

**Reference: European Commission's Inception Impact Assessment – Review of the Construction product Regulation**

PU Europe, representing the European polyurethane insulation industry, welcomes the opportunity to provide input to the European Commission's Inception Impact Assessment for the future of the Construction Product Regulation (CPR) and would like to contribute with the following points:

- We strongly support the existing Construction Products Regulation and believe that focusing on a better implementation of the CPR while providing additional guidance – hence, Option A of the Future options for the review of the CPR- is the best way forward in order to overcome the problems that the current EC initiative for the future CPR aims to tackle;
- Whilst CEN must continue to be in charge of the preparation of the harmonised European technical specifications, the European Commission's standardisation mandates need to ensure that those technical specifications are drafted in full compliance with the CPR. To that end clear guidelines and processes on how these mandates need to be prepared and adopted are needed. In parallel, industry also needs proper procedures to deal with the revisions of hENs, or amendments that have been deemed not in compliance with the Construction Products Regulation (for instance, the adaption of several hENs in the PU industry is needed to account for the transition from HFCs blowing agents family to HFOs one as demanded by the F Gas regulation). The fundamental principle that the harmonised European technical specifications are keeping pace with major innovation and market developments must be abided by;
- In clear support to the spirit of this internal market legislation, national requirements must be implemented through the European technical system and therefore based on the existing harmonised European technical specifications, in order to avoid de-harmonisation, fragmentation of the common technical language as well as barriers to trade;
- Concerning national marks and certifications, we stand the view that member states cannot be allowed to certify the performance in relation to essential characteristics already included in hEN and covered by the CE marking, and this in in order to ensure a well-functioning of the European single market;
- We believe that effective market surveillance is essential to fulfill the goal of the CPR and to ensure a level playing field among economic operators, however in Europe the approaches differ from member state to member state, therefore market surveillance need to be enhanced and a more consistent approach needs to be applied across all member states;
- When addressing the sustainability aspects of construction products, we welcome the efforts from the European Commission to bring LEVEL(S), a building sustainability performance assessment method, to the next stage in the coming months.

Construction products, as intermediary products, shall feed into such framework and any European Technical Specification shall not set pass/fail criteria and be material agnostic (reminder: most of the wall/roof performances are linked to the construction technics which also have an impact on the overall structure/design). The PU industry has been investing in Environmental Product Declarations (EPDs) for years and since the EN 15804 is being aligned with the Product Environmental Footprint methodology, we believe that EPDs of insulation products must be the building blocks for assessing and calculating the environmental footprint of buildings;

- Finally, on the issue of DoP and CE marking, we call for further clarification to market actors on the meaning of the CE marking as well as the information that can be found in the DoP. This can be tackled via additional European Commission guidance.

#### About PU Europe:

PU Europe is the European voice of the polyurethane (PUR / PIR) insulation industry. The 110 manufacturing sites and more than 20,000 direct jobs in the PU rigid foam sector contribute to tackling the carbon footprint of the buildings stock responsible for around 36% of the CO<sub>2</sub> emissions of the European Union (more information about us via [www.pueurope.eu](http://www.pueurope.eu) and lobbying transparency register ID number 27993486325-38).