

Qualification of construction fasteners under the current and future CPR: The manufacturers' view

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From the fastening industry, as well as from the customer point of view, the legal framework of the current CPR (Construction Products Regulation) has triggered quite some dynamics.

New products and new applications have been developed continuously to an extent that the range of applicability was dramatically increased. At the same time the performance of the fastening products has nearly doubled in some areas. The investment of the industry in research has led to a clear leadership position of the European fastening industry in the world.

More than 50 EADs and 2,800 ETAs have been issued in the scope of fastening technology. The number of ETAs – taking into account that they are voluntary documents – clearly demonstrate the huge acceptance in the industry and by the respective customers.

Despite the favorable environment of the existing CPR to develop new fastening products/applications for the construction industry, some optimisation of the speed and transparency of the administrative process at EOTA and EC level, and between both institutions, would further foster the necessary European harmonisation on technical specifications.

Fastening technology products are widely used in construction and play a major role for the functionality and safety of constructions. It is easy to imagine what happens if the products in the respective application fail. Transparent safety level and reliable installation are vital for constructions. This cannot be taken for granted as can be learnt from the accidents in major countries outside Europe (USA 2006 and Japan 2012). The EAD/ETA system has proven to provide a level playing field for competition in Europe, which is the basis for innovative, safe and economical fastening solutions. Most important is the agility and speed of the EAD/ETA development, which is a source of productivity in construction methods.

Customers in the construction sector are interested in finding safe and cost efficient solutions for the respective fastening. Technical solutions in construction nowadays need to be assessed with respect

to build, maintenance, robustness, energy efficiency, recycling potential and various other dimensions. Some products serve specific applications best in those dimensions, therefore cost of the product itself is getting less important. This trend will continue and even speed up, triggered especially by various initiatives of the EC to shape the European Future (Green Deal). The professional customer clearly understands that EAD/ETA qualified products with the respective 3rd party assessment included, ensures compliance with the technical requirements in a most transparent and reliable way.

On 30th March 2022, the European Commission published a draft for the revision of the Construction Products Regulation (CPR). At a first glance it looks like there are no major changes with respect to the EAD/ETA process. A closer look unfortunately reveals substantial deviations from the current practice. A survey among Construction Fixing Europe member companies has brought up the most critical elements of the draft of the new CPR (See Figure One).

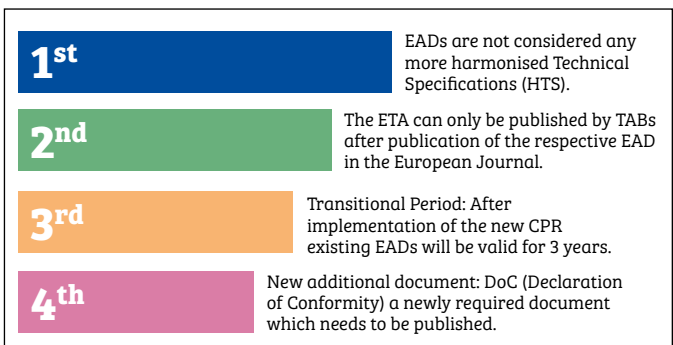


Figure One: Most critical elements of the EC proposal for the revised Construction Products Regulation (CPR) rated by member companies of Construction Fixings Europe (CFE)

Firstly, EADs will lose their status as harmonised technical specifications, this would lead to a de-harmonisation of products covered by ETAs. There are severe doubts that this gap could be filled by Harmonised Standards in a reasonable time, keeping in mind the huge efforts needed by CEN, the European Commission, and the stakeholders to overcome the backlog of existing standards. A lot of EADs cover special products and the respective intended uses, which are quite challenging for standardisation.

Secondly, it is important to understand that EADs are triggered by customer needs and developed very focused and much faster (within months) than hEN (typical takes 5 – 7 years). The current sequence of publication after a new EAD is worked out includes: Step One: First ETA published; Step Two: EAD is published in the European Journal – ensuring a good practical quality of the EAD and providing confidentiality over a short period of time for the stakeholder, which brings up the innovation in product or application.

In a recent study¹ the European Commission has stated: “The Renovation Wave² aims to at least double the annual rate of building renovation in the EU. In practice, this would result in 35 million buildings being renovated by 2030. For the achievement of this ambition, a mix of policy instruments, funding and technical assistance is available.” It is obvious that the renovation of existing buildings with respect to the targets expressed in the Commission document on “Scenarios for a transition pathway for a resilient, greener and more digital construction Ecosystem” requires a substantial volume of suitable fasteners, which are qualified on their performances in the respective application.

From this perspective it is hard to understand that the draft for the new CPR will eliminate all currently existing EADs three years after the new CPR is implemented without any clarity on what is going to replace all those EADs. The intention may be to develop new EADs in the framework of the new CPR – with the same scope of product and application.

From an industry standpoint it is confusing to put existing key documents (EAD) out of function right at the point in time when you need them most to achieve targets on renovation and sustainability (until 2030). The different approach on validity between EADs (three years) and hEN (until 2045 if not reworked) is another dimension that should trigger modifications on the current CPR draft in the course of the discussion.

Europe has to undergo a twin transition “greener and digital” in the years to come. The construction sector will have an important contribution on this path to the future. It is strongly recommended to remove/modify the mentioned critical elements in the CPR draft, which endanger European harmonisation as well as agile and efficient innovation in construction industry. +

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References:

¹ Commission staff working document: ‘Scenarios for a transition pathway for a resilient, greener and more digital construction Ecosystem’, European r Brussels 14.12.2021

² A Renovation Wave for Europe – greening our buildings, creating jobs, improving lives’, COM (2020) 662 final
