Webinar of 2023-06-29

Webinar 'Harmonized standards under CPR: CPR Acquis, Fast-track and standardization request development process'

Questions & Answers

1	What will happen with the current cited Harmonised EN's?	They will be superseded when their new version will be cited in the OJEU.
2	Does the extraordinary route using alignment with the mandates end when the revised CPR is adopted or at the entry into force of the revised CPR? What happens with draft standards that have been aligned with a mandate which are under approval or awaiting citation at the closing date?	Harmonized standards drafted on the basis of mandates are applicable only under the current CPR . Upon the entry into force of the revised CPR, hENs shall be drafted on the basis of Standardization Requests. It is important to ensure that if a hEN, prepared under a mandate, is offered to the EC for citation, the current CPR is still applicable otherwise it will not be cited.
3	Does the extraordinary route using alignment with the mandates end when the revised CPR is adopted or at the entry into force of the revised CPR? What happens with draft standards that have been aligned with a mandate which are under approval or awaiting citation at the closing date?	Citation based on mandates will not be possible under the new CPR.
4	I didn't catch how long the fast-track process is supposed to last. Would you please clarify?	CPR Acquis normal route 15 months, fast track route 12 months.
5	Will there be a guidance document for the fast-track process? If yes, when?	The guidance document for the fast-track process and the templates were circulated to all TC secretaries. It has been explained during the webinar.
6	As Christophe Sykes sad the time frame after an improved standardisation request is important to know. If we (CEN TC) would have only two years' time to develop all hENs for products in the standardisation request we would limit the products to the essentials. We would appreciate a systematically approach and include all products.	When CEN or CENELEC receive a draft Standardization Request from the EC, the concerned Standardization Request Ad Hoc Group (SRAHG) will have to negotiate with the EC the deadlines to deliver each harmonized standards included in that Standardization Request.

7	If only 1 EN was cited but 140 rejected - then it might be that the problem is not on the side of the standard but on unrealistic requirements???	One of the issues is related to the fact that TCs need to work on the basis of very old mandates with outdated list of essential characteristics. Mandates need to be revised through Standardization Requests. The other reason is related to legal requirements from the EC. We are working together with the EC on a guidance document that clearly defines all these requirements.
8	Which EN was cited since 2020?	EN 1463-1:2021 'Road marking materials - Retroreflecting road studs - Part 1: Initial performance requirements' was cited in 2022
9	Hello, how the transparency will be ensured in the fast-track process?	Upon the finalization of Milestones, TCs will launch a TC consultation by CIB to seek consensus and ensure transparency. Whereas, the CPR Acquis steering group will assess and validate the provided input.
10	As CPR Acquis is supposed to complement the New CPR to solve the existing issues for construction products in the internal market I am wondering on the impact the still ongoing revision will have in the entire process? It might be that the first CPR Acquis outcomes deviate from the then published final revised CPR? How will that be managed?	As explained in the presentation, the CPR Acquis is flexible to integrate all relevant modification to the new CPR under discussion. The fact that the performance-based approach (and also other aspects) will not have significant changes offer us a solid block of certainty to work on.
11	Can a more detailed practical explanation be given of how the involvement of the MS works, both in regular CPR Acquis process, as in fast-track process? I suspect this will, for a big part, determine the content of final approved SReq's, correct?	This is clarified in a dedicated section of this webinar.
12	How are the environmental requirements currently covered under the CPR and how this will change with the new CPR? Are the existing EPDs environment-related information going to be considered in the future for construction products standards?	There is a section in the presentation given during the webinar tackling the environmental essential characteristics.
13	Can 'Member States' regulatory needs be specified further? What is meant by this?	Regulatory needs from Member States are the essential characteristics to be declared by

	Any examples would be helpful to better understand.	manufacturers when products are placed on the market.
14	It should be noticed that the requirement on the reference service life is linked very much to the Intended (declared) use of a product	Comment noted.
15	What are the area codes - are they relevant to the presentation?	Yes, they are. Area codes from Annex IV to the CPR are the legal basis to start the work on a product family.
16	The draft text of the revised CPR (at Parliament and Council level) does not seem to comprise the criteria used to establish the priority list, or even the notion of priorities. Does that mean that the principle of prioritisation disappears once the revised CPR is adopted or does the EC have the intention to maintain this principle even though not foreseen in the revised CPR?	The CPR proposal is being amended and the CPR acquis group is expected to be mentioned but the level of detail may not reach a clear prioritisation criteria.
17	'Specifications' are nationally determined contractual requirements. Standards outline the properties and compliance 'limits/values/thresholds' that can be written into contracts for compliance purposes...? Changing Standards into Specifications (with minimum thresholds) is a radically different approach, likely to create chaos in the market...	Comment noted.
18	If a SReq is accepted under current CPR (via CPR Acquis-, or fast-track process), will it still be valid under future revised CPR?	Yes, it will be, citation of standards on the basis of it will continue to be possible.
19	Is there a horizontal sub-group in order to deal with hazardous substances?	There is a horizontal subgroup on dangerous substances led by the EC. However, this is not integrated under the CPR Acquis as Subgroup, but it is rather consulted for specific product families on a need basis.
20	Where and how will documents from the acquis processes be made public? Eg mandates, list of participants, drafts, etc.	https://ec.europa.eu/transparency/expert-groups-register/screen/expert-

		groups/consult?lang=en&groupId=3776&fromMeetings=true&meetingId=36694
21	Are the tools and guidelines also available in German?	They are available in English only.
22	Did you think about an interim solution for updating and citing existing standards in OJEU under the current CPR? As mentioned by Oscar Nieto, even the fast-track route is no guaranty for being really fast. Could you think about an interim updated mandate (merge of mandate and answers to the mandate) until the standardization request is ready as the basis for revision corresponding to the new CPR?	Mandates cannot be amended. The procedure available is developing Standardization Requests and the necessary technical content can be transferred from the Mandate to the Standardization Request.
23	How to „apply“ for the fast track route for a product area?	This information is covered in a dedicated part of the webinar.
24	Whereas I understand that CEN/TCs should be efficient and conclude the fast-track process as soon as possible, is it possible to explain why a specific timeframe is being specified (4pprox.. 12 months)? Only the final milestone (IV) seems to involve parties external to the CEN/TC. Why not permit CEN/TCs to go faster or slower, depending on their particular situation and allow the TC to present the outcome when available?	The timeframe of 12 months is a recommendation. TCs have the flexibility to be faster or take longer than 12 months.
25	Why are products of priority levels 12-14 not among the product groups of the fast-track route?	For the high regulatory interest of the member State.
26	Will it be possible to split up the content of former mandates into more than just one SR?	In principle this is not appropriate for a series of reasons. But if duly justified and accepted by the member States, this may happen.
27	At several occasions we, in different CEN TCs, have now had information (from CEN) about the new possible routes forward. It is our wish that such information is not always general but adapted to the relevant TC (and hence the relevant products and product families) that we work with. That would make our work much easier and efficient,	Please reach out to your CEN/TC Project Manager to discuss the specific aspects of your product family.

	so we don't start to work on one way forward that after some work is revealed to us as not feasible.	
28	Is there a guidance available for dangerous substances topics?	Some mandates have an amendment about release of dangerous substances and as well there is the Indicative List of Regulated Dangerous Substances. Moreover, CEN/TC 351 develops horizontal methods for release of dangerous substances.
29	Nuno Pargana answered that the delivery deadlines for new hEN within a standardisation request have to be negotiated between EC and CEN. That means that the process after the standardisation request is defined by CEN for individual standards but not by EC for the bulk of hEN within the standardisation request. I have the impression that we get lost in complexity before we define some major boundary conditions e.g. clear time lines until publication of a new hEN in OJEU.	The deadlines for the delivery of standards are included in the Standardization Requests. The deadlines are clear from the very beginning of the standard drafting.
30	Nuno Pargana answered that the delivery deadlines for new hEN within a standardisation request have to be negotiated between EC and CEN. That means that the process after the standardisation request is defined by CEN for individual standards but not by EC for the bulk of hEN within the standardisation request. I have the impression that we get lost in complexity before we define some major boundary conditions e.g. clear time lines until publication of a new hEN in OJEU.	The EC is responsible for defining the deadlines to deliver each individual deliverable in the SReq. During the development of the SReq, CEN can negotiate with the EC and request a different deadline for the hENs to be developed.
31	Regarding detailed tasks of the subgroups (gantt diagram). Is there a deliverable templates defined for each or at least some of the tasks so we can see what is expected and we can plan ahead while we are "queuing"?	Fast track guidance follows the same approach as the normal route.
32	Do we know how to express the performance of dangerous substances and	Every substance is a separate essential characteristic.

	for environmental sustainability? Where can we find this guidance?	
33	Nice overview of the process, I wish there is a more precise guide about the different steps / approaches	More information are included on the guidance document.
34	Pavlina, do I interpret your last slide correctly, do we need a published c-PCR to go from milestone I to milestone III? Why do we need a completed supporting (c-PCR) standard to make a standardization request?	The technical content necessary to deliver environmental declarations is required. The default approach is developing c-PCR for this purpose.
35	The process before the decision to submit a request to CCMC for the fast-track route should be clarified. A CIB and call for experts before the TC applies to ensure commitment from members.	The instructions for the fast-track have been developed by CEN-CLC/BTWG 9 and the idea was to give some flexibility to TCs. Of course, the fast-track instructions should be considered as a living document and could be amended to include additional recommendations.
36	Due to TC 254 products we have the same experience as M. Simms on MS requirements. thanks for taking this into account. Martin	Comment noted.
37	It is said that the CPR acquis process of a product group has to define the characteristics on the products and the assessment methods within a timeframe of about 15 months. How to deal with this when the TC itself could not reach an agreement on that topic during more than 20 years…?	The decision-making process in CEN/TC is different, the involvement of Member States in the CPR Acquis process is much more relevant.
38	Structural wood products is the first product family queuing ranking number 7. When is it expected for this group to start its work? (Not belonging to fast track, I suppose)	It is expected to start in 2024.
39	For precast concrete products we have the same problems with dated references in hEN. Is there any solution for this big problem?	Dated references are required to keep legal consistency. Standards developed according to the new Standardization Requests shall include dated references.

40	There is a practical solution to the challenge of referenced standards becoming out-dated ... dated or latest". Use EN 12345-1:20xx OR a later revision IF that later revision has been cited in	For legal certainty, the EC is requesting that normative references are all dated in the body of the standard and in Clause 2.
41	Besides national contact points also the national mirror committees can check for essential characteristics	Comment noted.
42	How should CEN/TC's acquire all the regulatory needs from MS, and make sure nothing is missed? Can EC share all current regulatory needs of the MS for a certain product family/Mandate with a CEN/TC? The only channel for CEN/TC's to ask for national input from MS is via national mirror committees. There is a big risk that input on national regulatory needs will be missed via this channel, because it strongly depends on which parties/organizations are member of national mirror committees. Can CEN or EC provide adequate national contact points to acquire all necessary relevant national regulatory needs?	The work done by the TC will be assessed by representatives from Member States who will check if something is missing/required. The verification will be done in the context of the CPR Acquis Steering Group and also when the StandardiZation Request will be subject to their approval.
43	SReq will list the EC and Test Methods and if there will be any Classes or Thresholds, but we have been told that it shall also contain the limits of Classes or Thresholds while we though this last information would only be in hEN, is this right?	Classes and thresholds are only allowed in harmonized standards if they were already included in the Standardization Request. If this is not the case, they can be endorsed by a delegated act but this process is slower and more complex.
44	SReq will list the EC and Test Methods and if there will be any Classes or Thresholds, but we have been told that it shall also contain the limits of Classes or Thresholds while we though this last information would only be in hEN, is this right?	The SReq will list all the essential characteristics, but not the test methods. But indeed, the list of classes/thresholds will have to be included in the SREq. These classes/thresholds in hEN will need to be fully aligned with the ones in the SREq.
45	When will there be an involvement of CEN/TC 33 in the fast-track route for glass? In my opinion the work should cover the needs of the following industry in value chain using glass in the final product.	CEN/TC 129 will be happy to collaborate and share the documents.

46	Why do I need additional certification in France for an EPD which must be done by a local certifier?	This will become obsolete with AVCP 3+ and the Notified Bodies coming into play
47	Have you studied the cost of an EPD, since data recompilation to end verification? There are companies who deliver more than 6.000 products. How to go to this cost? Today is a voluntary thing, but it will be obligatory.	Comment noted.
48	At Julia, How C-PCRs include use and end of life for construction product having possibly different applications?	This topic is being discussed in the horizontal group of the CPR acquis dealing with environmental sustainability.
49	When is the webinar organized by CEN/TC 350?	No exact date yet.
50	A major challenge for many TCs is likely to be 'cascading' EPD data from upstream resources to a functional unit which is not owned or operated by the product producer, and/or in an environment which they cannot control (climate, frequency of use). Average data may not be robust enough (or believed) to give a high level of confidence / accuracy in the subsequent EPD.	This topic is being discussed in the CPR acquis subgroup on environmental sustainability. We are working with harmonised parametric or European scenarios.
51	Which sustainability requirements will be mandatory and which will be optional?	Hello, the essential characteristics to be declared will be fixed in the SReq.
52	In the fast-track route, will there be interaction facilitated between CEN/TC and steering group (EC + MS) during work on milestone I and III, in case the TC has specific questions on regulatory needs of MS?	EC consultants will assist TCs when needed, however, there will be no direct interaction between CEN/TCs and the CPR Acquis Steering Group during the drafting stage.
53	This is of little help when a technical standard is applicable from a legal point of view but not from a technical point of view.	Comment noted.
54	As far as I am informed, only company specific EPDs may be used for declaration in the future. Has this been reconsidered? It	There will be different ways, simplified procedures may be applied to reduce the burden of assessing and declaring these essential characteristics.

	would be very important to be able to use sector EPDs, especially with regard to SMEs.	
55	Yes, sector EPDs to minimize costs for SMEs would be very appreciated.	Comment noted.
56	Is the fixed deadline for all standards mentioned in this request or for each hEN standard and on which date the time is counting?	Each hEN could have a different deadline. The Standardization Request will have an expiration date.
57	What is the typical deadline for deliverables that we (CPR) may expect in our SReq?	The deadline for each deliverable could vary. During the SRAHG, CEN/TCs should provide feedback on the deadlines.
58	I would like to find a model for the so called document “Standardisation Request”. Where can I find it?	CEN is going to receive soon a draft Standardization Request for precast concrete. This could be shared to the TCs for info for you to understand how the SReq looks like.
59	What is the status regarding a freely available LCA database? Is this idea still being pursued by the EU COM?	Data quality and background datasets is a topic under discussion in the CPR Acquis subgroup on environmental sustainability.
60	Is there a SRAHG per standardisation request?	Correct. Each SReq will have one dedicated SRAHG.
61	According to EC information, 95% of EU manufacturers are SMEs. These companies typically have a broad range of different products. If we have no realistic solution for SMEs in hENs to have EPDs for their products (collective solutions), the CPR will not work.	Simplified procedures will be applicable including sharing, cascading and declaration without testing.
62	Thanks for your response Pavlina. When is the time starting to deliver within the deadline?	You are welcome! As soon as the Standardization Request is accepted.
63	That will be a challenge for CEN/TC 229 with 40 hEN's.	CEN/TC 229 will have the opportunity to provide feedback on the deliverable deadlines under the SRAHG
64	AUWP, ESO, ESTI, SHRAG, SReq, BT, TB, etc. So many acronyms: could be a good idea to join a list of those when sending the	Good point. We will include a slide at the end with the acronyms. Thanks for the suggestion.

	handouts. Or a link where they are all readily listed and defined.	
65	What will function as "national mirror" for voting by ESO .. is that the mirrors to the TC involved?	Assuming that by "voting" you refer to the acceptance/rejection of the Standardization Request, then it will be on the Technical Board to vote. The Technical Board is made of representatives of the National Members, which agree on a position at national level through their channels (e.g. national mirror committees).
66	During the development of the standards under SReq M/577, CEN/TC 295 determined that individual requirements of the SReq are not technically meaningful and can lead to meaningless contents of the standards. How can this be prevented in the future?	TCs shall provide a technical meaningful input under the CPR Acquis/fast track route. As well, TCs shall ensure that any potential issue is mentioned during the SRAHG.
67	If a product sector identifies that it can operate without a SReq (e.g. no practical cross-border trade because of product 'shelf-life' or non-recoverable installation restrictions ?) will it be possible to 'de-Regulate' the previous Mandate, citations and future SReq...? Even if the common technical language developed under CPD standards has proved 'scientifically' beneficial e.g. modern and updated test methods... i.e. technically harmonised for MS use, but not legally Harmonised...?? Many TCs have experience of rejection for citation after much time and effort under Mandates - will SReq enhance the certainty of citation ?	A Technical Committee may take the decision to "de-harmonize" a standard i.e. to remove the link to the CPR and delete the Annex ZA. Once the de-harmonization is approved by the CEN Technical Board, the information is communicated to the EC. The withdrawal of cited references from the OJEU is a decision that only the EC can take. The Standardization Requests replacing the current mandates, will constitute a certain legal basis for the TC to develop standards and offer them for citation. The final citation depends on various factors, the most important being the compliance of the published standards with the provisions in the Standardization Request and the Regulation (assessed by the HAS consultants during the development of the standard).
68	For the fast-track route, what happens in case the technical input from the CEN/TC for milestone I and III is not approved by the steering group(=EC + MS)? Will the steering group prepare alternative technical content for the SReq separately, without any further interaction and/or consultation of the CEN/TC? What if the CEN/TC does not deem the technical content of the final	CEN is involved in the development of SReq. in all stages. Including its final drafting and approval.

	SReq feasible? Many thanks for all answers today, and all your efforts in this!	
69	CEN standards are revised every 5 years. Once cited, will the harmonised standard follow the revision, or every 5 years a new standardization request will be needed?	CEN standards could be revised, withdrawn or confirmed. If there is a need to revise an hEN, a Standardization Request will be needed (if the previous Standardization Request is expired).
70	What is needed if a published hEN of the new Sreq procedure needs to be revised because there is an update of a dated supporting standard published? Is there always a new Sreq required?	CEN standards could be revised or confirmed. If there is a need to revise an hEN, a Standardization Request will be needed (if the previous Standardization Request is expired).
71	If the deliver time is 24 month, enq, fv and translations have to be done including de assessment of the HAS, it will be almost impossible to fulfil the 24 moths timeframe?	It is crucial that the Standardization Request Ad-Hoc Group (SRAHG) gives this feedback to the EC. The SRAHG shall evaluate the feasibility of the deadlines provided in the draft Standardization Request.
72	HAS assessment : Because of the renewal of the HAS consultant took time, can you tell us how many standards are in the backlog ?	There is no backlog for hEN in support of the CPR. However, the number of hENs under HAS assessment at this stage is limited.
73	When are Guide 36 and core rules ready?	The revision of Guide 36 is ongoing. TCs will be informed as soon as the documents are available.
74	This session has told me a lot, but also raised in my mind a lot more questions (probably too many for the chat) - as a TC Chair, who would you suggest is the right person to contact in CCMC for an informal discussion tailored to my particular TC situation?	Please reach out to the CEN and CENELEC Project Manager of your TC. This information is available on Projex-Online and on the CEN and CENELEC website.
75	Yes, this is in line with my understanding but shall the limits of classes and thresholds be in the SReq or only information of Class or threshold for an EC and the limits of them given in hEN ?	The detailed classification and the thresholds need to be explicit in the SReq.
76	What about the standards mentioned into the harmonised standard? This the problem 2 mentioned by Mrs Anne Minne. It seems it is not solved.	For legal certainty, the EC is requesting that normative references are dated in Clause 2 and in the body of the harmonized standard.
77	Do we have to apply the HAS checklist even if the standard was submitted to HAS	The checklist must be completed every time there is a submission of a document to CCMC for

	assessment some moth ago (end of last year) ?	FWD, ENQ or FV. If the standard was already submitted to HAS assessment, then there is no need to complete the checklist.
78	When will the revised CPR checklist be published?	The CPR checklist is currently under development. We hope that it will be published before the end of 2023.
79	In the past the WG was asked to align the draft hEN to each revised version of the Annex ZA template. This caused a lot of additional work for the WG and delay of work. Will it be possible to receive a template which is valid for the complete development of a single hEN?	The Annex ZA template available on CEN BOSS is still valid. Should the template change, the TCs will be notified accordingly.
80	When will all these mentioned guidelines be ready?	We are hoping that these documents will be available before the end of 2023. However, this will depend also on discussions with the EC as we want to have the guidelines agreed by the EC.
81	Just a remark: an EPD does NOT necessarily be reduced to 8-10 pages. A lot of EPD programme operators allow much more pages.	Comment noted.
82	Could you please confirm that the templates for the Milestones I and III were already sent to CEN TCs?	Yes, the instructions for the fast-track route and templates for Milestone I and III have been sent to secretary and chairs of construction Technical Committees.
83	Are approved standardisation requests (hor, sust & vertical) published somewhere, including those forming the basis for the acquis process (can a link be shared if so)?	The complete list of Standardization Requests issued under EU Regulation 1025/2012 is available here: https://ec.europa.eu/growth/tools-databases/enorm/. The list of mandates to be revised under the CPR Acquis and their priority order is available in the slides presented during the webinar.
84	CPD guidance documents were very helpful in explaining the processes for CE Marking producing Declarations of Conformity (now performance) and the responsibilities of Manufacturers and Notified Bodies for Factory Production Control audits etc. Has	Guidance documents are not applicable.

	this guidance been included in the CPR guidance being produced?	
85	If all the cited standards have to be dated - how will be the procedure to keep the hEN updated if one of the cited standards is updated?	For legal certainty, the EC is requesting that normative references are dated in Clause 2 and in the body of the harmonized standard. However, there is also a fast-track procedure, which requires BT approval, to update normative references in hEN after the FV or publication. This could be a useful tool for TCs in case of issues with normative references.
86	What's the process for hEN's being amended under the current mandate?	It is recommended that TCs consult the CCMC Project Manager to support with the evaluation of the feasibility of this option, as it is considered exceptional due to the outdated nature of the mandates and the fact that the EC also confirmed that TCs answers to the mandates are no longer valid. Moreover, this route should not be considered by TCs which are currently under the CPR Acquis route or for products that fall within the scope of the priority product families Subgroups (SGs) under the CPR Acquis.
87	If I understand well, CPR hENs need to address environmental sustainability. However, the CPR Annex V still needs to be revised to specify what AVCP-system 3+ means and specify requirements for notified bodies involved. In any case, FPC seems to be a task of the Notified Body. Is work on-going on the content of FPC requirements related to environmental sustainability? If CEN/TCs do not have such information, they cannot finalise hENs.	Indeed. We need to wait for the delegated act on AVCP system 3+ to be available and we will work together with the EC to amend the AVCP guidance to reflect these new elements.
88	In the past there used to be only one consultant dealing with all the standards developed by one TC. This made things easier and faster. Would it be possible to have this system again?	This is an approach that we will try to keep if possible. However, for the HAS consultant, the assessment cannot be made by the same consultant that has supported the CEN/TC in the fast track route since these are two different activities and not under the same contract.

89	What is the review of hENs published back in the 2010 - can they be fast tracked	TCs that wish to apply for the fast track can do so by following the guidance document produced by CEN in cooperation with the EC.
90	If a Standardisation Request is issued, does the TC still need 5 member states, which have experts willing to work on the standard?	Yes, the rule for starting the work on a New Work Item is to have five members committed to develop it.
91	To check continuously the dated reference standards for revised standards may be possible for the first level but is impossible for the referenced standards in the reference standards. Therefore, this system of dated references may answer the requests of lawyers but will not work for a continuously developing organism of standard.	Principles applying to EU law applies also in our sector and these shall be respected. The situation will improve progressively renewing the standards towards the new legal requirements that are already widely applied in other standardisation sector.
92	How can we receive the requirements of EN 15804? Will we be provided with the standard?	You can contact the CEN or CENELEC member holding the secretariat of the TC/WG to see how the standard could be obtained for the drafting of the c-PCR.