 23 Affiliate Company Members. The European market for adhesives and sealants is currently worth more than 17 billion euros. With the support of its national associations and several direct and affiliated members, FEICA coordinates, represents and advocates the common interests of our industry throughout Europe.



As an industry association, **Deutsche Bauchemie** represents the entire construction chemicals industry in Germany. In 2021, the more than 130 member companies with around 32,000 employees generated sales of 8.9 billion euros. This corresponds to half of the European market volume and about a quarter of the world market. Under the umbrella of the German Chemical Industry Association (VCI), Deutsche Bauchemie has been representing the interests of its member companies for over 70 years to the public, political actors, authorities, other industry sectors, science and the press.

Background

The Construction Products Regulation (CPR) plays a key role for the construction chemicals industry. The revision should overcome current problems in harmonised standardisation. It should further strengthen the European single market for construction products so that construction and renovation measures remain affordable and make an important contribution to the fight against climate change. To support the transformation to a greener and more digital construction sector, the environmental sustainability of construction products must be brought more into focus in the future CPR, whereby practicable provisions are important to ensure feasibility and cost efficiency.

FEICA and Deutsche Bauchemie take the following joint position on the European Commission's proposal:

Assessment of the environmental sustainability of construction products

Correctly, the European Commission's legislative proposal puts environmental sustainability more into the focus of the CPR.

Proposal of the European Commission:

- Annex I, Part A, No. 2 defines several Life Cycle Assessment (LCA) indicators as essential characteristics and stipulates that they must be covered by all harmonised technical specifications (hTS) as far as possible. In the list of 16 LCA indicators, the indicator a) climate change effects is marked as 'mandatory'.
- According to Article 22(1), the manufacturer shall assess its product in relation to the essential characteristics listed in Annex I, Part A, No. 2 (LCA indicators) and according to the relevant hTS regarding environmental sustainability.
- According to Art. 11(2)
 - the assessment of environmental sustainability according to Art. 22(1) and
 - the declaration of the performance of the essential characteristic listed as mandatory in Annex I, Part A, No. 2are mandatory parts of the manufacturer's declaration of performance.
- Art. 22(1) refers to a freely available software of the European Commission, which - as soon as available - must be used for assessment of the environmental sustainability.
- To increase transparency for the user and to promote sustainable products, the Commission can, according to Art. 22(5), introduce 'traffic light labelling' by delegated acts, which must be applied by the manufacturer.

Comments from FEICA and Deutsche Bauchemie

Information on the environmental sustainability of construction products is important to support the transformation of the construction sector. The construction chemicals industry is willing to generate and provide the necessary data.

To ensure the necessary practicability and to avoid a cost explosion, appropriate framework conditions are crucial.

• EPDs according to EN 15804

Environmental Product Declarations (EPDs) according to EN 15804 are well established for determining and communicating the environmental sustainability of construction products. With the 1a revision of EN 15804, the method was adapted as far as possible to the (Product Environmental Footprint (PEF) methodology. The resulting EN 15804+A2 should be referred to under the forthcoming CPR and referenced by the hTS.

• Binding declaration of the core indicators according to EN 15804+A2

Annex I, Part A, No. 2 contains the core environmental impact indicators and the additional environmental impact indicators according to EN 15804+A2. Due to the limited experience with the additional environmental impact indicators, these additional indicators have to be reported only voluntarily according to EN 15804+A2 and have to be provided with the following disclaimer: 'The results of this environmental impact indicator shall be used with care as the uncertainties on these results are high or as there is limited experience with the indicator'. Against this background, the assessment of environmental sustainability according to Art. 22(1) should be limited to the core environmental impact indicators of EN 15804+A2, and the declaration of the additional environmental impact indicators should be provided for only as a voluntary option. A corresponding adaptation of Annex I, Part A, No. 2 should be made.

• No redundant provisions for the declaration of the 'climate change' indicator

The environmental impact indicator 'climate change effects' is part of the essential characteristics to be assessed according to Art. 22(1) and to be declared in the declaration of performance. Against this backdrop, it is incomprehensible that according to Art. 11(2), the declaration of the performance of the essential characteristics listed as mandatory in Annex I, Part A, No. 2 (only 'climate change effects') is required, in addition to the declaration of the assessment of environmental sustainability according to Art. 22(1),

In line with the principle of 'no cherry picking of indicators' and to avoid redundant provisions, it would make sense to make all core environmental impact indicators of EN 15804+A2 the subject of the mandatory assessment according to Art. 22(1) and to declare them with the declaration

of performance. This would include the declaration of the indicator 'climate change effects', so that the separate provision could be omitted.

- **Recognition of sectorEPDs**

Manufacturers of construction chemical products usually produce a broad portfolio of different products. To provide the required life-cycle related environmental performance information in the form of EPDs for the resulting multitude of products, the model EPD (a type of sector EPD) has been developed. Many other construction product sectors have developed comparable tools.

To avoid an explosion of costs and to ensure general feasibility, it is necessary that manufacturers can refer to corresponding sector EPDs in the course of their assessment of environmental sustainability according to Art. 22(1). The prerequisite must be that the sectorEPDs comply with the requirements of EN 15804+A2 and that the AVS 3+ - provided for this purpose in accordance with Annex V - is applied. In particular for SMEs, the obligation to provide product-specific EPDs could mean market exclusion, as SMEs usually have neither the sufficient in-house expertise nor the financial resources to provide product-specific EPDs.

- **European Commission software is required**

Art. 22(1) refers to a free available software of the European Commission which – as soon as available – shall be used for the assessment of environmental sustainability according to Art. 22(1). A uniform software is an essential prerequisite for harmonisation under the future CPR.

Currently, different commercial databases with background data of the raw materials used for the production of construction products are used, which lead to different results. Only a uniform background database guarantees a harmonisation of the assessment of environmental sustainability in the sense of a 'Common European Language'.

In addition to a uniform database with background data, software that is as easy to use as possible is needed to carry out the life cycle analyses. The European Commission software referred to in Art. 22(1) should include both elements.

- **If required, 'Traffic Light Labelling' according to future EN 17672**

Should the Commission make use of its empowerment to introduce 'traffic light labelling', it should be limited to relevant product categories.

Currently, a new standard is being finalised in CEN/TC 350 under the title EN 17672 'Sustainability of construction works — Environmental product declarations — Horizontal rules for business-to-consumer communication'. EN 17672 builds on EPDs according to EN 15804+A2 and sets out the necessary prerequisites, framework and methodology for the development of traffic light systems. EN 17672 should be used as a basis for the development of 'traffic light labelling' under the CPR.

- **No ESPR 'safety net'**

The proposal for the Ecodesign for Sustainable Products Regulation (ESPR) provides that in cases in which sustainability aspects are not sufficiently regulated under the future CPR, the ESPR will also apply to construction products and act as a 'safety net'.

To ensure a uniform and consistent European legislation, all relevant sustainability aspects and the digital product passport should be conclusively regulated by the future CPR and not by the ESPR. Accordingly, construction products should be completely exempted from the ESPR.

The fundamental principle of the European Single Market is rightly preserved

To ensure that construction remains affordable, the future CPR should consolidate and further strengthen the European single market for construction products. The creation of the 'harmonised zone' and the provisions of Article 7 are in principle a very good approach, which FEICA and Deutsche Bauchemie strongly support.

Proposal of the European Commission:

- Art. 7(1) states that the harmonised zone is presumed to be comprehensive and to cover all potential requirements for construction products.

- Art. 3(38) defines the harmonised zone as the area covered by harmonised technical specifications.
- According to Art. 7(2), Member States (MS) are prohibited from imposing additional national requirements on products of the harmonised zone if these would go beyond the essential characteristics laid down in the htS.
 - According to Art. 7(2) d) this also includes the AVS set by the European Commission.
 - According to Art. 7(2) e), MS must implement the thresholds set by the Commission and may neither exceed nor fall below them.
- According to Art. 7(3), MS are encouraged to proactively use all opportunities relevant to the elaboration of htS to inform the Commission and the other MS about the following:
 - Product families or categories, essential characteristics, as well as the assessment methods applied, for which the MS imposes national requirements
- Art. 7(3) further states that the essential characteristics designated by MS shall be covered as far as possible by the htS.
- Art. 7(4) lays down a formal procedure that offers MS the possibility to address regulatory needs in the harmonised zone to the European Commission. The notification procedure according to EU Directive 2015/1535 applies.
- In the case of a notification according to Art. 7(4), the Commission examines the legality of the notification according to Art. 7(5) based on six criteria. If the Commission concludes that the request of the MS is justified, it authorises the MS to adopt a national measure by means of an implementing act.

Comments from FEICA and Deutsche Bauchemie

- **Exhaustiveness principle is key to a functioning internal market**

The preservation of the so-called exhaustiveness principle, which is already applied under the current CPR and which has been confirmed several times by the European Court of Justice (ECJ), is essential for the functioning of the European single market. In this sense, the principles of Art. 7 must be upheld at all costs.

- **Process to identify and address MS regulatory needs**

The long-term acceptance and functioning of the principles of Art. 7 depend on the implementation of a process that allows MS to designate their regulatory needs and that ensures that the reasonable regulatory needs designated by MS are covered by the htS. Only with this measure can it be effectively prevented that MS impose additional national requirements on harmonised construction products.

In this context, the Commission proposal with Art. 7(3) contains the above outlined call to MS and developers of htS. In contrast to the procedures under Art. 7(4) and Art. 7(5), the process for identifying and considering the MS' regulatory needs is less formal and more in the spirit of a call. The MS should be consulted as to whether they consider the envisaged procedure to be practicable or whether the process should be more specifically regulated in the article text.

- **Rules for exemptions create transparency**

The exemption in paragraphs (4) and (5) of Art. 7 brings clarification about the procedures between MS and the Commission and transparency for all parties involved. Based on the proposed provisions, it can be assumed that this path will be taken by the MS only in exceptional cases.

It is important that the framework conditions for this exemption not be extended; otherwise the exemption could become the rule. This would seriously jeopardise the internal market for construction products.

The massive problems in harmonised standardisation must be solved

The 'James Elliott judgement' of the ECJ has led to the situation, that for years the vast majority of standards submitted by CEN for publication in the Official Journal of the European Union OJEU have been blocked by the European Commission. The main reasons are nonconformities with the CPR. As a result, the further development of technical standards and the urgently needed adaptation to

technical progress have come to a standstill. All those involved agree that this problem must be solved as a matter of urgency.

Proposal of the European Commission:

- Art. 34(4) as well as Art. 4(2) still contain the obligation of the Commission to examine the standards submitted by CEN regarding conformity with the underlying mandate, the CPR and other EU legislation before their citation in the OJ-EU. Only if the Commission has not identified any nonconformities can the standard be introduced as an htS under the CPR via the OJ-EU citation.
- Should the Commission identify nonconformities in its examination - which is currently almost exclusively the case - it can solve the problem by eliminating the identified nonconformities and then introducing or adopting the relevant htS not as a standard but in the form of a delegated act pursuant to Art. 4(3).

Comments from FEICA and Deutsche Bauchemie

Delegated acts instead of harmonised standards are not a sufficient solution

The Commission proposal does not contain any elements that effectively improve the process of drafting harmonised standards and thus support the conformity of harmonised standards with the requirements of the CPR. Without changes to the process, there is a high risk that a large part of future htS would only be introduced via the route of delegated acts according to Art. 4(3).

The aim must be to maintain harmonised standards as the rule and to adopt delegated acts in accordance with Art. 4(3) only as an exception in justified individual cases. To this end, it is not enough to hang the 'Sword of Damocles' of delegated acts over CEN. Additional measures are necessary to significantly increase the proportion of legally compliant CEN standards. This requires, among other things, clear criteria for harmonised standards applied by CEN and accepted by the European Commission.

The expected mix of harmonised standards and delegated acts would lead to consumers, planners, builders, users and manufacturers losing an overview on the applicable legal provisions, and the necessary transparency would no longer exist.

The extent of empowerments for delegated acts should be reviewed

The Commission proposal contains a very extensive empowerment of the Commission to adopt delegated acts.

Proposal of the European Commission:

Art. 87 provides an overview of the scope of the European Commission's empowerments to adopt delegated acts. The Annex to this statement contains a list of the empowerments.

Comments from FEICA and Deutsche Bauchemie

- **The nature, scope and success of the implementation remain unclear**

A considerable part of the implementation of the future CPR depends on

- o to what extent,
- o in which form and
- o in which time frame

the European Commission makes use of its empowerment to adopt delegated acts.

The question of whether the revised CPR proposed by the Commission will solve the current problems and meet the future challenges is difficult to assess in terms of the article text and depends heavily on the Commission's secondary legislation.

- **Are the necessary human resources and technical expertise available?**

In addition to delegated acts, which are each issued only once, for example, to set up an EU construction products database or to amend individual annexes, several empowerments lead to a number of delegated acts. In particular, the establishment of product requirements under Art. 5(2) and the specification of additional environmental obligations acc. Art. 22(2) through delegated acts acc. Art 22(4) will each be applied separately for individual product families, if not separately for individual product categories. This will lead to scores of delegated acts under Art. 5(2) and Art. 22(4).

The question therefore arises as to whether the European Commission has the necessary human resources and technical expertise to issue the large number of delegated acts required for successful implementation in a timely and professional manner.

- **Is adequate involvement of MS and industry ensured?**

Furthermore, it is questionable whether the relevant stakeholders, in particular MS and industry, are adequately involved in the process of developing delegated acts.

Internal market must not be unnecessarily restricted by excessive European requirement levels

Under the current CPR, essential characteristics are defined, with reference to which the manufacturer declares the performance of the construction product. In the future, construction products may be placed on the market only if they fulfil additional specified product requirements.

European Commission proposal:

- According to Art. 5(1), construction products may be placed on the market only if they have previously fulfilled the specified product requirements.
 - o The requirements set out in Annex I, Part D 'Product information requirements' apply generally, even if they have not been specified in the form of a delegated act.
 - o The requirements set out in Annex I, Part B 'Requirements ensuring the appropriate functioning and performance of products' and Annex I, Part C 'Inherent product requirements' shall apply only if they have been specified by a delegated act in accordance with Art. 5(2).
- Following the establishment of product requirements in the form of delegated acts in accordance with Art. 5(2), the Commission may issue standardisation requests for voluntary standards to demonstrate conformity with the requirements of the delegated act.

Comments from FEICA and Deutsche Bauchemie

- **Ensure an appropriate European level of requirements**

In principle, an appropriate process should be established to ensure that all relevant stakeholders (in particular MS and industry) are adequately involved in the decision-making process for the setting of product requirements. In this way, it is important to avoid setting an excessive European level of requirements and thereby unnecessarily restricting the European single market, which could lead to an unnecessary increase in the cost of products and jeopardise the renovation wave.

- **Ensure a clear procedure for demonstrating conformity with product requirements**

It is unclear whether the Commission will issue a standardisation request for a standard to demonstrate conformity with the requirements of a delegated act under Art. 5(2) only in individual cases or in every case. According to Art. 5(2), the Commission may, but is not obliged to, issue a standardisation request. As this is a voluntary standard, the manufacturer may use it to prove conformity with the product requirements but is not obliged to do so. It is likely that this situation will lead to confusion and will not provide a 'level playing field' for companies.

To avoid this confusion, a clear procedure should be established for manufacturers to demonstrate conformity with product requirements laid down in delegated acts pursuant to Art. 5(2).

EU Construction Products Database: Minimise effort and protect CBI

Article 78(1) empowers the Commission to establish an EU database for construction products by a delegated act, into which manufacturers must then upload specified documents.

Proposal of the European Commission

- According to Art. 78(1), the Commission is empowered to establish an EU database for construction products by a delegated act.
 - The EU database for construction products should build as much as possible on the digital product passport introduced with the ESPR
- According to Art. 78(2), economic operators (incl. traders) can access all information specifically concerning them.
- According to Art. 21(7), manufacturers must upload the following information to the EU database
 - Declaration of performance
 - Declaration of conformity
 - Information according to Annex I, Part D
 - Technical documentation according to Art. 21(3)
- According to Art. 17(2) d), the CE marking shall include, among other things, a permalink to the product registration in the EU database.

Comments from FEICA and Deutsche Bauchemie

- **Digital product passport for construction products under the CPR and not under the ESPR**

If a digital product passport for construction products is to be introduced, it should be regulated in the revised CPR and there should be made no recourse to the future ESPR. The principles for the digital product passport should be aligned between the revised CPR and the ESPR.

- **Confidential Business Information (CBI) of manufacturers must be protected**

According to the Commission proposal, distributors and users have access to the manufacturer's database records. Therefore, the information uploaded by the manufacturer to the EU database must not contain Confidential Business Information (CBI). The technical documentation according to Art. 21(3) contains CBI and should therefore not be part of the data to be reported but reserved for market surveillance authorities upon request.

- **Effort for reporting obligations must not be underestimated and must be minimised**

It is known from other legislations, such as the notification requirements according to Annex VIII of the CLP Regulation, that the implementation and regular application of corresponding notification obligations are very burdensome for all parties involved. Against this background, any reporting obligations should be limited to the bare minimum.

According to Art. 21(3), the technical documentation shall contain all elements necessary to demonstrate performance and conformity. These include, among other things, factory production control data, test specifications, production data, test certificates and test reports. This data is not only of a confidential nature but also of an immense volume, so that the effort to upload and update it in an EU construction products database would be exorbitant.

Opportunities of digitalisation should be used consistently

Proposal of the European Commission

The declaration of performance and the declaration of conformity can be transmitted electronically. However, the Commission proposal does not provide for machine-readable formats.

Comments from FEICA and Deutsche Bauchemie

- **The opportunities of digitalisation must be embraced**

To take full advantage of the possibilities of digitalisation, the relevant information should also be made available in a machine-readable format. Only then, could the content of the declaration of performance and conformity be scanned with an app via a QR code and be compared with requirements of the individual MS (automatic compliance check). This possibility is rightly demanded by the users of construction products and should be realised with the revision.

- **Digital product passport for construction products under the CPR and not under the ESPR**

The basic idea of the digital product passport also includes a machine-readable data format. If necessary, a digital product passport for construction products should be introduced within the framework of the upcoming CPR and not with the ESPR.

Transitional provisions must ensure a 'level playing field'

The transitional provisions for the implementation of the revised CPR must ensure that fair competition is maintained and that users understand the content and meaning of the CE marking and the declaration of performance.

Proposal of the European Commission

- According to Art. 94, the revised CPR shall enter into force 20 days after publication in the OJ-EU and shall become applicable 1 month after entry into force.
- According to Art. 92, the current 'old' CPR (Regulation (EU) No. 305/2011) shall be repealed and withdrawn on 01.01.2045.
- According to Art. 92, references to Regulation (EU) No 305/2011 shall be made in accordance with a correlation table in Annex VII.
- According to Art. 34(2), harmonised standards must be applied in accordance with Art. 4(2) no later than 6 months after the publication of the harmonised standards in the OJ-EU.

Comments from FEICA and Deutsche Bauchemie

- **Longstanding coexistence of two legal provisions leads to confusion**

The proposed provisions would result in the current 'old' CPR and the revised, 'new' CPR applying in coexistence for a period of about 20 years. The different htS applied under the two EU regulations would have a different scope and cover different aspects. These differences would not be sufficiently transparent within the CE markings and declarations of performance based on them and would not be understood by the user. Distortions of competition could result and no 'level playing field' for the marketing of construction products would be guaranteed.

- **Transition period for the application of new htS is too short**

New harmonised standards (htS) must be applied at the latest 6 months after their publication in the OJ-EU. For new htS according to Art. 4(2), a 6-month transition period applies without free choice until 01.01.2045.

The experience under the current 'old' CPR (Regulation (EU) No 305/2011) has shown that co-existence periods of 12 months are appropriate and have proven successful. Manufacturers need at least this period to make the following preparations for their affected products:

- o Determine performance according to the htS, involving notified bodies where necessary
- o Ensure that specified requirements, if any, are met
- o Draw up the declaration of performance and conformity
- o Compile information according to Annex I, Part D
- o Apply CE markings to the products or their packaging

No safety data sheet (according to REACH) for private consumers

The contents of safety data sheets (SDSs) according to Art. 31 of the REACH Regulation are complex, very extensive and usually incomprehensible for the private end-user. In accordance with the provisions of the REACH Regulation (REACH, Art. 31(4)), SDSs are provided only to professional and industrial users and not to private users. The prerequisite is that the product is provided with sufficient information.

Proposal of the European Commission

- According to Art. 11(4), an SDS according to Art. 31 of the REACH Regulation should be provided together with the declaration of performance. In practice, this concerns mixtures.
- According to Art. 11(4), information on substances in articles according to Art. 33 of the REACH Regulation shall be provided together with the declaration of performance.

Comments from FEICA and Deutsche Bauchemie

- **Avoid double regulation via REACH and the CPR**
In the case of mixtures classified as hazardous, the REACH Regulation regulates the passing on of the SDS sufficiently, which would make corresponding provisions in the CPR redundant. The situation is similar with the provisions on the dissemination of information on substances in articles according to Art. 33 of the REACH Regulation. Paragraph 4 of Article 11 should therefore be deleted.
- **No safety data sheets for private end-users**
If the recipient is a private end-user, the requirement to provide the SDS together with the declaration of performance should be removed. The transfer of information to the private end-user is regulated by Art. 31(4) of REACH; therefore, the CPR should not contain any deviating provision. According to Art. 31(4) of REACH, no SDS has to be provided if a hazardous mixture is supplied to the general public and the product is accompanied by sufficient information for the protection of human health, safety and the environment.

Complaints portal harbours the risk of abuse

The planned complaints portal could be misused by market participants to unfairly discredit manufacturers.

Proposal of the European Commission

- According to Art. 68(1), the Commission shall establish a complaints portal through which anyone can complain about possible non-compliances with the CPR.
- According to Art. 68(2), the Commission shall instruct a market surveillance authority to deal with the complaint if it considers it to be well founded.

Comments from FEICA and Deutsche Bauchemie

Unjustified discrediting of producers must be avoided

The complaints portal would bring the risk that market participants, directly or through third parties, may attempt to unfairly discredit manufacturers. To prevent this, the Commission should be obliged to carry out a thorough examination of the complaint and the complainants before assigning a market surveillance authority.

Abbreviations used

AVS:	Assessment and verification systems (
htS:	Harmonised technical specifications
CPR:	European Construction Products Regulation (Regulation (EU) No. 305/2011)
MS:	Member States
SDS:	Safety Data Sheet

OJEU:	Official Journal of the European Union
ESPR:	Ecodesign for Sustainable Products Regulation
CBI:	Confidential Business Information
ECJ:	European Court of Justice
EPD:	Environmental Product Declaration (EPD)

Overview of the envisaged authorisations to adopt delegated acts

- Art. 4(3): Determination of mandatory or voluntary essential characteristics incl. test or assessment method (harmonised technical specification)
- Art. 4(4)(a): Establishment of mandatory or voluntary classes and thresholds
- Art. 4(4)(b): Establishment of WT/WFT conditions
- Art. 4(5): Amendment of Annex I, Part A 'Basic requirements for construction works and essential characteristics to be covered'.
- Art. 5(2): Establishment of product requirements for product families or product categories with regard to
- Annex I, Part B Requirements ensuring the appropriate functioning and performance of products
- Annex I, Part C Inherent product requirements
- Annex I, Part D Product information requirements
- Art. 5(3): Amendment of Parts B, C and D of Annex I
- Art. 6(1): Determination of the AVS (Annex V) for certain product families or product categories
- Art. 6(3): Amendment of Annex V (AVC systems)
- Art. 8: Fulfilment of requirements of the CPR by other Union law (avoidance of double regulation)
- Art. 11(3): Amendment of Annex II Format of the Declaration of Performance and of Conformity
- Art. 22(4): Specification of the additional environmental requirements according to Art. 22(2) for certain product families or product categories
- Art. 22(5): Introduction of compulsory 'sustainability-traffic-light-labelling'.
- Art. 35(4): Amendment of Annex III Procedure for adopting a European Assessment Document
- Art. 44(1): Amendment of Table 1 of Annex IV Product areas and requirements for TABs
- Art. 73(1): Determination of the minimum number of inspections by the market surveillance authorities of the MS
- Art. 73(2): Determination of the minimum number of personnel that MS must deploy for market surveillance
- Art. 78(1): Establishment of an EU Construction Products Data Band or EU Construction Products System
- Art. 84(1): Establishment of sustainability requirements for green public procurement by MS
- Art. 90(4): Determination of penalties for infringements of the CPR

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