

THE CONSTRUCTION PRODUCTS REGULATION PLAYS AN ESSENTIAL ROLE FOR FIRE SAFETY OF BUILDINGS

Executive summary:

The Construction Products Regulation (CPR), together with several other elements such as national building codes and regulations, plays an essential role for the safety of construction works, including for fire safety of buildings.

Any changes considered must carefully assess the potential safety impact and the potential for improvement which can mainly be found in better implementation and enforcement. Therefore, the Modern Building Alliance supports the option A proposed by the European Commission, namely no legislative changes. We consider that **the current CPR brings an adequate contribution to the general framework for safety of construction works** and that the challenges identified by the evaluation should be better addressed without legislative changes to the CPR but with **improved guidance and soft laws to increase the implementation**. The Modern Building Alliance rejects the option E (repealing the CPR) and calls for strengthening quality, compliance and enforcement by developing fire safety competencies.

The Construction Products Regulation (CPR) is a very important regulation for construction product manufacturers as it lays down harmonised rules for the marketing of construction products in the EU. It is also an essential basis for national building codes defining construction performance and safety characteristics of construction products by providing a common European framework to test and classify these products. There is clear merit in the current system with the CPR allowing EU wide declaration of products performance through harmonised technical specifications and the requirements for those product performances being set at national level. It ensures that reliable and harmonised information is available to professionals and consumers, and while respecting the subsidiarity principle, it allows national authorities to set criteria and requirements based on this framework.

Out of the seven basic requirements for construction work (BWR) from which essential characteristics are established, the following have a strong safety component: mechanical resistance and stability (BWR 1), safety in case of fire (BWR 2), Hygiene, health and the environment (BWR 3), and safety and accessibility in use (BWR 4).

It is important to keep the whole framework up to date, the current CPR allows for standards as well as test methods and classification standards to be regularly reviewed and updated in order to guarantee keeping pace with technological changes and societal challenges.

The CPR framework connects with EU standards, market surveillance and national building codes. Correct implementation of all these requirements relies on the qualifications and competencies of professionals.

Safety requirements depend on a building's purpose or primary function and have to first take into account national or local regulations. It will always be left to the designer and the architect to correctly assess which combination of products are to be used in a specific application, and to the end-user to

purchase the products with the specified performance for its intended use. It also means that professionals using this information and ultimately designing and constructing buildings must have the appropriate qualifications and competencies to ensure the quality, safety and compliance of the building they design and build.

The members of the Modern Building Alliance prioritise the safety of construction products, with a particular emphasis on fire safety during every stage of design, manufacturing and delivery to market. Any change considered to the CPR must carefully consider the impact on safety taking into account the interconnection with other elements of the framework including national building codes.

The members of the Modern Building Alliance consider that the current CPR brings an adequate contribution to the general framework for safety of construction works and that the challenges identified by the evaluation should be better addressed without legislative changes to the CPR but with improved guidance and soft laws to increase the implementation. **Therefore, the Modern Building Alliance supports option A (no legislative changes) and rejects option E (repealing the CPR).**

The CPR has brought significant improvements in the fire safety of buildings across the EU, since standards for fire safety are now comparable from country-to-country. Harmonised classification means that a buyer, a designer or a builder can easily compare the fire-safety performance of construction products regardless of where they originate. Repealing or downgrading the CPR would set this progress back significantly. The Modern Building Alliance focuses particularly on fire safety. Improved fire safety measures over the years, including the performance testing and declaration framework for construction products, have resulted in reducing the number of fire fatalities in Europe.

Going beyond the CPR

Further improvements can be achieved in Europe by taking a holistic view of fire safety. A holistic approach must cover the [7 layers of fire safety in buildings](#) (prevention, detection, early suppression, evacuation, compartmentation, structural safety and fire-fighting) that are integrated into building codes defining building, installations and organisational requirements - backed by EU standards (see B.I.O framework for more details: <https://www.modernbuildingalliance.eu/b-i-o-framework>).

Recent tragic events, such as the Bucharest disco fire in 2015 and the Grenfell fire in 2017, have highlighted a clear **lack of compliance. This must be addressed by strengthening enforcement, which should rely particularly on competencies of professionals.** Ensuring the fire safety of buildings is indeed a complex issue requiring competent professionals with clear roles and responsibilities, who are involved during the buildings' design, construction, renovation and maintenance phases.

Fire safety academics have analysed the need to improve fire safety competency and to better involve fire safety expertise in building design and inspection. They call for improved definition of competencies, enhanced education and accreditation, and the establishment of a legal framework for the involvement of accredited fire safety professionals in building design and inspections. The members of the Modern Building Alliance fully supports this need (more information: <https://www.modernbuildingalliance.eu/news/call-for-action-fire-safety-competency>).

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About the Modern Building Alliance

We are an alliance of trade associations and companies representing the plastics industry in the construction sector. Plastics are increasingly used in building and construction applications to make our buildings more sustainable, from window frames and durable pipes to state-of-the-art insulation solutions. An essential pillar of our cause is the ambition for greater fire safety across the construction industry. It is a key driver of our product design and manufacturing: improving the fire safety in buildings is a joint responsibility of the whole value chain involved in building and construction. That's why, by engaging with policy makers and stakeholders, we are committed to supporting the EU in ensuring safe and sustainable construction for people across Europe.

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