

Briefing

Evaluation of the Construction Products Regulation (CPR)

Euralarm comments on Commission Staff Working Document – Evaluation of Regulation (EU) No 305/2011 laying down harmonised conditions for the marketing of construction products

Euralarm in its representative role for the electronic fire safety industry welcomes the opportunity to provide comments for consideration on the Commission Staff Working Document – Evaluation of Regulation (EU) No 305/2011.

Euralarm strongly supports the free movement of products within the EU and therefore agrees on the need for EU legislation on construction products. We recognize the positive impact of the CPR on cross-border opportunities and trade.

Euralarm shares with the EC the conclusion that a revision and a simplification of the CPR is needed. **However, we disagree on the Commission's evaluation of the standardisation system.**

For several decades, Euralarm has been heavily involved in European standardisation. Our members have together more than 100 experts on CEN Technical Committees writing candidate harmonized standards under the CPR. Euralarm also gained the official status of *CEN Partner*.

Unlike the Commission concludes, the issue is NOT with the production of technical standards but with the requirements set up by the Commission for the harmonisation of standards under the CPR.

Since the effective entry into force of the CPR in 2013, Euralarm members' experts have spent together **more than 5000 working days** in CEN Technical Committee meetings and deliberations with representatives of the EC, including Harmonised Standards HAS consultants. From a technical standpoint, all European standards impacting our sector have been updated but **only three revised standards over a total of thirty in EN 54 series have been harmonized by the European Commission**. From a financial standpoint, the industry has absorbed costs exceeding 10 million Euro and lost 5000 days in productivity.

Notwithstanding the disproportionate standards development cost for the industry, this unacceptable situation also hinders our capacity to export fire safety products outside of Europe and more generally the competitiveness of the European Industry.

While our international competitors have been able to update their standards to the latest technological development, the European Fire Safety Industry is unable to compete because the publication of new standards is blocked by the Commission.

Euralarm is calling for the following consideration regarding the revision of the CPR:

- **Compliance with European standards should remain the main proof of compliance with the CPR**
- **European standards must be market-oriented rather than CPR-oriented**
- **The Industry needs more flexibility for the development of standards in order to ensure safety of the European citizens and preserve its competitiveness in the international market**
- **If these objectives cannot be met, a specific Fire & Life Safety EU Regulation mandating compliance to European standards should be considered**

Brussels, 20 January 2020

About Euralarm

Euralarm represents the fire safety and security industry, providing leadership and expertise for industry, market, policy makers and standards bodies. Our members make society safer and secure through systems and services for fire detection and extinguishing, intrusion detection, access control, video monitoring, alarm transmission and alarm receiving centres. Founded in 1970, Euralarm represents over 5000 companies within the fire safety and security industry valued at 67 billion Euros. Euralarm members are national associations and individual companies from across Europe.

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