



EFCA Position on the future options for the review of the Construction Products Regulation (CPR)

Re. EC survey on the Future Options for the Review of the Construction Products Regulation
Brussels, August 20th, 2020

The Construction Product Regulation represents the Common Technical Language for CE Marking, which preserves and strengthens the benefits of the single market, avoiding barriers to trade.

The European Federation of Concrete Admixtures Associations (EFCA) is a strong supporter of this system, and through this position paper, EFCA intends to share its concerns over the radical changes proposed by the European Commission in the *Refined Indicative Options for the Review of the Construction Products Regulation*.

EFCA believes that while a targeted improvement of the Construction Products Regulation (CPR) would benefit all stakeholders, some of the Commission's current suggestions risk affecting the construction sector very negatively in terms of adaption costs, timeliness and **the practicability of implementation**.

Harmonized product standards and related testing methods are essential tools for manufacturers to produce and supply construction products under harmonized conditions. A important prerequisite for a functioning European single market is the regular adaptation of the harmonized product standards to technical progress.

The European product standards for concrete admixtures **EN 934 Admixtures for concrete, mortar and grout** and the related **EN 480 Test methods**, are harmonised under the Construction Product Regulation, and the package of technical specifications has always been used by the European Member States as reference for their national requirements.

Currently a revision of EN 934 -2 is urgently needed to include a new type of admixture (shrinkage reducers) to consider the technical progress in the field of concrete technology. Due to the uncertainties of the European Commission intentions on the future of the CPR, the present revision process has come to a standstill so that industry is not able to market the new concrete admixtures types under harmonised conditions. This delay is a significant issue for the concrete admixtures industry and for all the stakeholders in the supply chain. The problems described must be resolved in short term within the current legal framework (current CPR). It is not acceptable to postpone possible solutions until a revised CPR comes into force.

To date, the CE marking system has been proved to work satisfactorily. Consequently, **EFCA holds the opinion that improvement in the system could be better achieved without legislative changes, but by improving implementation through guidance, and by adopting a "soft-law approach" by the European Commission.**



For this reason, EFCA (and the related construction sectors) believes that the market needs the CPR to function properly, and that a “soft updated CPR” from the European Commission represents the best way forward.

At the same time EFCA considers **CEN** to be the reference body of the entire regulation process, and the only body entitled to develop harmonized standards, with a clear distinction between “legal”(under the European Commission) and “technical” (under CEN/EOTA) requirements.

Furthermore, the concrete admixture industry follows and supports the new policies promoted by the European Commission under the new green deal, and believes that environmental aspects can be implemented only within the current regulatory framework.

Harmonisation should be based only on EN 15804 – A”, developed within integrated part of the PEF approach. Therefore, the Environmental Product Declaration should remain the only reference tool in the CPR.

In the light of these arguments, EFCA and its members strongly recommend that improvement of the current system, rather than complete change, is the best way forward, and we encourage the identification of viable short- and medium-term solutions to the current harmonization backlog and the allocation of sufficient resources for this purpose.

Who is EFCA

Founded in 1984 to represent the interests of the industry at a time when the European legislation and standardization of construction products was increasing, the European Federation of Concrete Admixtures (EFCA), a partnership of 12 National Associations, is the voice of the European admixtures’ producers. EFCA members represent more than 80 producers including all the major admixture manufacturers, all together supplying more than 80% of admixtures in Europe. More than 1.4 million tons were supplied by EFCA members in 2019.

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