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FEICA's input to the public consultation regarding the European Commission's Inception Impact Assessment

FEICA, the Association of the European Adhesive and Sealant Industry, is a multinational association representing the European adhesive and sealant Industry. 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 aims to establish a constructive dialogue with legislators in order to act as a reliable partner and create a mutually beneficial economic and legislative environment.

FEICA's position

Both the former Construction Products Directive (CPD, Council Directive 89/106/EEC) and the Construction Products Regulation (CPR, Regulation (EU) No. 305/2011) have been the regulatory basis for construction products in Europe for the last three decades.

A solid regulatory framework is of greatest importance for the economic activities of manufacturers of construction products, such as adhesives and sealants. A consistent regulatory environment is key for an effective and working European market, which in turn allows manufacturers to provide citizens with high-quality construction products, while maintaining competitiveness.

Given that the CPR has only been fully applied since July 2013, FEICA welcomes the Commission's Inception Impact Assessment, and in particular supports **the Baseline scenario** described by the Commission, in which efforts would be made to **support the CPR implementation** through flexible and uniform interpretation.

In view of the efforts made and costs borne by all stakeholders in the construction sector (in particular the manufacturers and users) to adjust to the CPR system, all parties have the obligation to improve the system without calling it into question at this point in time. Unknown consequences for parts of the CPR (other than the ones envisaged in Option II) and the single market could arise from restarting a complex political and legislative process such as the revision of the CPR.

Conclusion

The members of FEICA are therefore in support of maintaining the stability provided by a consistent regulatory environment and strongly urge that the CPR should not at this point be subject to revision (Baseline scenario). Consequently, we oppose the repeal of the CPR (Option III) and a potential revision of the CPR (Option II).

Instead of repealing or revising the CPR, FEICA members call for pragmatic solutions to tackle the most relevant issues, aimed at ensuring a smooth and harmonised implementation of the common legislative framework for all.

Contact

FEICA Regulatory Affairs:

Nicolás Fuentes (n.fuentes@feica.eu)

FEICA - Association of the European Adhesive & Sealant Industry
Avenue Edmond van Nieuwenhuysse 4, B-1160 Brussels, Belgium

Tel: +32 (0)2 676 73 20 | Fax: +32 (0)2 676 73 99

info@feica.eu | www.feica.eu

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