CONSTRUCTION PRODUCTS EUROPE

Position Paper CPE KAS

22 July 2026

Introduction

Construction Products Europe supports efforts to facilitate the effective implementation of Regulation (EU) 2024/3110 laying down harmonised rules for the marketing of construction products (CPR). In this context, we welcome the discussions taking place within the CPR Acquis Subgroup on Kits, Assemblies and Systems (KAS).

Given the potentially significant implications of the initiative for construction product manufacturers and the European standardisation system, we consider it essential that any future activities are based on clear objectives, demonstrated market needs and the efficient use of existing expertise and resources. The scope and ambition of the initiative should also remain proportionate to the implementation capacity of the European Commission, the European standardisation system and industry, so as not to delay the overall implementation of the CPR.

General Principles

1. Clear definition of scope, objectives and expected outcomes

Before launching any additional standardisation activities, the scope, objectives and expected outcomes of the KAS initiative should be clearly defined and agreed by all relevant stakeholders.

A common understanding of the problems to be addressed, the intended regulatory benefits and the expected deliverables is necessary to ensure that any future work is proportionate, targeted and effective.

2. Market-driven standardisation

Standardisation activities should be driven by demonstrated market needs and industry demand rather than by a top-down political approach.

The European standardisation system has traditionally been successful because it responds to concrete market requirements and benefits from the expertise of industry stakeholders. The KAS initiative should therefore follow a bottom-up approach, allowing sectors to identify, prioritise and justify their standardisation needs, and to express their commitment to any respective standardisation request.

Given the diversity of construction products, supply chains and market structures, sector-specific expertise should remain the primary driver for determining whether additional standardisation is necessary and, where appropriate, how it should be developed. Any new standardisation activity should therefore be supported by clear evidence that it responds to an identified market need and provides tangible added value. The KAS framework should remain neutral regarding existing business models and supply chains, avoiding unintended competitive advantages or disadvantages for market approaches.

Before assigning a product or product family to the KAS initiative, it should first be assessed whether it can be more appropriately addressed within an existing CPR Acquis Subgroup and the corresponding sectoral Technical Committee. The KAS initiative should not lead to overlapping scopes or competing technical specifications for products that are already adequately covered, or are intended to be covered, by existing CPR Acquis Subgroups and existing or forthcoming harmonised technical specifications.

3. Avoidance of unnecessary burdens

The creation of unnecessary standards and administrative burdens for industry should be avoided.

Any proposed standardisation activity should be supported by the relevant industry sectors and be subject to a careful assessment of its necessity, feasibility and impact on manufacturers, particularly SMEs. New requirements should deliver clear benefits and should not create disproportionate compliance costs or additional complexity without a corresponding market or regulatory need.

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Such an assessment should also consider the resources required from industry, the European Commission and standardisation experts. Additional activities should not create a workload that risks delaying the delivery of other priority standardisation work under the CPR.

4. Use of existing expertise and ongoing work

Existing sector expertise and ongoing work within the relevant CEN Technical Committees should be fully utilised.

Many of the technical issues potentially covered by the KAS initiative are already addressed within established Technical Committees possessing extensive sectoral knowledge and experience. Parallel structures, overlapping standardisation work and unnecessary duplication of effort should be avoided to ensure consistency, efficiency and the best use of existing expertise and resources. This is particularly important given the limited capacity of both the European Commission and industry experts to support an increasing number of parallel standardisation activities under the CPR.

5. Coordination between Technical Committees

Assigning responsibility exclusively to a single Technical Committee may not adequately reflect the multidisciplinary nature of many construction products and systems. Effective cooperation between the relevant Technical Committees and CPR Acquis Subgroups is therefore essential to ensure coherent and technically robust outcomes while avoiding overlapping scopes, duplication of work and conflicting technical specifications.

Where products, kits or assemblies use products as components which fall within the competence of several Technical Committees or CPR Acquis Subgroups, the Commission should establish coordination mechanisms and request that CEN ensures appropriate liaison between the relevant TCs, e.g. by establishing Joint Working Groups.

6. Exclusion of prefabricated houses from the scope

CPE considers that prefabricated houses should be excluded from the scope of the KAS initiative, in line with their exclusion from the original Commission proposal for a new CPR.

The inclusion of prefabricated houses would significantly broaden the scope of the initiative and raise complex questions relating to design, manufacturing, construction and building-level assessments that go beyond the harmonisation of construction products under the CPR.

Summary

We remain committed to contributing constructively to the discussions within the CPR Acquis Subgroup on Kits, Assemblies and Systems.

Any future standardisation activities should be based on clearly defined objectives, demonstrated market needs and the effective use of existing sector expertise. A proportionate, market-driven and bottom-up approach will be essential to ensure that the initiative delivers practical benefits while avoiding unnecessary complexity and administrative burdens for manufacturers.

The scope and ambition of the KAS initiative should also remain proportionate to the implementation capacity of the European Commission, the European standardisation system and industry, ensuring that it complements rather than delays other priority work under the CPR.

Founded in 1988, Construction Products Europe is a Brussels-based international non-profit making association. The association is made up of national and European associations that represent Small and Medium-size Enterprises and world-leading companies. Construction Products Europe aims to promote the European construction industry, to share information on EU legislation and standardisation and to provide input in all European construction-related initiatives.

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