

2020 Public consultation on the Review of the Construction Products Regulation

Fields marked with * are mandatory.

Introduction

Following up on the conclusions of the evaluation of the **EU Construction Products Regulation (CPR)** published in 2019 ([available via this link](#)), the European Commission has identified **five different policy options** for how to improve the functioning of the **EU market for construction products**.

It is important to understand the preferences and expected impacts of the policy options from as many relevant and interested stakeholders as possible. **We are inviting you to share your insights, facts and expectations in this public consultation survey.** Your input is highly valuable in order to contribute to the evolution and design of the EU legislation on construction products.

The survey consists of **two parts**: the first part focuses on some **background information** about you / your organisation, and the **second part focuses on the policy options and the impacts you expect them to have**. If you are responding as an **individual in your personal capacity, you will be able to choose if you wish to respond to a shorter CPR-related questionnaire** of a more general nature, or if you wish to respond to a longer, more detailed CPR-related questionnaire that requires a certain level of prior knowledge of the CPR.

If you encounter any issues or have questions regarding the questionnaire, please feel free to contact Copenhagen Economics and the Danish Technological Institute on: CPRsurvey@dti.dk (Copenhagen Economics and the Danish Technological Institute are part of the external contractor in charge of the supporting study commissioned by the European Commission for the assessment of the impacts of future options).

Thank you for your participation.

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech

- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- Gaelic
- German
- Greek
- Hungarian
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* Is your organisation a Technical Body (*e.g. a Notified Body, Technical Assessment Body, standardisation organisation, CEN, EOTA, consultancy for national competent authorities*)?

- Yes
- No

* First name

Gonzalo

* Surname

Sánchez

* Email (this won't be published)

gonzalo.sanchez@eeb.org

* Organisation name

255 character(s) maximum

European Environmental Bureau

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

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* Country of origin

Please add your country of origin, or that of your organisation.

- Afghanistan
- Djibouti
- Libya
- Saint Martin
- Åland Islands
- Dominica
- Liechtenstein
- Saint Pierre and Miquelon

- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname

- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Myanmar /Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine

- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena Ascension and Tristan da Cunha
- Saint Kitts and Nevis
- Saint Lucia
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

*** Publication privacy settings**

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only your type of respondent, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

Public

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

I agree with the [personal data protection provisions](#)

Design of detailed survey

5 main policy options have been defined by the European Commission. Policy option C contains three different elements that can either be implemented alone or in combination with each other. Policy option D comes in two different versions, D1 and D2.

A) Baseline: No revision of the CPR, improvements to be made under the current rules and available mechanisms

B) Repairing the CPR: Option A + improvements to be made by revising various aspects of the CPR

C) Focusing the CPR: Option B +

- C1) Limit the CPR to testing methods, and/or
- C2) Limit the CPR to core areas, and/or
- C3) Make the Common Technical Language optional for manufacturers

D) Enhancing the CPR: Option B + introduction of a thin layer of general product requirements applicable to all or almost all construction products, and subsequent gradual introduction of detailed product requirements for specific products via one of two possible approaches

- D1) Essential product requirements defined in Commission legal acts + voluntary standards
- D2) Product requirements defined in Commission legal acts, co-prepared with CEN and other stakeholders

E) Repealing the CPR: The general EU Mutual recognition principle applies for construction products

We have broken down the policy options into **13 distinct CPR-related elements**. In the following, we ask you, for each of these 13 elements, to select **your most and your least preferred variant** with regard to that element (labelled as “Best” and “Worst”).

You also have the **option to skip each of these 13 elements** to which you prefer to not provide any input.

Following your selection of most and least preferred variants, we will ask you to estimate how you think your selected variants will impact your organisation and/or the EU market for construction products in general.

Please remember to save your answer responses frequently to avoid them being lost!

Element 1: Scope of EU harmonisation

The scope of EU harmonisation refers to the level of harmonisation between all products covered by the CPR. Currently, the harmonisation consists in the Common Technical Language for assessing construction product performance. Changes in the CPR can either reduce or increase the scope of harmonisation of construction products in the Single Market.

* Do you wish to provide input regarding **Scope of EU harmonisation**?

- Yes
 No

Please select the variants that you like best and worst

	Best	Worst
Variant A) No legislative change, current level of EU harmonisation, continued information efforts where and when needed about the CPR's scope.	<input type="radio"/>	<input type="radio"/>
Variant B) Variant A + Eliminate confusion about the scope of the CPR, for example by excluding some products where there is little need for regulation, little intra-EU trade and little safety or environmental concern. It would also explicitly include certain products where there currently is confusion about whether a product is covered or not (e.g. modules, kits and assemblies).	<input type="radio"/>	<input type="radio"/>
Variant C1) Variant B + Limit the CPR's scope to assessment methods only. No performance threshold levels or classes would be laid down at EU level.	<input type="radio"/>	<input type="radio"/>
Variant C2) Variant B + Limit the CPR's scope to core areas only: i) Where Member States have similar regulatory needs ii) Where there are relevant environmental or safety concerns related to the products iii) Where it is relevant for the market in other ways. Mutual recognition applies for non-core areas.	<input type="radio"/>	<input type="radio"/>
Variant C3) Variant B + Make it optional for manufacturers to use the Common Technical Language, and Member States may regulate alternative paths to market access not based on the Common Technical Language. However, Member States must offer market access to manufacturers that do use the Common Technical Language.	<input type="radio"/>	<input type="radio"/>
Variant D1 and D2) Variant B + Continue the current Common Technical Language approach, but gradually complementing it with proper EU-level product requirements. Minimum harmonisation would be the rule, full harmonisation the exception.	<input checked="" type="radio"/>	<input type="radio"/>
Variant E) Repeal the CPR: No EU-level harmonisation, mutual recognition applies but no Common Technical Language to express construction product performance.	<input type="radio"/>	<input checked="" type="radio"/>
I do not know/Indifferent	<input type="radio"/>	<input type="radio"/>

Comments:

Minimum level of harmonization should be the baseline scenario. Its definition should be comprehensive and ambitious to ensure a driver change. Maximum optimal level of harmonisation should be addressed with all of the MS requirements despite the challenge it would be. This definition has to cover at least the safety of use and environmental impacts of construction products.

If the harmonisation work takes these points on board, it will contribute to the total decarbonisation of the building sector and ensure the achievement of the environmental goal by 2050, notably carbon neutrality. These environmental harmonised technical specifications must focus on: reusability of construction products; prioritising locally available raw materials, and introducing life cycling environmental approach, but enabling to distinguish between the various life cycle steps, notably extraction and manufacturing, use stage and end of life stage. This approach will contribute to promoting a new and innovative low carbon/carbon-free market in EU. This will spread the mark of quality and sustainability of European product all over the world. When harmonisation increases with the inclusion of the MS requirements, so do the safety and sustainability of construction products.

Other EU experiences could guide this process. On the one hand, the Packaging and packaging waste Directive experience with essential requirements implementation through industrial standards and presumption of conformity, has not necessarily proven effectiveness. That is the reason why it is currently being revised as asked by both EU Parliament and the European Council and reiterated in the 2020 Council Conclusions on Make the Recovery Green and Circular. On the other hand, the experience of Ecodesign policy tends to show that the technical specifications route has been proven effective. At least the two options should be thoroughly studied.

Continuing with the current unclear approach to product requirements does not have a positive impact. This approach is based on fragmented requirements that rely upon MS action, and fragmented harmonisation of them, which could hamper the introduction of sustainability requirements. When it comes to the existing requirements, they are barely included within Harmonised Standards.

Impacts of the variant you selected as “Best”, compared to variant A (No legislative change).

Please specify all the relevant impacts that you think that your “Best” variant will have on the following aspects on the EU market for construction products, compared to variant A (no legislative change). You only need to select an answer for those impacts that you expect your “Best” variant to have (you can leave some or all impacts blank). If you leave impacts blank, they will be processed as an ‘I don’t know/Not relevant’ reply. You also have the opportunity to add comments in free text.

	Large decrease	Small decrease	No or negligible impact	Small increase	Large increase	I do not know/Not relevant
The administrative burden for your organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Cross-border trade of construction products within the EU Single Market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Exports of construction products to non-EU countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Imports of construction products from non-EU countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Economic actors' compliance with relevant rules and regulations for construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Competition among manufacturers of construction products within the EU Single Market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Safety of construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Construction product innovation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Competitiveness of micro, small and medium-sized manufacturers of construction products, compared to large manufacturers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sustainable use of resources for producing construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Durability of construction products (i.e. product lifetime)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Quality of the built environment (i.e. the human-made environment: buildings, cities, etc) in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Comments

500 character(s) maximum

Option D2 could facilitate innovative and new sustainable products through the harmonisation of requirements across EU. This option will bring mutual benefits for MS and SMEs: it will enable economy of scale, boost the European trade, help improve market surveillance and increase compliance, and create a clear framework for competition with imported products, ensuring the quality of products. Due to the legal certainty it may create, SMEs could compete with imported products and larger companies

Element 2: CE marking and Declaration of Performance (DoP)

The Declaration of Performance (DoP) provides information on the performance of a construction product – it is a standardised document that must include a set of pre-defined characteristics of the product, no more, no less. The CE marking indicates that a construction product is in conformity with its declared performance and that it has been assessed according to a European standard or that a European Technical Assessment has been issued for the product. Each construction product covered by a European harmonised standard or for which a European Technical Assessment has been issued needs to have this Declaration and has to be CE marked in order to be placed on the EU market.

* Do you wish to provide input regarding **CE marking and Declaration of Performance (DoP)**?

- Yes
 No

Please select the variants that you like best and worst

	Best	Worst
Variant A) No legislative change but continued promotion of the CE marking and DoPs through information/communication efforts	<input type="radio"/>	<input type="radio"/>
Variant B) Variant A + Clarify and eliminate information overlaps with DoP. Allow preliminary CE marking when standards are in the pipeline (valid for a limited time period). Make it possible to declare additional characteristics in the DoP.	<input type="radio"/>	<input type="radio"/>
Variant C2) Same as Variant B, but only applicable to the core areas of the CPR. For products outside the core areas, no CE marking or obligation to draw up or communicate a DoP.	<input type="radio"/>	<input type="radio"/>
Variant C3) Same as Variant B, but CE marking and DoP is only allowed for manufacturers that use the Common Technical Language. If the Common Technical Language is not used, it is not allowed to use a CE mark or a DoP, or any document that could be mistaken for a DoP.	<input type="radio"/>	<input type="radio"/>
Variant D1 and D2) Variant B + mandatory CE marking for products covered by EU product requirements (even if they are not covered by national regulation on construction works). DoP supplemented or replaced by a Declaration of Conformity with product requirements.	<input checked="" type="radio"/>	<input type="radio"/>

Variant E) Repeal the CPR: No CE marking or obligation to draw up or communicate a DoP for construction products	<input type="radio"/>	<input checked="" type="radio"/>
I do not know/Indifferent	<input type="radio"/>	<input type="radio"/>

Comments:

CPR has not brought the expected impact, however a repeal of the CPR would mean the loss of the opportunity to reinforce the EU single market, based on harmonized minimum requirements.

The current CE and DoP systems are not effective and they have not delivered a change, but this is not a reason to leave them out. The CPR revision is the opportunity to rethink how legally required performance information, currently in the form of a DoP, could be more comprehensive, powerful, and understandable, defining requirements that set a minimum product performance for health, functionality, and environmental sustainability. The current use of CE marking and DoP do not deliver guarantees of performance or safety to end users. However, it is generally agreed businesses and consumers consider the CE mark as a satisfactory declaration of performance on safety or sustainability. Because of that, CE marking has to bring a harmonised, comprehensive and robust legally required performance information which should be compiled in a digital and physical file, allowing the access to information to the agents involved.

In order to create a sustainable and recognizable mark from Europe (CE marking), the CPR has to include additional information requirements on product characteristics with regard to health, safety, and environmental aspects across the Single Market. These should include carbon footprint, material and hazardous contents, durability, reusing, and recyclability.

Impacts of the variant you selected as “Best”, compared to variant A (No legislative change).

Please specify all the relevant impacts that you think that your “Best” variant will have on the following aspects on the EU market for construction products, compared to variant A (no legislative change). You only need to select an answer for those impacts that you expect your “Best” variant to have (you can leave some or all impacts blank). If you leave impacts blank, they will be processed as an ‘I don’t know/Not relevant’ reply. You also have the opportunity to add comments in free text.

	Large decrease	Small decrease	No or negligible impact	Small increase	Large increase	I do not know/Not relevant
The administrative burden for your organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Cross-border trade of construction products within the EU Single Market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Exports of construction products to non-EU countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Imports of construction products from non-EU countries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic actors' compliance with relevant rules and regulations for construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Competition among manufacturers of construction products within the EU Single Market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Safety of construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Construction product innovation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Competitiveness of micro, small and medium-sized manufacturers of construction products, compared to large manufacturers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sustainable use of resources for producing construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Durability of construction products (i.e. product lifetime)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Quality of the built environment (i.e. the human-made environment: buildings, cities, etc) in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Comments

500 character(s) maximum

If the definition of minimum harmonized EU rules make legally required performance information clearer with comprehensive requirements, including range of safety, environmental and health impacts, this will ensure a better quality of products, extending its durability, adaptability, and sustainability, and improving the quality of built environment.

Element 3: Standardisation process

The standardisation process refers to the process of adapting and adding standards under the framework of the Construction Products Regulation. Currently, this refers to standards of the assessment of construction products' performance when incorporated in a construction work, and the Common Technical Language to express such product performance. CEN (European Committee for Standardization) develops these standards, together with Member States, industry representatives and other experts. Currently, there is a problem that many of the standards that are developed are not approved by the Commission – therefore, firms cannot refer to those standards and affix a CE mark on their products.

* Do you wish to provide input regarding **Standardisation process**?

- Yes
 No

Please select the variants that you like best and worst

	Best	Worst
Variant A) No legislative change. Attempt to further streamline standardisation work with CEN within the existing rules.	<input type="radio"/>	<input type="radio"/>
Variant B) Variant A + The Commission can complement the Common Technical Language where needed, when no harmonised standards exist or where they are insufficient. This will be based on technical content provided by private bodies and Member States' authorities. All standards will be freely available and translated into all official EU languages. Claims that are not based on Harmonised Technical Standards must be based on 'state of the art' methods or 'best available techniques'.	<input checked="" type="radio"/>	<input type="radio"/>
Variant E) Repeal the CPR: No EU standards and therefore no EU standardisation process for construction products	<input type="radio"/>	<input checked="" type="radio"/>
I do not know/Indifferent	<input type="radio"/>	<input type="radio"/>

Comments:

Under the current issues generated by the Harmonised Standards under the CPR, the variant B only presents options that could contribute to complementing common technical language by the Commission.

In order to ensure transparency, inclusiveness, and sustainable principles, legislators at EU and Member State level have to be the mandate to conduct this process of standardisation definition. There is no point in continuing under the current process of self-regulate requirements by the industry.

Existing performance requirements are minimal, which generates a fragmented European market. The minimum requirement has to include more definitions in fields which are already covered by the CPR, such as mechanical resistance and stability safety; hygiene, health, and the environment; accessibility in use; protection against noise; energy economy, and heat retention, and sustainable use of natural resources. Following variant B allows to involve several stakeholders, experts, and interested parties to contribute to the definition of the product performance requirements with their knowledge and background.

Another key aspect is to manage the information related to the performance requirements. This information has to be freely available in all EU languages so as to ensure the use for SMEs and citizens. This strategy should be aligned with the development of product passports and building passports in a common dataspace platform to analyse the Whole Life Cycle of a building including the performance requirements of products.

The Commission has to define clearly the meaning and conditions of “state of the art methods” and “best available techniques” used in the Variant B in order to ensure the environmental and safety requirements that could be compared with other products.

* What impact do you think that Variant B would have on the issue of delays in the standardisation process?

- Large decrease
- Small decrease
- No or negligible impact
- Small increase
- Large increase
- I do not know/Not relevant

Comments

500 character(s) maximum

The materialization of the standardization process is a long-term strategy; thus no immediate results can be expected. Due to the current backlog of standard definitions, a progressive plan of adaptation which will probably take substantial resources should be developed in the short term. However, the main objective is to create an efficient protocol for the standardization of construction products that could increase the efficiency and efficacy of standardization in a long-term.

Impacts of the variant you selected as “Best”, compared to variant A (No legislative change).

Please specify all the relevant impacts that you think that your “Best” variant will have on the following aspects on the EU market for construction products, compared to variant A (no legislative change). You only need to select an answer for those impacts that you expect your “Best” variant to have (you can leave some or all impacts blank). If you leave impacts blank, they will be processed as an ‘I don’t know/Not relevant’ reply. You also have the opportunity to add comments in free text.

	Large decrease	Small decrease	No or negligible impact	Small increase	Large increase	I do not know/Not relevant
The administrative burden for your organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Cross-border trade of construction products within the EU Single Market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Exports of construction products to non-EU countries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Imports of construction products from non-EU countries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic actors' compliance with relevant rules and regulations for construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Competition among manufacturers of construction products within the EU Single Market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Safety of construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Construction product innovation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Competitiveness of micro, small and medium-sized manufacturers of construction products, compared to large manufacturers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Sustainable use of resources for producing construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Durability of construction products (i.e. product lifetime)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Quality of the built environment (i.e. the human-made environment: buildings, cities, etc) in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Comments

500 character(s) maximum

Standards should fundamentally support regulatory requirements. Variant B represents a streamlined process for integrating regulatory elements into standards that will support easier compliance with regulations that directly integrate technical requirements for the sector, including those aimed at reducing environmental impacts that are effectively non-existent in standards today.

Element 4: National requirements

The purpose of the Construction Products Regulation is to improve the free circulation of construction products in the EU Single Market. Currently, Member States are not allowed to have additional, national or local, requirements that adds requirements beyond those that are harmonised at EU level. However, Member States are responsible for setting the safety, environmental and energy requirements applicable to buildings and civil engineering works. For example, a Member State is free to set the level of fire safety performance it deems necessary for construction products to be used on its territory, but it must allow market access to any product that has been placed on the market in accordance with the CPR requirements. However, there are instances where Member States do maintain national or local requirements even where they should not be allowed to do so.

* Do you wish to provide input regarding **National requirements**?

- Yes
 No

Please select the variants that you like best and worst

	Best	Worst
Variant A) No legislative change, the Commission will go against national requirements within the existing system	<input type="radio"/>	<input type="radio"/>
Variant B) Variant A + National requirements allowed only in specific cases where EU provisions do not yet cover the relevant regulatory need of the Member State	<input type="radio"/>	<input type="radio"/>
Variant C2) Same as Variant B for the core areas. For non-core areas, national requirements are allowed	<input type="radio"/>	<input type="radio"/>
Variant C3) Variant B + Member States would be allowed to have an alternative path to market access not based on the Common Technical Language, but Member States must offer market access for products that use the Common Technical Language.	<input type="radio"/>	<input type="radio"/>
Variant D1 and D2) Variant B + EU sets minimum product requirements. Member States may have additional product requirements, unless the EU has fully harmonised the requirements for a product.	<input checked="" type="radio"/>	<input type="radio"/>
Variant E) Repeal the CPR: Member States free to set requirements for all aspects of construction products, not regulated by other EU laws	<input type="radio"/>	<input checked="" type="radio"/>
I do not know/Indifferent	<input type="radio"/>	<input type="radio"/>

Comments:

There is no point in continuing with the conflict between EU and MS requirements. In order to improve the environmental, health, and functional quality of products and promote clear conditions for the single market, the harmonisation of product requirements should be developed based on a clear method of standardization.

According to the European compromise for the decarbonisation of the continent by 2050, EU legislative on product performance requirements must be ambitious, including MS requirements. This effort has to focus on integrating environmental, energy, safety, and health performance of construction products at EU level and regulatory MS requirements.

The European Single Market has a potential added value in the EU-level harmonisation of product information and performance requirements including life cycle analysis, carbon footprint impacts, durability, safety or recyclability, ensuring compliance with national regulatory measures.

EU product requirements should have ambitious minimum levels of requirements regarding environmental sustainability, safety, and health, whereas MS should be allowed to complement these requirements with additional dimensions not covered at EU level. In the case of harmonised requirements, a regular assessment to adjust these requirements has to be developed at the EU and MS levels.

In order to facilitate MS evaluations of building sustainability and support net-zero carbon buildings, EU requirements should be based on a sustainability performance assessment that would be compatible with assessments at the building level. For that purpose, several aspects related to buildings have to be considered in the production process, such as the construction and demolition waste generated or the energy performance. Regarding waste, product management practices should reduce waste and increase circularity through measures such as the establishment of requirements for deconstruction and reuse products or a construction sector EPR regime. When it comes to Energy Performance, requirements for in-use performance validation of product should be included in order to validate the impact of the product in the energy efficiency of buildings. For that purpose, embodied emissions must also be identified and included, clearly differentiating between extraction/manufacturing stages, use stage and end of life stage.

Impacts of the variant you selected as “Best”, compared to variant A (No legislative change).

Please specify all the relevant impacts that you think that your “Best” variant will have on the following aspects on the EU market for construction products, compared to variant A (no legislative change). You only need to select an answer for those impacts that you expect your “Best” variant to have (you can leave some or all impacts blank). If you leave impacts blank, they will be processed as an ‘I don’t know/Not relevant’ reply. You also have the opportunity to add comments in free text.

	Large decrease	Small decrease	No or negligible impact	Small increase	Large increase	I do not know/Not relevant
The administrative burden for your organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Cross-border trade of construction products within the EU Single Market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Exports of construction products to non-EU countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Imports of construction products from non-EU countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic actors' compliance with relevant rules and regulations for construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Competition among manufacturers of construction products within the EU Single Market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Safety of construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Construction product innovation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Competitiveness of micro, small and medium-sized manufacturers of construction products, compared to large manufacturers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Sustainable use of resources for producing construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Durability of construction products (i.e. product lifetime)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Quality of the built environment (i.e. the human-made environment: buildings, cities, etc) in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Comments

500 character(s) maximum

Under an EU leadership that coordinates all the process, variant B+D2 could bring improvements that would ensure the common product requirements and performance at the EU and MS level. This EU leadership and coordination could increase safety, environmental sustainability, durability, health, and quality of the construction products, and enforceability.

Element 5: Product safety requirements

Currently, harmonisation of construction products is limited to a harmonised method of assessment of product performance. There are no EU-wide product safety requirements defined for construction products by the CPR. It is important to note the difference between construction product safety requirements (input requirements), which may be introduced in a revised CPR, and construction safety requirements (process requirements) which would not be introduced in a revised CPR.

* Do you wish to provide input regarding **Product safety requirements?**

- Yes
- No

Please select the variants that you like best and worst

	Best	Worst
Variant A) No EU construction product safety requirements. However, national product safety requirements must comply with the general EU free movement principles (non-discrimination and mutual recognition).	<input type="radio"/>	<input type="radio"/>
Variant D1) Introduce a thin layer of horizontal EU product safety requirements applicable to the vast majority of construction products. Additional specific requirements would gradually be introduced afterwards, for certain selected products or product families. Where such EU requirements are introduced, manufacturers must comply with them and affix a CE mark, even if their products are not covered by national regulation on construction works. The EU would in most cases introduce minimum product safety requirements, so that Member States can introduce national product safety requirements in addition. In exceptional cases, the EU would introduce full product safety requirements where Member States would not be allowed to introduce national requirements. The additional specific requirements would be introduced via the New Legislative Framework approach: CEN will develop voluntary standards with essential product requirements upon request from the European Commission, and products that comply with those standards would provide presumption of conformity.	<input type="radio"/>	<input type="radio"/>
Variant D2) Same as Variant D1, except that the additional specific requirements would be introduced via the Technical specifications Approach: Detailed requirements would be included in Harmonised Technical Specifications, i.e. Commission acts would lay down harmonised technical specifications	<input checked="" type="radio"/>	<input type="radio"/>

Variant E) Repeal the CPR: Same as A, no EU construction product safety requirements. National product safety requirements must comply with the general EU free movement principles (non-discrimination and mutual recognition).	<input type="radio"/>	<input checked="" type="radio"/>
I do not know/Indifferent	<input type="radio"/>	<input type="radio"/>

Comments:

The EU-wide product safety requirements should be defined for construction products, including the MS conditions based on ongoing coordination and an updating of requirement proposals. Variant D2 could ensure a base for legal compliance with all product requirements. Product safety requirements should be developed under this variant.

The development of EU standards by the CEN that could be supporting and used within legal acts are welcome. EEB urges to develop clear and ambitious minimum requirements of products in all the areas, including safety. Safety requirements for a larger range of products and materials would contribute to increasing confidence in end-of-life products across the Single Mark.

Impacts of the variant you selected as “Best”, compared to variant A (No legislative change).

Please specify all the relevant impacts that you think that your “Best” variant will have on the following aspects on the EU market for construction products, compared to variant A (no legislative change). You only need to select an answer for those impacts that you expect your “Best” variant to have (you can leave some or all impacts blank). If you leave impacts blank, they will be processed as an ‘I don’t know/Not relevant’ reply. You also have the opportunity to add comments in free text.

	Large decrease	Small decrease	No or negligible impact	Small increase	Large increase	I do not know/Not relevant
The administrative burden for your organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Cross-border trade of construction products within the EU Single Market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Exports of construction products to non-EU countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Imports of construction products from non-EU countries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic actors' compliance with relevant rules and regulations for construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Competition among manufacturers of construction products within the EU Single Market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Safety of construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Construction product innovation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Competitiveness of micro, small and medium-sized manufacturers of construction products, compared to large manufacturers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sustainable use of resources for producing construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Durability of construction products (i.e. product lifetime)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Quality of the built environment (i.e. the human-made environment: buildings, cities, etc) in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Comments

500 character(s) maximum

Developing clear safety requirements could increase confidence and cross-border circularity at the end-of-life of products.

Element 6: Market surveillance and enforcement

Member States are responsible for ensuring proper market surveillance of construction products placed on their market. The purpose of the market surveillance activities is to ensure that construction products comply with the CPR rules. Currently, the CPR has procedures for when construction products are not marketed in conformance with the CPR, but in order to use them it must be that the declared performance of a product is inaccurate and that it poses a risk to health and safety.

A revised CPR could introduce a series of legislative measures to strengthen market surveillance and enforcement of construction products, including:

- *Stronger empowerments for market surveillance authorities related to fact-finding (e.g. the right to confiscate samples or to seize documents related to presumably non-compliant products)*
- *Stronger empowerments for market surveillance authorities to issue punitive measures on non-compliant operators (e.g. by imposing fiscal sanctions or to exclude non-compliant operators from public tenders)*
- *Allow manufacturers to sue non-compliant competitors*
- *Allow consumer and environment organisations to sue non-compliant operators*
- *Set up a sector-specific EU-wide whistle blowing portal for non-compliant construction products*
- *Introduce minimum benchmarks for the number of full-time equivalent staff at national market surveillance authorities*
- *Introduce procedures to ensure the proper performance of market surveillance staff, e.g. EU-wide qualification requirements for hiring staff*

* Do you wish to provide input regarding **Market surveillance and enforcement**?

- Yes
 No

* Are you giving your contribution as a public authority?

- Yes
 No

Please indicate the variants that you like best and worst

	Best	Worst
Variant A) No legislative change. Enhance national market surveillance enforcement through guidance and recommendations to Member State authorities.	<input type="radio"/>	<input type="radio"/>

Variant B) Variant A + a legislative package of measures to strengthen market surveillance and enforcement (the following question will allow you to indicate the measures you would prefer to be included and not included, if you select Variant B as your “Best” variant)	<input checked="" type="radio"/>	<input type="radio"/>
Variant E) Repeal the CPR: Market surveillance up to each Member State and according to national rules and procedures.	<input type="radio"/>	<input checked="" type="radio"/>
I do not know/Indifferent	<input type="radio"/>	<input type="radio"/>

Comments

In order to boost a Single Market of environmental, safety, and health construction products in Europe, a level of market surveillance is essential. Market surveillance practices should be improved at the EU and MS levels under a package of measures that provide resources for this aim.

Market surveillance should be strengthened to ensure proper detection and communication of non-compliant products, taking inspiration from the verification procedure which is legally defined in the Ecodesign implementing measures. Moreover, a package of measures to incentivize compliance, including dissuasive sanctions, resources sharing among MSs and sharing of best national experiences should be part of this strategy.

In the current situation, manufacturers have a large responsibility in the market surveillance, however, the MS authorities could play a more important role. CPR should define the responsibilities of the MS and ensure resources to carry them out.

Please indicate your preference for including the following legislative measures in a revised CPR:

	Include	Do not include	No opinion
* Stronger empowerments for market surveillance authorities related to fact-finding (e.g. the right to confiscate samples or to seize documents related to presumably non-compliant products)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Stronger empowerments for market surveillance authorities to issue punitive measures on non-compliant operators (e.g. by imposing fiscal sanctions or to exclude non-compliant operators from public tenders)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Allow manufacturers to sue non-compliant competitors	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Allow consumer and environment organisations to sue non-compliant operators	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Set up a sector-specific EU-wide whistle blowing portal for non-compliant construction products	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Introduce minimum benchmarks for the number of full-time equivalent staff at national market surveillance authorities	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* Introduce procedures to ensure the proper performance of market surveillance staff, e.g. EU-wide qualification requirements for hiring staff



Impacts of the variant you selected as “Best”, compared to variant A (No legislative change).

Please specify all the relevant impacts that you think that your “Best” variant will have on the following aspects on the EU market for construction products, compared to variant A (no legislative change). You only need to select an answer for those impacts that you expect your “Best” variant to have (you can leave some or all impacts blank). If you leave impacts blank, they will be processed as an ‘I don’t know/Not relevant’ reply. You also have the opportunity to add comments in free text.

	Large decrease	Small decrease	No or negligible impact	Small increase	Large increase	I do not know/Not relevant
The administrative burden for your organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Cross-border trade of construction products within the EU Single Market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Exports of construction products to non-EU countries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Imports of construction products from non-EU countries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic actors' compliance with relevant rules and regulations for construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Competition among manufacturers of construction products within the EU Single Market	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Safety of construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Construction product innovation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Competitiveness of micro, small and medium-sized manufacturers of construction products, compared to large manufacturers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sustainable use of resources for producing construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Durability of construction products (i.e. product lifetime)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Quality of the built environment (i.e. the human-made environment: buildings, cities, etc) in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Comments

500 character(s) maximum

Market surveillance is a key point to improving compliance and the setting of clear, precise legal minimum information and performances requirements supported by verification procedures based on standard measurement and test methods could help with that regard and boost innovation, environmental sustainability, health, and durability.

Element 7: EOTA and Technical Assessment Bodies (TABs)

EOTA is the European Organisation for Technical Assessment. Its purpose is to develop European Assessment Documents (EADs) which is a document providing information about the performance of a construction product. Technical Assessment Bodies (TABs) are the executive arm of EOTA and in charge of the technical assessment of construction products not covered or not fully covered by current standards. TABs are entitled to issue European Technical Assessments (ETAs) based on the EADs. ETAs can be used as an alternative route to market access where there are no harmonised European standards.

* Do you wish to provide input regarding **EOTA and Technical Assessment Bodies (TABs)**?

- Yes
- No

Please indicate the variants that you like best and worst

	Best	Worst
Variant A) No legislative change, work to improve the functioning of EOTA and TABs within the current rules	<input type="radio"/>	<input type="radio"/>
Variant B) The TABs would be replaced by the Regulatory Advancement Bodies (RABs). When a draft Harmonised Technical Specification (HTS) is in the pipeline, manufacturers can have their products assessed by a RAB. The RABs can issue a certificate confirming the performance and conformity of the products as requested in that draft HTS. The certificate would be valid until the actual citation or publication takes effect, or a maximum of 18 months. The certificate gives manufacturers the right to affix a preliminary CE mark followed by the letters "(pr)" and the date of expiry of the certificate, to their products. EOTA would be replaced by a follow-up organisation taking the role as a second standardisation body.	<input checked="" type="radio"/>	<input type="radio"/>
Variant E) Repeal the CPR: No need for the EOTA/TABs	<input type="radio"/>	<input checked="" type="radio"/>
I do not know/Indifferent	<input type="radio"/>	<input type="radio"/>

Comments

The current framework did not develop the all of the capacities of the EOTA and TABs. A unified body that facilitates links between regulation and requirements, such as RABs, could make the assessment processes more efficient. Under the CPR revision, novel environmental, sustainable, and safety products that are not covered by the CPR would be introduced in the market. EOTA could play the main role in guiding this process, ensuring compliance with legal requirements related to their function and intended use.

Impacts of the variant you selected as “Best”, compared to variant A (No legislative change).

Please specify all the relevant impacts that you think that your “Best” variant will have on the following aspects on the EU market for construction products, compared to variant A (no legislative change). You only need to select an answer for those impacts that you expect your “Best” variant to have (you can leave some or all impacts blank). If you leave impacts blank, they will be processed as an ‘I don’t know/Not relevant’ reply. You also have the opportunity to add comments in free text.

	Large decrease	Small decrease	No or negligible impact	Small increase	Large increase	I do not know/Not relevant
The administrative burden for your organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Cross-border trade of construction products within the EU Single Market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Exports of construction products to non-EU countries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Imports of construction products from non-EU countries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic actors' compliance with relevant rules and regulations for construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Competition among manufacturers of construction products within the EU Single Market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Safety of construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Construction product innovation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Competitiveness of micro, small and medium-sized manufacturers of construction products, compared to large manufacturers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sustainable use of resources for producing construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Durability of construction products (i.e. product lifetime)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Quality of the built environment (i.e. the human-made environment: buildings, cities, etc) in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Comments

500 character(s) maximum

Proposal B is the best option. The revision of the CPR should bring facilities to introduce novel environmental and sustainable products in the market. Consequently, a separate route to assess innovative products does not seem to be the most effective strategy. An easier market access to environmental and sustainable products needs to be developed by the Commission.

Element 8: Notified Bodies

Notified Bodies are the only recognised third parties to carry out the assessment of performance of construction products covered by the standards set in the CPR. They are appointed by the responsible authority in each Member State. Notified Bodies assess the performance of construction products, they can certify constancy of performance, and certify factory production control systems. They can carry out these activities for all, a few, or just one of the 7 Basic Requirements for construction Works (BWRs) (for example, some specialise in fire safety assessments only). However, calculating and assessing environmental impacts (BWR7) would only be possible for a few Notified Bodies, as such calculations are a science of their own.

* Do you wish to provide input regarding **Notified Bodies**?

- Yes
 No

Please indicate the variants that you like best and worst

	Best	Worst
Variant A) No legislative change, attempt to improve the functioning of the Notified Bodies within the current rules	<input type="radio"/>	<input type="radio"/>
Variant B) Variant A + Introduce mandatory qualification and competence requirements that Member States must use when they designate a Notified Body. The Commission can block the designation of a Notified Body if there is not enough evidence to prove its competence. Notified Bodies must apply clear pass-fail criteria towards manufacturers, and must change the staff responsible for certifying products of a given manufacturer every 3 years. In addition to the Notified Bodies, special bodies would be designated with specific responsibility for BWR 7 (environmental impact calculations). The special bodies could be a sub-group of the Notified Bodies, similar to the current ones in charge of fire safety.	<input checked="" type="radio"/>	<input type="radio"/>
Variant E) Repeal the CPR: no role for Notified Bodies	<input type="radio"/>	<input checked="" type="radio"/>
I do not know/Indifferent	<input type="radio"/>	<input type="radio"/>

Comments

Special bodies that calculate the environmental impacts of construction products into the notified bodies are essential so as to facilitate the access of novel products in the market and incorporate expert knowledge into the notified bodies. For this purpose, these organizations must be totally free of potential client conflicts of interest. The public authority could play a principal role in ensuring the transparency of these processes.

Element 9: Product Contact Points for Construction

The main purpose of the national Product Contact Points for Construction is to provide information about Member States' building regulations relevant to the intended use of construction products. They are currently not in charge of providing information on the harmonised system created by and under the CPR, although it happens that Product Contact Points for Construction do this anyway, while it is not clear to what extent they are used for their main purpose.

* Do you wish to provide input regarding **Product Contact Points for Construction**?

- Yes
 No

Please indicate the variants that you like best and worst

	Best	Worst
Variant A) Improve the functioning of the Product Contact Points for Construction to ensure that they fulfil their current purpose	<input type="radio"/>	<input type="radio"/>
Variant B) Variant A + Evaluate the role and use of Product Contact Points for Construction. In case they are not or hardly used for their main purpose, a different purpose could be envisaged, such as providing information about the harmonised system of the CPR	<input checked="" type="radio"/>	<input type="radio"/>
Variant E) Repeal the CPR: No obligation for Member States to administer Product Contact Points for Construction	<input type="radio"/>	<input checked="" type="radio"/>
I do not know/Indifferent	<input type="radio"/>	<input type="radio"/>

Comments

One of the main identified problems in the current CPR directive is the harmonisation and coordination between EU and MS requirements. Accordingly, a proposal for the renovation PCPCs is welcome. With this measure, they would give information from the EU level at the MS level. PCPCs could play an important role in providing information about harmonised systems of the CPR and about Member States' building regulations to local SMEs.

In case product requirements are not yet defined at the EU level, a detailed list of actions to guide the Member States in adapting PCPCs should be available in the CPR. EEB would like to highlight the importance of supporting access to innovative environmental construction products for national and local organizations.

Please indicate

	Large decrease	Small decrease	No or negligible impact	Small increase	Large increase	I do not know /Not relevant
* What impact do you think it would have on economic operators' access to relevant information, if the national Product Contact Points for Construction' purpose was changed to provide information about the harmonised system of the CPR?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments

500 character(s) maximum

It would have a good impact on compliance, facilitating the access to information at both the national and local level.

Element 10: Simplification

The CPR contains some simplification provisions to reduce the administrative burden for manufacturers. For example, manufacturers may refrain from drawing up a Declaration of Performance in some instances (e.g. if a product is custom-made), or by replacing the need for type-testing or type-calculation of a product if it is deemed that the product achieves a certain level or class of performance without further testing or calculation. However, the use of many of these simplification provisions is limited, and there are concerns that the wording of some of these provisions is unclear and difficult to understand.

Between the No change option and the Repeal option, legislative measures could be envisaged to improve simplification, for example:

- *Redraft the current simplification provisions of the CPR to clarify them*
- *Allow Member States to exempt **all firms** from all or some conformity assessment obligations*
- *Allow Member States to exempt **small, medium and micro firms** from all or some conformity assessment obligations*
- *Allow Member States to exempt **micro firms** from all or some conformity assessment obligations*
- *Make it possible for the Commission to reduce or lift AVCP obligations if manufacturers have an appropriate liability insurance in place*

* Do you wish to provide input regarding **Simplification**?

- Yes
- No

Please indicate the variants that you like best and worst

	Best	Worst
Variant A) No legislative change, promote the uptake of the current simplification provisions within the CPR to the extent possible	<input type="radio"/>	<input type="radio"/>
Variant B) Variant A + legislative measures to improve simplification (to be further examined in the following question if you select Variant B)	<input checked="" type="radio"/>	<input type="radio"/>
Variant E) Repeal the CPR: No need for simplification provisions of the CPR	<input type="radio"/>	<input type="radio"/>
I do not know/Indifferent	<input type="radio"/>	<input checked="" type="radio"/>

Comments

A simplified process could bring benefits for the introduction of innovative products in the market if this process is well implemented. However, creating an exemption environmental and safety framework to support these innovations would be a misconception. The innovative status of a product should be assessed by a qualified body of expert and including CSOs and in case recognised as an innovative solution be granted a simplified introduction to the market subordinated to a full disclosure of evidence of compliance with minimum requirements under a given timeframe.

Micro and small enterprises could benefit from it, nevertheless, this should not mean a reduction of assessment and verification of safety and environmental requirements of products. Exemption for SMEs should focus on other areas.

Please indicate your preference for including the following legislative measures in a revised CPR

	Include	Do not include	No opinion
* Redraft the current simplification provisions of the CPR to clarify them	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Allow Member States to exempt <u>all firms</u> from all or some conformity assessment obligations	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Allow Member States to exempt <u>small, medium and micro firms</u> from all or some conformity assessment obligations	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Allow Member States to exempt <u>micro firms</u> from all or some conformity assessment obligations	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Make it possible for the Commission to reduce or lift AVCP obligations if manufacturers have an appropriate liability insurance in place	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Impacts of the variant you selected as “Best”, compared to variant A (No legislative change).

Please specify all the relevant impacts that you think that your “Best” variant will have on the following aspects on the EU market for construction products, compared to variant A (no legislative change). You only need to select an answer for those impacts that you expect your “Best” variant to have (you can leave some or all impacts blank). If you leave impacts blank, they will be processed as an ‘I don’t know/Not relevant’ reply. You also have the opportunity to add comments in free text.

	Large decrease	Small decrease	No or negligible impact	Small increase	Large increase	I do not know/Not relevant
The administrative burden for your organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Cross-border trade of construction products within the EU Single Market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Exports of construction products to non-EU countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Imports of construction products from non-EU countries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic actors' compliance with relevant rules and regulations for construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Competition among manufacturers of construction products within the EU Single Market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Safety of construction products	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Construction product innovation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Competitiveness of micro, small and medium-sized manufacturers of construction products, compared to large manufacturers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sustainable use of resources for producing construction products	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Durability of construction products (i.e. product lifetime)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Quality of the built environment (i.e. the human-made environment: buildings, cities, etc) in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments

500 character(s) maximum

Element 11: New business models / products – 3D-printing, prefabricated houses

Standardised rules as laid down by the CPR refer mostly to traditional construction products. Innovative products, such as 3D printed construction products of pre-fabricated small one-family houses, are usually not, or at least not fully, covered by the CPR's scope.

* Do you wish to provide input regarding **New business models / products – 3D-printing, prefabricated houses**?

- Yes
- No

Please indicate the variants that you like best and worst

	Best	Worst
Variant A) No legislative change, implying no anticipation of/provisions for new business models in the CPR beyond what is currently possible	<input type="radio"/>	<input type="radio"/>
Variant B) Legislative change so that the CPR would anticipate new business models, for instance by bringing materials and datasets used for 3D-printing of construction products, and small prefabricated one-family houses, within its scope. Operators of 3D-printshops would be assigned the responsibilities of distributors within the meaning of the current CPR. The Commission would further be empowered to modify the CPR's scope and/or to make clarifications regarding the CPR's application to new business models in the future.	<input checked="" type="radio"/>	<input type="radio"/>
Variant E) Repeal the CPR: No (need for) the CPR to anticipate new business models, up to each Member State to regulate market access for new construction products.	<input type="radio"/>	<input type="radio"/>
I do not know/Indifferent	<input type="radio"/>	<input checked="" type="radio"/>

Comments

New business models/products – 3D-printing and prefabricated houses are one of the main topics in the construction sector for the following years. New approaches could bring innovative solutions to decarbonize the construction sector and make construction products more sustainable. Anyway, all the products that want to have access to the market must fulfil the minimum environmental requirement performances

On the other hand, new business models should focus on the introduction of circular economy principles in the construction sector, as the European Green Deal mentioned. The Commission should prioritise the support for business models for reuse and recycle. CPR should support several areas, such as the digitalization of buildings, the creation of a product passport to improve transparency and data sharing to cover the entire value chain and product lifecycle, and the promotion of reliable maintenance, repair, reuse, and recycling of constructions products.

Another business model that should be considered is product-as-a-service (PaaS). PaaS business merges the sale of a product with services related to its maintenance, repair, and guarantees. Some components of buildings, which usually focus on non-structural components, could be regularly maintained and punctually replaced in order to extend the service life of the building and its safety and health conditions. The aim of PaaS business is to reduce the need to replace components by increasing their efficiency. However, in case certain components need replacing, a plan of reusing and recycling them has to be developed to avoid an environmental impact and to extend the life-cycle of construction materials.

Impacts of the variant you selected as “Best”, compared to variant A (No legislative change).

Please specify all the relevant impacts that you think that your “Best” variant will have on the following aspects on the EU market for construction products, compared to variant A (no legislative change). You only need to select an answer for those impacts that you expect your “Best” variant to have (you can leave some or all impacts blank). If you leave impacts blank, they will be processed as an ‘I don’t know/Not relevant’ reply. You also have the opportunity to add comments in free text.

	Large decrease	Small decrease	No or negligible impact	Small increase	Large increase	I do not know/Not relevant
The administrative burden for your organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Cross-border trade of construction products within the EU Single Market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Exports of construction products to non-EU countries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Imports of construction products from non-EU countries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic actors' compliance with relevant rules and regulations for construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Competition among manufacturers of construction products within the EU Single Market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Safety of construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Construction product innovation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Competitiveness of micro, small and medium-sized manufacturers of construction products, compared to large manufacturers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sustainable use of resources for producing construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Durability of construction products (i.e. product lifetime)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Quality of the built environment (i.e. the human-made environment: buildings, cities, etc) in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments

500 character(s) maximum

As mentioned before, the benefits that 3D, prefab, and modular construction products could bring should not divert the centre of attention. The main new business model has to focus on introducing more durable, adaptable, sustainable, environmental, health, and safe construction products that improve its value during its life cycle. Innovations are welcome if they cover all these aspects.

Element 12: Environmental aspects (BWR7 Sustainable use of natural resources)

The CPR does not include a harmonised method for assessing and communicating a construction product's environmental performance. It is likely that Member States will increasingly introduce national legislation on how to assess the environmental footprint of buildings and other construction works, and therefore indirectly also the environmental footprint of construction products.

* Do you wish to provide input regarding **Environmental aspects (BWR7 Sustainable use of natural resources)**?

- Yes
- No

Please indicate the variants that you like best and worst

	Best	Worst
Variant A) Continued slow introduction of requirements regarding environmental aspects in harmonised standards	<input type="radio"/>	<input checked="" type="radio"/>
Variant B) Introduce a harmonised method for assessing and communicating the environmental performance of construction products. The harmonised method would be based on an existing Life Cycle Assessment method, for example the Commission's Product Environmental Footprint or EN 15804. It is currently open which method that will be chosen.	<input checked="" type="radio"/>	<input type="radio"/>
Variant E) Repeal the CPR: No Basic Works Requirements	<input type="radio"/>	<input type="radio"/>
I do not know/Indifferent	<input type="radio"/>	<input type="radio"/>

Comments

Creating and implementing a harmonised method to assess and communicate construction products' environmental performances is essential to ensure the proper environmental performance of products in the whole of Europe. Because of the fragmentation of EPD systems, there is not so much comparability in essence between construction products and data quality issues. EEB recommends using the strengths of existing methods of assessment to ensure comprehensive, accessible, intelligible, and accurate information. This environmental performance information has to reach retailers, installers and end-users, enabling comparisons between materials and solutions. This would support a lifecycle approach, boosting the eco-design values and changing consumption patterns.

For this purpose, the current Environmental Product Declaration is not the best choice to guide this process. It was created to fit in a fragmented market and other certification schemes, therefore, a wide adaptation will be necessary to tackle this topic. Variant B should be developed under a fully harmonized approach that could achieve environmental goals.

In order to drive change, access to information has to be completed with a framework that establishes the product requirements needed to reduce the environmental impact of construction products. The development of minimum requirements across all environmental performance indicators should be a priority to prevent and reduce the environmental impacts of construction products. These requirements should support environmental actions, such as reducing the use of raw materials, increasing the use of recyclable, secondary raw and locally available raw materials, preventing the use of harmful substances, decreasing the embodied emissions, and reducing manufacture and construction waste. In the same way, bio-based material should be regulated under the cascade use principles to not ignore the impacts these products have on land use, water use, and biodiversity.

In order to compare construction products properly, minimum resource efficiency requirements should be considered to be developed for each functional product group. These requirements should be a ratio based on the environmental footprint derived from the quantity of material used. That could promote a more efficient use of resources to manufacture products.

Impacts of the variant you selected as “Best”, compared to variant A (No legislative change).

Please specify all the relevant impacts that you think that your “Best” variant will have on the following aspects on the EU market for construction products, compared to variant A (no legislative change). You only need to select an answer for those impacts that you expect your “Best” variant to have (you can leave some or all impacts blank). If you leave impacts blank, they will be processed as an ‘I don’t know/Not relevant’ reply. You also have the opportunity to add comments in free text.

	Large decrease	Small decrease	No or negligible impact	Small increase	Large increase	I do not know/Not relevant
The administrative burden for your organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Cross-border trade of construction products within the EU Single Market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Exports of construction products to non-EU countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Imports of construction products from non-EU countries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic actors' compliance with relevant rules and regulations for construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Competition among manufacturers of construction products within the EU Single Market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Safety of construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Construction product innovation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Competitiveness of micro, small and medium-sized manufacturers of construction products, compared to large manufacturers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sustainable use of resources for producing construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Durability of construction products (i.e. product lifetime)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Quality of the built environment (i.e. the human-made environment: buildings, cities, etc) in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Comments

500 character(s) maximum

The CPR revision has to include a commitment to introduce environmental construction product requirements. The introduction of a harmonised method could bring a large improvement in each environmental impact indicator based on comprehensive product performance requirements for environmental sustainability. It will also enhance market surveillance and sharing of best practices among MSs.

Element 13: Circular economy

A circular economy is an economic system aimed at eliminating waste and promoting a continued use of resources. Currently, the CPR does not contain specific rules for used or remanufactured (i.e. altered in some way, e.g. by cleaning the products, cutting off damaged parts, or a new coating), construction products.

For this element, there are two alternatives of Variant B, representing two different ways in which a revised CPR could introduce specific rules for used or remanufactured construction products.

* Do you wish to provide input regarding **Circular economy**?

- Yes
 No

Please indicate the variants that you like best and worst

	Best	Worst
Variant A) No specific provisions regarding the placement of used or remanufactured construction products in the EU Single Market	<input type="radio"/>	<input checked="" type="radio"/>
Variant B1) Allow certain used or remanufactured construction products to obtain CE marking in the same way as new products, with limited obligations for companies. Certain obligations would be introduced for manufacturers to promote the circularity of the construction sector, for example an obligation to take back construction products from a construction site that have not been used, or an obligation to ensure appropriate access to spare parts to repair damaged construction products.	<input checked="" type="radio"/>	<input type="radio"/>
Variant B2) The revised CPR defines a 'gold standard' for (very few) used or remanufactured products and allow free circulation in the EU for those products. Member States would regulate all other products outside the 'gold standard'	<input type="radio"/>	<input type="radio"/>
Variant E) Repeal the CPR: Up to each Member State to regulate market access criteria for used and remanufactured construction products	<input type="radio"/>	<input type="radio"/>
I do not know/Indifferent	<input type="radio"/>	<input type="radio"/>

Comments

The circular economy principles should be included in the revision of the CPR in order to make the value chain of the construction sector more sustainable. The CPR has a key role in this transition due to the fact that construction products have a direct impact on all construction stages. The production of materials has to take into account their impacts on manufacturing, construction, operation and maintenance, dismantling and waste, and end-of-life stages. A framework position to boost the production and use of secondary raw materials and renewable products and materials on the market would bring economical and environmental benefits across the EU.

A strong commitment by the Commission is necessary to align and improve the coherence of the environmental requirements within construction product legislation, supported by harmonized standards.

The revision of the CPR should support circularity in the construction sector, including measures as the following ones: establishing methodological assessment for products and materials that would be reused, remanufactured, or recycled, including environmental, health, and safety requirements; increasing confidence in the market for these products; increasing the use of locally available materials; driving improved product performance; extending the life cycle of materials.

Variant B1 should include provisions that ensure reuse and recycle materials for new products that could be used in their end-of-life stage through the development of specific recycled content requirements (plastics) or recyclability requirements (metals) based on minimum recycling targets set for specific materials in addition to the overall 70% recycling & backfilling target set in the Waste Framework Directive for construction and demolition waste.

The companies that produce reused, remanufactured, or manufactured from recycled material products should ensure a proper assessment of them to increase confidence in the market. This process should be supported by both MS and EU institutions.

Lastly, the relevance of setting take-back schemes and Extended Producer Responsibility (EPR) systems for some construction materials should be considered in this revision in order to complement minimum product requirements and decrease environmental impacts of construction and demolition waste.

Impacts of the variant you selected as “Best”, compared to variant A (No legislative change).

Please specify all the relevant impacts that you think that your “Best” variant will have on the following aspects on the EU market for construction products, compared to variant A (no legislative change). You only need to select an answer for those impacts that you expect your “Best” variant to have (you can leave some or all impacts blank). If you leave impacts blank, they will be processed as an ‘I don’t know/Not relevant’ reply. You also have the opportunity to add comments in free text.

	Large decrease	Small decrease	No or negligible impact	Small increase	Large increase	I do not know/Not relevant
The administrative burden for your organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Cross-border trade of construction products within the EU Single Market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Exports of construction products to non-EU countries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Imports of construction products from non-EU countries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic actors' compliance with relevant rules and regulations for construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Competition among manufacturers of construction products within the EU Single Market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Safety of construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Construction product innovation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Competitiveness of micro, small and medium-sized manufacturers of construction products, compared to large manufacturers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sustainable use of resources for producing construction products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Durability of construction products (i.e. product lifetime)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Quality of the built environment (i.e. the human-made environment: buildings, cities, etc) in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Comments

500 character(s) maximum

No legislative changes will block the achievements of CEAP and the EGD objectives in the building sector. CPR is not currently able to meet these objectives; therefore, an ambitious revision should be developed to update the current European situation. Variant B1 is the option that could generate a maximum impact across the EU. A good system of assessment and validation of potential circular products could increase the confidence in the market and bring broader benefits for companies and the MS.

Interest in participating in the validation workshop

Later during the course of the project, we will host a validation workshop which will either take place in Brussels or online where the project team will present the findings of the analysis, for discussion among interested stakeholders. If you are interested in joining the validation workshop, please indicate your interest by selecting "yes" in the question below. The expression of interest is non-binding.

*** Would you like to receive an invitation to the validation workshop where the findings and conclusions of the project will be discussed?**

- Yes
- No

Thank you for participating in this survey, providing valuable insights to the work on the EU legislation on construction products. Please submit your reply by clicking "Submit" below.

[Link to Europa page for further updates](#)

Contact

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