

Role of standards

ENs contain the technical language of construction stakeholders. They are essential for manufacturers and customers and users alike.

ENs revision should deliver more consistent and complete standards keeping their compulsory part (hEN) as a regulatory tool and their voluntary part (EN) developed according to the industry and market needs.

> Regulatory purpose of standards should allow and support the development of voluntary content

hENs are tools for regulators but ENs should not be limited to this purpose.

Barriers to trade

Construction Products Regulation is intended to remove barriers to trade:

- Providing relevant information;
- Using common test methods;
- Under a European approach.

Stakeholders sometimes request additional information and assessments to better understand product behavior and suitability for use.

> Standards should keep a European approach to facilitate removal of barriers to trade

A complete EN is key to satisfying the demands of customers.

Products Europe organised a workshop to discuss standardisation activities under the framework of the Construction Products Regulation (CPR). Over 60 experts were in attendance. They are active in CEN technical committees for various construction products. Overall, the debate focused on the revision of harmonised standards (hEN).

The morning session was dedicated to the CEN standardisation protocol and the identification of core issues related to the CPR implementation in standards. In their presentations, Eric Winnepenninckx (FIEC) and Antonio Caballero (Construction Products Europe) underlined the gaps between the information required by contractors and the legal requirements that have to be met by producers. This led to a fruitful open debate with the experts.

This report presents the outcome of the workshop in the form of a list of issues to be addressed urgently by all concerned parties. It is a working document to be used by all stakeholders, standardisation bodies and regulators to improve construction products standards under the CPR.





hEN development

Regulatory approach of hEN is based on Mandates but:

- Mandates are not clear;
- Mandates are out of date:
- Amendments and answers to the mandates procedure are not transparent.

Mandates are not always consistent with regulatory needs.

Mandates and their development should be improved to facilitate standardisation

Mandates are the basis of hENs and have a huge impact on their quality.

Classes of performance

Declaration through classes is key for understandable standards and usually better than numeric values:

- facilitates designation of products;
- quarantees good understanding;
- is market driven.

Classes of performance are very useful.

Classes development is a TC's task Process should be fast and clear

Cases where classes become barriers to trade should be prevented without slowing down development of the other cases.

Thresholds

Declared performance through thresholds (including pass/fail criteria) is useful in some cases:

- ▼ is sometimes the only way (impact tests, permeability test...)
- is linked to market use.

In general classes of performance are a better option.

Thresholds are needed and should be discussed under a technical approach

EU legal considerations about thresholds including complex procedures for approval limit the freedom of sectors to express the performance in the best way.

Classes and thresholds developed for the voluntary part of standards should be possible to provide relevant information not related to regulatory needs.



Templates and guidance

Guidance documents and templates (Annex ZA) are key to homogenous practical standards:

- help drafting process;
- prevent questions and wrong interpretation.

Guidance should be consistent, agreed, stable in time and flexible under certain conditions.

Template for Annex ZA should be approved quickly and remain valid for a number of years (before starting revision of hEN)

Quality hENs demand a first-rate unambiguous Annex ZA template. TCs cannot deal with unjustified revisions.

hEN assessment

Citation in the OJEU is the culmination of the standardisation process but:

- is often delayed;
- ▼ is subject to additional assessment.

Market cannot deal with CEN published standards including Annex ZA when not cited in the OJEU.

Assessment and resolution of questions on hEN should be done in early stages

EC and TCs should work together to guarantee that published standards are cited in the shortest possible period of time.

MS and stakeholders involvement

The role of Member States is key to maintaining the system through coordination with Market Surveillance Authorities, Notifying Authorities and National Regulators.

Information for TCs about national requirements must come from reliable sources.

Standardisation should benefit from coordination between stakeholders and authorities

National Authorities and stakeholders must be more involved in the development of mandates.

Market needs should be top priority

- Early identification of problems;
- Cost efficient and practical decisions;
- Open discussion on the development of delegated acts for AVCP systems, CWT / CWFT... (now limited to European and National Authorities).

Expertise and market needs may be overlooked if stakeholders do not participate in the discussions.