FEICA The European voice of the adhesive and sealant industry

Brussels, 12 March 2018

FEICA's position regarding the public consultation on the potential revision of the Construction Products Regulation (CPR)

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.

The CPR: A harmonised framework for the Single Market

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 activities of manufacturers of construction products, such as adhesives and sealants. Such harmonisation is key for a working European Single Market, which in turn allows manufacturers to provide citizens with high-quality construction products and maintain competitiveness.

As expressed in our position paper from 18 July 2017, FEICA supports a policy approach described by the European Commission in which efforts would be made to **support the current CPR implementation** through flexible and uniform interpretation. For example, as mentioned in our input to the consultation questionnaire, the positive impact of the CPR would be higher if standards were cited – one of the key improvement areas is to reach an adequate and efficient system to ensure citation of hENs.

There are still divergent views on how to best address some of the current issues, as identified in the Commission's CPR implementation report (COM (2016) 445)[1]. FEICA members believe that, given the already high costs borne by the industry, authorities and stakeholders should work together to solve these problems through practical solutions – within the current framework – and achieve greater harmonisation in the Single Market.

Concerns associated with a full or targeted revision of the CPR

Restarting a complex political process such as the revision of the CPR is likely to create unforeseeable outcomes for parts of the CPR and the Single Market. Even slight adjustments of the regulation can translate into significant changes in the way European manufacturers (including SMEs) operate in the EU market. Should the European Commission decide to move ahead and propose a revision to the CPR, this revision should clearly be targeted at addressing the issues already identified in the CPR implementation report cited above to ensure a smoother and less costly transition for the sector. In

[1] https://ec.europa.eu/docsroom/documents/17727/attachments/1/translations/en/renditions/native

such a case, the contradictions in Article 9(2) between the information requirements for CE marking and the Declaration of Performance (DOP) should be addressed.

Conclusion

The members of FEICA favour maintaining the stability provided by a consistent regulatory environment and therefore support that the CPR should not at this point be subject to revision, but instead, improved by further harmonisation and pragmatic solutions. Should the Commission decide to go ahead with a revision, this revision should be focused and limited to the points identified in the Commission's CPR implementation report.

Contact

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