



Brussels, 04 July 2022

## Position Paper of the European Association of Adhesives and Sealants Industry on the Commission Proposal for the **revision of the Construction Products Regulation (CPR)**

---

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. In this regard, FEICA works with all relevant stakeholders to create a mutually beneficial economic and legislative environment.

### **FEICA's 6 Policy Recommendations for a thriving construction sector in the European Union**

#### **1. Placing the Life Cycle Analysis at the heart of the Construction Products Regulation**

The CPR revision provides a unique opportunity to foster the sustainability of construction products. FEICA encourages the Commission and co-legislators to address the mandatory declaration of the core LCA indicators in the context of the Construction Products Regulation, rather than the Ecodesign for Sustainable Products Regulation (ESPR).

Environmental Product Declarations (EPDs) based on the EN15804 standard are well established. With the revision A2, the EPD methodology was aligned with the Product Environmental Footprint (PEF) methodology. Industry sectors developed appropriate solutions like the Model EPDs (Sector EPDs), which provide a proportionate approach that allows tangible progress towards sustainability improvements while ensuring cost-efficiency and prevent further costs increase in the context of high inflation.

Regarding the general interface between the CPR and ESPR, we are of the opinion that all relevant sustainability aspects of construction products and the Digital Product Passport should be conclusively regulated under the CPR and that construction products should be excluded from the scope of the ESPR. FEICA acknowledges the Commission statements during the CPR Q&A session on 14 June 2022 which called for CPR as the legislative instrument to address the environmental considerations for construction products, rather than ESPR that will be involved in energy-related construction products directly falling under existing Ecodesign requirements. However, postponing the definition of this interface to further secondary legislation and not already in the current legislative proposal, creates an uncertain regulatory environment that could hamper the single market for construction products.

## **2. Ensuring the well-functioning of the European Single Market for Construction Products**

Under the proposed legislation, the Member States are not allowed to define additional requirements for harmonised construction products, except on imperative grounds of health, safety or protection of the environment, including climate. This is a critical foundation to guarantee the viability of the single market and we appreciate that the European Commission is maintaining this exhaustiveness principle.

A potential path forward to further reinforce this provision should go beyond the communication of the required essential characteristics, product requirements and assessment methods. The process to identify and considering the regulatory needs of Member States in harmonised technical specifications is very unspecific. Only a clear-cut-understanding can address one of the key problems of the current CPR.

## **3. Accelerating the European Standardisation Process**

The current system has proven slow in developing harmonised standards for the construction sectors. While we recognise the limitation of the current European Committee for Standardisation (CEN) process, we encourage the Commission and co-legislators to guarantee the high quality of technical standards by optimising the interaction between CEN and the Commission services and ensuring sufficient resources are allocated to the CEN.

We believe that setting harmonised technical specifications by delegated acts should be prevented as far as possible and should remain the exception. The main goal must remain to enable the technical experts in CEN to develop standards citable in the Official Journal.

## **4. Leveraging digitalisation to its full potential with the Digital Products Passport**

We call on co-legislators to adopt the Digital Product Passport for construction products in the CPR and provide a clear, machine-readable data format in the text of the legislation that allows for digital continuity. Digital Product Passports should work in a harmonised template allowing interoperability in intermediate products like adhesives and sealants that are being used in different construction-related end markets (professionals, consumers). A uniform digital format will allow end-users to conduct user friendly compliance checks with the use of a QR code and an application.

## **5. Avoid overweening bureaucracy and protect Confidential Business Information (CBI)**

The proposed EU-Construction Products Database for declarations and supplementary information would place an extensive administrative burden on manufacturers hence it should be checked whether information from either the Declarations of Performance (DoP) or Declaration of Conformity (DoC) are sufficient. Technical documentation may contain Confidential Business Information (CBI). Such documentation should be available only to the national market surveillance authorities upon requests. The reporting obligations should be carefully calibrated in the legislation to ensure the protection of CBI and trade secrets not disclosed to competitors inside or outside the EU (data security).

## **6. Engaging industry provides necessary expertise**

The COM proposal introduces extensive empowerments for delegated acts. We call the co-legislators to check these empowerments and to ensure that the required expertise from stakeholders like member states and industry will be involved during the development of harmonised technical specifications. We believe that only a transparent and inclusive process, that involves stakeholders

from the industry and civil organisations can support the achievement of a well-functioning single market for construction products.

## Contact

### FEICA Regulatory Affairs:

Dimitrios Soutzoukis ([d.soutzoukis@feica.eu](mailto:d.soutzoukis@feica.eu))

FEICA is registered in the **EU Transparency Register** with ID no. **51642763262-89**

FEICA - Association of the European Adhesive & Sealant Industry  
Rue Belliard 40 box 10, 1040 Brussels, Belgium  
Tel: +32 (0)2 896 96 00  
[info@feica.eu](mailto:info@feica.eu) | [www.feica.eu](http://www.feica.eu)

### Publication ref.: POP-EX-L06-036

---

*This document has been designed using the best knowledge currently available, and is to be relied upon at the user's own risk. The information is provided in good faith and no representations or warranties are made with regards to the accuracy or completeness, and no liability will be accepted for damages of any nature whatsoever resulting from the use or reliance on this paper. This document does not necessarily represent the views of all member companies of FEICA.*

Copyright © FEICA, 2022