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Reused/remanufactured products in the revised CPR CU position

The European ceramic industry, represented by Cerame-Unie, fully supports the reuse of building materials and the introduction of reused construction products in the scope of the revised Construction Products Regulation (CPR) to contribute to the objectives of the green transition.

We would like to present in this position paper a few considerations regarding reused construction products in the context of the CPR:

- We are concerned about the imbalance we see arise in practice in terms of technical performance requirements in this regard but also the possible disruption of the level playing field between new and reused products.
- If a reused construction product originally fell under the scope of a harmonized technical specification , then the CPR should apply.
- Ensuring the same reliability of declared characteristics of reused products compared to new products is key.
- The requirements in the standards for reused products should be clarified (FPC, AVS, sampling...).
- Standardization for reused construction products is being developed in some Member States – we want to avoid deharmonisation related to strength stability etc.
- The performance concerning the essential characteristics of the product should be known before reusing it.
- The performance can be lower as long as the Declaration of Performance of the used product is adapted.

Pending questions:

- How to assess that the technical performance of a product is still the same after several decades? The remaining useful service life should be determined after the first service life.
- If the current standards are not well fitted to test reused products, an alternative standard is probably needed with dedicated rules on how to assess essential characteristics.

- A distinction should be made between reused products (e.g. 'old' DoP available, and product within Reference Service Life: no new assessment needed versus a product with unknown origin/use history: full assessment needed when use is directly related to safety...) (e.g. a steel beam, with a fatigue history)
- How to adapt the existing standards?