

With the next revision of the Construction Products Regulation¹ (CPR), rules for optional reduced CE marking and labelling should be considered. These could be included in Art. 9.2 or included in a derogation clause.

This option would boost the competitiveness of our industry, especially SMEs. More so, the reliability of the Declaration of Performance (DoP) would be reinforced and the visibility of the CE marking would increase.

For some construction products manufacturers it is near impossible to use CE labels to deliver the required information in an understandable way. Therefore, instead of providing it on the products or packaging, manufacturers are delivering the legally required information through accompanying commercial documents. This costly practice leads to wastage of resources and contravenes sustainability principles. More so, it is expected that the number of declared performances of construction products will increase and as more information may be required, the current CE marking rules will require larger labels, thereby further increasing the burden on industry.

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The purpose of our CE marking is to link construction products with their DoP. The option to work with a reduced CE marking would still guarantee access to the information provided in the DoP, irrespective of the (official) language.

A revised CPR may require to include a minimum set of information in the CE marking. Therefore, clear rules should be based on the inputs of the industry, described in the relevant mandates and explicitly indicated in the harmonised technical specifications. This would guarantee a harmonised and balanced legal approach.

Benefits

The optional reduced CE label would allow manufacturers to affix the label to the product, its packaging or its accompanying commercial documents. The information provided by the reduced CE marking would be easily accessible and its use would avoid the need to consult additional intermediary documents. More so, the information would be easily understood by recipients as DoPs are supplied in the language(s) required by Member States where products are made available.

Last but not least, this proposed option would show the DoP as a reliable and uniform source of information. More so, it would help harmonise the provision of labels (less content, less variability).

Impact assessment

According to the study on *Economic impacts of the Construction Products Regulation*² there are some 215,772 companies that input the construction sector. The types of products and markets are variable but generally the majority of these enterprises manufacture products for which CE marking is compulsory. Assuming that every company places on the market at least a daily production batch, any expenses reduction linked to CE marking will be immediately translated into savings. A competitiveness boost would be delivered to the industry, especially to our SMEs.

¹ Regulation (EU) No 305/2011

² <http://ec.europa.eu/DocsRoom/documents/20903>

This option would greatly increase the visibility of the CE marking as size restrictions would no longer be a barrier to its use.

The majority of our customers advised us that the CE logo with a link to the DoP will enable them to obtain the information whenever it is required.

External reports

The following reports reflect the burden caused by the duplicity of information in the CE label and DoP:

- ▼ *Analysis of implementation of the Construction Products Regulation*³ (2015)
- ▼ *Implementation of the CPR*⁴ Report from the Commission to the European Parliament and to the Council (2016)
- ▼ *Study on economic impacts of the Construction Products Regulation*⁵ (2016)

Construction Products Europe (CPE) is a international non-profit making association made up of national and European associations that represent small and medium-size enterprises and world-leading companies. CPE aims to promote the European construction industry, to share information on EU legislation and standardisation and to provide input in all European construction-related initiatives.

³ <https://bookshop.europa.eu/en/analysis-of-the-implementation-of-the-construction-products-regulation-pbET0415686/>

⁴ <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52016DC0445&from=EN>

⁵ <http://ec.europa.eu/DocsRoom/documents/20903>