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Summary of the fifth Technical Platform, 04.10.2017

The future of EOTA, European Organisation for Technical Assessment

The CPR Technical Platforms are a series of meetings organised as a follow-up to the Report on the implementation of the CPR adopted on 07.07.2016 ([COM/2016/0445 final](#)).

They are organised by the services of the European Commission (DG Internal Market, Industry, Entrepreneurship and SMEs, Directorate Industrial Transformation and Advanced Value Chains - Unit Clean Technologies and Products).

The CPR Technical Platforms aim at providing an opportunity for interested stakeholders to present their views and have informal discussions on specific issues relating to the CPR implementation and the legislative framework applicable to construction products.

This session aimed at considering the need for an alternative route to mainstream route, including reconsidering the mainstream route for harmonised technical specifications (beyond current harmonised European standards - hENs - developed by European Standardisation Organisations). Exchanges were invited to focus on experience and on potential impacts of various scenarios for the future.

Views expressed by stakeholders:

1. Need for an alternative route to harmonised European standards

- Article 19 of the CPR defines the scenarios for the EOTA route.
- ETAs are critical for manufacturers and users of products that cannot be standardised.
- Innovative products, but also products not covered by a harmonised standard or deviating from harmonised standards, need a solution.
- Harmonisation is needed as it allows economies of scale; but for products not covered EOTA is the alternative solution.
- In the presence of gaps in the mainstream route, EOTA provides an adequate answer for niche sectors, and particularly for many SMEs for which time to market makes the difference.
- The number of CUAPs conversions proves that there is a demand from manufacturers who want to CE mark.
- On the time to market, it was noted that not all ETAGs have been converted to EADs yet and that this creates obstacles.
- Harmonised standards are complicated and require time to be delivered (they also harmonise test methods), therefore an alternative has to be offered, otherwise national systems would prevail, and in particular national systems of big Member States.
- In the CPR system, the EOTA route provides the only freedom to produce non-standardised products and it has to be maintained as such.
- Both routes have to remain equivalent with no competitive advantage offered to one against the other and the CE marking should be technically identical whether based on an ETA or a hEN.
- EADs set the way for next manufacturers in the absence of standards.
- It was stated that there is actually a third route, not yet fully exploited, which is the industrial route through BWR7.
- Sometimes EOTA is to be used only due to the extreme specificity in the scope of hENs.

2. Need for an alternative route in the hypothesis of new harmonised technical specifications

- Limiting mandatory parts in standards and leaving room for voluntary parts would mean going backwards and losing all benefits on what has been achieved so far. Dropping some of the basic works requirements would imply the return to national approaches.
- Limiting the scope of standards would devalue them.
- CEN route is not dysfunctional. Standardisation is key, even if it could be improved and made faster.
- There is no fundamental problem with the system created by the CPR and main issues do not relate to standardisation and EOTA route. Therefore there is no reason to envisage a critical overhaul of standardisation.
- The system in the USA is very similar to ours and it is not questioned. One single route cannot be an option.
- CEN and EOTA are known and recognised, at EU level but also in third countries and there is no existing alternative.
- CEN is mainly based on the standardisation regulation, not on the CPR.

3. Organisational considerations

- There is a need for a national dimension (expertise and proximity contact for SMEs in their language) and an EU dimension (coordination).
- The existing system provides a good balance with EADs developed by EOTA who has an EU vision and products assessed by TABs who have stronger industry involvement.
- EOTA has required considerable investment (knowing that TABs do incur part of current EOTA costs); creating an agency would be significantly more costly.
- One single organisation at EU level would create a monopoly and relying on TABs only would mean stepping back from EU harmonisation.
- On the question whether Notified Bodies could replace TABs, it was noted that they do not offer / provide the technical expertise for which TABs are recognised.
- The existing scheme is appropriate even if there is room for improvement.
- Indeed EOTA could be strengthened through stronger involvement from stakeholders.
- To promote the European approach, EOTA should be strengthened vis à vis TABs, it should take more of a leading role in the development of EADs and the process should be made more transparent.
- The connection between CEN and EOTA should be improved for the development of hENs following EADs.
- On the idea to make a difference between products produced by one single manufacturer or a few manufacturers and products produced by lots of manufacturers, it was stated that this was the rationale for the proposal to revise Annex II.
- It was also argued that only true technical differences could justify a breach in equal treatment.

Participants -----

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Austrian Institute of Construction Engineering (OIB)
Belgian Brick Association
BRE / UK DCLG
BVPI Bundesvereinigung der Prüfengeieure
CEMBUREAU
CEN-CENELEC
CEPE
Cerema
Construction Products Europe
CSTB - Centre Scientifique et Technique du Bâtiment
Czech Office for Standards, Metrology and Testing
Danish Transport-, Construction- and Housing Authority
Deutsche Bauchemie
Deutsches Institut für Bautechnik (DIBt)
EAPFP / Budenheim Ibérica S.L.U
EC Consultant
ECAP
ECS - European Engineered Construction Systems Association e.V.
ECSPA & EMO
EFCC
EOTA
EPPA ivzw
ERF
Eurideas
Eurima European Insulation Manufacturers association
Eurogypsum
European Builders Confederation (EBC)
Federal Ministry of Science, Research and Economy, AT
Federal Office for Buildings and Logistics (FBL), CH
FEICA (The Association of the European Adhesive & Sealant Industry)
GNB-CPR Technical Secretariat - held by DTI
Ministry of Economy and Development, EL
ITeC - The Catalanian Institute of Construction Technology
Ministère de la transition écologique et solidaire, FR
Ministerio de industria, ES
Ministry of Civil Works, ES
Ministry of Economic Affairs and Communications, EE
Ministry of Economic Development and Technology, SI
Ministry of Economy, BE
Ministry of Environment, LT
Ministry of Infrastructure and Construction, PL
Ministry of Interior National Fire Rescue and Service, IT
Ministry of Interior, CY
Ministry of Regional Development and Public Works, BG
Ministry of Transport and Construction, SK
National Board of Housing, Building and Planning (Boverket), SE
Norwegian Building Authority, NO
PENTAIR
PU Europe
SBS Small Business Standards
SORMAT Oy
Stichting Bouwkwaliiteit - SBK