

19 August 2020

Re: Commission's considerations for the review of the Construction Products Regulation (EU) 305/2011

EUEW welcomes the opportunity provided by the Commission to comment on the roadmap for the CPR review. Herewith, EUEW wishes to contribute the views of European electrical wholesalers to this public consultation.

The European Union of Electrical Wholesalers (EUEW), founded in 1955, is a 17-national organisation representing the interests of the electrical wholesaling channel which distributes domestic and industrial products including lamps, lighting fixtures, electrical wires and cables, household appliances and electronic components. As an intermediary linking the upstream and the downstream of the value chain, wholesalers constitute a knowledge hub in the ecosystem and enhance the implementation of innovation.

New innovative electrotechnical products and digitalisation will play an important role in achieving the objectives related to the decarbonisation of the European building stock and the constitution of a more sustainable internal market for construction products. EUEW considers for the CPR review that it is important to follow a solution providing a regulatory framework of clear rules supporting a differentiated approach depending on the nature and the specificities of the product categories. The framework should be open for innovation allowing the integration of upcoming new technological developments and the progressive integration of sustainability aspects. The creation of additional regulatory burdens for economic operators can be avoided by considering existing initiatives of the professions in the ecosystem.

- Electrotechnical products have to comply to a series of legal provisions laid down in different legal acts for the internal market (e.g. Low Voltage Directive (2014/35/EU), Radio Equipment Directive (2014/53/EU) Eco-design Directive (2009/125/EC), Energy Labelling Framework Regulation (EU) 2017/1369, etc.). In order to overcome inefficiencies and unnecessary burdens within the entire supply chain in the pursuit of the internal market an alignment between the CPR and the internal market rules is needed by establishing clear and harmonised technical specifications for these products. The implementation of the Green Deal will require the establishment of harmonised methods for the assessment and communication on the environmental performance of products based on existing Life Cycle Analysis. A system based on a declaration of compliance as laid down in option D1 "new legal framework approach with product requirements" would strengthen the internal market for electrotechnical products and would allow the progressive integration of new technological developments and environmental aspects of the Green Deal.
- Harmonised technical specifications should be based on standards produced by CEN or CENELEC. However, adaptation of the standardisation procedures would be required to ensure that adequate standards are available on time for the ecosystem, without loss of quality and coherence.
- Electrical wholesalers assemble a tailor-made portfolio of products and services (e.g. information and training on new products) for its professional clients, which may contain construction products, which have no harmonised standards or legal provisions for the

internal market. A differentiated approach should be followed for these products, which may be based on a declaration of performance approach.

- Construction product manufacturers have to comply with their obligations related to product declarations and have to ensure that these are well documented. In order to facilitate traceability the CE marking needs to be on the product allowing access to complete product documentation on the internet. In this context, EUEW refers to its position on the CPR Cable, which is found on the EUEW website under this [link](#).
- Building Information Modelling (BIM) can play an important role for construction products as it facilitates the consideration of sustainability and circularity aspects in buildings. In its role as an intermediary linking the upstream with the downstream of the value chain wholesalers may play a role in reverse logistics.
- In relation to digital technical product information electrical wholesalers would like to draw the attention to ETIM International. ETIM (European Technical Information Model) is a classification standard for technical product categories initially established for electrotechnical products and has been expanded to HVAC, plumbing and building materials. It is giving structure to the flow of technical product information within the value chain and facilitates effective interaction between B2B professionals worldwide. Information on ETIM International can be found on their website <https://www.etim-international.com/>.
- Article 9 of regulation 2019/1020 on market surveillance and compliance of products foresees joint agreements between market surveillance authorities with organisations representing economic operators to promote compliance with products. In this context we refer to the Market Surveillance and Support Initiative for electrical products initiated by CECAPI, the European organisation representing the associations of manufacturers of electrical installation equipment In collaboration with trade bodies, market surveillance and law enforcement authorities MSSI Electrical provides information and training to support efforts ensuring that electrical product are safe and compliant. Wholesalers are joining this initiatives at national level. Information on the MSSI Electrical can be found under <http://mssi-electrical.org/>.

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