



28 February 2022

ASTM Response – European Commission Staff Working Document – “Scenarios for a transition pathway for a more resilient, greener and more digital construction ecosystem”

ASTM International welcomes the European Commission Staff Working Document "Scenarios for a transition pathway for a more resilient, greener and more digital construction ecosystem" and is pleased to provide our feedback. We also appreciate the opportunity to participate in the High-Level Construction Forum (HLCF) including the thematic digital, green and resilience cluster group meetings in September and October 2021.

ASTM International is a globally recognized leader in the development of voluntary consensus technical standards. Today, over 13,000 ASTM standards are used around the world to improve product quality, enhance health and safety, strengthen market access and trade, and build consumer confidence. Our leadership in international standards development is driven by the contributions of our members: more than 30,000 of the world’s top technical experts and business professionals representing 140 countries. Working in an open and transparent process and using ASTM’s advanced information technology infrastructure, ASTM members create the test methods, specifications, classifications, guides and practices that support industries and governments worldwide.

The following ASTM Technical Committees and related subcommittees develop standards that can support the European and global construction industry in its efforts to become greener, more digital, and more resilient:

More specifically:

- Subcommittee D08.24 on Sustainability, part of Committee D08 on Roofing and Waterproofing, develops standards for green roofs, a dynamic and growing aspect of sustainable building construction.
- “ASTM International standards have paved the way for transitioning products, where for example, we can take a type of cement and transition to a much lower environmental footprint material using ASTM standards such as C1157, which is a performance-based standard for hydraulic cement.”¹ Subcommittee C01.10 on Hydraulic Cements for General Concrete Construction, part of Committee C01 on Cement, developed, adopted, and updates this standard as necessary.

- Subcommittee F42.07.07 on Construction, part of Committee F42 on Additive Manufacturing is currently developing a standard that “will define activities and sequences within an AM site or project. The standard will be useful for all AM technologies in building and construction of structural and infrastructure building elements for residential and commercial applications and follows an approach oriented to the manufacturing process.”²
- Subcommittee D37.07 on industrial hemp is developing standards for hempcrete to be used in construction as an eco-friendly insulation material.

Some examples of standards currently under development:

Green

- WK80282, New Test Methods for Determination of CO₂ in Cements and Concretes
- WK70550, New Test Method for Establishing Unbiased R-value and Fire Resistance Properties of Hempcrete Insulation Materials

Resilience

- WK62276, Standard Specification for Determining the Flood Damage Resistance Rating of Building Materials
- WK62996, Standard Guide for Property Resilience Assessment

Digital: Additive Construction (3DP), F42.07.07 – Work Items

- WK77614, Standard Specification for Additive Manufacturing for construction -- Qualification principles -- Structural and infrastructure elements
- WK78110, Standard Guide for Additive Manufacturing -- General Principles -- Development and Roadmapping of Additive Construction Standards

We agree that the European Commission and European Union Member States should provide an enabling and stable regulatory framework, supporting the transition of the ecosystem and make it attractive for companies and the labour force.

We believe that in order to anticipate and address current and future standardisation needs in today’s global economy, the European standardisation system should better coordinate with international bodies that are contributing to the development of the sets of global standards that are needed by our complex value chains.

Current Commission policies are preventing not only the recognition of alternative solutions to harmonized European standards, but also the normative referencing of existing non-EN standards within European standards and referencing of non-EN standards within European Assessment Documents under approval for citation in the Official Journal of the European Union.

The current lack of flexibility in coordinating and accepting more diverse sets of global standards in Europe is causing additional delays in the approval of the needed technical solutions and as

² <https://sn.astm.org/?q=update/additive-manufacturing-construction-standard-so21.html>

such can be blamed for the more-costly and resource-consuming approaches taken by economic operators.

A more flexible EU approach to the recognition of technical solutions developed within these contexts would better equip the European standardisation system in the anticipation of future needs and would help it strike the right balance between timeliness and quality in the delivery of appropriate technical solutions in support of the European and global construction ecosystem.

Every day, several thousand European experts participate in the development of globally relevant technical requirements that are needed by their companies and organizations to achieve their global business objectives. These experts devote their time and expertise working with their peers from around the world, within international technical committees of organizations such as ASTM International, ASME, SAE International, IEEE, UL and others. These organizations, thanks to agile and robust processes and/or focused scope of activities, enable development of science-based, voluntary international standards that keep pace with innovation in emerging areas. Many national regulators and international organizations reference these standards due to their technical quality, market relevance, and their reflection of state-of-the-art industry technology and practices.

EOTA Route for CE marking

ASTM International welcomes and supports the development and adoption of European Assessment Documents (EADs) by the European Organisation for Technical Assessment (EOTA) as an alternative CE marking route for construction products manufacturers when no harmonized European standards exist. This route is typically needed for new and innovative construction products. References to ASTM standards can be found in many EADs currently published in the Official Journal of the European Union (OJEU). Regrettably, the European Commission no longer allows references to ASTM standards in EADs which may create market barriers for certain European construction product manufacturers, particularly SMEs. ASTM looks forward to collaborating with EOTA and the Technical Assessment Bodies (TABs) located in EU member and partner states to find solutions to these challenges and support the European construction industry.

More on ASTM International and international standards in support of legislation

ASTM International welcomes and encourages participation from around the world. Our open consensus process, using advanced Internet-based standards development tools, ensures worldwide access for all interested individuals while also ensuring balance, consensus, and other essential attributes. ASTM standards are developed in accordance with the six guiding principles of the WTO TBT Committee on the development of international standards. In 2021, the Organization for Economic Cooperation and Development (OECD) published a case study of ASTM International as an international private standard setting organization that contributes to international regulatory cooperation¹.

According to the OECD Study “Voluntary standards, such as ASTM standards, can provide input for domestic policymakers and regulators when designing measures to advance their policy objectives. This is particularly evident for technical regulations, and for the co-ordination of approaches among peers with similar goals. Recognition of international standards is one of the

primary approaches available for countries to embed international considerations within domestic rule-making (OECD, 2013[2]). International standards are a central dimension of regulatory alignment, enabling the alignment of technical specifications of products as well”.

Among others, the OECD study also cites ASTM collaborations with the International Organization for Standardization (ISO), the International Electrotechnical Commission (IEC) and the European Committee for Standardization (CEN).

In particular, ASTM International and ISO agreed to co-operate on international standards for additive manufacturing in the form of a Partner Standards Development Organization (PSDO) co-operation agreement. The initiative reflects the shared objective of the involved international standard-setting organizations to minimize duplication in the work of their respective committees, while maximizing efficient resource allocation in additive manufacturing industry.

Thank you for your consideration of the preceding comments. For more information, please contact Sara Gobbi, European Affairs Director, at sgobbi@astm.org.

Sincerely,

Jeff Grove

Jeffrey Grove

Vice President – Global Policy, Cooperation and Communication

ASTM International

¹ THE CASE OF ASTM INTERNATIONAL © OECD 2021: <https://www.oecd.org/gov/regulatory-policy/irc-astm-case-study.pdf>