Baden-Baden, 11 September 2013

EAE position regarding amendments of Annex III of the CPR following discussions of the latest consultation on 9 September 2013 in Brussels

Preliminary remarks

The European Association for External Thermal Insulation Composite Systems (EAE) representing the European ETICS manufacturers and their major suppliers would like to thank the European Commission for offering the opportunity to further discuss the latest draft for a Delegated Act clarifying Annex III of the Construction Products Regulation. We are thankful that most of the comments discussed before have already been taken into account in the revised draft. The EAE welcomes the approach of the Commission to amend Annex III in order to both clarify and simplify the drawing up of Declarations of Performances.

However, we would like to take the opportunity to point out few aspects that are essential for manufacturers of complex systems (kits) like ETICS and recommend taking this into consideration. Most of these points have already been raised by us in the meeting.

Furthermore we would like to point out that all proposals are intended to improve readability and usability for all stakeholders, delivering all information as required in the Articles of the CPR. To meet the requirements of such different industries in the European construction business, flexibility will be required.

Aspects to be taken into account in the Delegated Act

1. Trade names should be accepted as unique identification. ETICS are assessed following the EOTA route as long as the European harmonized standard is not published. In existing ETAs the identification of ETICS via trade names is common practice since more than one decade.

2. Today each existing ETA for ETICS covers a large variety of system configurations (different adhesives, insulation types, insulation thicknesses, finishing coats, reinforcements, mechanical fixings). Each ETA clearly displays which configurations will lead to specific sets of characteristics. Therefore we highly recommend to allow different DoPs in one document and to allow the use of tables. Otherwise a huge amount of single documents needs to be drawn up and supplied through the whole supply chain in multiple languages.

3. Allowing this flexibility allows manufacturers to transfer information given in ETAs into their DoPs. At the same time it will make the work of market surveillance much easier as the same information can be found in both DoPs and ETAs.

4. In case of using tables manufacturers shall take care that all information demanded by the Articles of the CPR is supplied in a form that it can be easily understood.

5. To enable the use of tables headlines should be kept short and the numbering may be deleted. Annex III may include short descriptions e.g. in brackets explaining which content should be delivered. This explanation should be removed in manufacturers' DoPs.

   <u>Example:</u>

   1. ……

   [Unique identification of the product]

   <u>Proposed headlines:</u>

   1. ……

   2. Intended use(s)

   3. Manufacturer

   4. Authorised representative

   5. AVCP system(s)

   6a. Harmonised technical specification/Notified body

   6b. Harmonised technical specification/ETA/Technical assessment body/Notified body

   7. Declared performance

   8. Technical documentation

6. Manufacturers may be allowed to delete lines if not relevant in their specific circumstances.

7. It should be possible to make use of formula to express how to calculate characteristics. In specific situations this will improve usability of information compared to complex tables with different values, e.g. formula how to calculate wind load resistance in accordance with national safety factors.

8. Proposal for the last clause of the DoP

   The product(s) identified above is in conformity with performance declared. The Declaration of Performance is issued under the sole responsibility of the manufacturer identified above.

In this regard the new Annex III could be interpreted as a model in the sense of an example or guide how to fulfill the requirements of the CPR when drawing up a DoP. The requirements, which information shall be delivered are already described in the Articles of the CPR itself.

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