

Mr. Thierry Breton
Commissioner for Internal Market
European Commission
Rue de la Loi 200
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cab-breton-contact@ec.europa.eu

July 9, 2020

Dear Commissioner Breton

Re: Commission's considerations for the review of the Construction Products Regulation (EU) 305/2011 and its relationship with the ETA (European Technical Assessment) route.

The undersigned associations and bodies address you concerning the possible changes that the European Commission is considering for the revision of the Construction Products Regulation.

We consider that a revision of the Regulation can be positive, especially if it improves the effectiveness of its instruments for a better service to the construction sector. However, we are concerned that, according to the available information, the current plans of the Commission do not provide for the continuation of the ETA route.

We consider that the removal of this route **would have very negative consequences for the sector**, and would be understood with difficulty by many manufacturers that have been applying the Regulation for years, as it would imply that:

- Manufacturers **would not have at their disposal an instrument** of recognised prestige at European level, and also at third countries level, **which facilitates improvement and innovation in construction products**.
- Manufacturers of products not considered a "priority" **would not have access to CE marking**, as the planned "harmonised sphere" will cover only those products identified as a priority by the European Commission. This would result in a **higher economic cost** for these manufacturers when accessing other European Union countries and would entail a much greater burden on management.
- In addition, the **time** required to obtain certifications in the different Member States would be **notably longer** than in a harmonised route such as the ETA one. This factor is crucial in the case of innovative products and small enterprises.
- Finally, the withdrawal of this instrument **would entail significant economic losses**, as manufacturers who benefited from it be obliged to use new instruments and, especially, because of the loss of the added value already acquired by the products on the market thanks to having an ETA.

As you know, the Construction Products Regulation establishes the ETA route for **any product** that cannot benefit from a harmonised standard, enabling access to the European market to any manufacturer with a product in this situation.

Below, we indicate some outstanding aspects of this route that, in our activity, we have found to be the most relevant:

- It enables innovative products to access the European Union countries by means of **CE marking**.
- It offers a harmonised mechanism, officially recognised and appreciated by the market, and reasonably agile for an innovative product or a product without a standard to demonstrate its performance, according to the requirements applying in the various Member States of the European Union. **It is therefore the way in the Regulation that makes possible the internationalisation of innovative products and products without a standard.**
- It is particularly useful for innovative products, little known products and niche products, kits and complex products.
- ETAs are an instrument of recognised prestige in Europe and also in third countries on different continents. For example, recently, EOTA has signed an agreement with the American organisation for the assessment-ICC-ES by which both organisations can share their technical specifications. This agreement will facilitate the marketing of European products on the US market.
- In addition to market access, the ETA route also contributes to the knowledge of innovative products. In fact, we have found that **it is an instrument that facilitates the innovation of construction products in Europe.**
- According to figures given by EOTA, there are currently more than **8.000 ETA** issued in Europe for around **2.700 manufacturers**, both SMEs and large enterprises.

For the above reasons, and in order to prevent the disappearance of an instrument that, in our experience, facilitates innovation and enables the internationalisation of both innovative products and products without a harmonised standard, **we request that the ETA route be maintained in the Construction Products Regulation revision.**

Yours sincerely,

Signed by (see following page)



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de Fabricantes de Productos de
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<http://www.cepco.es>

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Navarro
Presidente



Confederación Nacional de la
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Presidente



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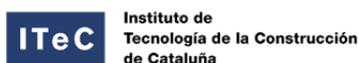
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**(1) Confederación Española de Asociaciones de Fabricantes de
Productos de Construcción (CEPCO) integrated by:**

AFELMA	Asociación de Fabricantes Españoles de Lanasy Minerales Aislantes
AIFIM	Asociación Ibérica de Fabricantes de Impermeabilización
ANDECE	Asociación Nacional de la Industria del Prefabricado de Hormigón
ANDIMAT	Asociación Nacional de Fabricantes de Materiales Aislantes
ANEFHOP	Asociación Nacional Española de Fabricantes de Hormigón Preparado
ANEFUNCO	Asociación Nacional de Fabricantes de Elementos de Fundición
ASCER	Asociación Española de Fabricantes de Azulejos y Pavimentos Cerámicos
ASEFAVE	Asociación Española de Fabricantes de Fachadas Ligeras y Ventanas
ANAIP	Asociación Española de Industriales de Plásticos
ASIT	Asociación Solar de la Industria Térmica
ASPREL	Asociación de Fabricantes de Pavimentos y Revestimientos Ligeros
ATEDY	Asociación Técnica y Empresarial del Yeso
FdA	Federación de Áridos
PIEDRA	Clúster de la Piedra Natural
HISPALYT	Asociación Española de Fabricantes de Ladrillos y Tejas de Arcilla Cocida
OFICEMEN	Agrupación de Fabricantes de Cemento de España
UNESID	Unión de Empresas Siderúrgicas