

EADs and ETAs: Added value to the construction sector

1 June 2020



Written by CSIL – Centre for Industrial Studies

Foreword

This report is part of the research project “EAD and ETA added value” carried out by CSIL – Centre for Industrial Studies – for the European Organisation for Technical Assessment (EOTA).

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The authors are grateful to all the stakeholders that agreed to respond to the survey and the team’s questions and contributed to the realisation of this report. The authors are also grateful for the helpful insights, the data provided and the support in the survey dissemination from the EOTA staff, and particularly to Mr. Sergio Vazquez Jimenez. The authors are responsible for any remaining errors or omissions.

Quotation is authorised as long as the source is acknowledged.

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Executive summary

Objectives

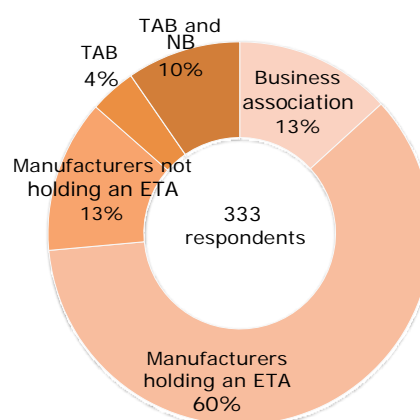
This report provides an assessment of the **added value and relevance of the European Assessment Documents (EADs) and European Technical Assessments (ETAs)** as well as of the EAD development process, coordinated by the European Organisation for Technical Assessment (EOTA) and implemented in collaboration with its members, the Technical Assessment Bodies (TABs). The overall objective is to identify possible areas of improvement for EOTA to achieve the goals of the Construction Products Regulation (CPR) and deliver a better service to the construction sector.

Methodology

Methods of analysis include:

- A **desk review** of regulatory documents and previous studies and evaluations of the CPR and EOTA;
- An **online survey** to collect a diversified set of information and opinions on the topic of this study. A total of 333 stakeholders participated in the survey;
- Eight **semi-structured interviews** with stakeholders to complement the analysis and gain deeper understanding.

Number of respondents in the online survey



Main findings

- Between the entry into force of the CPR and 31st December 2019, a **total of 439 EADs** has been adopted. **7,708 ETAs** were developed in the same time period.
- A large majority of the stakeholders interviewed find that the EOTA route is a valuable alternative route to CE marking in the absence of harmonised standards (hENs). Around 70% of the manufacturers and business associations surveyed consider that the EADs largely **meet the manufacturers' needs**.
- The ETA route has a **high standing among construction industry professionals both within and outside the EU**. The ETAs are recognised by the manufacturers and business associations surveyed as important documents that not only allow cross-border trade of CE-marked products, but also improve the manufacturers' reputations, increase their sales and opportunity to access new markets.
- Over time, EOTA has accomplished the tasks assigned to it by the CPR better and better. The stakeholders consulted, i.e. manufacturers, business associations, and TABs, are especially satisfied with the **confidentiality** and **timeliness** of the process, considered effective to ensure faster placement of more innovative

products into the market. More than 80% of the TABs consider that EOTA carries out its tasks effectively.

- The analysis of all the EADs developed so far confirms that the EADs tend to be more numerous in some product areas than others. Over 80% of the TABs and 70% of the manufacturers and business associations believe that the EADs are more relevant and numerous for **products characterised by higher innovativeness and larger product variety**.
- About 73% of survey respondents (manufacturers, business associations, and TABs) agreed that the EOTA route contributes to enhancing manufacturers' potential for product innovation. A considerable share of respondents (between 65% and 90%, depending on the type of stakeholder) considers that **the EOTA route targets, at least partly, new-to-the-world or improved products**. The length of the hENs' development process is not aligned with the constant incremental innovations typical of certain product areas and therefore makes the EOTA route more relevant to the needs of manufacturers of such products.
- Building on official definitions of innovation existing in the literature, this report proposes a **simple methodology to assess the degree of innovativeness** of the products covered by EADs based on information contained in the EADs themselves. The process would allow distinguishing between radically innovative, moderately innovative, incrementally innovative or non-innovative products.
- Beyond the issuing of ETAs, nearly 60% of the TABs have been involved in the development of EADs. **The TABs significantly differ from one another in terms of available human and financial resources as well as in range of expertise**. This can explain why some TABs are more active than others. The checklist for the TABs and the establishment of a technical quality management team in the EOTA secretariat have contributed to improving the quality of the EADs submitted to the European Commission. This improvement is expected to reduce, in the near future, the time required for revisions and approval.
- The degree of overlap and conflict between the EADs and existing hENs is limited and not regarded as problematic by the stakeholders. **A higher number of EADs in some product areas has been found to be appropriate and necessary to these areas**. This indicates that the EOTA and the CEN route truly complement each other, as they tend to cover different types of products.
- The majority of stakeholders agreed that ETAs could not be replaced by any other third-party body verification without a loss of product credibility. About 70% of respondents indicated that **repealing the EOTA route would be detrimental to the companies' economic performance**.

Recommendations

- There is still room for all stakeholders involved to **further streamline the EAD development process**, through a greater sharing of best practices; more clarity on the process timeline for manufacturers; a faster and smoother revision process by the European Commission; and a significantly timelier EADs citation process in the EU Official Journal by the European Commission. Some of the proposed improvements may require a revision in the CPR.

- Different parties suggested the possible reintroduction of the “**fitness-for-use**” concept in the ETAs, which was removed by the CPR but is considered by the manufacturers to be very useful.
- Given the importance of the ETAs for the industry, it could be considered to give EOTA the means to **monitor the consistency and quality not only of EADs but also of ETAs** and communicate any concerns to the designating Member States and the Commission.
- In line with the CPR provisions, the Member States should make sure that **periodic performance audits on the nominated TABs** are carried out properly. EOTA and/or the European Commission could be involved in this process to make sure that the performance audits are conducted consistently across all Member States.
- The findings of this study, more complete and up-to-date than the previous reports on CPR implementation and EOTA, should be **taken into account in the ongoing discussions about reviewing the CPR**.
- Building on the findings of this study, a **follow-up study** could be initiated by (or in collaboration with) the European Commission to better explore the implications that any change in the CPR could have, and to develop concrete proposals on how the EOTA route could be improved under the different policy options being considered in the review of the CPR. Considering that any legislative amendment increases uncertainty among stakeholders and significantly slows down the standardisation process, the impact of a possible repeal of the EOTA route should be duly assessed against all available evidence.



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