

REPLY TO PUBLIC CONSULTATION

European Drinking Water (EDW) reply to the Commission public consultation on the Review of the Construction Products Regulation CPR

The European Drinking Water Industrial Alliance (EDW) supports the objectives of the Construction Products Regulation EU/305/2011 (CPR) to promote the ongoing completion of common market for construction products. As an alliance - including 30 European industry associations representing suppliers of materials and products in contact with drinking water (which include but it is not limited to construction products) - we believe that a better coordination between the CPR and the Drinking Water Directive 98/83/EC (DWD) should be achieved.

As the DWD will be shortly revised, this is a good time to provide for an increased consistency between the latter, the CPR, and any other relevant future EU harmonised initiative concerning material and products in contact with drinking water. The EDW believes that the market of construction products coming into contact with drinking water is currently too fragmented due to the lack of binding hygienic standards under the DWD.

For the above reasons, for all products in contact with drinking water including those falling under the scope of the CPR, EU-wide harmonised hygienic requirements – such as a list of authorised substances for the production of materials and products in contact with drinking water - should be set under the revised DWD. As a result, construction products compliant with the revised DWD in relation to their hygienic safety characteristics shall also be deemed to be compliant with the CPR hygienic safety requirements. This would avoid the needless duplication of regulatory measures as well as of compliance assurance efforts from the manufacturers. The performance assessment of other product characteristics - such as mechanical resistance and stability - should continue to be covered by the CPR. Such a link between the CPR and the DWD would ensure coherence between the two pieces of legislation and avoid unnecessary duplication.

Our Comment to the Policy options in line with the "Think Small First" principal:

Option I – Baseline scenario

The EDW cannot support this option.

The EDW is of the position that a revised CPR is needed to guarantee the improved safety and marketing of construction products, including those coming into contact with drinking water. The improvement of the safety standards and access to market of construction products coming into contact with drinking water can only be achieved by a strengthened CPR combined with a modified and more efficient DWD.

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Option II – Revising the CPR:

II.A: Limited CPR revision

The EDW cannot support this option.

This limited revision option will not solve the problems with the harmonisation encountered by our industry during the last 17 years. It would still mean to follow the drafting rules for harmonised standards set by the Commission, as recently confirmed by document CPR 12-03 "Additional characteristics in harmonised standards".

II.B: Wider CPR revision

The EDW supports this option. It should also allow the reference to the hygienic requirements fixed under the DWD.

II.C: Profound CPR revision

The EDW supports this option. It should also allow the reference to the hygienic requirements fixed under the DWD.

Option III – Repealing the CPR

The EDW cannot support this option, since the CPR is an important tool to ensure the existence of a common market for construction products.

About the European Drinking Water (EDW)

The European Drinking Water (EDW) is an alliance of currently 28 European trade associations representing industries involved with the supply of products or materials that are used in drinking water applications and connected to municipal drinking water supplies within the European Union (EU). This ranges, from raw materials suppliers to producers of pumps, water meters, pipes, valves, taps, fittings, water treatment, water heaters, catering equipment industry, seals, etc. and all types of materials, such as elastomers, metals, plastics, etc. The alliance is open to any industry association relevant to drinking water contact applications.

European Drinking Water

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European Drinking Water – Member association



ANIMA
Federation of Association of
Mechanical and Engineering
Industry



AQUA
European Association of
Water Meters and Heat
Meters Manufacturers



AQUA EUROPA



BMA
Bathroom Manufacturers
Association



Branchehuset



British Water



CEDEC
European Committee of
Domestic Equipment
Manufacturers



CEIR
European Association for
the Taps and Valves
Industry



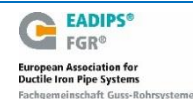
CES
Silicones Europe



CESA
Catering Equipment
Suppliers Association



DKI
Copper Alliance



EADIPS
European Association for
Ductile Iron Pipe Systems



EFCEM
European Federation of
Catering Equipment
Manufacturers



EHI
European Heating Industry



ELISANA
European Light Stabilisers
and Antioxidants Association



ESA
European Sealing
Association



ETRMA
European Tyre & Rubber
Manufacturers' Association



Europump
The European Pump
Manufacturers Association



EVA
European Vending
Association



EWTA
European Water
Treatment Association

European Drinking Water











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 <p>FCA Food Contact Additive</p>	 <p>figawa</p>	 <p>KRV KUNSTSTOFFROHREVERBAND E.V.</p>	 <p>PlasticsEurope ASSOCIATION OF PLASTICS MANUFACTURERS</p>
<p>FCA Food Contact Additives (a Cefic Sector Group)</p>	<p>Figawa Association of Companies for Gas and Water Technologies</p>	<p>KRV Fachverband der Kunststoffrohrindustrie</p>	<p>PlasticsEurope</p>
 <p>SOIA Ion Exchange & Adsorbent Resins</p>	 <p>teppfa The European Plastic Pipes and Fittings Association Channelling Performance</p>	 <p>VDDW</p>	 <p>VRH VERBAND TECHNISCHER ANSCHLÜSSE IM HAARBAUWESEN</p>
<p>SOIA Synthetic Organic Ion Exchangers and Adsorbents</p>	<p>TEPPFA The European Plastic Pipes and Fittings Association</p>	<p>VDDW Association of German water- and heat meters industry</p>	<p>VRH Association for Piping Systems Inside Buildings</p>
 <p>Water Quality Association</p>	 <p>ZVEI: Die Elektroindustrie</p>		
<p>WQA Water Quality Association</p>	<p>ZVEI German Electrical and Electronic Manufacturers' Association</p>		
