

ETRMA Feedback to the Inception Impact Assessment on the review of the construction products regulation

Brussels, 12th August 2020

The European Tyre & Rubber Manufacturers Association (ETRMA) and its members count around 4.300 companies in the EU employing directly 360.000 people. ETRMA tyre corporate companies represent globally 59 % of world sales and 7 out of 10 world leaders are our Member. We have strong presence in the EU and candidate countries with 93 tyre-producing plants and 17 R&D centres.

Several general rubber goods are covered under the scope of the construction products regulation, for instance joints and bearing pads for bridges. The use of rubber goods for construction products is essential to secure the safety of civil structures. The use of rubber goods in construction works usually covers specific niche applications, producers are highly specialised SMEs.

Many applications of End-Of-Life Tyres derived granules are under the scope of the construction products regulation. For instance, moulded goods such as tiles or carpets in sport facilities, asphalts, and crumb rubber granules used as infill material in artificial grass.

ETRMA believes that the CPR needs to adapt and enhance its role to boost the use of recycled materials. Adaptions to the CPR shall bear in mind the green deal objectives and the need to move towards a circular economy society.

In the view of supporting the Inception Impact Assessment, ETRMA would like to highlight the following:

- The CPR is needed in order to secure a level playing field and a single market of construction goods across Europe. There is no need to change or derogate de regulation.
- The CPR needs to enhance its scope to promote the green deal and the circular economy goals, particularly facilitating the access to the market in equal condition of recycled goods in construction works.
- The application of Basic requirement 7 related with the environmental performance of products needs to be harmonised across Member States. The CPR should enforce the EU single market and prevent the need for industry to develop different environmental declaration for each EU Member State. The Commission should coordinate and invest resources in supporting harmonization.
- The standardization process of harmonised standards shall take into account the specificities of each sector.

- Clarification on the scope of the CPR regarding groups of products is required to avoid double regulation, this is critical for rubber goods covered by the drinking water directive and the construction products directive.
- Further, the interface between chemicals, products and waste must also be addressed in the CPR. For instance, depending on the situation, ELT derived rubber granules are mixtures under REACH, waste under the Waste Framework Directive and construction products under the CPR. Adding clarity on the scope of each regulation is key to boost recycling of ELT derived rubber.
- Any guidelines, technical document or related that aims to clarify the CPR should be adequately agreed and used by Member States in its local enforcement. Otherwise, guidelines are weak on clarifying aspects.

ETRMA will also share its views during the public consultation on Future Options for the Review of the Construction Products Regulation.

European Tyre and Rubber Manufacturers' Association members (www.etrma.org).

ETRMA represent 86 tyre manufacturing plants spread across EU28, Turkey and other candidate countries employing some 200.000 direct jobs in the tyre sector. ETRMA, represents more than 6.000 companies in EU28, employing 360.000 individuals and supports another 800.000 jobs in related sectors. The product range of its members is extensive from tyres to pharmaceutical, baby care, construction and automotive rubber goods and many more applications. ETRMA members' turnover in 2016 is approximately € 73 billion, of which up to 5% continues to be invested in R&D, annually. ETRMA's membership include the following tyre manufacturers: APOLLO VREDESTEIN, BRIDGESTONE EUROPE, BRISA, COOPER TIRES, CONTINENTAL, GOODYEAR DUNLOP TIRES EUROPE, HANKOOK, MARANGONI, MICHELIN, NOKIAN TYRES, PIRELLI, PROMETEON, SUMITOMO RUBBER INDUSTRIES AND TRELLEBORG WHEEL SYSTEMS. Furthermore, members include Associations in the following countries: Belgium, Finland, France, Germany, Hungary, Italy, the Netherlands, Poland, Spain and the UK.