EUROPEAN COMMISSION

Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs

Industrial Transformation and Advanced Value Chains Clean Technologies and Products

Open public consultation on EU rules for products used in the construction of buildings and infrastructure works (January-April 2018)

Results1

The twelve-week open public consultation is a key data collection tool of the CPR² Review supporting study; it was launched on 22 January 2018 and remained open until 16 April 2018. The consultation was offered in all EU languages, allowing any potentially interested party to contribute, including environmental NGOs, consumer associations, trade unions, consumers, workers, citizens etc.

1. Brief descriptive overview responses received and of the profile of respondents to the open public consultation

1.1. Number of submissions

In total, 641 online questionnaires have been completed. Among those, no complete duplicates have been found. However, there were 11 "pairs" and one "triple" of respondents with identical first and last names.

- In two of those cases, one contribution has been made in personal capacity and one in professional capacity; in both these cases, different responses have been given in the different capacities.
- In six of those cases, both contributions have been made in professional capacity but on behalf of different organisations; in four of those six cases, the responses are largely identical, in the two other, they are different.
- In the remaining four of these cases, the contributions were made on behalf of the same organisation; in three of those four cases, the responses differ significantly and in one slightly.

In addition to these 641 completed online questionnaires, 96 complementary documents (position papers etc.) have been submitted; the key messages of these are presented in section 4.2. The rest of the present report is focussing on the 641 replies provided online.

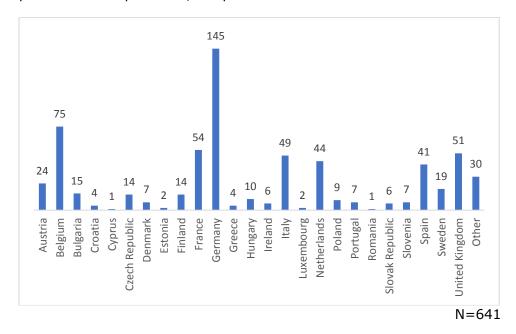
¹ Source: Supporting study for the Review of the Construction Products Regulation, VVA Economics & Policy, Joint Institute for Innovation Policy (JIIP), Danish Technological Institute (DTI), and Global Data Collection Company (GDCC), September 2018

² Construction Products Regulation

1.2. Profile of respondents

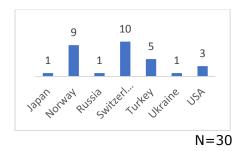
1.2.1. Distribution by country

In terms of geographic distribution of the participants, including both individual and professional respondents, the picture looks as follows:



By far the largest number of participants (22.6%) comes from Germany. Participation from other countries is roughly in line with the size of their population and/or economic importance, with France, the UK and Italy all representing around 8% of participants. The particularly high participation from Belgium (11%) is explained by the number of European umbrella organisations with seat in Brussels that have participated.

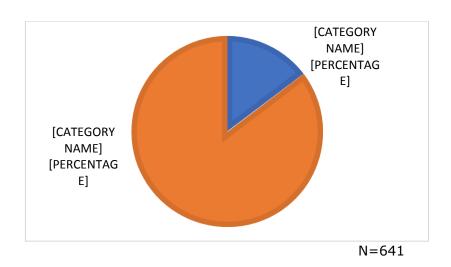
Looking at the participation from third countries only, we see the following distribution:



The strong participation from both Switzerland and Norway is not surprising, as both countries apply the CPR.

1.2.2. Distribution by type of respondents

547 questionnaires have been completed in professional capacity, 94 in personal capacity:



Split up by country, the numbers are as follows:

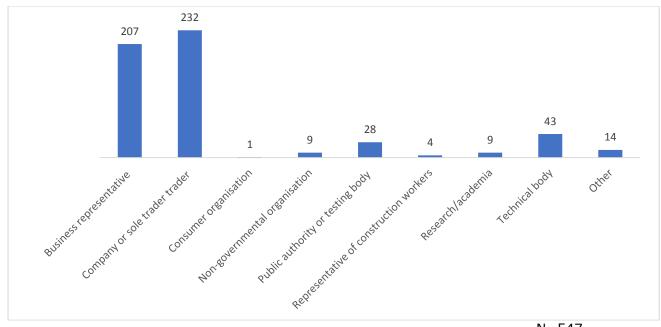
	Austria	Belgium	Bulgaria	Croatia	Cyprus	Czech	Denmark	Estonia	Finland	France	Germany	Greece	Hungary	Ireland	Italy	Luxembourg	Netherlands	Poland	Portugal	Romania	Slovak	Slovenia	Spain	Sweden	United	Other	Total
as individual	2	7	2			2		1	1	8	15	1	5	2	6		5		4	1	3	4	11		13	1	94
as professional	22	68	13	4	1	12	7	1	13	46	130	3	5	4	43	2	39	9	3		3	3	30	19	38	29	547
Total	24	75	15	4	1	14	7	2	14	54	145	4	10	6	49	2	44	9	7	1	6	7	41	19	51	30	641

Hungary, the Slovak Republic and Slovenia were the only three countries where there were just as many (or even more) respondents who participated as individuals as there were respondents who participated in their professional capacity. In all other countries, the vast majority of participants responded on behalf of an organisation.

1.2.3. Distribution of respondents by type of organisation (if applicable³) – overall and by country

Broken down by type of organisation, the distribution can be seen in the following graph:

 $^{^{3}}$ I.e. the 547 respondents who replied in their professional capacity or on behalf of an organisation



N = 547

The vast majority of participants are companies, making up 42.4% of participants; organisations representing businesses (incl. industry associations, chamber of commerce, professional organisation) constitute 37.8% of participants. Technical bodies account for 7.9% percent of participants and public authorities or testing bodies for 5.1%. It is notable that only 1 single consumer organisation (representing 0.2%) has participated.

By type of organisation and by country, the breakdown is as follows:

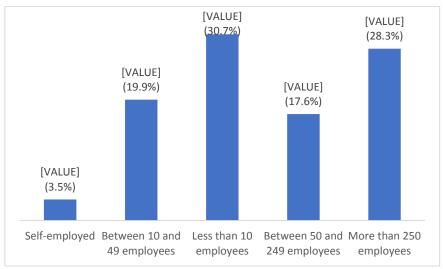
	Business representative	Company or sole trader	Consumer organisation	Non-governmental organisation	Public authority or testing body	Representative of construction workers	Research/ academia	Technical body	Other	Total
Austria	9	8		1	1		1	1	1	22
Belgium	49	12			2			3	2	68
Bulgaria		6	1		1			5		13
Croatia		2			1				1	4
Cyprus					1					1
Czech Republic	2	5			2	1		2		12
Denmark	2	4						1		7
Estonia	1									1
Finland	1	11						1		13
France	16	23		1	1		1	4		46
Germany	42	65		5	4		3	4	7	130
Greece		2						1		3
Hungary	1	1			1			2		5
Ireland	2	2								4
Italy	16	24					1	1	1	43
Luxembourg		2								2
Netherlands	22	9		1	1	1	1	3	1	39

Other	9	12			3	1		4		29
Poland	1	5						3		9
Portugal	2	1								3
Slovak Republic	1			1	1					3
Slovenia		2						1		3
Spain	12	9			3		2	4		30
Sweden	6	8			3			1	1	19
United Kingdom	13	19			3	1		2		38
Total	207	232	1	9	28	4	9	43	14	547

It can be seen that from all countries with a significant number of participants, by far the strongest participation is equally from individual companies and business representatives.

1.2.4. Distribution of respondents by size of organisation (if applicable⁴) – overall and by country

Broken down by size of organisation, the distribution can be seen in the following graph:



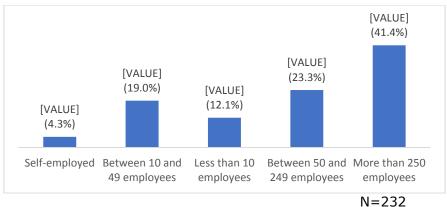
N = 547

Organisations with less than 10 employees make up the largest share of participants, followed by organisations with more than 250 employees. This overview may however be somewhat misleading, as it includes all types of organisations, not just companies.

For the purpose of this consultation, it will therefore be of particular interest to select only the 232 companies that have participated and analyse their size, which is done in the following graph:

5

⁴ I.e. the 547 respondents who replied in their professional capacity or on behalf of an organisation



This shows that by far the largest share (41.4%) of the companies that have participated have more than 250 employees. It also shows that only 28 of the 168 organisations with less than 10 employees are companies.

Continuing to look only at the 232 companies and segmenting both by size of organisation and by country, the breakdown is as follows:

	Self- employed	< 10 employees	10 - 49 employees	50 - 249 employees	≥ 250 employees	Total
Austria		1	2	1	4	8
Belgium		1	2	4	5	12
Bulgaria		1	2	2	1	6
Croatia					2	2
Czech Republic		1			4	5
Denmark			1		3	4
Finland	2	1		2	6	11
France	1	2	3	4	13	23
Germany	1	13	12	14	25	65
Greece		1	1			2
Hungary		1				1
Ireland	1			1		2
Italy	3	2	10	5	4	24
Luxembourg				1	1	2
Netherlands		1	3	1	4	9
Poland				3	2	5
Portugal				1		1
Slovenia		1	1			2
Spain			2	5	2	9
Sweden	2			2	4	8
United Kingdom		2	5	4	8	19
Other				4	8	12
Total	10	28	44	54	96	232

The above table shows that there are two countries with a particularly strong participation of large companies, which are Germany and France.

2. Questions related to the evaluation – detailed analysis of results

2.1. Question 13: Knowledge of CE symbol

2.1.1. Complete wording of the question



"Do you know this symbol?"

2.1.2. Quantitative analysis

634 out of 641 respondents (98.9 %) indicated that they know the CE symbol. Two respondents (0.3%) answered with "no" to that question, five respondents (0.8%) left the question unanswered. The two "no" responses came from participants based in Slovakia and Ukraine, respectively, the "blanks" came from participants based in Belgium (2), Sweden (2) and the UK (1). The very high knowledge of the CE symbol among the respondents is of course not surprising, as it can be taken for granted that participants of this public consultation are familiar with and interesting in the subject matter.

2.2. Question 14: Understanding of CE symbol

2.2.1. Complete wording of the question and dependency link with other questions

This question is addressed to all 634 participants who have responded positively to question no. 13 (knowledge of the CE symbol). The complete wording of the question is:

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

It is specified that multiple replies are possible. The answering options are the following ones:

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

2.2.2. Quantitative analysis

Taking into account all answers (including multiple answers), the distribution is as follows:

a) T	is construction prod	uct has bee	n assessed	as to its	603	95.1%
perfo	rmance in accordan	ce with a h	armonised	European		
stand	ard or a European Ass	essment Docu	ment			

b) This construction product complies with applicable local, regional or national building requirements and can therefore	73	11.5%
be used		
c) This construction product is safe	115	18.1%
d) This construction product is environmentally sustainable	27	4.3%
e) This construction product is made in the European Union	37	5.8%
f) I don't know	6	0.9%
No answer	8	1.3%
Total	869	

The right answer represent 95.1% of the replies, which however may be misleading, as multiple answers were possible and as, in addition to other possible answers that represent 41.9%, a share of the correct replies were combined with others, showing relative uncertainty.

Looking not at individual answers but at the combinations of different answers (provided by the 634 respondents) that were given, the distribution is as follows:

A	451	71.1%
a+b	27	4.3%
a+b+c	18	2.8%
a+b+c+d	5	0.8%
a+b+c+d+e	8	1.3%
a+b+c+e	4	0.6%
a+b+e	2	0.3%
a+c	56	8.8%
a+c+d	11	1.7%
a+c+d+e	1	0.2%
a+c+e	3	0.5%
a+c+f	2	0.3%
a+d	2	0.3%
a+e	10	1.6%
a+f	3	0.5%
В	8	1.3%
b+c+e	1	0.2%
С	5	0.8%
c+e	1	0.2%
е	7	1.1%
f	1	0.2%
No answer	8	1.3%
Total	634	100%

Even though still more than 70% chose the correct answer and only the correct answer, these figures show that almost a third of the respondents were not completely aware of the correct meaning of the symbol.

If we break down the answers by size of enterprise, we see that among self-employed, the rate of respondents who do not know the fully correct meaning of the symbol is almost 50%:

	ts	Individual responden	din pi dy da	Self-	empioyees	< 10	empioyees	10 - 49		50 - 249 employees	empioyees	≥ 250		Total
a	59	63.4%	10	52.6%	123	74.5%	82	75.9%	67	70.5%	110	71.4%	451	71.1%
a+b	7	7.5%	1	5.3%	7	4.2%	4	3.7%	3	3.2%	5	3.2%	27	4.3%
a+b+c	1	1.1%	1	5.3%	8	4.8%	1	0.9%	3	3.2%	4	2.6%	18	2.8%
a+b+c+d		0.0%		0.0%	1	0.6%	1	0.9%		0.0%	3	1.9%	5	0.8%
a+b+c+d+e	3	3.2%		0.0%	3	1.8%		0.0%	1	1.1%	1	0.6%	8	1.3%
a+b+c+e	1	1.1%	1	5.3%	1	0.6%		0.0%		0.0%	1	0.6%	4	0.6%
a+b+e	1	1.1%		0.0%	1	0.6%		0.0%		0.0%		0.0%	2	0.3%
a+c	7	7.5%	1	5.3%	12	7.3%	5	4.6%	11	11.6%	20	13.0%	56	8.8%
a+c+d	3	3.2%	2	10.5%	1	0.6%	1	0.9%	3	3.2%	1	0.6%	11	1.7%
a+c+d+e		0.0%		0.0%	1	0.6%		0.0%		0.0%		0.0%	1	0.2%
a+c+e	1	1.1%		0.0%		0.0%	2	1.9%		0.0%		0.0%	3	0.5%
a+c+f		0.0%		0.0%		0.0%		0.0%		0.0%	2	1.3%	2	0.3%
a+d	1	1.1%	1	5.3%		0.0%		0.0%		0.0%		0.0%	2	0.3%
a+e	4	4.3%	1	5.3%	3	1.8%	1	0.9%		0.0%	1	0.6%	10	1.6%
a+f		0.0%		0.0%		0.0%	2	1.9%	1	1.1%		0.0%	3	0.5%
b	1	1.1%		0.0%		0.0%	3	2.8%	2	2.1%	2	1.3%	8	1.3%
b+c+e		0.0%		0.0%		0.0%		0.0%		0.0%	1	0.6%	1	0.2%
С	1	1.1%		0.0%		0.0%	1	0.9%	1	1.1%	2	1.3%	5	0.8%
c+e		0.0%		0.0%		0.0%		0.0%	1	1.1%		0.0%	1	0.2%
e	1	1.1%		0.0%	2	1.2%	2	1.9%	1	1.1%	1	0.6%	7	1.1%
f		0.0%	1	5.3%		0.0%		0.0%		0.0%		0.0%	1	0.2%
No answer	2	2.2%		0.0%	2	1.2%	3	2.8%	1	1.1%		0.0%	8	1.3%
Total	93	100%	19	100%	165	100%	108	100%	95	100%	154	100%	634	100%

2.3. Questions 15 (a-j): Effectiveness

2.3.1. Complete wording of the questions

"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:

- 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"

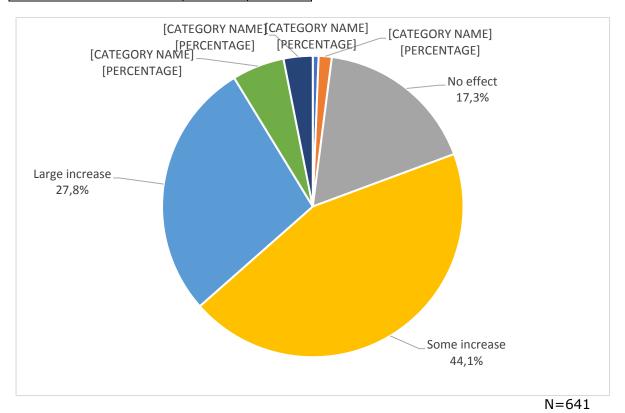
The respondents then have the possibility to specify other impacts as well as to elaborate on issues which are the most important or applicable in their case.

2.3.2. Quantitative analysis of individual issues

The detailed results per issue look as follows:

2.3.2.1 Market opportunities for companies in other Member States than their own

Large decrease	4	0.6%
Some decrease	9	1.4%
No effect	111	17.3%
Some increase	283	44.1%
Large increase	178	27.8%
I don't know or not	36	5.6%
applicable		
No answer	20	3.1%
TOTAL	641	100%



Taken together, 72% of participants saw "some increase" or a "large increase" for companies in other Member States. This can be regarded as quite a positive result.

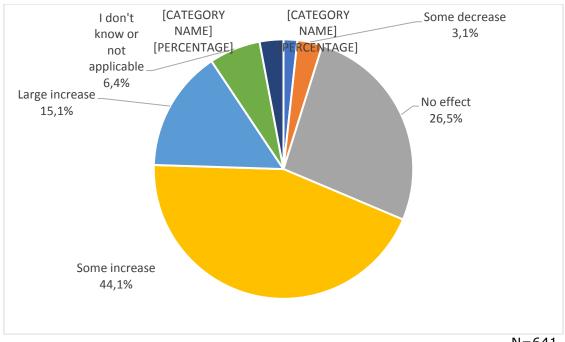
Only looking at companies and segmenting them by company size, the situation looks as follows:

	,	Self- employed		< 10 employees		10 - 49 employees		50 - 249 employees	,	≥ 250 employees		Total
Large decrease		0.0%		0.0%		0.0%	1	1.9%		0.0%	1	0.4%
Some decrease		0.0%		0.0%	2	4.5%		0.0%	3	3.1%	5	2.2%
No effect	3	30.0%	4	14.3%	13	29.5%	10	18.5%	17	17.7%	47	20.3%
Some increase	3	30.0%	9	32.1%	18	40.9%	22	40.7%	38	39.6%	90	38.8%
Large increase	4	40.0%	9	32.1%	7	15.9%	19	35.2%	34	35.4%	73	31.5%
I don't know or not applicable		0.0%	5	17.9%	3	6.8%	2	3.7%	3	3.1%	13	5.6%
No response		0.0%	1	3.6%	1	2.3%		0.0%	1	1.0%	3	1.3%
Total	10	100%	28	100%	44	100%	54	100%	96	100%	232	100%

The above figures show that the positive assessment concerning the increased market possibilities seems to be fairly consistent across all company sizes. Minor differences should not be overstated due to the fact that statistical representativeness is not given.

2.3.2.2 Competition in your national market

Large decrease	11	1.7%
Some decrease	20	3.1%
No effect	170	26.5%
Some increase	283	44.1%
Large increase	97	15.1%
I don't know or not	41	6.4%
applicable		
No answer	19	3.0%
TOTAL	641	100%



N=641

Also with regard to the competition on the national market, a clear majority confirms to see an increase: Taken together, nearly 60% see "some increase" or a "large increase". This is of course consistent and a logical consequence of the fact that 72% of respondents see an increase of market opportunities in other countries (see question 15a).

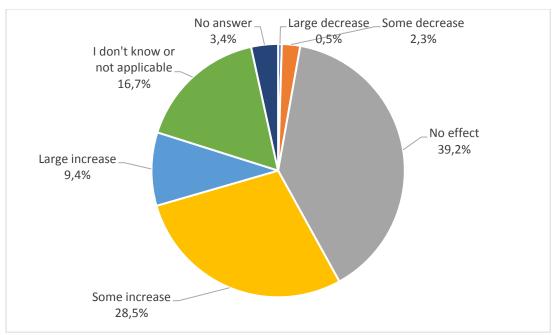
Only looking at companies and segmenting them by company size, the situation looks as follows:

	Self-		_		< 10 employees Self- employed		< 10 employees	10 - 49 employees			50 - 249 employees		≥ 250 employees		Total		
Large decrease	1	10.0%	1	3.6%	1	2.3%		0.0%		0.0%	3	1.3%					
Some decrease		0.0%		0.0%	5	11.4%	2	3.7%	1	1.0%	8	3.4%					
No effect	2	20.0%	5	17.9%	16	36.4%	15	27.8%	24	25.0%	62	26.7%					
Some increase	6	60.0%	13	46.4%	13	29.5%	29	53.7%	48	50.0%	109	47.0%					
Large increase	1	10.0%	7	25.0%	7	15.9%	5	9.3%	16	16.7%	36	15.5%					
I don't know or not applicable		0.0%	1	3.6%	1	2.3%	3	5.6%	6	6.3%	11	4.7%					
No response		0.0%	1	3.6%	1	2.3%		0.0%	1	1.0%	3	1.3%					
Total	10	100%	28	100%	44	100%	54	100%	96	100%	232	100%					

The impact on the competition on the national market is generally confirmed by companies of all sizes, except for the segment of small enterprises (10-49 staff), where there is a balance between companies that confirm the impact and companies that see either no effect or a negative impact. Again, such differences should not be overstated as statistical representativeness is not given.

2.3.2.3 Market opportunities for EU companies in countries outside the EU

Large decrease	3	0.5%
Some decrease	15	2.3%
No effect	251	39.2%
Some increase	183	28.5%
Large increase	60	9.4%
I don't know or not	107	16.7%
applicable		
No answer	22	3.4%
TOTAL	641	100%



N = 641

With regard to opportunities outside the EU, there is almost parity between respondents who see no effect (39.2%) and respondents who see "some increase" or a "large increase" (38%). It is to be noted that less than 3% think there has been a negative impact and that 20.1% state that they do not know or have not answered the question.

Only looking at companies and segmenting them by company size, the situation looks as follows:

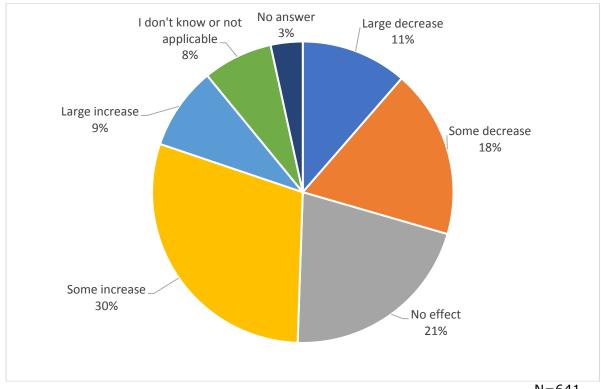
	Self- employed			< 10 employees		10 - 49 emplovees	50 - 249 employees		≥ 250 employees			Total
Large decrease		0.0%		0.0%	1	2.3%		0.0%		0.0%	1	0.4%
Some decrease		0.0%	1	3.6%	2	4.5%	2	3.7%	1	1.0%	6	2.6%
No effect	5	50.0%	8	28.6%	19	43.2%	18	33.3%	41	42.7%	91	39.2%
Some increase		0.0%	5	17.9%	6	13.6%	14	25.9%	28	29.2%	53	22.8%
Large increase	2	20.0%	3	10.7%	6	13.6%	11	20.4%	12	12.5%	34	14.7%
I don't know or not applicable	3	30.0%	9	32.1%	9	20.5%	9	16.7%	13	13.5%	43	18.5%
No response		0.0%	2	7.1%	1	2.3%		0.0%	1	1.0%	4	1.7%
Total	10	100%	28	100%	44	100%	54	100%	96	100%	232	100%

The share of companies that see either no effect or that do not know represents the majority across all company sizes. This combined share ranges between 50% in the case of medium-size enterprises (50-249 staff) and 80% in the case of self-employed.

2.3.2.4 Ability for small companies to compete with big companies

Large decrease	73	11.4%
Some decrease	116	18.1%

No effect	135	21.1%
Some increase	190	29.6%
Large increase	57	8.9%
I don't know or not	48	7.5%
applicable		
No answer	22	3.4%
TOTAL	641	100%



N=641

With respect to the ability for small companies to compete with big companies, the field is divided: 38.5% sees an increasein the ability for small companies to compete with big companies, 29.5% see a decrease and 21.1% see no impact, while 10.9 are undecided.

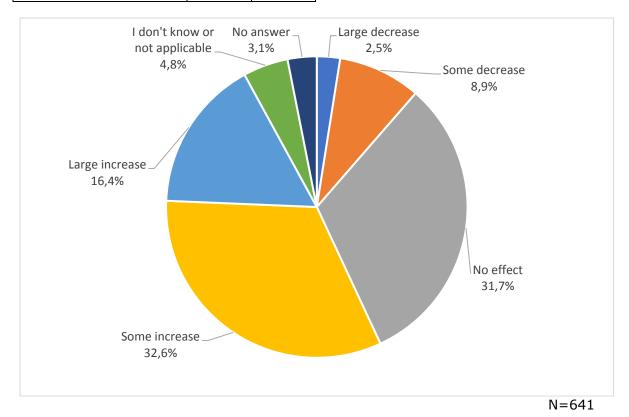
Only looking at companies and segmenting them by company size, the situation looks as follows:

		Self- employed		< 10 employees		10 - 49 employees		50 - 249 employees		≥ 250 employees		Total
Large decrease	3	30.0%	6	21.4%	8	18.2%	4	7.4%	10	10.4%	31	13.4%
Some decrease		0.0%	7	25.0%	6	13.6%	14	25.9%	15	15.6%	42	18.1%
No effect	2	20.0%	7	25.0%	16	36.4%	10	18.5%	19	19.8%	54	23.3%
Some increase	1	10.0%	4	14.3%	13	29.5%	14	25.9%	23	24.0%	55	23.7%
Large increase	2	20.0%	3	10.7%		0.0%	9	16.7%	14	14.6%	28	12.1%
I don't know or not applicable	1	10.0%		0.0%		0.0%	3	5.6%	13	13.5%	17	7.3%
No response	1	10.0%	1	3.6%	1	2.3%		0.0%	2	2.1%	5	2.2%
Total	10	100%	28	100%	44	100%	54	100%	96	100%	232	100%

Here it is of course very interesting to distinguish between different company sizes. It can be noted that the response on the ability for small companies to compete with big companies is least positive among micro-enterprises (25% see some or large increase, while 46.4% see some or large decrease), whereas this ratio is quite different for medium-size companies with 50-249 staff (with 42.6% of them seeing some or large increase and 33.3% seeing some or large decrease) and companies with 250 or more staff (with 38.5% of them seeing some or large increase and 26% seeing some or large decrease). Nonetheless, it should be noted once again that such differences should not be overstated as statistical representativeness is not given at this level of analysis.

2.3.2.5 Product choice for end-users

Large decrease	16	2.5%		
Some decrease	57	8.9%		
No effect	203	31.7%		
Some increase	209	32.6%		
Large increase	105	16.4%		
I don't know or not	31	4.8%		
applicable				
No answer	20	3.1%		
TOTAL	641	100%		



In terms of product choice for the end-users, half of the respondents (49%) see a positive effect, as opposed to only 11.4% who see a negative effect. 31.7% see no effect, while 7.9% do not know or choose not to answer the question.

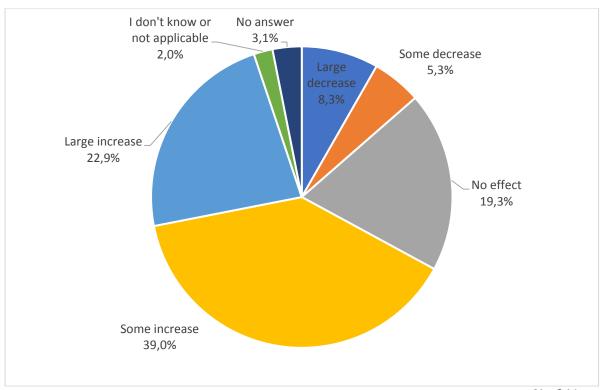
Only looking at companies and segmenting them by company size, the situation looks as follows:

		Self- employed		< 10 employees		10 - 49 employees		50 - 249 employees		≥ 250 employees		Total
Large decrease	2	20.0%		0.0%	3	6.8%		0.0%		0.0%	5	2.2%
Some decrease		0.0%	4	14.3%	6	13.6%	5	9.3%	12	12.5%	27	11.6%
No effect	4	40.0%	13	46.4%	13	29.5%	21	38.9%	29	30.2%	80	34.5%
Some increase	3	30.0%	5	17.9%	12	27.3%	18	33.3%	34	35.4%	72	31.0%
Large increase	1	10.0%	3	10.7%	8	18.2%	9	16.7%	17	17.7%	38	16.4%
I don't know or not applicable		0.0%	1	3.6%	1	2.3%	1	1.9%	3	3.1%	6	2.6%
No response		0.0%	2	7.1%	1	2.3%		0.0%	1	1.0%	4	1.7%
Total	10	100%	28	100%	44	100%	54	100%	96	100%	232	100%

It can be observed that there seems to be a more positive view on the impacts on product choice for end users among larger companies, with 50% of medium-size companies and 53.1% of larger companies seeing a positive effect, as opposed to only 28.6% in the case of micro-enterprises.

2.3.2.6 Product information for end-users

Large decrease	53	8.3%
Some decrease	34	5.3%
No effect	124	19.3%
Some increase	250	39.0%
Large increase	147	22.9%
I don't know or not	13	2.0%
applicable		
No answer	20	3.1%
TOTAL	641	100%



N = 641

In terms of product information for end-users, the responses are overwhelmingly positive, with 61.9% seeing a positive effect, as opposed to 13.6% seeing a negative effect.

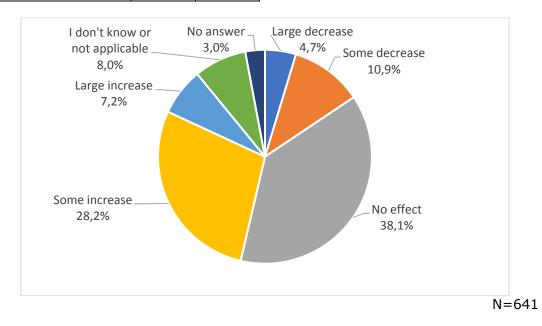
Only looking at companies and segmenting them by company size, the situation looks as follows:

		Self- employed		< 10 employees		10 - 49 employees		50 - 249 employees		≥ 250 employees		Total
Large decrease	2	20.0%	10	35.7%	5	11.4%	7	13.0%		0.0%	24	10.3%
Some decrease		0.0%	2	7.1%	3	6.8%		0.0%	3	3.1%	8	3.4%
No effect	2	20.0%	6	21.4%	10	22.7%	12	22.2%	25	26.0%	55	23.7%
Some increase	4	40.0%	6	21.4%	15	34.1%	20	37.0%	41	42.7%	86	37.1%
Large increase	2	20.0%	3	10.7%	8	18.2%	15	27.8%	25	26.0%	53	22.8%
I don't know or not applicable		0.0%		0.0%	1	2.3%		0.0%	1	1.0%	2	0.9%
No response		0.0%	1	3.6%	2	4.5%		0.0%	1	1.0%	4	1.7%
Total	10	100%	28	100%	44	100%	54	100%	96	100%	232	100%

Once again, the responses to this question vary quite significantly across the different company sizes. While it would not be scientifically sound to assume any statistical representativeness, one can note that 32.1% of micro-enterprises (excluding self-employed) see some or large increase while this rate is 68.8% in the case of larger enterprises with 250 staff or more. With regard to the 10 self-employed persons to whom this question has been addressed, it may be noted that 6 out of those ten saw an increase.

2.3.2.7 Innovation in the construction products sector

Large decrease	30	4.7%		
Some decrease	70	10.9%		
No effect	244	38.1%		
Some increase	181	28.2%		
Large increase	46	7.2%		
I don't know or not	51	8.0%		
applicable				
No answer	19	3.0%		
TOTAL	641	100%		



As far as innovation in the construction centre is concerned, nearly half of respondents (49%) see either no effect, does not know or chooses not to answer the question. Roughly one third (35.4%) sees a positive effect, while one sixth (15.6%) sees a negative effect.

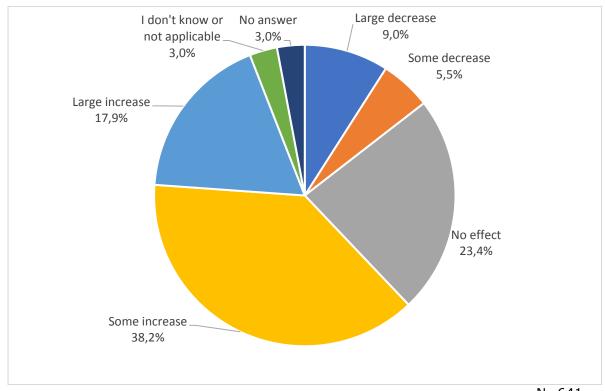
Only looking at companies and segmenting them by company size, the situation looks as follows:

		Self- employed	< 10 employees		10 - 49 employees		50 - 249 employees		≥ 250 employees		Total	
Large decrease	1	10.0%	3	10.7%	1	2.3%	3	5.6%	5	5.2%	13	5.6%
Some decrease	1	10.0%	1	3.6%	6	13.6%	7	13.0%	14	14.6%	29	12.5%
No effect	3	30.0%	13	46.4%	18	40.9%	25	46.3%	32	33.3%	91	39.2%
Some increase	1	10.0%	8	28.6%	11	25.0%	14	25.9%	30	31.3%	64	27.6%
Large increase	3	30.0%	2	7.1%	6	13.6%	1	1.9%	6	6.3%	18	7.8%
I don't know or not applicable	1	10.0%		0.0%	1	2.3%	4	7.4%	8	8.3%	14	6.0%
No response		0.0%	1	3.6%	1	2.3%		0.0%	1	1.0%	3	1.3%

Here the views of the companies are rather consistent. Across all company sizes, the combined rate of companies that see either no effect, does not know how to answer or decides not to answer makes up between 40% and 50% (with a slightly higher rate of 53.7%) in the case of medium-size enterprises. Looking only at those companies that do identify an effect, there is a clear majority seeing a positive effect across all company sizes.

2.3.2.8 Product safety

Large decrease	58	9.0%
Some decrease	35	5.5%
No effect	150	23.4%
Some increase	245	38.2%
Large increase	115	17.9%
I don't know or not	19	3.0%
applicable		
No answer	19	3.0%
TOTAL	641	100%



N = 641

With regard to product safety, more than half (56.2%) see a positive effect, as opposed to 14.5% who see a negative effect.

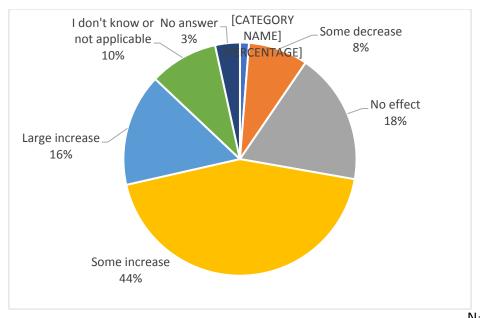
Only looking at companies and segmenting them by company size, the situation looks as follows:

	Self- employed		< 10 employees Self- employed		10 - 49 employees		50 - 249 employees		≥ 250 employees		Total	
Large decrease	2	20.0%	9	32.1%	7	15.9%	8	14.8%	3	3.1%	29	12.5%
Some decrease		0.0%	2	7.1%	2	4.5%		0.0%	4	4.2%	8	3.4%
No effect	3	30.0%	7	25.0%	8	18.2%	13	24.1%	31	32.3%	62	26.7%
Some increase	2	20.0%	2	7.1%	15	34.1%	23	42.6%	40	41.7%	82	35.3%
Large increase	2	20.0%	6	21.4%	11	25.0%	9	16.7%	15	15.6%	43	18.5%
I don't know or not applicable	1	10.0%	1	3.6%		0.0%	1	1.9%	2	2.1%	5	2.2%
No response		0.0%	1	3.6%	1	2.3%		0.0%	1	1.0%	3	1.3%
Total	10	100%	28	100%	44	100%	54	100%	96	100%	232	100%

The answers vary quite significantly depending on company size. While only 28.6% of micro-enterprises see a positive effect (and 39.3% a negative one), almost 60% of medium-size and of larger companies identify a positive effect (and only 14.8% and 7.3%, respectively, a negative effect).

2.3.2.9 Overall cost of production

Large decrease	8	1.2%
Some decrease	53	8.3%
No effect	117	18.3%
Some increase	280	43.7%
Large increase	100	15.6%
I don't know or not	61	9.5%
applicable		
No answer	22	3.4%
TOTAL	641	100%



N=641

In terms of the effect on the overall cost of production, 59.3% of respondents see "some increase" or a "large" increase, which must be understood as a negative statement in this case.

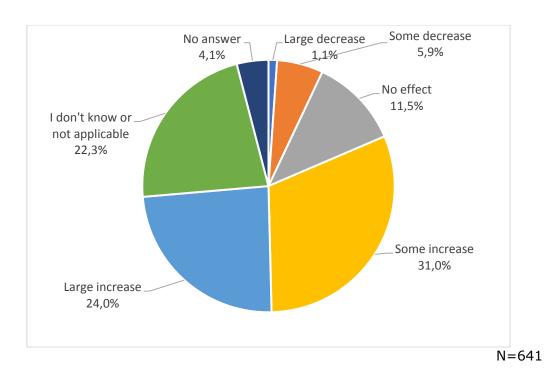
Only looking at companies and segmenting them by company size, the situation looks as follows:

	Self- employed		< 10 employees Self- employed		10 - 49 employees		50 - 249 employees		≥ 250 employees		Total	
Large decrease		0.0%	1	3.6%		0.0%	2	3.7%		0.0%	3	1.3%
Some decrease	2	20.0%	1	3.6%	5	11.4%	4	7.4%	12	12.5%	24	10.3%
No effect	2	20.0%	1	3.6%	7	15.9%	9	16.7%	18	18.8%	37	15.9%
Some increase	4	40.0%	5	17.9%	19	43.2%	26	48.1%	44	45.8%	98	42.2%
Large increase	2	20.0%	15	53.6%	11	25.0%	10	18.5%	13	13.5%	51	22.0%
I don't know or not applicable		0.0%	3	10.7%	1	2.3%	3	5.6%	7	7.3%	14	6.0%
No response		0.0%	2	7.1%	1	2.3%		0.0%	2	2.1%	5	2.2%
Total	10	100%	28	100%	44	100%	54	100%	96	100%	232	100%

The picture is fairly consistent across all company sizes. The view that production costs have increased is shared by roughly two thirds of companies across all segments.

2.3.2.10 Administrative costs to apply SME and simplification provisions

Large decrease	7	1.1%
Some decrease	38	5.9%
No effect	74	11.5%
Some increase	199	31.0%
Large increase	154	24.0%
I don't know or not	143	22.3%
applicable		
No answer	26	4.1%
TOTAL	641	100%



55.1% sees an increase in administrative costs for applying the SME and simplification provisions, which is obviously quite counterintuitive. Quite notable in this respect is also the fact that more than a quarter of respondents (26.4%) cannot or does not want to answer the question, implying that they are not familiar with the provisions in question.

Only looking at companies and segmenting them by company size, the situation looks as follows:

	Self- employed		Self- employed			< 10 employees		10 - 49 employees		50 - 249 employees		≥ 250 employees		Total	
Large decrease	1	10.0%		0.0%		0.0%		0.0%		0.0%	1	0.4%			
Some decrease		0.0%	1	3.6%	3	6.8%	3	5.6%	6	6.3%	13	5.6%			
No effect	1	10.0%	1	3.6%	1	2.3%	3	5.6%	6	6.3%	12	5.2%			
Some increase	4	40.0%	5	17.9%	20	45.5%	19	35.2%	27	28.1%	75	32.3%			
Large increase	4	40.0%	16	57.1%	14	31.8%	18	33.3%	18	18.8%	70	30.2%			
I don't know or not applicable		0.0%	4	14.3%	4	9.1%	11	20.4%	38	39.6%	57	24.6%			
No response		0.0%	1	3.6%	2	4.5%		0.0%	1	1.0%	4	1.7%			
Total	10	100%	28	100%	44	100%	54	100%	96	100%	232	100%			

One can in fact disregard the segment of companies with 250 staff or more, as they are not addressed by the simplification provisions for SMEs. Among the remaining segments, there is an overwhelming majority (between 70% and 80%) across all company sizes stating that there is an increase in administrative costs for applying these provisions.

2.3.3. Synthesis of free text replies

As mentioned, participants also had the possibility to specify other impacts that they see. The most frequent positive impacts that have been mentioned are the following ones:

- Consistency of information, based on the common technical language
- Transparency on the market
- Positive impacts generated by the introduction of the ETA procedure

The most frequently mentioned negative impacts are the following ones:

- Additional and unnecessary administrative burden
- Slow and tedious standardisation process
- Confusion on the market, due to the fact that the CE mark means different things under different directives, and related to the fact that it is sometimes required and sometimes not
- Decrease on the quality of products ("the poorest quality can become the standard across the EU")
- Decrease in terms of safety

Furthermore, the respondents had the possibility to elaborate on issues which are the most important or applicable to their specific case. This has resulted in the following comments, many of which repeat what has been said above. These comments can be grouped into the following issues:

ETA procedure:

Overall, a large number of respondents express their positive appreciation about the ETA procedure and the possibilities it offers for the marketing of innovative products. At the same time, a certain number stresses that there was a large degree of redundancy with regard to the information to be included in the DoP on the one hand and in the ETA on the other. A significant number of respondents suggest to introduce the possibility that the DoP just refers to the ETA. Also, the number of necessary translations should be reduced. A small number of respondents criticises that in their view, the ETA procedure allows big companies "to create their very own standard" and to use that as a competitive advantage over others.

Slowness of standardisation procedures, non-citation of standards

A significant number of respondents express frustration about the slowness of the harmonisation procedure and about the fact that the hENs are not (promptly) cited in the OJEU. In line with that, a very frequently made comment is that the positive impact of the CPR would be much higher if standards were more (quickly) cited.

Persistence of national requirements and marks

A significant number of respondents express frustration about the fact that in their view, the common market is still hindered by additional de facto requirements or marks in certain Member States, such as Germany and France. At the same time, many (other) participants state that such additional requirements or marks are absolutely necessary in order to ensure and reassure customers about fitness for purpose, quality and/or safety.

Misconception about the CE label

A significant number of stakeholders state that the CE label was not (yet) properly understood, as it is frequently misconceived as a quality label.

Importance of enforcement and much improved market surveillance

A significant number of participants state that both market surveillance and enforcement need to be much strengthened and improved.

Omission of fire safety requirements and of hygienic requirements

A certain number of organisations from the relevant sectors state that the CPR does currently not address fire safety requirements. The same comment is made by relevant organisation with regard to hygienic requirements concerning construction products in contact with drinking water which, accordingly, were still regulated at national level. These organisations state that harmonisation in this field could significantly reduce the financial burden on industry imposed by multiple national certification schemes.

Lack of clarity of the question itself

Another comment found several times is that it was not entirely clear whether the situation should be compared to that during or before the CPD.

2.4. Question 16: Efficiency - costs vs. benefits

2.4.1. Complete wording of the question

"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?

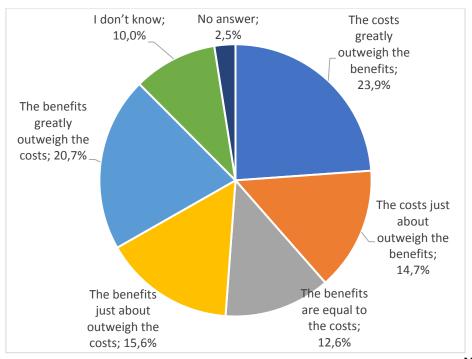
- The costs greatly outweigh the benefits
- The costs just about outweigh the benefits
- The benefits are equal to the costs
- The benefits just about outweigh the costs
- The benefits greatly outweigh the costs
- I don't know"

Additional explanations can be made at the end in free text format.

2.4.2. Quantitative analysis

The overall result of answers looks as follows:

The costs greatly outweigh the benefits	153	23.9%	38.6%
The costs just about outweigh the benefits	94	14.7%	38.0%
The benefits are equal to the costs	81	12.6%	12.6%
The benefits just about outweigh the costs	100	15.6%	36.3%
The benefits greatly outweigh the costs	133	20.7%	
I don't know	64	10.0%	12.5%
No answer	16	2.5%	12.5%
Total	641	100%	100%



N = 641

Across the totality of respondents, it can be seen that 36.6% are of the opinion that the benefits outweigh the costs, while 38.6% of the responds state that the costs outweigh the benefits.

If we only select companies and break down the results by size of enterprise, we see that the highest rate of sceptical respondents is to be found among the representatives of micro-enterprises (60.7%).

	employed	Self- employed		< 10 employees		10 - 49 employees		50 - 249 employees		≥ 250 employees		Total	
The costs greatly outweigh the benefits	4	40.0%	15	53.6%	14	31.8%	15	27.8%	13	13.5%	61	26.3%	
The costs just about outweigh the benefits	1	10.0%	2	7.1%	6	13.6%	10	18.5%	23	24.0%	42	18.1%	
The benefits are equal to the costs	1	10.0%	3	10.7%	9	20.5%	8	14.8%	14	14.6%	35	15.1%	
The benefits just about outweigh the costs	1	10.0%	2	7.1%	4	9.1%	9	16.7%	13	13.5%	29	12.5%	
The benefits greatly outweigh the costs	3	30.0%	2	7.1%	5	11.4%	10	18.5%	26	27.1%	46	19.8%	
I don't know		0.0%	4	14.3%	4	9.1%	2	3.7%	7	7.3%	17	7.3%	
No answer		0.0%		0.0%	2	4.5%		0.0%		0.0%	2	0.9%	
Total	10	100%	28	100%	44	100%	54	100%	96	100%	232	100%	

2.4.3. Synthesis of free text replies

The free text comments further explain the mixed results of the closed question. A significant amount of participants state that the benefits do not outweigh the costs and that they do not see advantages of the CPR. As can be expected, these critical

statements come in particular from locally oriented SMEs. At the same time, a very large number of participants clearly states that a repeal of the CPR should be avoided by any means, as this would drastically increase the administrative costs as compared to now. One respondent has provided the following analysis: "Due to big one-time investment in securing compliance with CPR the picture right now will be that costs outweigh the benefits. It is expected though that the benefits will greatly outweigh the costs in the long run, but to get there it is very important that no changes are made to the wording of CPR. If changes are introduced the costs the industry has had so far will never transfer into benefits."

One observation (also when looking at the responses to the subsequent questions) is that construction engineers consider the costs of the CPR as particularly high and often do not see any benefits at all. This point of view is explained by some comments who state that now, under the CPR, construction engineers have to ensure the fitness for purpose and safety in their planning, which accordingly was not the case before (at least not in the same way).

As a means to reduce costs, several participants reiterate the suggestion to allow for the DoP to just refer to the ETA (rather than "duplicating" it) and to limit the number of required translations. Also, it is suggested to include information as to whether the construction product can be used for a specific application in the different Member States.

2.5. Question 17: Efficiency – necessity of costs

2.5.1. Complete wording of the question

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

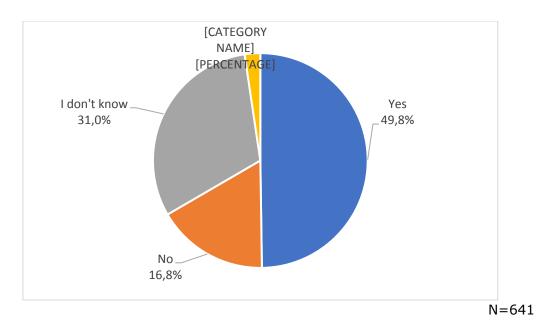
- Yes
- No
- I don't know"

Additional explanations can be provided at the end in free text format.

2.5.2. Quantitative analysis

The overall result of answers looks is as follows:

Yes	319	49.8%
No	108	16.8%
I don't know	199	31.0%
No answer	15	2.3%
Total	641	100%



It is quite remarkable that only 16.8% of respondents sees the current legislation as the most efficient solution to achieve the results. Almost 50% of the respondents says clearly that this would have been possible at lower costs and 31% are unsure.

If we distinguish by type of organisation, we get to the following results:

	Υ	es	N	lo	I don'	t know	No ar	nswer	Total	
Individual respondent	35	37.2%	15	16.0%	41	43.6%	3	3.2%	94	100%
Business representative	138	66.7%	23	11.1%	40	19.3%	6	2.9%	207	100%
Company or sole trader	109	47.0%	46	19.8%	75	32.3%	2	0.9%	232	100%
Consumer organisation		0.0%		0.0%	1	100%		0.0%	1	100%
Non-governmental	4	44.4%	2	22.2%	3	33.3%		0.0%	9	100%
organisation										
Public authority or testing	11	39.3%	4	14.3%	12	42.9%	1	3.6%	28	100%
body										
Representative of		0.0%	2	50.0%	2	50.0%		0.0%	4	100%
construction workers										
Research/academia	5	55.6%	2	22.2%	2	22.2%		0.0%	9	100%
Technical body	15	34.9%	11	25.6%	16	37.2%	1	2.3%	43	100%
Other	2	14.3%	3	21.4%	7	50.0%	2	14.3%	14	100%
Total	319	49.8%	108	16.8%	199	31.0%	15	2.3%	641	100%

With 66.7%, the group of business representatives show the highest rate of respondents that say that the same results could have been achieved at lower costs, and only 11% of that group sees the current solution as the most efficient one.

2.5.3. Synthesis of free text replies

The free text replies focus mainly on suggestions to reduce the costs for the market participants. These include the following:

- Improved and more consistent implementation and enforcement
- Clarification of wording of unclear or ambiguous passages of the CPR
- Reduction of redundancy between the information included in the DoP and that included in the CE marking

- Swift citation of new hENs in the OJEU
- Lowering of testing costs, harmonisation of testing methods
- Focussing the information to be provided in the DoP/ CE mark on indication that are actually required by the market (fitness for use).

We find that the following comment provides a good summary of the various types of feedback received: "Make CE-marking requirements for products more practical and to the level of a common-sense trust in the overall decent quality and performance of European construction products. CPR should primarily serve manufacturers and the construction sector actors, not the business interests of testing and assessment bodies. Make all formal steps such as publications in the OJEU swift. Ensure regulatory clarity when revising of harmonized standards to comply with revised Mandates is going on (the interim period may be substantial)."

Furthermore, there are suggestions for two types of databases to be set up: One that would include information about minimum requirements in the different Member States and another one were all DoPs can be stored and archived.

2.6. Questions 18a-i: Relevance

2.6.1. Complete wording of the question

"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)
- b) Extent of choice available for consumers in construction products
- c) Legal certainty in the market for construction products
- d) Extent of cross-border trade between EU Member States
- e) Level of administrative costs for market operators to comply with the EU legislation on construction products
- f) Safety of construction products
- g) Environmental impact of construction products
- h) Energy efficiency of construction products
- i) Innovation in general, in particular information and information processing technologies (including BIM Building information modelling) use in the construction product sector"

To each of these issues, the respondent has the choice between one of the following answers:

- "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"

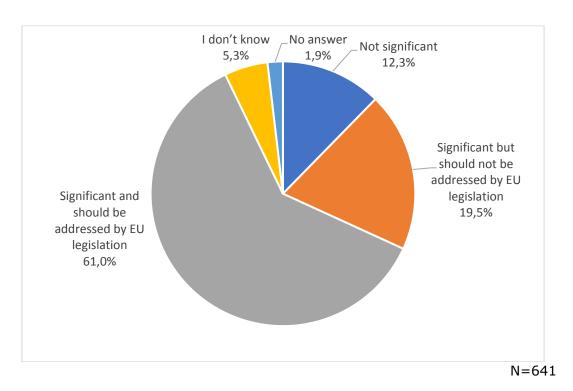
Free text comments are possible after each sub question in case the respondent opts for the second or third answer (stating that it is a significant issue).

2.6.2. Analysis of individual issues

The detailed results per issue look as follows:

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

Not significant	79	12.3%
Significant but should not be addressed by EU legislation	125	19.5%
Significant and should be addressed by EU legislation	391	61.0%
I don't know	34	5.3%
No answer	12	1.9%
TOTAL	641	100%



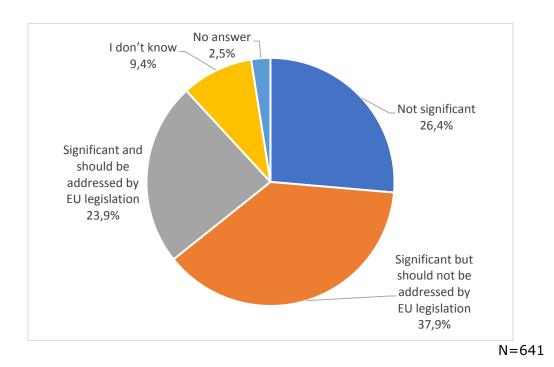
The above numbers show that an overwhelming majority (80.5%) confirm the significance of the issue including 61% who state that it should be addressed by EU legislation.

Synthesis of free text replies

A significant number of respondents state that, in order to make the CE and the DoP more relevant to users, producers should have the possibility to include additional (voluntary) characteristics. A good number also expresses the point of view that the value of the information is limited as long as it is not related to the basic work requirements. Therefore, additional information covering the performance of the products under real conditions would be necessary. Furthermore, many respondents suggest to make it obligatory to include information on whether the product satisfies, or not, work requirements in certain countries.

2.6.2.2 Extent of choice available for consumers in construction products

Not significant	169	26.4%
Significant but should not be addressed by EU legislation	243	37.9%
Significant and should be addressed by EU legislation	153	23.9%
I don't know	60	9.4%
No answer	16	2.5%
TOTAL	641	100%



While 61.8% confirm the significance of the issue (with 26.4 % considering it is not), 23.9% state that it should be addressed by EU legislation against 37.9%.

Synthesis of free text replies:

The vast majority of comments state that they do not see any connection between the CPR and the available product choice. A significant number of them stress that the increase of product choice should be left to market forces. That idea that it might precisely be one of the objectives of the CPR to stimulate market forces is apparently not very present.

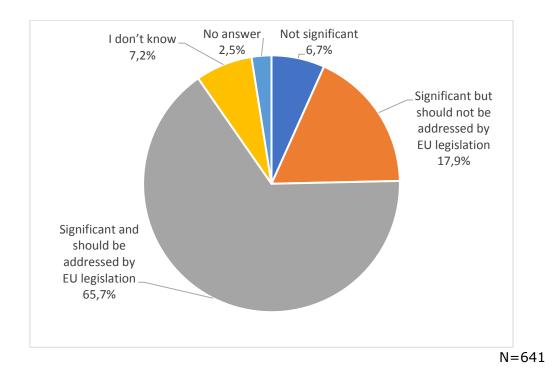
A number of comments make a semantical issue of the question itself. They understand the term "consumers" in the sense of "end-users" and argue that the choice is not made by the latter anyway.

Furthermore, a small number of respondents argue that due to the heavy administrative, assessment and testing requirements, the marketing of new and innovative products is hampered.

The number of respondents who see a direct link between the CPR and the product choice is rather small and comes in particular from smaller Member States. This is not surprising, as it is safe to assume that the smaller the respective market was before the CPR, the smaller was also the number of suppliers active on those markets.

2.6.2.3 Legal certainty in the market for construction products

Not significant	43	6.7%
Significant but should not be addressed by EU legislation	115	17.9%
Significant and should be addressed by EU legislation	421	65.7%
I don't know	46	7.2%
No answer	16	2.5%
TOTAL	641	100%



An overwhelming majority of 83.6% confirms the significance of the issue and 65.7% confirm that it should be addressed by EU legislation.

Synthesis of free text replies:

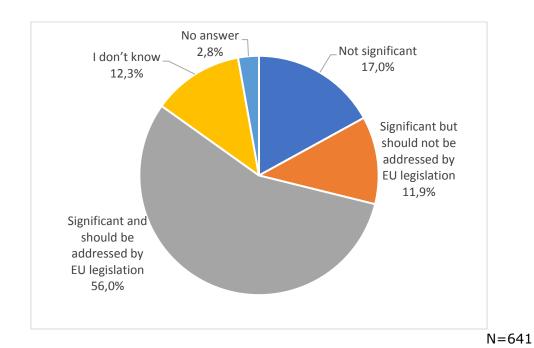
Overall, respondents overwhelmingly confirm the importance of the issue. Many point out that stronger enforcement, market surveillance and more uniform interpretation of rules across the different Member States is crucial. A number of participants stress that the fact that the CE marking does not mean compliance with all (national) building safety rules has created very significant legal uncertainty. Furthermore, several respondents point to the fact that the real meaning of the CE marking is still not clear to many and that efforts should be made in order to clarify that the CE marking is not a Otherwise, the confusion created by the misunderstanding/ misinterpretation of the CE marking creates significant legal uncertainty. One very frequent comment (which was provided with identical wording by many respondents) is the following: "Legal certainty shall be improved by a CPR revision, e. g. regarding the availability of Notified Bodies as soon as an EAD is published (specially for a new EAD created acc. to the procedure of CPR Annex II). For ETAs issued containing a severe mistake there should be an obligation to withdraw it."

Many respondents stress that not only legal certainty, but also transparency is needed; leaving however somewhat unclear what exactly is meant by "transparency". A somewhat more concrete comment is the following: "The complexity of the regulations by means of the Construction Products Regulation alone creates legal uncertainties on

the market, in particular due to a large number of harmonized European standards that are not published in the OJEU. In addition, for our customers, it becomes particularly opaque for products that fall under several European regulations / directives (for example, electric windows and doors)."

2.6.2.4 Extent of cross-border trade between EU Member States

Not significant	109	17.0%
Significant but should not be addressed by EU legislation	76	11.9%
Significant and should be addressed by EU legislation	359	56.0%
I don't know	79	12.3%
No answer	18	2.8%
TOTAL	641	100%



Again, a strong majority of more than two thirds (67.9%) confirms the significance of the issue and 56% consider that it should be addressed by EU legislation.

Synthesis of free text replies:

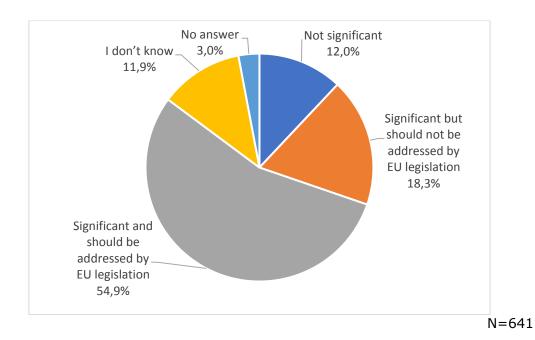
A significant number of the respondents refer to the additional requirements at national level. Some of the respondents state that these hamper the cross-border trade, while others emphasise the point of view that these are important and justified.

Several respondents point out that the extent to which products are traded cross-border depends a lot on the product family. For concrete products, for example, the amount of cross-border trade is almost negligible. The more specialised and "high-tech" a product is, however, the more significant cross-border trade becomes.

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

Not significant	77	12.0%
Significant but should not be addressed by EU legislation	117	18.3%

Significant and should be addressed by EU legislation	352	54.9%
I don't know	76	11.9%
No answer	19	3.0%
TOTAL	641	100%



Once more, a very clear majority of respondents (73.2%) confirm the significance of the issue and nearly 55% confirm that it should be addressed by EU legislation.

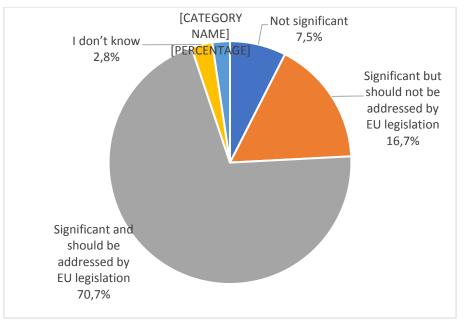
Synthesis of free text replies:

A significant number of respondents state that the administrative costs related to the compliance with current legislation are very high. While a certain number of them sees them as a reason for a more thorough revision of the CPR, a very clear majority is in favour of reducing complexity and increasing clarity within the current framework. Many also point out that a more thorough change of the CPR would cause even higher administrative costs.

A frequent comment is also that SMEs are disproportionally strongly "hit" by the administrative costs.

2.6.2.6 Safety of construction products

Not significant	48	7.5%
Significant but should not be addressed by EU legislation	107	16.7%
Significant and should be addressed by EU legislation	453	70.7%
I don't know	18	2.8%
No answer	15	2.3%
TOTAL	641	100%



N = 641

No other issue has seen such a strong confirmation with regard to its significance, which is confirmed by 87.4% of respondents. Also, 70.7% consider that it should be addressed by EU legislation, which is the highest rate among all issues related to "relevance".

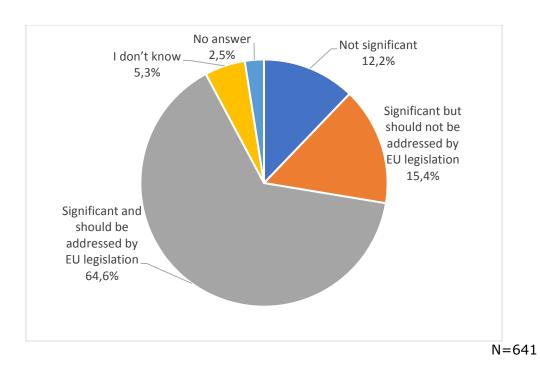
Synthesis of free text replies:

The answers provided to this question differ essentially between the following points of view:

- Safety of construction products should not be regulated at EU level;
- It should be regulated at EU level but it is currently not the case;
- It should be regulated at EU level and it is sufficiently addressed by the CPR, more specifically through the BRCWs;
- It should be regulated at EU level and it is addressed but could/ should be strengthened through stronger AVCP systems, threshold levels, classes, pass/fail indications in hENs etc.;
- It should be regulated at EU level and is addressed by other legislation, e.g. REACH, CLP, CM.

2.6.2.7 Environmental impact of construction products

Not significant	78	12.2%
Significant but should not be addressed by EU	99	15.4%
legislation		
Significant and should be addressed by EU	414	64.6%
legislation		
I don't know	34	5.3%
No answer	16	2.5%
TOTAL	641	100%



Also the significance of the issue of environmental impact is overwhelmingly confirmed by 80% of the respondents. 64.6% consider that it should be addressed by EU legislation.

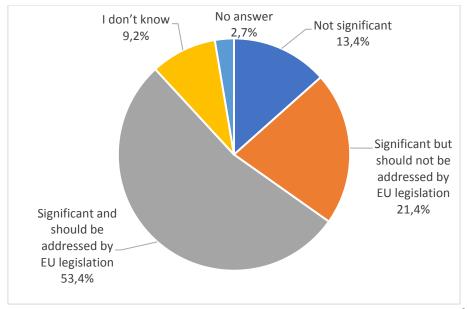
Synthesis of free text replies:

As for the previous subquestion, there are a number of different points of view represented:

- Environmental impact should not be regulated by the CPR but by other legislation (EU or national);
- It should be regulated at EU level but it is currently not the case;
- It should be regulated at EU level and it is sufficiently addressed by the CPR, more specifically through BRCWs 3 and 7;
- It should be regulated at EU level an is in theory addressed by BRCW 3 and 7, but there is a need to clarify the details of their implementation/ application;
- It should be regulated at EU level but could be strengthened through the introduction of classes and thresholds;
- It should be regulated at EU level but higher requirements by individual MS should be allowed.

2.6.2.8 Energy efficiency of construction products

Not significant	86	13.4%
Significant but should not be addressed by EU legislation	137	21.4%
Significant and should be addressed by EU	342	53.4%
legislation		
I don't know	59	9.2%
No answer	17	2.7%
TOTAL	641	100%



N = 641

74.7% of respondents confirm the significance of energy efficiency and 53.4% state that it should be addressed by EU legislation.

Synthesis of free text replies:

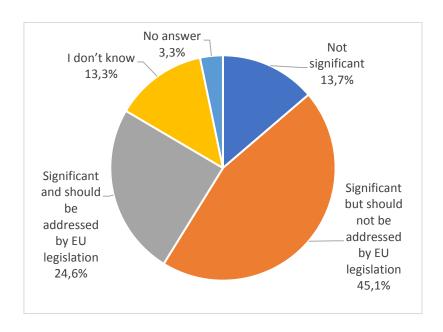
A large number of respondents point out that energy efficiency should be dealt with at building level, not at product level, and that hence, the CPR was not the appropriate tool to regulate this.

Apart from that, the range of opinions is relatively close to that of subquestions f and g:

- Environmental impact should not be regulated by the CPR but by other legislation (EU or national);
- It should be regulated at EU level but it is currently not the case;
- It should be regulated at EU level and it is sufficiently addressed by the current system through BRCW 6; the information in the DoP is deemed sufficient to compare the performance of relevant products;
- It should be regulated at EU level an is in theory addressed by BRCW 6, but there is a need to clarify the details of their implementation/ application;
- It should be regulated at EU level but could be strengthened through the introduction of classes and thresholds;
- It should be regulated at EU level but higher requirements by individual Member States should be allowed.

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

Not significant	88	13.7%
Significant but should not be addressed by EU legislation	289	45.1%
Significant and should be addressed by EU legislation	158	24.6%
I don't know	85	13.3%
No answer	21	3.3%
TOTAL	641	100%



N = 641

While again a very clear majority of 69.7% of respondents confirm the significance of the issue of innovation, only 24.6% consider that it should be addressed by EU legislation.

Synthesis of free text replies:

A majority of respondents sees little or no relevance of the CPR to innovation and comments that innovation should be left to industry and not be regulated by law. A certain number of comments point out the importance of faster standardisation procedures and of a much swifter citation of the standards. Only a small minority of respondents state that BIM should be considered at the level of the CPR.

2.7. Question 19: External coherence – contradictions and overlaps

2.7.1. Complete wording of the question

"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"

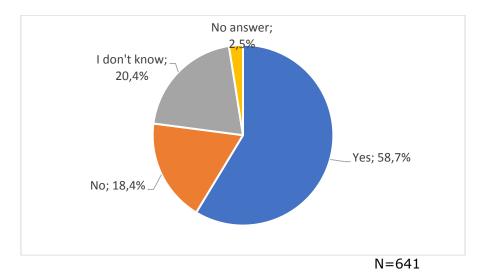
For the case that they answer with "yes", respondents have the possibility to further explain their case in free text format.

2.7.2. Quantitative analysis

Overall, the distribution of answers to this question looks as follows:

Yes	376	58.7%
No	118	18.4%
I don't know	131	20.4%

Total	641	100%
No answer	16	2.5%



Nearly 60% of the respondents state that they see an issue of coherence between the CPR and other legislations at EU or national level. 22.9% of respondents do not know or choose not to answer, which is rather high.

If we distinguish by type of organisation, we get to the following results:

	Y	es	N	lo	I don't	t know	No ar	iswer	1	Total
Individual respondent	44	46.8%	16	17.0%	31	33.0%	3	3.2%	94	100%
Business representative	155	74.9%	24	11.6%	22	10.6%	6	2.9%	207	100%
Company or sole trader	122	52.6%	54	23.3%	54	23.3%	2	0.9%	232	100%
Consumer organisation		0.0%	1	100%		0.0%		0.0%	1	100%
Non-governmental organisation	5	55.6%		0.0%	3	33.3%	1	11.1%	9	100%
Public authority or testing body	14	50.0%	7	25.0%	5	17.9%	2	7.1%	28	100%
Representative of construction workers	1	25.0%	2	50.0%	1	25.0%		0.0%	4	100%
Research/academia	3	33.3%	4	44.4%	2	22.2%		0.0%	9	100%
Technical body	20	46.5%	10	23.3%	12	27.9%	1	2.3%	43	100%
Other	12	85.7%		0.0%	1	7.1%	1	7.1%	14	100%
Total	376	58.7%	118	18.4%	131	20.4%	16	2.5%	641	100%

With nearly 75%, organisations that represent businesses show the highest rate of respondents that see a conflict or coherence with other pieces of legislation (apart from those that have classified themselves as "other", among which the rate is even 85.7%). Among companies themselves, the rate is significantly lower, with only 52.6%.

2.7.3. Synthesis of free text replies

In their comments, respondents provide quite a large number of examples of specific pieces of legislation which overlap or contradict the CPR. The by far most frequently mentioned example is that of contradiction with national legislation and here in particular additional requirements that are in place. Apart from that, other pieces of legislation that are mentioned multiple times are the following:

- Public procurement rules at national and/or local level as well as EU "green public procurement" rules;
- Eco-design Directive
- Drinking Water Directive;
- REACH;
- Waste Framework Directive;
- Marine Equipment Directive;
- Classification, Labelling and Packaging Regulation;
- Energy Performance of Buildings Directive;
- Product Liability Directive;
- Machine Directive.

2.8. Question 20: External coherence – synergies

2.8.1. Complete wording of the question

This question does not depend on any other question in the questionnaire. However, it is to be seen in complementarity to the previous question: while question 19 asks about incoherencies with other legislation, question 20 asks about positive external coherence. The complete wording of the question is the following:

"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)??

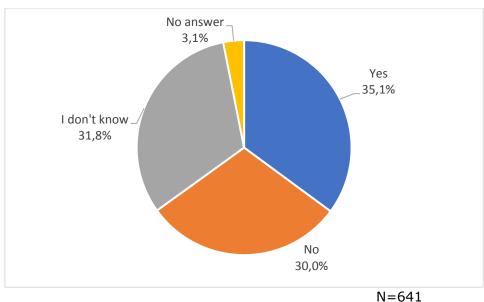
- Yes
- No
- I don't know"

For the case that they answer with "yes", respondents have the possibility to further explain their case in free text format.

2.8.2. Quantitative analysis

Overall, the distribution of answers to this question looks as follows:

Yes	225	35.1%
No	192	30.0%
I don't know	204	31.8%
No answer	20	3.1%
Total	641	100%



As shown in the graph, the field is split into three thirds between respondents who see positive synergies, respondents who do not see any and respondents who do not know.

If we distinguish by type of organisation, we get to the following results:

	Y	es	N	lo	I don'	t know	No a	nswer	1	otal
Individual respondent	26	27.7%	31	33.0%	35	37.2%	2	2.1%	94	100%
Business representative	92	44.4%	59	28.5%	48	23.2%	8	3.9%	207	100%
Company or sole trader	69	29.7%	79	34.1%	79	34.1%	5	2.2%	232	100%
Consumer organisation		0.0%		0.0%	1	100%		0.0%	1	100%
Non-governmental organisation	3	33.3%	2	22.2%	4	44.4%		0.0%	9	100%
Public authority or testing body	13	46.4%	3	10.7%	11	39.3%	1	3.6%	28	100%
Representative of construction workers	1	25.0%	3	75.0%		0.0%		0.0%	4	100%
Research/academia	2	22.2%	4	44.4%	3	33.3%		0.0%	9	100%
Technical body	14	32.6%	5	11.6%	22	51.2%	2	4.7%	43	100%
Other	5	35.7%	6	42.9%	1	7.1%	2	14.3%	14	100%
Total	225	35.1%	192	30.0%	204	31.8%	20	3.1%	641	100%

Interestingly, business representing organisations, who were the group with the highest share of respondents pointing out contradictions and overlaps with other pieces of legislation, are at the same time also among the groups with the highest share of respondents (44.4%) pointing out synergies with other pieces of legislation (together with public authorities and testing bodies, where the percentage is 46.6%). Individuals are among the group with the lowest share of respondents seeing such synergies (27.7%).

2.8.3. Synthesis of free text replies

In their free-text replies, respondents mention a number of existing or potential synergies with other pieces of legislation. A very frequently found comment is that "any essential characteristic under the CPR could be used to fit the requirements of any other legislation". Specific examples that are given in this context are national building codes, the EPBD and the PLD. Apart from that, synergies are mentioned with regard to the Product Liability Directive, REACH and fire safety regulations. A significant number of respondents also point out that the CPR increases the usefulness of research results, as the same methods and definitions are used across the EU. A number of respondents state that "potential" synergies could be achieved with the Eco-design Directive and the Drinking Water Directive, if the respective legislations were further harmonised.

2.9. **Question 21: EU added value**

2.9.1. Complete wording of the question

"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)?

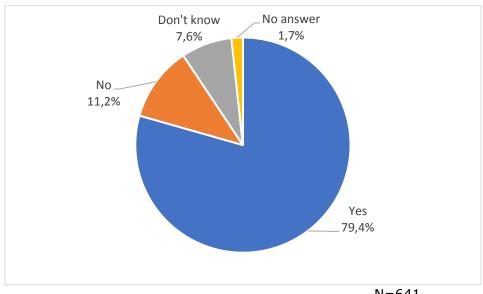
- Yes
- No
- I don't know"

For the case that they answer with "yes" or with "no", respondents have the possibility to further explain their case in free text format.

2.9.2. Quantitative analysis

Overall, the distribution of answers to this question looks as follows:

Yes	509	79.4%
No	72	11.2%
I don't know	49	7.6%
No answer	11	1.7%
Total	641	100%



N = 641

With nearly 80%, the confirmation of the EU added value among participants is overwhelming.

If we distinguish by type of organisation, we get to the following results:

	Yes		No		I don't know		No answer		Total	
Individual respondent	65	69.1%	16	17.0%	13	13.8%		0.0%	94	100%
Business representative	171	82.6%	22	10.6%	7	3.4%	7	3.4%	207	100%

Company or sole trader	181	78.0%	26	11.2%	23	9.9%	2	0.9%	232	100%
Consumer organisation	1	100%		0.0%		0.0%		0.0%	1	100%
Non-governmental organisation	7	77.8%	1	11.1%	1	11.1%		0.0%	9	100%
Public authority or testing body	27	96.4%		0.0%	1	3.6%		0.0%	28	100%
Representative of construction workers	3	75.0%	1	25.0%		0.0%		0.0%	4	100%
Research/academia	8	88.9%	1	11.1%		0.0%		0.0%	9	100%
Technical body	33	76.7%	5	11.6%	4	9.3%	1	2.3%	43	100%
Other	13	92.9%		0.0%		0.0%	1	7.1%	14	100%
Total	509	79.4%	72	11.2%	49	7.6%	11	1.7%	641	100%

It can be seen that the confirmation of the EU added value is very clear across all types of organisations, ranging between 69.1% in the case of individuals up to 96%.4 in the case of public authorities and testing bodies (we do not count consumer organisations here, as only one has participated).

A breakdown by country may also be of interest in this case:

	Y	es	N	lo	I don'	t know	No a	nswer	1	Total
Austria	21	87.5%	3	12.5%		0.0%		0.0%	24	100%
Belgium	68	90.7%	4	5.3%	1	1.3%	2	2.7%	75	100%
Bulgaria	10	66.7%	1	6.7%	3	20.0%	1	6.7%	15	100%
Croatia	4	100%		0.0%		0.0%		0.0%	4	100%
Cyprus	1	100%		0.0%		0.0%		0.0%	1	100%
Czech Republic	11	78.6%	2	14.3%	1	7.1%		0.0%	14	100%
Denmark	5	71.4%	2	28.6%		0.0%		0.0%	7	100%
Estonia	2	100%		0.0%		0.0%		0.0%	2	100%
Finland	13	92.9%	1	7.1%		0.0%		0.0%	14	100%
France	41	75.9%	8	14.8%	3	5.6%	2	3.7%	54	100%
Germany	114	78.6%	24	16.6%	7	4.8%		0.0%	145	100%
Greece	2	50.0%		0.0%	2	50.0%		0.0%	4	100%
Hungary	7	70.0%	2	20.0%	1	10.0%		0.0%	10	100%
Ireland	6	100%		0.0%		0.0%		0.0%	6	100%
Italy	42	85.7%	4	8.2%	3	6.1%		0.0%	49	100%
Luxembourg	2	100%		0.0%		0.0%		0.0%	2	100%
Netherlands	29	65.9%	10	22.7%	3	6.8%	2	4.5%	44	100%
Poland	7	77.8%	1	11.1%		0.0%	1	11.1%	9	100%
Portugal	4	57.1%	1	14.3%	2	28.6%		0.0%	7	100%
Romania		0.0%		0.0%	1	100%		0.0%	1	100%
Slovak Republic	4	66.7%		0.0%	2	33.3%		0.0%	6	100%
Slovenia	6	85.7%		0.0%	1	14.3%		0.0%	7	100%
Spain	36	87.8%		0.0%	5	12.2%		0.0%	41	100%
Sweden	15	78.9%	1	5.3%	3	15.8%		0.0%	19	100%
United Kingdom	41	80.4%	6	11.8%	2	3.9%	2	3.9%	51	100%
Other	18	60.0%	2	6.7%	9	30.0%	1	3.3%	30	100%
Total	509	79.4%	72	11.2%	49	7.6%	11	1.7%	641	100%

Again, the confirmation of the EU added value is unambiguous across all countries. However, it should be noted that statistical representativeness it not given.

2.9.3. Synthesis of free text replies

In line with the quantitative analysis, a clear and overwhelming majority of respondents confirms the EU added value of a legislation at EU level. A significant number of them state that the alternative, i.e. a repeal of the CPR, would create an enormous amount of costs and administrative burden and/or even lead to "chaos". Notwithstanding, a good number of respondents criticize the fact that many additional national (de facto) requirements persist and thus limit the freedom of trade. On the other hand, quite many also argue that these national regulations are necessary and justified and should therefore be allowed. A small number of respondents declares that the CPR, the CE marking etc. only benefit large companies.

3. Questions related to the impact assessment – detailed analysis of results

3.1. Question 22: Overall policy options

3.1.1. Complete wording of the question

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

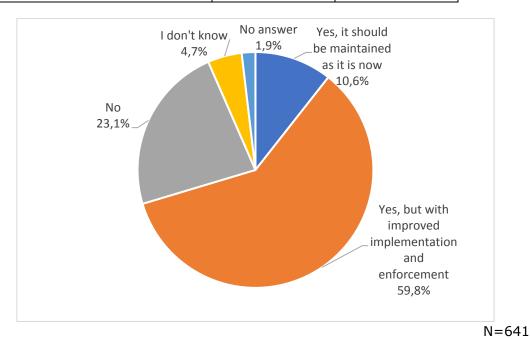
- Yes, it should be maintained as it is now
- Yes, but with improved implementation and enforcement
- No
- I don't know"

For the case that they answer with "yes" or with "no", respondents have the possibility to further explain their answer, focussing on the particular advantages (benefits) and disadvantages (costs) that this would entail.

3.1.2. Quantitative analysis

Overall, the distribution of answers to this question looks as follows:

Yes, it should be maintained as it is now	68	10.6%
Yes, but with improved implementation and	383	59.8%
enforcement		
No	148	23.1%
I don't know	30	4.7%
No answer	12	1.9%
Total	641	100%



The picture is very clear, with nearly 60% of the respondents in favour of maintaining the current legislation but with improved implementation and enforcement.

Broken down by type of organisation, we get to the following results:

	b maint	should e ained s now	Yes, but with improved implementation and enforcement		N	No		I don't know		nswer	Total	
Individual respondent	9	9.6%	53	56.4%	20	21.3%	11	11.7%	1	1.1%	94	100%
Business representative	20	9.7%	134	64.7%	45	21.7%	1	0.5%	7	3.4%	207	100%
Company or sole trader	32	13.8%	126	54.3%	59	25.4%	13	5.6%	2	0.9%	232	100%
Consumer organisation		0.0%	1	100%		0.0%		0.0%		0.0%	1	100%
Non-governmental organisation		0.0%	6	66.7%	1	11.1%	2	22.2%		0.0%	9	100%
Public authority or testing body	3	10.7%	19	67.9%	5	17.9%	1	3.6%		0.0%	28	100%
Representative of construction workers	1	25.0%	2	50.0%	1	25.0%		0.0%		0.0%	4	100%
Research/academia	1	11.1%	8	88.9%		0.0%		0.0%		0.0%	9	100%
Technical body	2	4.7%	30	69.8%	9	20.9%	1	2.3%	1	2.3%	43	100%
Other		0.0%	4	28.6%	8	57.1%	1	7.1%	1	7.1%	14	100%
Total	68	10.6%	383	59.8%	148	23.1%	30	4.7%	12	1.9%	641	100%

As can be seen, the very clear preference for the option of maintaining the current legislation as it is but with improved implementation and enforcement applies to nearly all stakeholder groups (except for the group of "others", who however are too few in number to be seen as statistically representative).

Selecting only the companies and breaking them down by number of employees, the distribution is as follows (please note that statistical representativeness is not given):

			impr imple tatio	Yes, but with improved implementation and enforcement		No		I don't know		No answer		tal
Self-employed		0.0%	7	70.0%	2	20.0%	1	10.0%		0.0%	10	100%
< 10 employees	2	7.1%	12	42.9%	11	39.3%	3	10.7%		0.0%	28	100%
10 - 49 employees	6	13.6%	18	40.9%	15	34.1%	3	6.8%	2	4.5%	44	100%
50 - 249 employees	9	16.7%	29	53.7%	14	25.9%	2	3.7%		0.0%	54	100%
≥ 250 employees	15	15.6%	60	62.5%	17	17.7%	4	4.2%		0.0%	96	100%
Total	32	13.8%	126	54.3%	59	25.4%	13	5.6%	2	0.9%	232	100%

As can be seen, micro- and small enterprises are least in favour of maintaining the CPR. Nonetheless, even among these two groups, the combined rate of supporters of either maintaining the CPR as it is or of maintaining it but with improvement implementation and enforcement is significantly higher than the rate of those who are in favour of changing it.

3.1.3. Synthesis of free text replies

The free-text replies are primarily used to suggest concrete improvements to the CPR. More specifically, these comments concern the following aspects:

 Enforcement and market surveillance must be much improved (= by far most frequent comment);

- Standardisation procedures must be much accelerated; citation of harmonised standards must happen much more quickly;
- The requirements on the DoP shall be revised and reduced; more specifically, the number of necessary translations should be limited and it should be possible to simply refer to the ETAs (rather than duplicating them);
- The rules for listing performances within the CE mark should be simplified and a mere referene to the DoP should be sufficient;
- The use of electronic means should be promoted (keyword "short CE marking" and "smart CE marking");
- There should be better guidance in order to achieve uniform application across the EU;
- There should be better communication towards stakeholders, in order to achieve a better understanding of the various aspects of the CPR;
- National annexes should be removed.

A very large number of comments also point out that a repeal of the CPR would have very dramatic consequences, lead to very undesirable fragmentation and huge costs.

A number of German stakeholders is more critical and rejects the CPR more fundamentally. They say that for them, not benefits are identifiable and that free trade should not be prioritised over safety and consumer rights.

3.2. Question 23: Repeal option

3.2.1. Complete wording of the question and dependency link with other questions

This question was only asked to the 148 respondents that have answered the previous question with a "no". The complete wording of the question is the following:

"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"

For the case that they answer with "yes" or with "no", respondents have the possibility to further explain their answer, focussing on the particular advantages (benefits) and disadvantages (costs) that this would entail.

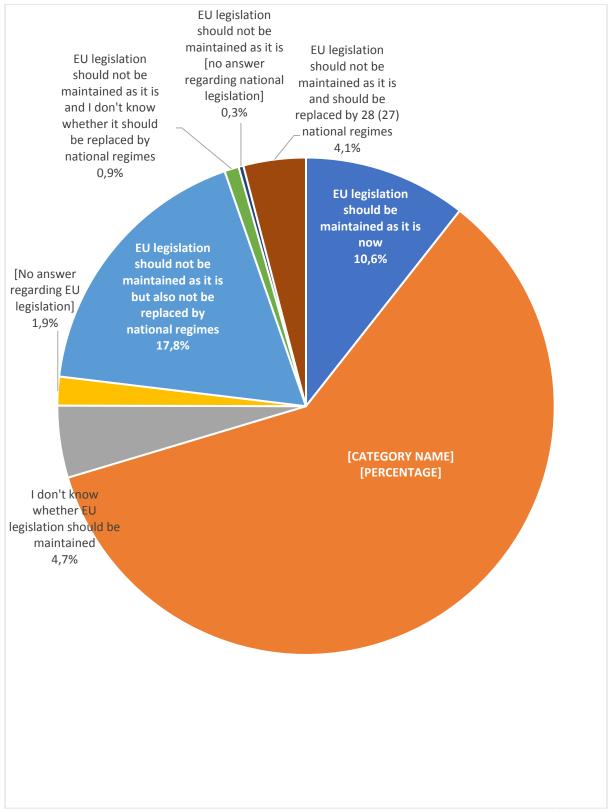
3.2.2. Quantitative analysis

In total, 148 respondents have been asked this question. Among those, the overall distribution of answers looks as follows:

Yes	26	17.6%
No	114	77.0%
I don't know	6	4.1%
No answer	2	1.4%
Total	148	100%

The above numbers show that even among those 23.1% of the total number of respondents who are in favour of not maintaining the CPR as it is, only 17.6% are in

favour of replacing it with national regimes. Calculated against the total number of participants of the consultation, this corresponds to a rate of only 4.1% (26 out of 641). The below diagram shows the combined percentages of responses to questions 22 and 23:



Even though it should be stressed that statistical representativeness is not given at all, it may still be interesting to see how these answers are distributed across countries:

	Υ	es	N	lo	I don't	t know	No ar	nswer	1	Total
Austria	2	50.0%	2	50.0%		0.0%		0.0%	4	100%
Belgium	1	10.0%	9	90.0%		0.0%		0.0%	10	100%
Czech Republic	2	50.0%	1	25.0%	1	25.0%		0.0%	4	100%
Denmark	1	100%		0.0%		0.0%		0.0%	1	100%
Finland		0.0%	5	100%		0.0%		0.0%	5	100%
France	3	30.0%	7	70.0%		0.0%		0.0%	10	100%
Germany	9	14.3%	52	82.5%	1	1.6%	1	1.6%	63	100%
Hungary		0.0%	4	100%		0.0%		0.0%	4	100%
Ireland		0.0%	2	100%		0.0%		0.0%	2	100%
Italy		0.0%	4	80.0%	1	20.0%		0.0%	5	100%
Netherlands	1	25.0%	3	75.0%		0.0%		0.0%	4	100%
Poland		0.0%	3	100%		0.0%		0.0%	3	100%
Portugal	1	100%		0.0%		0.0%		0.0%	1	100%
Slovak Republic		0.0%	2	66.7%	1	33.3%		0.0%	3	100%
Slovenia		0.0%	2	100%		0.0%		0.0%	2	100%
Spain		0.0%	5	100%		0.0%		0.0%	5	100%
Sweden		0.0%	1	50.0%		0.0%	1	50.0%	2	100%
United Kingdom	4	30.8%	8	61.5%	1	7.7%		0.0%	13	100%
Other	2	28.6%	4	57.1%	1	14.3%		0.0%	7	100%
Total	26	17.6%	114	77.0%	6	4.1%	2	1.4%	148	100%

It is notable that the country that features by far the highest number of respondents who had answered with a "no" to the previous question (on whether the EU legislation should be maintained as it is), which is Germany, has at the same time a very low rate of respondents who would prefer 28 (27) national solutions over an EU solution.

3.2.3. Synthesis of free text replies

As can be seen in the quantitative analysis, only 26 out of the 641 respondents (i.e. 4%) are in favour of a repeal of the EU legislation and a replacement by national legislation. Consequently, there are very few comments in support of such a repeal and replace option. Most of these latter ones explain their opinion again with the point of view that free trade should not be prioritised over safety and customer protection. The overwhelming majority of respondents explain why the replacement by national systems would not be an option in their view. There are mainly two types of arguments, which are:

- Agreement-in-principle with the idea of a European legislation (even though improvements may be necessary);
- Too many costs already invested in adaptation, which would be made completely useless if the CPR was now repealed again.

3.3. Questions 24a-g: Reform options

3.3.1. Complete wording of the question and dependency link with other questions

Question 24 is only asked to the 114 respondents that have answered question 22 and question 23 both with a "no" (CPR should not be maintained and should not be replaced by national regimes). The complete wording of the question is the following:

"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)
- b) Making European standards purely voluntary, while creating European-wide testing/assessment methods
- 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
- d) Making EU-wide rules for assessing and communicating construction products' performance optional
- e) Prescribing precise technical requirements which construction products have to comply with across all EU Member States
- f) Including in the EU framework aspects relating to the safety of construction products, so far entirely under Member States' responsibility
- g) Another reform"

To each of these (except for point g), the respondent has the choice between one of the following answer options:

- "Yes
- No
- I don't know"

For the case that they answer with "yes" or with "no", respondents have the possibility to further explain their answer, focussing on the particular advantages (benefits) and disadvantages (costs) that this would entail.

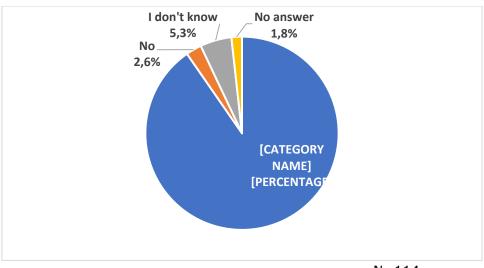
3.3.2. Analysis of individual options

The detailed results per policy option look as follows:

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

With only 3 out of the 114 respondents that have been asked this question being against this option, it can be said that there is almost unanimous support for it:

Yes	103	90.4%
No	3	2.6%
I don't know	6	5.3%
No answer	2	1.8%
Total	114	100%



N = 114

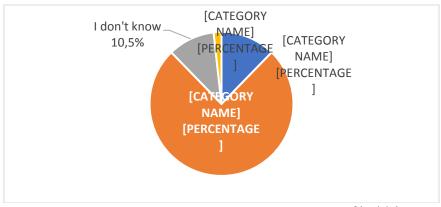
Synthesis of free text replies:

Most of the comments made with regard to this approach repeat comments already made under question 22. These relate primarily to the need to speed up the procedures of standardisation and of citation of hENs in the OJEU as well as to the need to communicate and provide guidance to all relevant stakeholders in order to ensure a better and more uniform understanding and application of the CPR. One relatively specific point which is made by a number of participants concerns the need for alignment with the Drinking Water Directive and the Mutual Recognition Directive. At a more general level, many respondents plea for a more pragmatic approach and application of the CPR and for standards to be seen as technical, not legal documents.

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

75.4% of the 114 supporters of a legislative revision are against this option, only 12.3% are in favour:

Yes	14	12.3%
No	86	75.4%
I don't know	12	10.5%
No answer	2	1.8%
Total	114	100%



N = 114

Synthesis of free text replies:

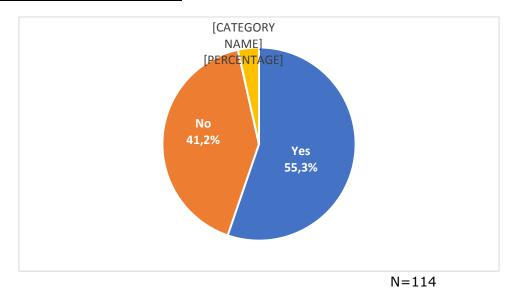
Most comments provided explain why making European standards purely voluntary would not be an option. Almost all of them consider this to be a step back and or a "jump into the dark", which is not what they want.

Of the few comments that support this option, we would like to quote the following comment from CEN/CENELEC: "CEN/CENELEC produces standards in the field of construction for use in a variety of purposes. By definition they are voluntary and organizations that use them do so voluntarily. Users include manufacturers and specifiers, sometimes well beyond the EU/EEA. When a regulator, national or European, requires the use of a standard, this can put into question its voluntary use and may constitute a deviation from the principle of the New Approach. This is a deviation from Regulation (EU) No 1025/2012 that has to be further clarified. Article 4 Clause 1 and 2 of CPR gives requirements for the expression of information about the performance of products and on the use of CE marking for products."

3.3.2.3 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

55.3% of the 114 supporters of a legislative revision are in favour of this option:

Yes	63	55.3%
No	47	41.2%
I don't know	0	0.0%
No answer	4	3.5%
Total	114	100%



Synthesis of free text replies:

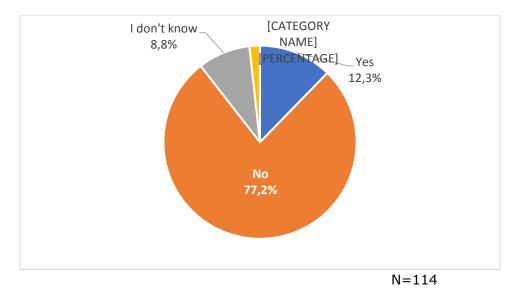
Among those respondents who are against this option, virtually all point out the fact that this would re-open the door back to a fragmented system and thus the CPR would lose its whole point. This should clearly be avoided.

Among those that are in support of this option and who provided further explanatory comments, the following subgroups can be discerned. A first group argues that this option is necessary in the interest of consumer protection and safety rules that are regulated at national level. A second group of respondents argue on the basis of the subsidiarity principle. A third group consists of respondents who struggle with the question itself. Last but not least, there is again CEN/CENELEC, who states: "CEN/CENELEC produces standards in the field of construction for use in a variety of purposes and hENs represent between 10-15% of the standards that are developed for this sector. It should be ensured that hENs produced for the construction sector reflect the needs of all stakeholders, in particular users, address aspects that include and are not limited to the CPR, and not only focus on the mandatory regulatory elements. Therefore, the scope of a hEN can have a wider scope than the regulatory provisions that meet the requirements, which are identified in the Annex ZA. It shall be noted that essential characteristics are those identified in the mandate/standardization request and therefore only in this case we can ensure their inclusion in the hEN."

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

77.2% of the 114 supporters of a legislative revision are against this option:

Yes	14	12.3%
No	88	77.2%
I don't know	10	8.8%
No answer	2	1.8%
Total	114	100%



Synthesis of free text replies:

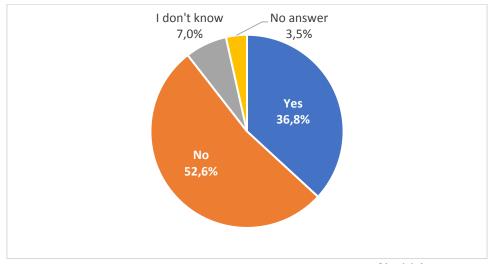
As can be seen in the quantitative analysis, the vast majority of respondents answers reject this option. The comments provided explain that this would run counter to the very idea of a harmonised technical language, which in principle is supported.

Only 6 comments supporting the "yes" option were provided, which are however not clear and can therefore not be synthesised.

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

52.6% of the 114 supporters of a legislative revision are against this option:

Yes	42	36.8%
No	60	52.6%
I don't know	8	7.0%
No answer	4	3.5%
Total	114	100%



N = 114

Synthesis of free text replies:

Among those who reject this option, a significant number argues that it would simply not be practical and/or not realistic, because of the competences of the Member States in the field of building safety and/or because of climatic and other differences. Others state that the question is not clear and that a qualified answer can therefore not be provided. A number of German construction engineers argues that this could be an option, provided that it does not lead to a decrease in security standards.

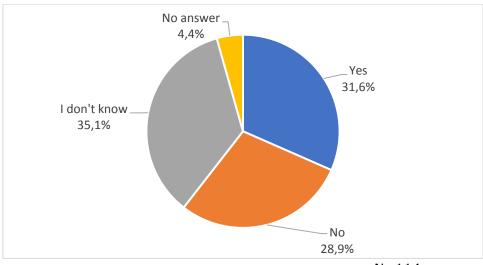
Among the supporters of this option, several argue that it would be good to have at least a harmonisation of minimum requirements at EU level. The case of products in contact with drinking water (which thus also fall under the Drinking Water Directive) is mentioned several times. Others argue more generally, that this would allow for a real internal market.

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

With regard to this option, the answers of the 114 supporters of a legislative revision are quite evenly split between supporters, opponents and a somewhat larger share of respondents who do not know:

Yes	36	31.6%
No	33	28.9%
I don't know	40	35.1%

No answer	5	4.4%
Total	114	100%



N = 114

Synthesis of free text replies:

As can be seen in the quantitative analysis, a small majority of respondents has ticked the "I don't know" answer. A very frequent further explanation to that is that "without the rewriting of the planned measures on the part of the EU, this question cannot be answered seriously".

Among the respondents who pick "no" as an answer, the comments refer generally to the fact that this is not politically implementable and/ or not desirable, as the safety of construction works is better regulated at national level.

The supporters of this option argue mainly that this would strengthen the internal market. Some of the supporters do however at the same time admit that there are very low chances for the implementation of this option.

3.3.2.7 Another reform

This option allows in fact only for free-text replies, which are meant to focus on advantages (benefits) and disadvantages (costs) that this would entail. The 38 comments received on this question go "all across the field" and are very hard to synthesise. In general, they repeat many of the points made already before. The more frequently mentioned points are the following:

- More and better guidance is needed;
- The declaration of one single characteristic should not be sufficient for being able to affix the CE mark;
- Pass/ fail marks should be included in standards;
- A more pragmatic and less legalistic approach should be taken;
- Alignment with the Drinking Water Directive is needed;
- The requirements (content) of the CE mark should be simplified;
- A large database of databases should be set up.

The most comprehensive and at the same time specific answer is submitted by a Technical Institute:

- "A) at the general level of all harmonised specifications, to improve their technical coherence:
 - Define those characteristics that should always be declared, according to the use assigned to the product
 - Define minimum values according to the use assigned to the product for those essential characteristics considered necessary, without having to go through a long process that can last for years.

B) at the EADs and ETAs level:

- Annex II must be revised to meet the needs identified in the elaboration of FADs
- ETA should include, whenever necessary, relevant information regarding the different phases of the life cycle of the products, especially when these are innovative
- The evaluation of innovative products should not be limited only to those characteristics which are regulated in a Member State."

3.4. Question 25: Need for marking

3.4.1. Complete wording of the question

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

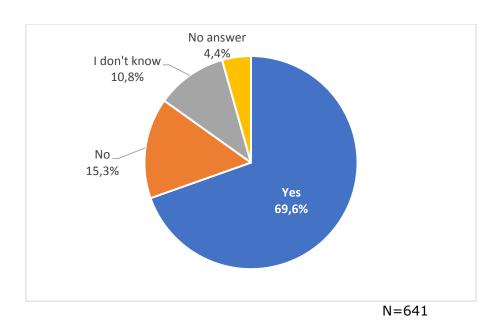
- Yes
- No
- I don't know"

For the case that they answer with "yes", respondents have the possibility to further explain their answer, focussing on the particular advantages (benefits) and disadvantages (costs) that this would entail.

3.4.2. Quantitative analysis

Overall, the distribution of answers to this question looks as follows:

Yes	446	69.6%
No	98	15.3%
I don't know	69	10.8%
No answer	28	4.4%
Total	641	100%



The need for a marking is confirmed by (69.6% of respondents). This opinion is shared by all types of respondents, as can be seen in the following table:

	Yes		No		I don't know		No answer		Total	
Individual respondent	59	62.8%	16	17.0%	9	9.6%	10	10.6%	94	100%
Business representative	134	64.7%	37	17.9%	25	12.1%	11	5.3%	207	100%
Company or sole trader	169	72.8%	41	17.7%	18	7.8%	4	1.7%	232	100%
Consumer organisation	1	100%		0.0%		0.0%		0.0%	1	100%
Non-governmental organisation	6	66.7%	2	22.2%	1	11.1%		0.0%	9	100%
Public authority or testing body	23	82.1%		0.0%	4	14.3%	1	3.6%	28	100%
Representative of construction workers	4	100%		0.0%		0.0%		0.0%	4	100%
Research/academia	8	88.9%		0.0%	1	11.1%		0.0%	9	100%
Technical body	31	72.1%	2	4.7%	10	23.3%		0.0%	43	100%
Other	11	78.6%		0.0%	1	7.1%	2	14.3%	14	100%
Total	446	69.6%	98	15.3%	69	10.8%	28	4.4%	641	100%

Only selecting companies and breaking them down by size, the distribution is as follows (please note that statistical representativeness is not given):

	Yes		Yes No		I don't know		No answer		Total	
Self-employed	6	60.0%	1	10.0%	3	30.0%		0.0%	10	100%
< 10 employees	22	78.6%	2	7.1%	3	10.7%	1	3.6%	28	100%
10 - 49 employees	33	75.0%	8	18.2%	1	2.3%	2	4.5%	44	100%
50 - 249 employees	39	72.2%	10	18.5%	5	9.3%		0.0%	54	100%
≥ 250 employees	69	71.9%	20	20.8%	6	6.3%	1	1.0%	96	100%
Total	169	72.8%	41	17.7%	18	7.8%	4	1.7%	232	100%

The opinion that another type of marking would be needed if the CE marking was no longer allowed is shared by more than 70% across all company sizes. Only among the self-employed, the rate is somewhat lower (60%), but there is also only one single respondent in this group that rejects this view.

3.4.3. Synthesis of free text replies

Only respondents that have answered the question with a "yes" are invited to use the comment function. Consequently, the answers essentially only differ between comments confirming that something very similar and based on the same principles would be needed and comments that state that the question is irrelevant, as the CE mark is not to be abolished. A number of respondents use this field to point out again that a withdrawal of the CE mark would lead to a plethora of national and/ or private marks, which in turn would lead to a lot of confusion and would therefore be very undesirable. A certain number of respondents states that they see a need for a European quality and/ or safety mark. A small minority of participants indicates that the return to national marks would be preferable in their view, as these could take into account the respective quality and safety requirements that are applicable in the respective Member States.

3.5. Question 26: RAPEX system

3.5.1. Complete wording of the question

"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).

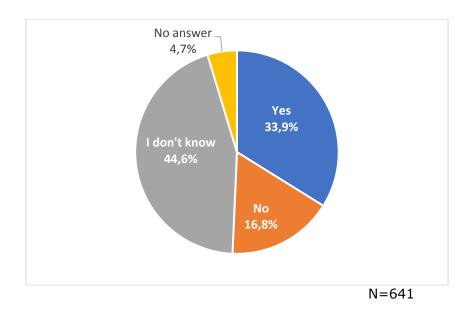
- Yes
- No
- I don't know"

For the case that they answer with "no", respondents have the possibility to state whether they see other tools that should be used.

3.5.2. Quantitative analysis

Overall, the distribution of answers to this question looks as follows:

Yes	217	33.9%
No	108	16.8%
I don't know	286	44.6%
No answer	30	4.7%
Total	641	100%



49,3% of the respondents do not know how to answer or do not want to answer the question. 33,9% consider that RAPEX is the right tool to help ensure the safety in use of construction products, 16.8% do not.

Broken down by type of organisation, we get to the following results:

	Yes		No		I don't know		No answer		Total	
Individual respondent	32	34.0%	10	10.6%	42	44.7%	10	10.6%	94	100%
Business representative	60	29.0%	36	17.4%	98	47.3%	13	6.3%	207	100%
Company or sole trader	79	34.1%	45	19.4%	104	44.8%	4	1.7%	232	100%
Consumer organisation		0.0%		0.0%	1	100%		0.0%	1	100%
Non-governmental organisation	5	55.6%	1	11.1%	3	33.3%		0.0%	9	100%
Public authority or testing body	12	42.9%	4	14.3%	11	39.3%	1	3.6%	28	100%
Representative of construction workers	1	25.0%	1	25.0%	2	50.0%		0.0%	4	100%
Research/academia	4	44.4%	1	11.1%	4	44.4%		0.0%	9	100%
Technical body	22	51.2%	3	7.0%	18	41.9%		0.0%	43	100%
Other	2	14.3%	7	50.0%	3	21.4%	2	14.3%	14	100%
Total	217	33.9%	108	16.8%	286	44.6%	30	4.7%	641	100%

The above results may be interpreted in such a way that respondents in general, and in particular individuals, businesses and business representing organisations, are not sufficiently familiar with RAPEX to answer this question, as around 50% of all these groups does not know what to answer or does not want to answer this question. If we take out all those who "do not know", then the positive answers clearly prevail across all types of organisations, except for the group of "Others".

3.5.3. Synthesis of free text replies

Even though the comment field is primarily meant for suggestions regarding other tools in case the respondent answer with "no", it is hardly used for that purpose. In general, the comments received went into the following directions:

- Risks do not lie in the products themselves but in the way they are installed. Therefore, the system is not really applicable.
- Such a system is of limited us for products once they are integrated in a building. In general, an effective ex-ante assessment system is much preferable.

- RAPEX is a good alert reporting system but should be complemented by stronger market surveillance
- The system is not known.

4. Additional information provided

4.1. Question 27 – further information

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

Respondents used question 27 primarily in order to emphasise once again their key demands with regard to EU legislation on construction products. These can be summarised by the following points:

- More control, market surveillance and enforcement is needed;
- The EC should focus on pragmatic solutions for a better implementation, rather than launching a time-consuming and complex process for a possible redesign of the regulation;
- The procedure for introducing classes into hENs should be facilitated;
- The procedure for the citation of hENs in the OJEU should be much accelerated
- Redundancy between DoP and hEN (ETA/EAD) should be reduced;
- Aspects of sustainability and circularity should be more considered;
- More information, communication and "education" regarding the application of the CPR is needed;
- Efforts should be made in order to remove additional (de facto) requirements at national level;
- A repeal of the CPR should definitely be avoided;
- CPR should be aligned with the Drinking Water Directive;
- Some questions themselves were often not clear (in particular various sub questions under 18), in many cases this was also linked to their translation (e.g. "issue" was translated by "Problem" in German, which is ambiguous to someone who does not know the EC impact assessment jargon).

4.2. Review of complementary documents uploaded

The key messages emerging from the 96 position papers delivered focus on the priority issues as stakeholders see them and are detached from the analytical structure which guides the impact assessment.

Still there are a number of core positions, which are worth underscoring:

4.2.1. Repeal of the CPR

No position paper calls for a repeal of the Regulation, since all stakeholders support a solid and accepted EU framework ruling the European construction product market. The main arguments concern:

- The need for a strong legal framework for construction products.
- Transparency.
- Regulatory certainty and contrasting nationally-driven rules limiting the market operations and creating border-related barriers to operators.
- CPR, although improvable, is the foundation for the operation of the single market and a factor of stability and transparency.
- It effectively supports the limitation of administrative burden for CP operators.
- There are margins for improvement, simplification, often outside the strict CPR regulatory domain, e.g. standardization.
- Certainly the CPR shall counter the propensity of EU MS to add regulations on top of the CPR, which hampers the market functioning.

4.2.2. Revision of the CPR

The opinions on the revision of the CPR are diverse, several position papers point out the danger of initiating a revision at this stage of relatively short operation of the regulation, which needs stakeholders to get accustomed to its principles and guidelines and adjust their operations and market behaviours to them.

Many position papers underline the risks of a revision, which would initiate a complex negotiation process and uncertainty in the sector, which is not favoured.

The main points raised concern:

- Better specification of the use of the CE marking
- Better specification and implementation of the standardisation mandates and improvement of their publication. There is major focus on the standardisation process.
- Closer monitoring of the notified bodies and their efficiency
- Improvement of market surveillance
- Better communication and dissemination of the CPR to improve capabilities of players who have to apply the rules in their concrete organisational and market situation
- The EC shall facilitate the harmonisation, efficiency and effectiveness of the operation of the main players: Member States, CEN, EOTA, Notified Bodies to ensure a smooth integrated operation of regulations
- The EC shall take a strong leading role in using and applying all instruments provided by the CPR, supporting the national deployment of the rules. Pragmatic and concrete measures to support the CPR in Europe are the priority, rather than initiating a vast revision process.
- The EC shall resolve overlaps with other EU rules, such as the environmental ones
- The system or rules shall be applied and implemented in such a way that it favours innovation, allowing innovative products to be introduced without having to recourse to the expensive TA procedures.
- A clear guideline should be provided for safety-critical construction products.
- Certainly the content and compilation of the DoP can be streamlined with appropriate guidelines.
- There are specific voices calling for a clearer implementation of the environmental and circular-economy related rules of the CPR.
- Clarification of exemptions (Article 5), providing explanations of definitions.

4.2.3. Standards

Standards and the associated processes, rules and implementations are a key success factor for the success of the CPR. Already in the interviewing phase this critical aspect has been widely underscored. The standardisation process needs to work efficiently and effectively to make the CPR work.

Position papers state the following:

- Thay confirm the need for good hENs and their power. They need to be carefully drafted as well as the mandates, which are part of their development.
- hENs should be voluntary.
- CEN/CENELEC have an established procedure in place to manage claims on defective standards, it should be clarified how formal objections from Member States to the citation of hENs in the OJEU are processed
- It is essential today to unblock urgently all the standards not cited in the OJEU, all of which have been approved at the Formal Vote knowing that the standardization system has demonstrated since a long time its principles of transparency, openness and consensus.
- The hENs in the Commission and Court of Justice interpretation cover all essential characteristics and are exhaustive. Several Member States are of the opinion that

- the harmonised sphere can be derived from harmonised standards and harmonised standards do not cover per se all essential characteristics.
- It should be possible for Member States to regulate the way the performance of construction products is expressed in relation to those essential characteristics that are not covered by the harmonised standard.
- The responsible Commission services have to be provided with additional resources. Moreover, all stakeholders involved in the standardisation process have to receive guidance and to be trained on the formal procedures.

4.2.4. Market surveillance

Market Surveillance is a key issues to ensure trust and adherence to the CPR, as well as of the CE marking, in the way it is associated to the CPR.

Position papers call for a more comprehensive and strong approach to market surveillance.

4.2.5. ETAs

The way technical assessments are done can vary widely across the sector and countries. Position papers require:

- clarification that the unlimited validity of ETAs is not affected by revisions of the respective EAD, as long as there is no technical need for an amendment of the ETA according to Article 11(3);
- Devices should be tested in equivalent European notified laboratories, avoiding that the same product presents performance results that can vary quite significantly from one laboratory to another.

4.2.6. Notified Bodies and EADs

Position papers call for:

- Immediate citation of finalised EADs in the OJEU;
- Update of the list of Notified Bodies based on finalised EAD drafts before or in parallel with their citation in the OJEU;
- Availability of the list of Notified Bodies also for outdated EAD versions as long as ETAs based on their basis are valid.

Further issues concern:

- The need to promote a correct understanding of the concept of European Assessment. Third countries' products are being placed in the market with classes that are in between the classes defined by European harmonized standards, confusing consumers.
- Notified Bodies and Technical Assessment Bodies need to support products safety as standardized or defined at the respective levels of CEN and EOTA. Coordination processes need to be improved, to ensure a harmonised operation across Europe.