

Members of the SCC

Brussels, 20 February 2018

Dear Members of the SCC,

The undersigned associations, representing manufacturers and professional users of construction products, would like to express their concern about a possible repeal of the ETA route to CE marking, as described in some of the policy options for the CPR review presented by the European Commission.

The ETA route to CE marking offers many construction product manufacturers a valuable alternative to CEN standardisation when no harmonised standard is available. This concerns mostly unique, innovative and complex products and systems placed on the market by SMEs. Over the past years, the ETA route to CE marking has been successful in stimulating the internal market for construction products, reducing technical barriers to trade, relieving administrative burdens and providing a common technical language to construction professionals across Europe. More than 4200 ETAs of more than 1300 different manufacturers are currently valid. A repeal of the ETA route would definitely result in increased costs which might lead to serious sales drops for concerned manufacturers, a significant number of them being SMEs.

The benefits of the ETA route for the construction market stakeholders have been underlined in various Technical Platforms organised by, and studies commissioned by, the European Commission. They include, among others, access to the entire internal market, or – from a user's perspective – Europe-wide availability of products, facilitation of common assessment procedures and, therefore, improved comparability of products, and transparency in product performance.

Continuity in the legal framework is a key concern for the undersigned economic actors. The ETA route to CE marking has been profoundly remodelled only four years ago. Communicating the new rules to all stakeholders has proven extremely difficult. Overhauling the entire regime yet again would jeopardise the harmonisation efforts invested in by all stakeholders.

While there is leeway for CPR improvement as identified in the July 2016 CPR Implementation Report (e.g. with regard to SMEs), the ETA route to CE marking should continue to exist. A system based on mutual recognition, losing the possibility to provide for a harmonised technical language, can only be a poor substitute for the existing harmonised ETA route.

The success of the ETA route is based on trust in the quality, reliability and impartiality of the assessment based on the expertise and knowledge of Technical Assessment Bodies and EOTA. ETAs have a high standing among construction industry professionals and national authorities across Europe and beyond. The ETA route has thus created added value for the entire sector. This acquis should not be given up lightly.

The construction industry needs a stable legal framework and a flexible, but dependable assessment regime. The CPR has successfully implemented both. This is why the undersigning parties appeal to the European Commission to maintain the CPR as well as the well-proven ETA route to CE marking.

We remain at your disposal should you require any further information.

Yours sincerely

	<p>European Construction Industry Federation (FIEC)</p>
	<p>Construction Products Europe (CPE)</p>
	<p>Small Business Standards (SBS)</p>
	<p>Construction SMEs Europe (EBS)</p>
	<p>Engineered Construction Systems (ECS)</p>
	<p>Construction Fixings Europe (CFE)</p>
	<p>European Organisation for Technical Assessment (EOTA)</p>

This letter has also been sent to:

1. Chair of the IMCO – European Parliament Committee “Internal Market and Consumer Protection”
2. Vice-Chair of the IMCO – European Parliament Committee “Internal Market and Consumer Protection”
3. Commissioner for the Internal Market, Industry, Entrepreneurship and SMEs (GROWTH)
4. Director General for the European Commission – DG Internal Market, Industry, Entrepreneurship and SMEs
5. Director of DG GROW Dir C - Industrial Transformation and Advanced Value Chains
6. Head of Unit of DG GROW C.1 – Clean Technologies and Products