



Position Paper

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IMPROVING STANDARDISATION UNDER THE CPR

The Construction Products Regulation (CPR) is a key legislation for fire safety in buildings. Standardisation is at the centre of this legislation, and Europe has been seen providing positive examples in fire safety standards to the rest of the world, notably through the work of the European Committee for Standardization (CEN) and the European Organisation for Technical Assessment (EOTA).

Fire Safe Europe (FSEU) believes this position needs to be built upon and further developed by:

- Improving the existing standardisation processes;
- Ensuring the legal clarity of the CPR;
- Further including fire safety in the scope of CPR standards;
- Ensuring standards are up to speed and stimulate innovation.

Improving the existing standardisation processes

Through harmonised technical specifications¹ and the CE marking, the CPR has brought better information for consumers and more transparency about products' performance in fire, a comparable level of fire safety, and the removal of barriers to trade.

This has been rendered possible through the work of expert technical bodies: CEN and EOTA. The EOTA voluntary route has especially been instrumental in allowing a number of fire protective products for which there is no CEN route at the moment to be CE marked. If the European Commission chooses to retain the roles of CEN and EOTA, we must work on improving the harmonisation and standardisation processes, and if an alternative or additional route is being developed, it should include industry expertise as well as independent experts. It would also be beneficial to increase the

¹ Product standards (hEN, through CEN) and European Assessment Documents (EAD, through EOTA)



representativity in CEN and EOTA, by including a balanced number of industry-wide experts, including from sectors such as the insurance industry, fire brigade, consumers, engineering firms, etc. A wealth of experience with the CE marking system has been gained, and CE marking has been implemented in the building codes, as well as in the value chain starting from production, through distribution and in design and specifications. Whilst the implementation of the CPR in the construction sector may benefit from improving the legal transparency of the standardisation process, it is clear that stakeholder collaboration in developing new and revising existing technical standards is key for adequate adoption and support.

There is a broad consensus that the inclusion of fire performance of products (reaction to fire) is a positive achievement of the CPR. This must be further improved by expanding fire safety under the CPR's basic requirement 2 – safety in case of fire in collaboration with Member States, as explained below.

Ensuring the legal clarity of the CPR

First, there is a need to clarify the ambiguity around products versus materials, and what should be covered under the CPR, versus what should be left for Member States alone to regulate. A significant point of debates when it comes to the CPR revolve on regulations on products versus end use.

Second, given that product standards underpinning the CPR are part of the legal framework, product standards must be drafted in a way that is legally sound and shows proper stakeholder engagement, including from end-users.

Third, dated referencing in legal documents and standards in the current harmonisation/standardisation system should not cascade down in test and classification standards. Indeed, if the product standard start using dated references to tests standards and classification standards, issues will arise:

- The risk for unnecessary re-testing would increase, therefore impeding innovation;
- Compliance would become extremely difficult, as it would be hard for manufacturers to know which standard is up to date;
- The standardisation process itself would become more difficult and time consuming.

Therefore, the European Commission should allow product standards to refer to undated versions of test and classification standards.



Further including fire safety

The CPR should continue to address fire safety. The basic requirement for construction works 2 – Safety in case of fire, should clarify the link towards EN products standards and fire safety. There is a need for standardisation mandates on fire safety aspects, such as, for example, a testing and classification method for smoke toxicity of burning construction products, smoke inhalation is the leading cause of fire deaths².

Fire safety should also be further included in the Declarations of Performance (DOPs) and other datasheets, so that they address fire resistance and systems.

It is important to have European standards defining the fire performance characteristics of a construction product material, the test method that has to be used, the reporting format for informing about the results, and ensuring that the testing/assessment is done in all EU Member States in the same way. Having reliable classifications for systems and keeping European standards updated to reflect present use of materials and construction design as well as reflecting real fire risks by referring back to basic requirements is in the interest of European citizens, Member States, and industries alike.

Ensuring standards are up to speed and stimulate innovation

European harmonised technical specifications (hEN and EADs) under the CPR as well as the test and classification standards need to be updated to reflect real fire safety risks by referring back to basic requirements, and to address the present challenges of modern construction.

The current review cycle in standardisation is a valuable mean of ensuring standards keep up with innovation. Standards related to the CPR should be transparently assessed, and if needed transparently revised, every 5 years to ensure that they are still applicable to new construction products on the market.

To conclude, harmonised technical specifications (hENs and EADs), as well as harmonised testing and classification standards of high quality are a key success of the CPR. However, the existing standardisation processes and the work of CEN and EOTA should be developed and improved, notably to better include fire safety aspects.

² According to the UK home office, from April 2018 to March 2019, 34% of fire deaths were due to smoke inhalation, 26% to burns, and an additional 19% due to a combination of smoke and burns. <https://www.gov.uk/government/statistics/detailed-analysis-of-fires-attended-by-fire-and-rescue-services-england-april-2018-to-march-2019>