

Open public consultation on EU rules for products used in the construction of buildings and infrastructure works

Fields marked with * are mandatory.

Information about respondents

* 1. You are replying:

- ☐ as an individual in your personal capacity
- ☐ in your professional capacity or on behalf of an organisation

* 2. Your first name:

* 3. Your last name:

* 4. Your country of residence:

- ☐ Austria
- ☐ Belgium
- ☐ Bulgaria
- ☐ Croatia
- ☐ Cyprus
- ☐ Czech Republic
- ☐ Denmark
- ☐ Estonia
- ☐ Finland
- ☐ France
- ☐ Germany
- ☐ Greece
- ☐ Hungary
- ☐ Ireland
- ☐ Italy
- ☐ Latvia
- ☐ Lithuania
- ☐ Luxembourg
- ☐ Malta
- ☐ Netherlands
- ☐ Poland

- ☐ Portugal
- ☐ Romania
- ☐ Slovak Republic
- ☐ Slovenia
- ☐ Spain
- ☐ Sweden
- ☐ United Kingdom
- ☐ Other

* Please specify:

* 5. Name of the organisation:

* 6. Postal address of the organisation:

* 7. Country of organisation's headquarters:

- ☐ Austria
- ☐ Belgium
- ☐ Bulgaria
- ☐ Croatia
- ☐ Cyprus
- ☐ Czech Republic
- ☐ Denmark
- ☐ Estonia
- ☐ Finland
- ☐ France
- ☐ Germany
- ☐ Greece
- ☐ Hungary
- ☐ Ireland
- ☐ Italy
- ☐ Latvia
- ☐ Lithuania
- ☐ Luxembourg
- ☐ Malta
- ☐ Netherlands
- ☐ Poland
- ☐ Portugal
- ☐ Romania
- ☐ Slovak Republic

- ☐ Slovenia
- ☐ Spain
- ☐ Sweden
- ☐ United Kingdom
- ☐ Other

* Please specify:

* 8. Type of organisation:

- ☐ Company or sole trader trader (manufacturer, importer, distributor, builder, designer, supplier, final user)
- ☐ Business representative (industry association, chamber of commerce, professional organisation)
- ☐ Technical body (notified body, technical assessment body, standardisation organisation, EOTA)
- ☐ Public authority or testing body (market surveillance e.g. inspectors/enforcement authorities, accreditation, notifying authority, product contact point, building controls)
- ☐ Non-governmental organisation
- ☐ Representative of construction workers
- ☐ Consumer organisation
- ☐ Research/academia
- ☐ Other

* Please specify:

* 9. How many employees does your enterprise have?

- ☐ More than 250 employees
- ☐ Between 50 and 249 employees
- ☐ Between 10 and 49 employees
- ☐ Less than 10 employees
- ☐ I am self-employed

* 10. Is your organisation included in the Transparency register?

If it is not, we invite you to register [here](#), although it is not compulsory to be registered to reply to this consultation.

(see: [Why a transparency register?](#))

- ☐ Yes
- ☐ No
- ☐ Not applicable

* 11. Please enter your Register ID number:

* 12. Your contribution

(Note that, whatever option is chosen, your answers may be subject to a request for public access to documents under Regulation (EC) N°1049/2001)

- ☐ can be published with your organisation's information *(I consent the publication of all information in my contribution in whole or in part including the name of my organisation, and I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication)*
- ☐ can be published provided that your organisation remains anonymous *(I consent to the publication of any information in my contribution in whole or in part - which may include quotes or opinions I express - provided that it is done anonymously. I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent the publication).*

Consultation



13. Do you know this symbol?

- ☐ Yes
- ☐ No

14. In your view what information does it provide with regard to construction products?

(it is possible to select more than one reply)

- ☐ This construction product has been assessed as to its performance in accordance with a harmonised European standard or a European Assessment Document
- ☐ This construction product complies with applicable local, regional or national building requirements and can therefore be used
- ☐ This construction product is safe
- ☐ This construction product is environmentally sustainable
- ☐ This construction product is made in the European Union
- ☐ I don't know

15. The following main elements of the EU legislation on construction products aim to provide a level playing field for all stakeholders working with construction products:

- harmonised European standards defining the performance characteristics of a product that could be tested as well as the test method that has to be used, and the reporting format for informing about the results;
- a harmonised system to select testing/assessment bodies (called "Notified Bodies") and to define their precise role, so as to ensure that the testing/assessment is done in all EU Member States in the same way.

Please rate how you think the above main elements have impacted the following issues:

	Large decrease	Some decrease	No effect	Some increase	Large increase	I don't know or not applicable
a) Market opportunities for companies in other Member States than their own	☐	☐	☐	☐	☐	☐
b) Competition in your national market	☐	☐	☐	☐	☐	☐
c) Market opportunities for EU companies in countries outside the EU	☐	☐	☐	☐	☐	☐
d) Ability for small companies to compete with big companies	☐	☐	☐	☐	☐	☐
e) Product choice for end-users	☐	☐	☐	☐	☐	☐
f) Product information for end-users	☐	☐	☐	☐	☐	☐
g) Innovation in the construction products sector	☐	☐	☐	☐	☐	☐
h) Product safety	☐	☐	☐	☐	☐	☐
i) Overall cost of production	☐	☐	☐	☐	☐	☐
j) Administrative costs to apply SME and simplification provisions	☐	☐	☐	☐	☐	☐

Other impacts, please specify:

1000 character(s) maximum

You may elaborate on issues which are the most important or applicable in your case:

1000 character(s) maximum

16. Before the introduction of harmonised European standards for construction products, you were generally using national/regional systems.

Comparing the situations before and since the introduction of harmonised European standards, how would you consider that the benefits of the EU legislation on construction products (e.g. improved product information, improved product safety, increased cross-border trade, greater market opportunities, greater product choice, greater legal certainty) compare to the costs you bear (e.g. fees and charges, administrative costs, staff costs, materials costs, investment costs, hassle costs) when applying it?

- ☐ The costs greatly outweigh the benefits
- ☐ The costs just about outweigh the benefits
- ☐ The benefits are equal to the costs
- ☐ The benefits just about outweigh the costs
- ☐ The benefits greatly outweigh the costs
- ☐ I don't know

Please explain with reference to your case:

1000 character(s) maximum

17. In your view, could the benefits of EU legislation on construction products be achieved at a lower cost?

- ☐ Yes
- ☐ No
- ☐ I don't know

If "yes", please explain with reference of your case:

1000 character(s) maximum

18. Please tell us whether in your view the CPR addresses each of the following potential issues regarding construction products sufficiently or not?

a) Extent and usefulness of information available to users of construction products (professional users and consumers)

- ☐ This is not a significant issue
- ☐ This is a significant issue but it should not be addressed by EU legislation on construction products
- ☐ This is a significant issue and it should be addressed by EU legislation on construction products
- ☐ I don't know

Please explain:

1000 character(s) maximum

b) Extent of choice available for consumers in construction products

- ☐ This is not a significant issue
- ☐ This is a significant issue but it should not be addressed by EU legislation on construction products

- ☐ This is a significant issue and it should be addressed by EU legislation on construction products
- ☐ I don't know

Please explain:

1000 character(s) maximum

c) Legal certainty in the market for construction products

- ☐ This is not a significant issue
- ☐ This is a significant issue but it should not be addressed by EU legislation on construction products
- ☐ This is a significant issue and it should be addressed by EU legislation on construction products
- ☐ I don't know

Please explain:

1000 character(s) maximum

d) Extent of cross-border trade between EU Member States

- ☐ This is not a significant issue
- ☐ This is a significant issue but it should not be addressed by EU legislation on construction products
- ☐ This is a significant issue and it should be addressed by EU legislation on construction products
- ☐ I don't know

Please explain:

1000 character(s) maximum

e) Level of administrative costs for market operators to comply with the EU legislation on construction products

- ☐ This is not a significant issue
- ☐ This is a significant issue but it should not be addressed by EU legislation on construction products
- ☐ This is a significant issue and it should be addressed by EU legislation on construction products
- ☐ I don't know

Please explain:

1000 character(s) maximum

f) Safety of construction products

- ☐ This is not a significant issue
- ☐ This is a significant issue but it should not be addressed by EU legislation on construction products
- ☐ This is a significant issue and it should be addressed by EU legislation on construction products

☐ I don't know

Please explain:

1000 character(s) maximum

g) Environmental impact of construction products

- ☐ This is not a significant issue
- ☐ This is a significant issue but it should not be addressed by EU legislation on construction products
- ☐ This is a significant issue and it should be addressed by EU legislation on construction products
- ☐ I don't know

Please explain:

1000 character(s) maximum

h) Energy efficiency of construction products

- ☐ This is not a significant issue
- ☐ This is a significant issue but it should not be addressed by EU legislation on construction products
- ☐ This is a significant issue and it should be addressed by EU legislation on construction products
- ☐ I don't know

Please explain:

1000 character(s) maximum

i) Innovation in general, in particular information and information processing technologies (including BIM Building information modelling) use in the construction product sector

- ☐ This is not a significant issue
- ☐ This is a significant issue but it should not be addressed by EU legislation on construction products
- ☐ This is a significant issue and it should be addressed by EU legislation on construction products
- ☐ I don't know

Please explain:

1000 character(s) maximum

19. Do you see any contradictions or overlaps between the EU Construction Products Regulation and other legislation at EU or national level (for example, rules on public procurement, rules on product safety, rules on eco-design, rules on health and safety of workers)?

- ☐ Yes
- ☐ No

☐ I don't know

If "yes", please explain with reference to your case:

1000 character(s) maximum

20. Do you see any positive synergies between the EU Construction Products Regulation and other legislation at EU or national level (for example, rules on public procurement, rules on product safety, rules on eco-design, rules on health and safety of workers)?

- ☐ Yes
☐ No
☐ I don't know

If "yes", please explain with reference to your case:

1000 character(s) maximum

21. Do you think there is merit in legislating on construction products at EU level compared to doing it at national level (28 (27) national regimes)?

- ☐ Yes
☐ No
☐ Don't know

If "yes" OR "no", please explain:

1000 character(s) maximum

22. Do you believe that the EU legislation on construction products should be maintained as it is?

- ☐ Yes, it should be maintained as it is now
☐ Yes, but with improved implementation and enforcement
☐ No
☐ I don't know

If "yes" OR "no", please explain, with particular focus on the advantages (benefits) and disadvantages (costs) this would entail:

1000 character(s) maximum

23. Do you think that the EU legislation on construction products should be repealed and replaced by 28 (27) national regimes?

- ☐ Yes
☐ No

☐ I don't know

If "yes" OR "no", please explain, with particular focus on the advantages (benefits) and disadvantages (costs) this would entail:

1000 character(s) maximum

24. What type of reform would you support?

a) Clarifying procedures, better aligning with other legislation and simplifying rules so as to make it easier to apply (for smaller businesses especially)

- ☐ Yes
☐ No
☐ I don't know

Please explain, with particular focus on the advantages (benefits) and disadvantages (costs) this would entail:

1000 character(s) maximum

b) Making European standards purely voluntary, while creating European-wide testing/assessment methods

- ☐ Yes
☐ No
☐ I don't know

Please explain, with particular focus on the advantages (benefits) and disadvantages (costs) this would entail:

1000 character(s) maximum

c) Having standards to cover selected essential characteristics (e.g. fire safety) but leaving flexibility to Member States to address those essential characteristics not covered by harmonised European standards

- ☐ Yes
☐ No
☐ I don't know

Please explain, with particular focus on the advantages (benefits) and disadvantages (costs) this would entail:

1000 character(s) maximum

d) Making EU-wide rules for assessing and communicating construction products' performance optional

- ☐ Yes
- ☐ No
- ☐ I don't know

Please explain, with particular focus on the advantages (benefits) and disadvantages (costs) this would entail:

1000 character(s) maximum

e) Prescribing precise technical requirements which construction products have to comply with across all EU Member States

- ☐ Yes
- ☐ No
- ☐ I don't know

Please explain, with particular focus on the advantages (benefits) and disadvantages (costs) this would entail:

1000 character(s) maximum

f) Including in the EU framework aspects relating to the safety of construction products, so far entirely under Member States' responsibility

- ☐ Yes
- ☐ No
- ☐ I don't know

Please explain, with particular focus on the advantages (benefits) and disadvantages (costs) this would entail:

1000 character(s) maximum

g) Another reform

Please explain, with particular focus on the advantages (benefits) and disadvantages (costs) this would entail:

1000 character(s) maximum

25. If the CE marking were no longer allowed for construction products, would you see a need for another kind of marking?

- ☐ Yes
- ☐ No

☐ I don't know

If "yes", please explain what kind of marking and why, with particular focus on the advantages (benefits) and disadvantages (costs) this would entail:

1000 character(s) maximum

26. Do you believe that the use of the RAPEX system (i.e. the Rapid Alert System for dangerous non-food products posing a risk to the health and safety of consumers) for construction products is the right tool to help ensure their safety in use?

The Rapid Alert System for dangerous non-food products ("RAPEX") enables quick exchange of information between 31 European countries and the European Commission about dangerous non-food products posing a risk to health and safety of consumers. This allows enforcement authorities in the countries that are members of the network to swiftly follow up on the notifications and to screen their markets for the possible presence of these unsafe products. Since 2010, the Rapid Alert System also covers professional products and products posing risks other than those affecting health and safety (such as risks to the environment).

- ☐ Yes
☐ No
☐ I don't know

If "no", would you see other tools that should be used?

1000 character(s) maximum

27. If you wish to add further information - within the scope of this questionnaire - please feel free to do so here.

1000 character(s) maximum

Please feel free to upload a concise document, such as a position paper. The maximal file size is 1MB. Please note that the uploaded document will be published alongside your response to the questionnaire which is the essential input to this open public consultation. The document is an optional complement and serves as additional background reading to better understand your position.

The maximum file size is 1 MB

Thank you very much for your input into the review of the Construction Products Regulation!