



Enterprise Directorate-General

**EVALUATION OF
THE SYSTEM OF EUROPEAN TECHNICAL
APPROVALS IN THE FRAMEWORK OF THE
CONSTRUCTION PRODUCTS DIRECTIVE**

FINAL REPORT

DG ENTERPRISE / G-5

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GLOSSARY

The following abbreviations are used in this report:

ABs:	EOTA Approval Bodies
AoC:	Attestation of Conformity; refers to the CPD system for attesting the conformity of construction products to European technical specifications
CEN:	Comité Européen de Normalisation
CPD:	Construction Products Directive (Directive 89/106/EEC)
CUAP:	Common Understanding of Assessment Procedures
EC:	European Commission
EFTA:	European Free Trade Association
EN:	European Standard
EOTA:	European Organisation for Technical Approvals
ETA:	European Technical Approval
ETAG:	European Technical Approvals Guideline
EU:	European Union
hEN:	harmonised European Standard
GNB:	Group of Notified Bodies
M&TA:	Manufacturers and Trade Associations
MS:	Member States
NB:	Notified Body for AoC tasks (i.e. certification, inspection or testing bodies)
SCC:	Standing Committee on Construction (CPD, Article 19)

1. EXECUTIVE SUMMARY

This evaluation of the system of the “European Technical Approvals” (ETAs) has been performed as developments in the area of European Technical Approvals since the creation of EOTA in 1991 and in the practices and policies of the European Commission, make it appropriate to examine the system of ETAs in order to determine whether they allow for the effective implementation of Community policy in the construction products sector.

An independent evaluation has not yet been performed, and the current Framework Agreement with EOTA expires in October 2004. Since its creation, EOTA has undertaken the elaboration of important technical documents in many areas not covered by harmonised standards and has received substantial financial support from the Commission.

The output of this evaluation may be a useful element in the broader context of the practical implementation of the Construction Products Directive (89/106/EEC) in the heavily regulated construction products sector. The main objective is to assess how effectively the ETA system corresponds to the objectives of the CPD for the implementation of the Internal Market in the construction products sector. Any findings and recommendations may serve as input for a review of Directive 89/106/EEC, the Framework Agreement with EOTA and the EOTA Common Procedural Rules (Commission Decision 94/23/EC).

The evaluation was carried out under the leadership of Unit G-5 of the Enterprise Directorate General of the European Commission and was based on a desk analysis of available information and on a survey realised through questionnaires addressed to the regulatory authorities of the Member States, to EOTA Approval Bodies and to manufacturers of construction products and their trade associations.

It must be underlined that we are still in the initial phase of the implementation of the CPD with a relatively small number of standards (20% of the total necessary) and a few European Technical Approvals. Therefore the experience of all partners in the implementation of the ETA system is rather limited. The findings and the recommendations of the present evaluation will contribute to ameliorating the ETA system. It is however suggested to undertake a similar evaluation exercise in 5 years time. **The findings of the above survey lead to the following main conclusions:**

- The ETA system is perceived as being slow, complex and expensive and the overall efficiency of the system should be improved. This is a serious issue because in a system designed to cover innovative products a long and expensive approval procedure (particularly for SME) is far from ideal and might be detrimental to the efficiency of the market.
- The quality and consistency of ETAGs and CUAPs needs improvement and simplification. The complexity and the extent of product assessment create concerns to the manufacturers. SMEs are worried about the cost of ETAs.
- Manufacturers request more participation in the EOTA Working Groups to increase transparency of EOTA procedures, but issues regarding confidentiality and fairness of treatment concerning competing products must be assured.

- Member States need also to ameliorate their performance and to promote the ETA system.

The findings from the analysis of the available information confirm the above conclusions and lead to the following additional conclusions:

- The formulation of certain provisions in the CPD does not allow for the effective and coherent transposition of the directive in all Member States concerning basic issues for ETAs.
- Although the CE marking is now possible for several ETA Guidelines only the Guideline on Metal Anchors resulted in a number of ETAs. Important delays are also encountered in the issuing of ETAs without Guidelines. This is due to the fact that the implementation of the ETAGs is not clearly made obligatory by the CPD and that manufacturers are not convinced that the benefits will surpass the costs.
- The ETA system is dominated by a few Approval Bodies from only 3 Member States. Approval Bodies of the other Member States have attracted only a few of manufacturer's applications and have issued only a very small number of ETAs.
- Member States need to ameliorate their internal consultations with their nominated ABs. Most of the Member States have not published the ETA Guidelines in their language(s) although this is required by CPD.
- The EOTA accounts do not seem to be a source of particular concerns. The Commission's practise in EOTA financing (supporting mandates and a diminishing structural support in the past) is in line with the requirements of the new financial regulations.
- Only a very small number of manufacturers (less than 30) have received ETAs till now (70% concerning metal anchors for concrete). For this reason the impact of the ETA system in the implementation of the Internal Market is for the moment very limited.

A detailed presentation of the conclusions of the evaluation can be found in chapter 8 of the present report.

Taking into account the findings of the evaluation, the evaluation team has proposed certain recommendations in order to make the ETA system faster, simpler, more affordable for the producers and to increase its effectiveness and transparency on the basis of the existing provisions of the CPD. Recommendation have also been formulated concerning necessary amendments in order to clarify certain provisions of the CPD and to achieve a unique and coherent transposition of the directive in the Member States.

The main recommendations are as follows:

The Commission, Member States, EOTA and CEN should use as much as possible written consultation procedures and their restricted access websites and e-mails in order to speed up the necessary consultations.

CEN should shorten the CEN/TCs consultation period and reply precisely on the capability of the CEN/TCs to elaborate a harmonised EN within a certain timetable.

The **Commission Services**:

- should propose an amendment of the Directive 89/106/EEC in order to clarify the obligatory character of the CE marking, the status of the ETA Guidelines and to impose the route to ETAs for products not covered by harmonised ENs. The criteria for the nomination of the EOTA ABs should also be clarified.
- should consult CEN on new EOTA requests only where this is really necessary,
- should examine the possibility to allow the issue of ETAs if no hEN are envisaged within a reasonable time (e.g. earlier than 5 years);
- should consider to allow purely voluntary product performance aspects to be covered in a voluntary addendum to the ETAs and to request UEAtc to refrain from approval activities in the regulated areas;
- provide EOTA with all necessary information concerning financing possibilities in the appropriate time in order to allow to EOTA to prepare the necessary financing requests.

EOTA / Approval Bodies should:

- simplify the ETAGs and stress to manufacturers the possibility to use the agreed NPD option (No Performance Determined).
- assure a harmonisation between the existing national regulatory requirements in the CUAPs;
- assure that the assessment testing foreseen in ETAGs / CUAPs is defined taking into account the cost as a principal issue; serviceability aspects should be kept to a minimum;
- shorten substantially the ETAG and CUAP elaboration period as well as the time necessary to issue ETAs on the basis of the adopted ETAGs / CUAPs;
- organise the exchange of experience and know-how between the EOTA Approval Bodies in order to increase the number of ABs able to issue ETAs in certain areas;
- send the adopted finalised CUAPs to the Commission for the information of the regulators and market surveillance authorities of the Member States;
- make efforts to assure a representative participation of the industry in the technical work and that the confidentiality of product technical details and the fairness of treatment of competing products will be respected.
- finance the expenses for the necessary increase of the personnel in the EOTA Secretariat by the fees and contributions of the EOTA ABs.

Member States authorities should:

- co-operate fully with their EOTA Approval Bodies in order to assure constructive and not obstructive consultation (delays) in technical work;
- disseminate information to construction products manufacturers and their associations on the obligations / possibilities offered by the ETA system;
- translate the adopted ETAGs in their language(s), make them available to the interested parties and incorporate them in their regulatory system;

- re-examine the compliance of their Approval Bodies with the criteria of the CPD and clarify their competence concerning the various product families;
- oblige Approval Bodies not to issue national approvals as soon as for those products ETAs are possible;
- avoid that executives from of EOTA Committees or EOTA Approval Bodies act as Head of Delegations in the SCC or as members of the Preparatory Group (for EOTA related questions).

A detailed presentation of the recommendations can be found in chapter 9 of the present report.

Depending on the objectives, these recommendations could be incorporated by the responsible Unit of DG Enterprise (G-5) in the proposals to amend the Directive 89/106/EEC, the new Framework Agreement between the Commission and EOTA and the Commission Decision 94/23/EC on the procedure to issue ETAs¹.

¹ It should be mentioned that the DG ENTR/G-5 and EOTA (on the basis of the results of the Antwerp seminar in September 2002) are already considering actions necessary in order to cope with several points covered by the above recommendations and progress is being made in a number of issues.

2. INTRODUCTION

This evaluation has been performed given the necessity for considering the effectiveness of the ETA system in the framework of the CPD. The results of the evaluation give rise to a number of recommendations to increase the effectiveness of the ETA system. These also include aspects which are not directly related to the ETA system but have been considered to have an effect on its efficient running.

The evaluation has been carried out under the management of unit G5 of the Directorate General Enterprise, with the co-operation of Units G3, G4, R1 and R5².

3. THE REASONS FOR THE EVALUATION, AND ITS OBJECTIVES

The reasons for this evaluation of the system of the “European Technical Approvals” (ETAs) are as follows:

- (1) Developments in the areas of European technical approvals since the creation of EOTA in 1991 and in the practices and policies of the European Commission, make it appropriate to examine the system of ETAs in order to determine whether they allow for the most effective implementation of Community policy in the construction products sector;
- (2) An independent evaluation has not yet been performed;
- (3) the current Framework Agreement with EOTA expires in October 2004;
- (4) Since its creation, the European Organisation for Technical Approvals (EOTA) has undertaken the elaboration of important technical documents in many areas not covered by harmonised standards and has received substantial financial support from the Commission;
- (5) The output of this evaluation may be a useful element in the broader context of the practical implementation of the Construction Products Directive (89/106/EEC) in the heavily regulated construction products sector.

The main objective of the evaluation is to assess how effectively the ETA system corresponds to the objectives of the CPD for the implementation of the Internal Market in the construction products sector. Any findings and recommendations may serve as input for a review of Directive 89/106/EEC, the Framework Agreement with EOTA and the EOTA Common Procedural Rules.

In view of the above, the key evaluation questions considered were:

- Is the EOTA organisation working effectively?

² The project manager was Georgios KATSARAKIS (ENTR G5), the steering committee/evaluation team also included, Jean Luc ABRIVARD (ENTR R1), David EARDLEY (ENTR G3), Daniel HANEKUYK (ENTR G4), Sara HECTOR (ENTR R5) and Andrew WILLIAMS (ENTR R5).

- How does the ETA system perform?
- Is the EOTA organisation carrying out the tasks entrusted to it in the CPD and the Framework Agreement, as well as in accordance with the EOTA Common Procedural Rules?
- Is the financial support to EOTA compatible with the new financial regulations?

4. THE CONTEXT AND FRAMEWORK OF THE EVALUATION

4.1. The Construction Products Directive (89/106/EEC)

The Construction Products Directive (CPD) was adopted within the framework of Community legislative measures designed to achieve the Internal Market in the construction products sector. The Directive applies to all regulated construction products that are permanently incorporated in construction works (e.g. buildings, roads, bridge, water supply networks).

The construction products sector is important for the EU, with a total annual turnover of around 160 billion EURO (3% of the GDP of the EU), and it employs around 2.5 million persons.

The CPD is different to the other “New Approach” directives. In a “classic” New Approach directive the Essential Requirements are applied directly to the product and the conformity of the product to a European Harmonised Standard (EN) confers a presumption of conformity of the product with the relevant Essential Requirements of the Directive that are covered by that standard. In the CPD the Essential Requirements apply to construction works (e.g. buildings, bridges, roads, water supply networks) and only indirectly to the construction product itself. In the case of the CPD the conformity of a construction product with the relevant European specification(s) confers a presumption of fitness for the intended use.

Products that are fit for their intended use allow construction works to comply with the Essential Requirements of the CPD (provided that the works are properly designed and built). The provisions concerning the design and the construction of the works remain in the responsibility of the Member States.

If the construction product complies with one of the following specifications, it is considered "fit for the intended use" and can therefore be placed on the EU market bearing the CE marking:

- harmonised European standards (hENs), or
- European Technical Approvals (ETAs), or
- national specifications recognised at European Level.

By implementing the CPD the Internal Market for construction products is achieved gradually for each product family, depending on the elaboration of the above technical specifications.

4.2. The system of ETAs under the CPD

ETAs are foreseen to cover products for which harmonised ENs cannot be elaborated or cases where the manufacturer deviates from an existing harmonised EN. The ETA is a document attesting that the construction product of a specific manufacturer has been assessed and found fit for use.

ETA Guidelines are considered necessary in cases where ETAs are expected to cover a number of similar products that are produced by many manufacturers. In such cases Guidelines are developed to ensure common product assessment rules for these products at a European level. These Guidelines are called ETA Guidelines (ETAGs), and are elaborated by EOTA under a mandate from the Commission.

For specific products, which are manufactured by a limited number of manufacturers, ETAs can be issued by the Approval Bodies without Guidelines (CPD art 9.2). In this case the Approval Bodies need to achieve a common understanding with respect to how to assess the fitness for use of the product. This agreement is recorded in a document issued by EOTA and called CUAP (Common Understanding of Assessment Procedure). The CPD does not foresee a mandate from the Commission in this case.

EOTA is responsible for the elaboration of the ETAGs (under a mandate from the Commission) whilst ETAs are issued by the EOTA Approval Bodies.

4.2.1. The European Organisation for Technical Approvals (EOTA)

EOTA is made up of Approval Bodies designated by their respective Member States to issue European Technical Approvals (CPD, Annex II). EOTA members also include Approval Bodies designated by EFTA States that have signed the EEA agreement, and is expected to expand also to enable Approval Bodies to be appointed by candidate countries with a PECA agreement containing an annex on construction products.

EOTA is an International Association under Belgian Law. Its Statutes are covered by a Royal Decree. EOTA cannot refuse Approval Bodies nominated by Member States and cannot accept as members, bodies other than those designated by Member States to issue ETAs.

EOTA includes of the following organs:

- A Plenary Meeting (all Approval Bodies);
- An Executive Commission (all spokespersons nominated by national authorities);
- A Technical Board (all Approval Bodies);
- Working Groups (to elaborate ETA Guidelines) and Project Teams (to deal with horizontal or ad hoc questions) under the responsibility of the TB.
- A Central Secretariat (in Brussels)

Decisions concerning technical issues are taken by consensus by the Technical Board and ETA Guidelines are approved via a qualified majority within the Executive Commission (the political body of EOTA). Observers from associations of manufacturers, contractors,

engineers, participate in the meetings of the TB and of the WG. Observers from candidate countries participate in the meetings of all EOTA bodies.

The Plenary Meeting elects the EOTA Officers (President, Treasurer and Chairman of the Technical Board) for two years with the potential for a further two-year extension. EOTA applies a rotation of tasks between its Members as far as possible and tries to ensure that EOTA officers are elected from the EOTA Approval Bodies that have not held these positions before.

EOTA personnel consists of the Secretary General and one secretary. No assistant has yet been hired although the need for such an assistant was identified by EOTA some time ago.

In order to establish the terms of the relationship between EOTA and the Commission, a five-year Framework Agreement was set up between the European Commission and EOTA in 1994. A second Framework Agreement was concluded in October 1998, which will end in October 2004.

4.2.2. The role of the EOTA Approval Bodies

EOTA Approval Bodies are designated by national authorities to co-operate within EOTA in order to issue ETAs. The EOTA ABs must:

1. satisfy the requirements of the CPD. In particular they must be able to:
 - assess the fitness for use of new products on the basis of scientific and practical knowledge;
 - take impartial decisions in relation to the interests of the manufacturers concerned or their agents; and,
 - collate the contributions of all the interested parties in a balanced assessment;
2. apply the Common Procedural Rules for the preparation and the granting of ETAs;
3. afford each other all necessary support (CPD Annex II.4).

4.2.3. Procedures for issuing ETAs.

The Common Procedural Rules defining the procedures for the manufacturers' applications, and the issuing of ETAs have been published as Commission Decision 94/23/EC. The basic steps for these procedures are shown in the flowchart in Annex VII (which also indicates the average time each step takes).

4.2.4. Financial Aspects concerning the ETA system

EOTA receives financial support for the elaboration of the ETAGs under mandates from the Commission and from the EFTA Secretariat. The total cost of the ETAGs is mainly (80%) covered by the EOTA Approval Bodies and the remaining 20% is covered by the Commission ((95%) and the EFTA Secretariat (5%). EOTA has also received a declining "structural support" from the Commission to enable to contribute to its establishment. This

support was suspended in 2001 in view of the evaluation, which at that time has been considered necessary.

13% of the financial support provided for the elaboration of ETAGs is kept by EOTA secretariat to cover overheads and the rest is paid to the AB holding the secretariat of the relevant WG, the convenor and the Approval Bodies which are members of the Project Team, in order to cover the cost of meetings, travel, translation, etc. for the elaboration of the ETAGs. The details of the financing conditions are foreseen in the Framework Agreement.

EOTA has also received financing from the Commission (TAIEX) for seminars in candidate countries concerning the ETA system.

The annual expenditure of the EOTA secretariat is about 500,000 EURO.

Budgetary commitments made for EOTA by DG III and later by DG Enterprise are shown in Annex VI of this report.

The main income of the EOTA secretariat comes from members' fees. This can be broken-down as follows:

- a fixed fee per member (7,900 EURO for 2003),
- a fee according to the weighting factor of Member States and
- a fee for every ETA issued (200 EURO).

The income from the fixed fee and the fee from the weighting factor are around 376,000 EURO in total. The weighting factor fee amounts to about 25% of this total. This income covers the salary of the Secretary General and its secretary, office rent, travel cost office equipment and other operating expenses. The accounts show an accumulated deficit of 32.000 EURO at the end of the year 2002.

Applicants do not contribute to the elaboration of the ETA Guidelines financially, because the cost is financed by the Approval Bodies, the Commission and the EFTA Secretariat.

With regard to the cost of the ETA the CPD (Annex II.6) foresees that “the costs arising from the approval procedure shall be paid by the applicant in accordance with national rules”, this means that ABs are free to decide their own prices

It should be noted that in the case of ETAs the product has been tested by the ETA Approval Body during the ETA issuing procedure. This means that manufacturers may experience significant cost saving in the second phase (as the expensive initial type testing does not need to be repeated).

4.2.5. Other actors affecting the ETA system

CEN / CENELEC

CEN/CENELEC are the European organisations, which elaborate the harmonised European standards (hENs) required for the implementation of the New Approach Directives, under mandates from the Commission. Mandates under the CPD require CEN/CENELEC to elaborate harmonised European standards as far as practicable in performance terms. This

performance-based approach allows a wide range of products to be covered by the harmonised ENs under the CPD.

UEAtc

UEAtc is an Association of European Approval Bodies (including those of many candidate countries) which has existed for 30 years. It issues technical approvals for construction products and applies the mutual recognition of national approvals between the UEAtc members. These national approvals refer not only on regulatory aspects but also on “voluntary aspects”. The CPD does not refer to UEAtc at all, although it existed before the adoption of the CPD. It must be noted that all EOTA spokes-bodies (except those of Austria, Greece and Luxembourg) are also members of UEAtc.

National Approval Bodies

Many EOTA Approval Bodies are also competent to issue national approvals in their respective Member States. Some of these bodies issue a large number of national approvals every year.

Notified Bodies under the CPD

There are three different types of bodies (certification bodies, testing laboratories and inspection bodies), which are expected to provide services to manufacturers in accordance to the procedures foreseen in the relevant Commission Decision on Attestation of Conformity procedures. They are notified by the Member States (CPD Art. 18) and have to comply with the criteria of the Annex IV of the CPD. Member States are responsible for verifying the fulfilment of these criteria.

It must be noted that about 70% of the EOTA Approval Bodies are also active as notified bodies for attestation of conformity tasks under the CPD (initial type testing, certification of the product or of the factory production control).

5. THE SCOPE OF THE EVALUATION AND METHODOLOGY USED

The main objective of the evaluation has been to assess the effectiveness of the ETA system. The evaluation was based on:

- A survey of construction products manufacturers, Member States' regulators and EOTA Approval Bodies. The target population included manufacturers who have received ETAs and manufacturers associations covering certain product families. The survey was distributed by e-mailing three separate models of questionnaire to three groups of potential respondents. The surveys also prompted respondents to make comments in certain cases.

One questionnaire was sent to manufacturers and trade associations (M&TA), one to Member States (MS) and one to EOTA Approval Bodies (AB). These documents (see Annex I for blank examples of each questionnaire) were distributed by e-mail in April 2003. It should be noted that trade associations were asked to circulate the relevant questionnaire amongst their members in order to increase the response size. ABs were also asked to circulate the questionnaire addressed to manufacturers amongst the manufacturers which have applied to the corresponding AB for an ETA.

The M&TA and MS questionnaires were essentially similar (though that to Member States posed more questions), especially in regard to questions 3, 4, 5 and 6 (according to the numbering sequence of the M&TA questionnaire). Question 6 (as per numbering sequence of the M&TA questionnaire) was in fact designed to verify the perceived fulfilment of EOTA's objectives (the 5 elements to this question cover the 5 objectives).

NB: As explained more fully in part 6.3 (below) the Approval Bodies did not, in the end, respond directly to the Commission but in fact to EOTA who collated and edited the responses before sending them to DG Enterprise.

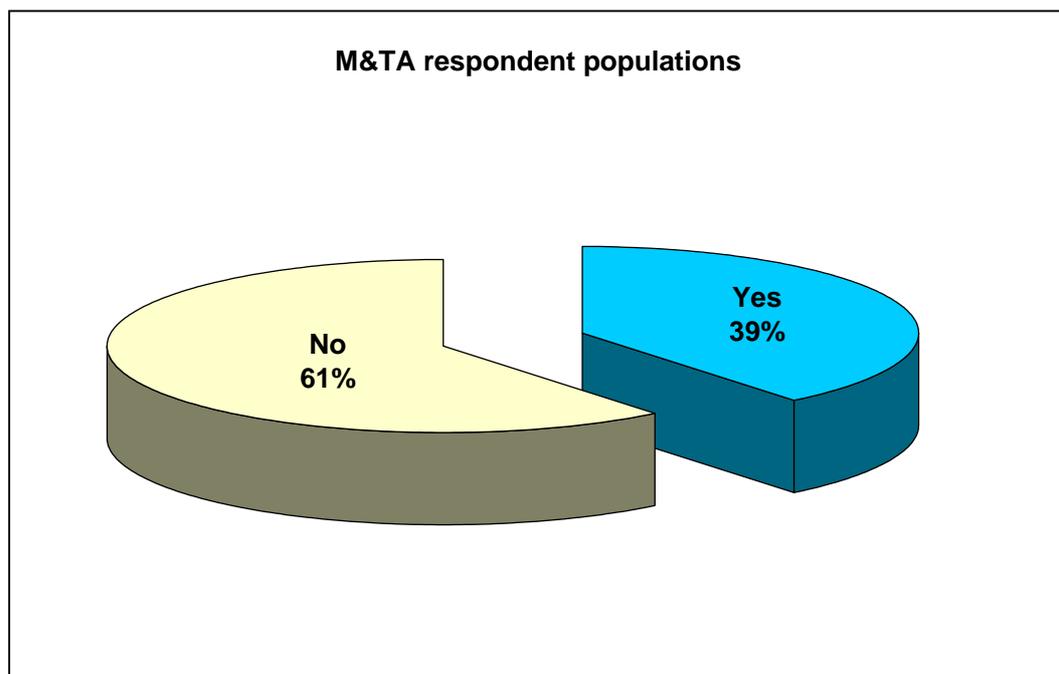
- An analysis of existing information including Directive 89/106/EEC, the Framework Agreement between EOTA and Commission, EOTA Common Procedural Rules, EOTA Statutes, EOTA website information, Commission mandates and financial support to EOTA, documents of the Standing Committee on Construction, official complaints, letters from manufacturers, results from Antwerp seminar. This analysis served also as a basis for preparing the necessary interviews and the survey of producers, EOTA Approval Bodies and Member States regulators.
- 2 Interviews with the officers of EOTA. These interviews took place during visits by the Evaluation Team to the offices of EOTA. The aim was to find out the opinions of the EOTA executives, because their position plays an important role in the effectiveness of the system.

6. FINDINGS & RESULTS OF THE SURVEYS

6.1. Findings and results of the M&TA survey

6.1.1. Overall assessment of M&TA survey findings & results:

56 completed replies to the survey of manufacturers and trade associations (M & TA) were received.



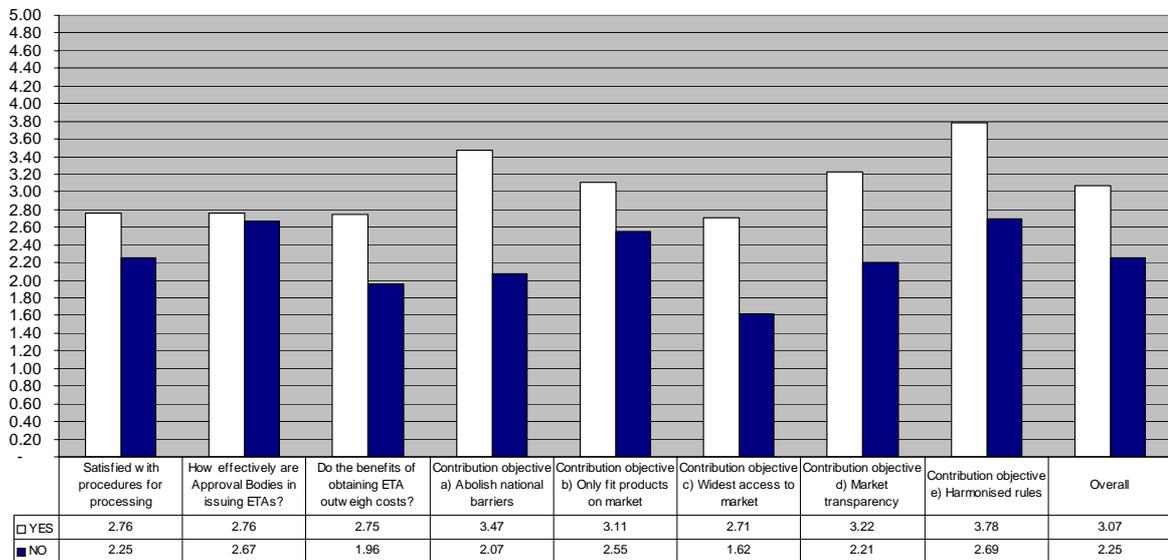
NB: in the graphs "Yes" means those responses from manufacturers who have applied for an ETA, while "No" refers to the responses of those who have not.

22 respondents to this survey stated that they had applied for an ETA, while 34 had not. This represents a respondent population split as shown in the diagram above. A detailed breakdown of the overall result of this survey is included in Annex II.

The survey demonstrates a mixed overall assessment of ETA by M & TA. They gave an average mark of 2.59 out of 5 for all the questions where the respondents had to mark the various questions in this manner. The lowest mark (2.14 on average) was given for question 6c and the highest (3.08 on average) for question 6e. The correlation of the two groups responses over all the questions was 15%, suggesting that the populations were essentially different.

As shown in the graph above there was a marked variation between the responses of those who had applied for an ETA and those who had not. In most cases those who had applied for an ETA gave more positive results when compared to those who had not. In fact the average mark (all questions combined) given by those who had applied was 2.87 out of 5, while the average mark of those who had not was 2.25. This divergence will be examined in more detail with regard to the response to each question, and is demonstrated in the graphs that accompany each question (where "Yes" = those who have applied for an ETA and "No" those who have not).

Graph showing the variation in the average ratings per question between the manufacturers/trade associations that have applied for an ETA and those that have not



For all questions, except questions 4 and 6, those that marked from 1 to 3 (lowest to middle ranking) were asked to explain how and why that aspect of the ETA system could be improved. **It should be stressed that comments/suggestions are therefore predominantly from those who rated the issue low to medium. This means that their comments, though constructive, tend to highlight perceived problems.**

6.1.2. Findings & results regarding procedures for processing of applications

M&TA survey question 2 was: "How satisfied are you with the procedures for processing of application for ETA's?"

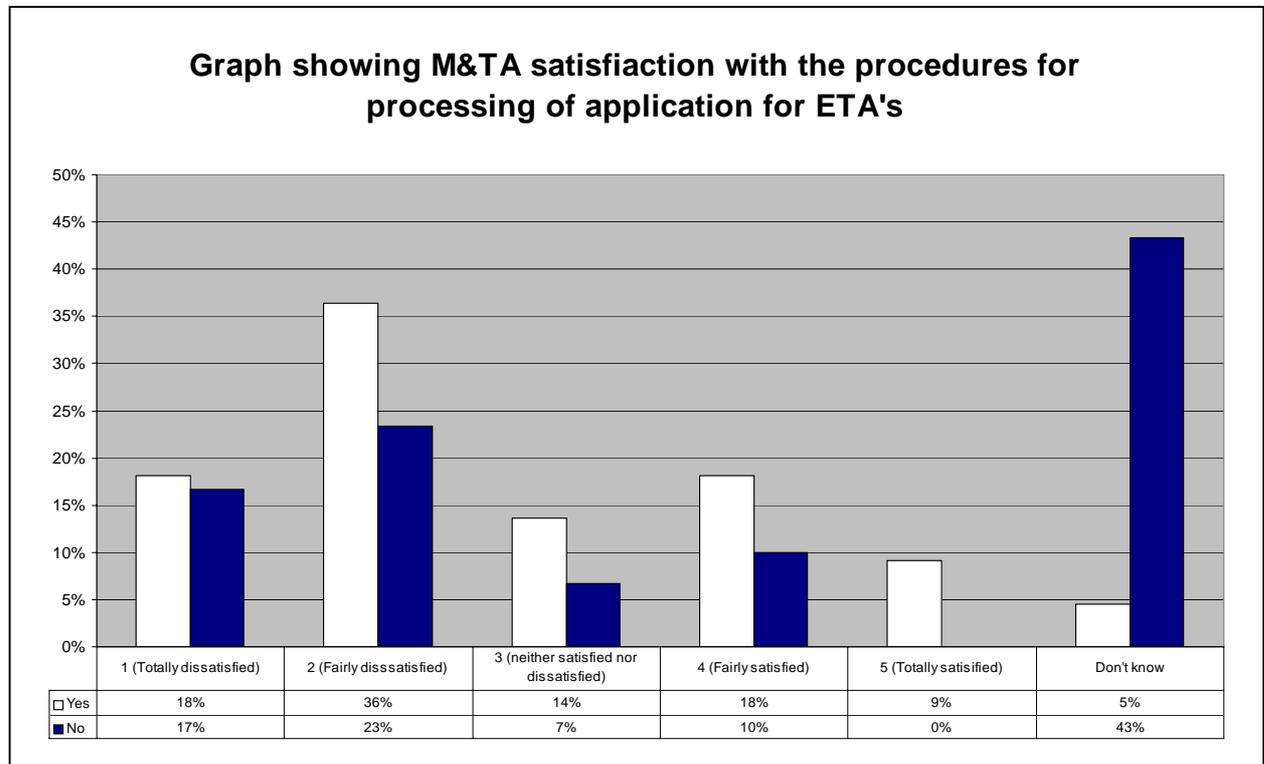
Respondents were asked to rate their responses from 1 (totally dissatisfied) to 5 (totally satisfied). 52 respondents answered this question, though 14 (27%) answered "Don't know". 17% rated this 1 (totally dissatisfied), 29% rated this 2, 10% 3, 13% 4, and 4% 5. Those who had applied for an ETA expressed an average satisfaction rating of 2.50 out of 5 (or 50%).

Comments arising from this question highlighted several problem areas (which it should be stressed, is to be expected as comments were only solicited from the questionnaire where respondents marked the question low - 1 to 3 - only).

Looking in detail at the comments it was noted that half a dozen or so respondents stated that the system is too slow, in fact a couple of respondents had experienced procedures lasting years. A couple of correspondents also felt to be too expensive – especially for small companies (some respondents stated that the system was particularly ill suited to the needs of SMEs), and it was felt that this might even have a negative impact on innovation.

Several respondents also stated that they found the too complex and burdensome, the guidelines in particular being too detailed – one respondent compared them to instructions for using a space rocket, and it was felt that the procedures needed to be made more transparent and communicative. Certain countries were felt by a couple of respondents to dominate the system, while others thought that test institutes did so.

The purpose of the system was questioned by some respondents as they felt that if an ETA does not guarantee acceptance onto the market then the system was pointless., In their

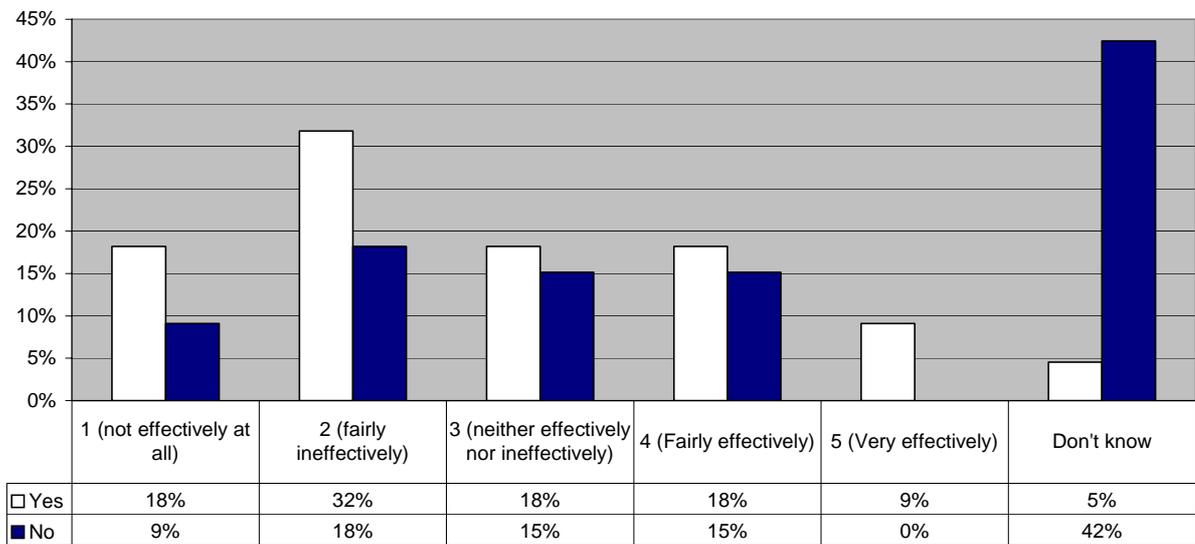


comments to this question several respondents cast doubts on the value of the system in opening markets to products. This was felt, *inter alia*, to be due to the multiplicity of national requirements – and the ETA writers’ lack of familiarity of this situation.

6.1.3. Findings & results regarding effectiveness of ABs in issuing ETAs.

M&TA survey question 3 was: "Given the existing regulatory framework and related procedures, how effectively do you consider that the Approval Bodies are in issuing ETAs?"

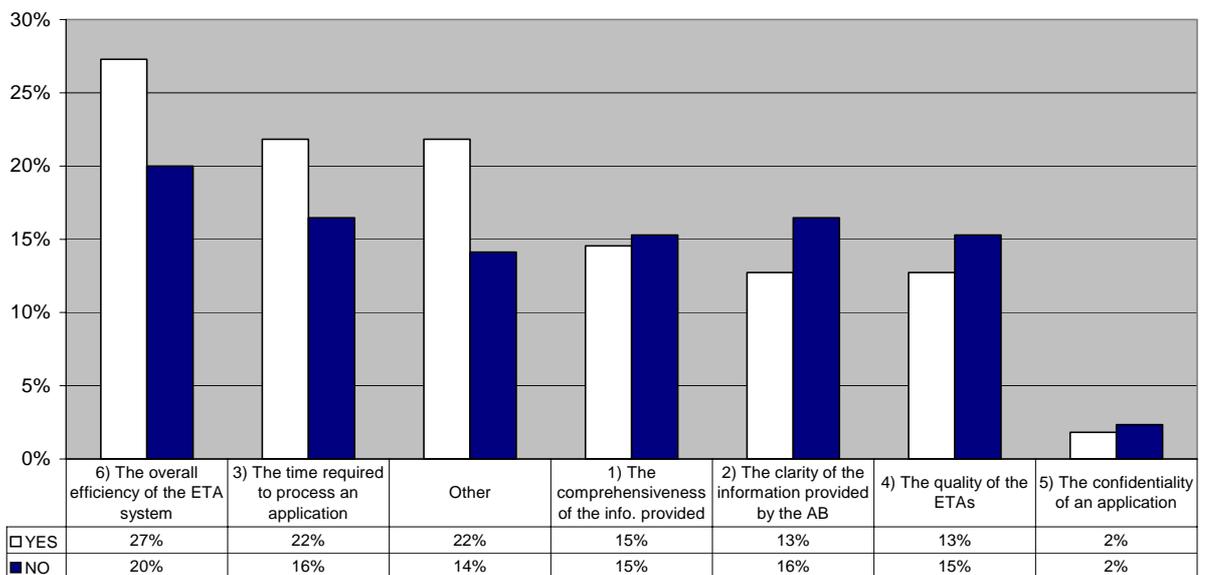
Graph showing M&TA views on the effectiveness of Approval Bodies in issuing ETAs, given the existing regulatory framework and related procedures.



Respondents were asked to rate their satisfaction with the procedures for processing of application for ETA's from 1 (not effectively at all) to 5 (very effectively). 55 respondents answered this question, though 15 (28%) answered "Don't know". 13% rated this 1 (not effectively at all), 24% rated this 2, 16% 3, 16% 4, and 4% 5. The average rating by those who had applied for an ETA was 2.55 out of 5. The ratings by this group ranged from 1 to 5: 40% of those who had applied for an ETA rated it 1 or 2 out of 5, yet 28% of these respondents rated it above 3 out of 5 (4 or 5).

Comments on the responses to this question again covered several problem areas (which, it should be stressed, is again to be expected as comments were solicited by the questionnaire

Graph showing what areas of ETA system M&TA felt should be improved



where respondents marked the question low - 1 to 3 - only).

Some respondents expressed general pessimism about the effectiveness of Approval bodies, and their absence in certain areas. Many respondents stressed the need for better co-operation between the Approval Bodies and industry; this was felt to be sometimes due to the nature of the test bodies.

One respondent criticised articles 9.1 and 10.2 of the CPD, saying that these should specify the necessary scientific and practical knowledge. Another stated that a main body should nominate approval bodies and referee disputes, while another stated there was a pattern of inconsistencies regarding the competencies of ABs.

The length of time needed to obtain an ETA was again criticised (see comments in regard to the previous question), some again cited delays measured in years, and commenting and enquiry times were specifically criticised. The guidelines were also criticised again (see comments in regard to the previous question) as being over ambitious and not pragmatic.

Some respondents felt that there was a variation in quality, fairness and respect of the guidelines by the Approval Bodies, and that some exploited their situation, by being linked to laboratories and therefore keeping them busy. Others acknowledged the fact that there were few entities across the EU competent to act as Approval Bodies or laboratories for ETAs, but this expertise was lacking in some countries.

6.1.4. Findings & results regarding areas for improvement

M&TA survey question 4 was: "Please indicate whether you think that any of the following aspects of the ETA system should be improved?"

Unlike most of the other questions respondents were not asked to mark their response to a question of effectiveness or satisfaction, but were asked where certain aspects of the system should be improved. Six options were given (each respondent could choose one, some, or all of these options). The option "other" was also available, and respondents were asked to explain what was meant when this option was chosen. It is important to note that respondents were not limited to one response to this question, but were able to choose one, several or even all options (including "other").

The graph above shows the response to this question in descending order, as per the opinion of those respondents that have applied for an ETA.

The six defined options are shown in the following table – the percentage of respondents that chose each option is stated after each case, firstly overall, then of those who had applied for an ETA and then for those who had not:

This shows that more than the issue that most respondents that had applied for an ETA (27% of the relevant responses to this question) should be improved is the overall efficiency of the ETA system. It should be noted that this is a larger majority than those that have not applied for an ETA assert (20%).

Another area that many that had applied for an ETA felt needing improvement is the time required to process an application – the result was identical for both groups in this case.

Significant numbers of respondents (also believe that the a) comprehensiveness or b) clarity of the information provided by the Approval Bodies, and c) the quality of the ETAs could be improved.

Other areas that are felt to need improvement	%
Guidelines too complicated	36%
Cost and cost/effectiveness issues	25%
Transparency should be improved	11%
The fact that ETAs have to be bought	6%
Public awareness too low	6%
Too many different ETAs for same type of product	6%
No point if does not guarantee market acceptance	6%
ETAGs written by Approval bodies and Lab. staff	6%

Few respondents believe that the confidentiality of an application is an area that needs improving

A large number of respondents also signalled that other areas need improvement. With regards to option "7) Other" for the improvement of the ETA system 17 responses/comments/suggestions were made. Of these 5 were made by entities that had applied for an ETA and 12 by entities that had not. The largest "other" area suggested for improvement was the complexity of the guidelines, followed by the costs of obtaining an ETA. These responses were consistent with the comments regarding the previous two questions, as was a comment that the system was too complex and expensive.

The other comments, although they were only made by one or two respondents, were also interesting. Some felt that the system should be more transparent, while others objected to having to buy versions of documents in order to get them in their mother tongue; some also stated that public awareness needed to be enhanced. One comment was made to the effect that if an ETA did not guarantee market acceptance then the system was pointless. One respondent said that if ETAs does not imply market acceptance then system is pointless, while another stated that Member States do not promote the ETA system.

6.1.5. Findings & results regarding costs versus benefits

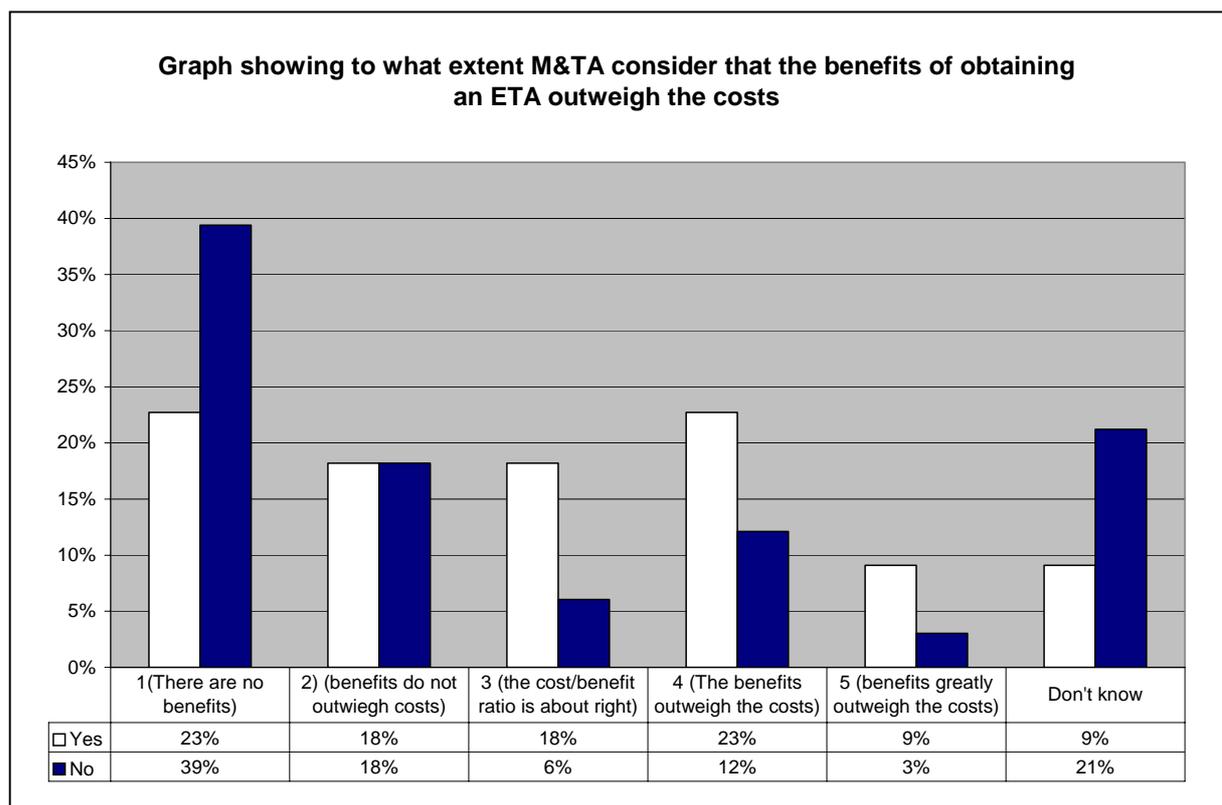
M&TA survey question 5 was: "To what extent do the benefits of obtaining an ETA outweigh the costs?"

The total number of responses to this question was 55 out of 56 completed replies. Respondents were asked to rate their reply to this question on a scale of 1 (there are no benefits) to 5 (the benefits greatly outweigh the costs). Interestingly the responses to this question by those who had applied for an ETA are almost identical (statistically speaking) to those for question 2. The average rating by those who had applied for an ETA was 2.5 out of 5 (50%).

Though the ratings by this group ranged from 1 to 5 it should be underlined that 41% of those who had applied for an ETA rated it 1 or 2 out of 5 (no benefit or limited benefit), while 31% of these respondents rated it above 3 out of 5 (4 or 5). It is also important in this case to note that 39% of those respondents who had not applied for an ETA thought there was no benefit in doing so, it could be surmised that this might have therefore been a reason for their not applying. On the other hand, their lack of experience with the ETA system could reduce the lucidity of their judgement.

Comments/suggestions in response to this question covered several issues. Some respondents felt that the fact that other similar approval systems existed meant that ETAs had little added value. Others stated that the costs were such that they prohibited benefits, especially for items with a low unit price. Small companies in particular felt that the system was biased against them as the costs were more easily borne by large companies that are present in several Member States.

One respondent expressed doubts about the number of tests needed and thought that ETA benefits could only outweigh costs if SME's could expect to see benefits. It was pointed out that manufactures were able to satisfy customers with quality products even if they did not have an ETA.



A couple of respondents were critical of EOTA in response to this question, stating that it was not interested in co-operation with industry experts, and that it should not cover areas where industry felt European Standards were needed. Some respondents stated that additional

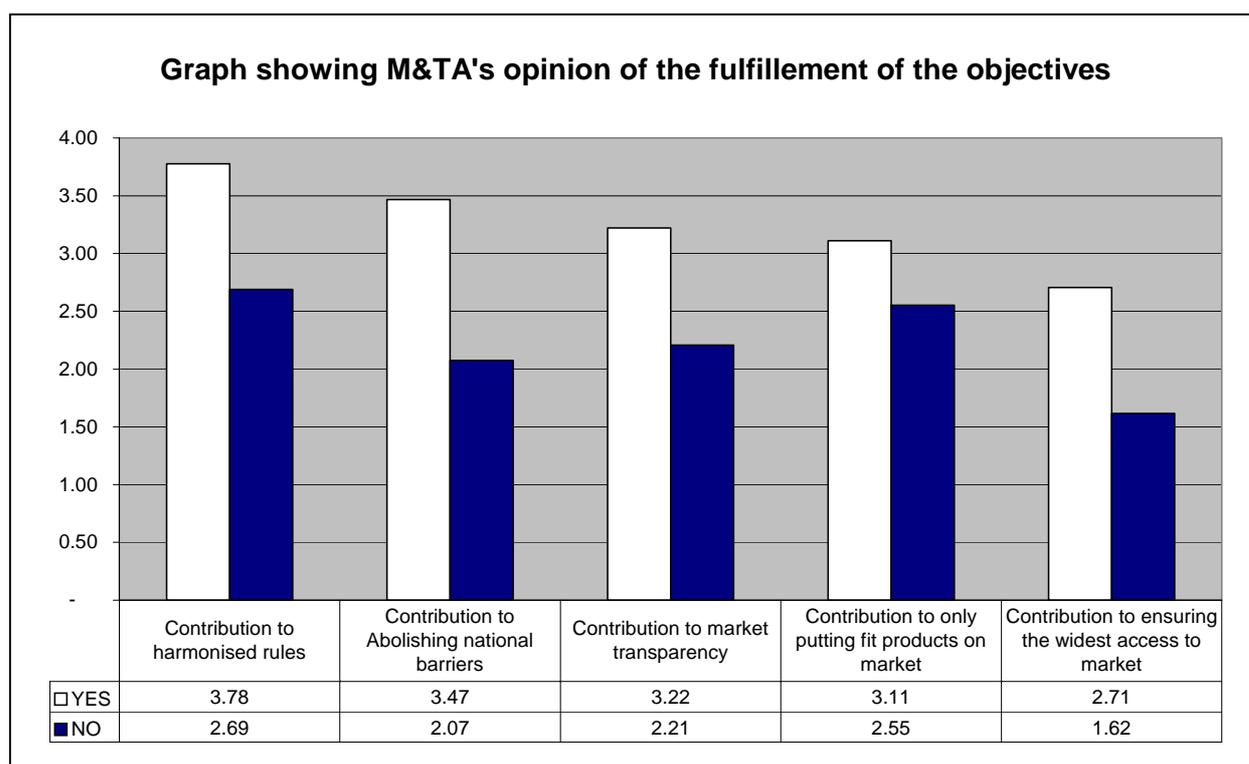
harmonisation in their market was not needed, and ETAs were an extra issue that only added to work, confusion and costs³.

One respondent stated that it was too early to identify the benefits of the ETA system, but there was "pressure" to go through the process. However another felt potential benefits would be present if procedures were simplified and costs were lowered. If a majority of products in a given market had CE markings then there was a market-driven need to obtain one.

On the other hand a couple of respondents felt that the time issue had a potentially serious consequences as products fit for use were expected to have a CE marking in their market (and therefore – if this is not present – customers will assume it is not and will choose other products). A few respondents also felt that a promotional effort was needed, as ETAs were little known amongst European technical and control bodies.

6.1.6. Findings & results regarding the achievement of objectives

M&TA survey question 6 was: "To what extent do you consider that the ETA system contributes to the achievement of the following objectives?"



This question asked respondents to rate the contribution the ETA system makes to achieving it's six objectives on a scale of 1 (no contribution) to 5 (significant contribution).

³ NB: There seems however to be a misunderstanding on their part concerning regulatory requirements and voluntary specifications

Once again the respondents that have applied for an ETA rated the contribution to each objective higher than those who have not. The respondents that have applied for an ETA rated the fulfilment of all objectives as above average, in fact only for objective *c) To afford access to the market for as many manufacturers as possible* did they rate it less than 3 on average (2.71). The highest average rating (3.78 out of 5) by those who had applied was for objective *e) To create the conditions for a harmonised system of general rules in the construction industry*. They also rated quite highly objective *a) To abolish national barriers to trade between EU member states in order to create the internal market for construction products*, at 3.47 out of 5.

Other points to be considered

M&TA survey question 7 was: "Are there any other points you feel the evaluators should take into consideration?"

The final question to manufacturers and trade associations invited them to make textual contributions regarding any other point that they felt should be taken into consideration. Responses under this question covered several areas:

Several respondents urged more involvement by industry in ETA decision-making process, while others urged a general review of the system, and wider consultation across as many companies that would potentially be affected by the system. Simplification of the whole system was felt to be needed, with a focus on quality assurance. National bodies were felt to need more training, and that big companies were too influential.

The need for multiple ETA's in some cases was criticised, and it was suggested that manufacturers (under AB supervision) be able to perform some tests. Safety was also an issue, as lowering them was not felt to be acceptable – especially when competing markets continued to respect higher standards.

While speed and costs were again flagged as being areas needing improvement (being, it was claimed, due to a near monopoly situation) by some respondents, others felt that the system would reduce costs, if the system was valid across all MS.

The maintenance of national barriers despite ETAs was a real concern to several respondents. Some even felt that some MS would require more than ETAs and that private organisations would seek to do this and would in fact be allowed to do so by MS.

6.2. Findings and results of the MS survey

Overall assessment of the MS survey findings

9 completed replies to the survey Member States (MS) were received. This represents a response rate of 60%.

While some of the questions posed included some that were totally or partly the same as those posed to the manufacturers and trade associations (M & TA), Member States were asked several other questions in order to gather further data. For many questions those that marked from 1 to 3 (lowest to middle ranking) were asked to explain how and why that aspect of the ETA system could be improved. **It should be stressed that comments/suggestions are therefore predominantly from those who rated the issue low**

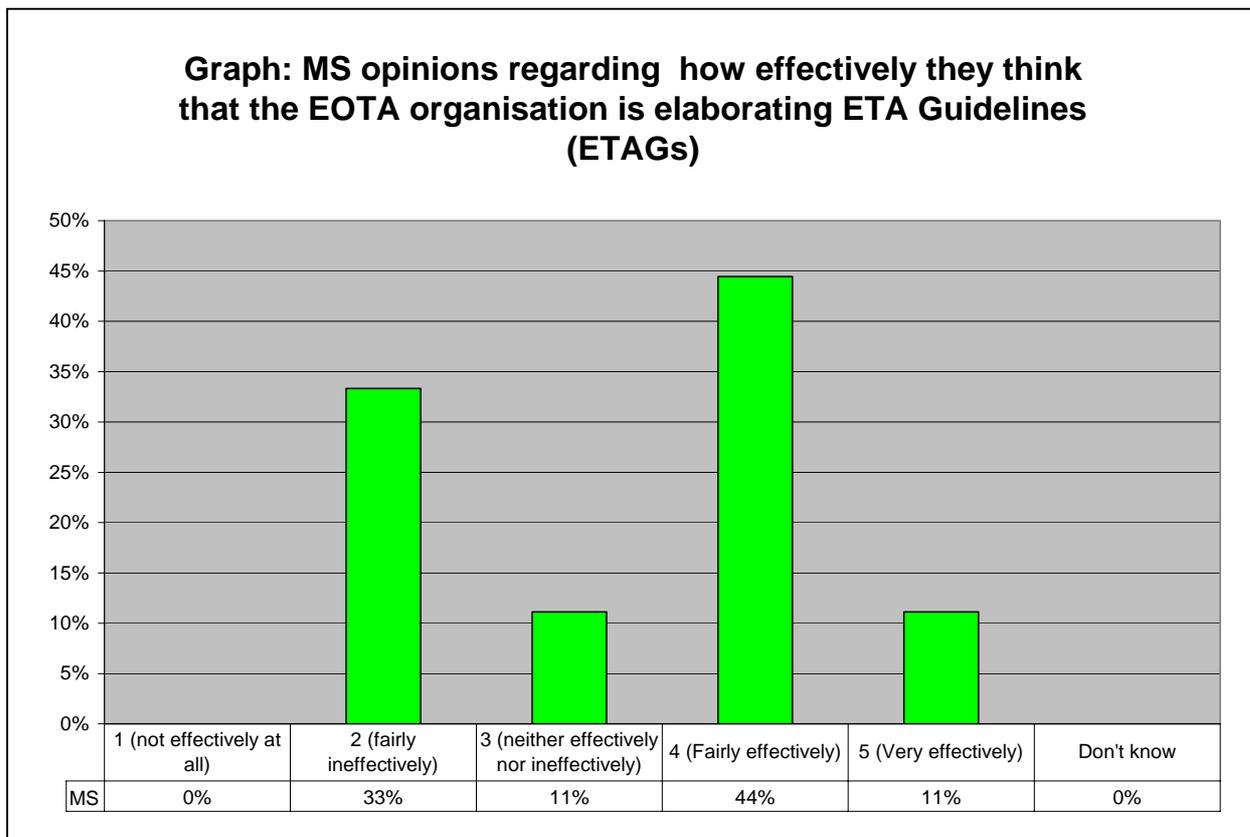
to medium. This means that their comments, though constructive, tend to highlight perceived problems.

Details of the MS survey results can be found in Annex III.

6.2.1. Findings & results regarding the elaboration of guidelines

MS question 1 was: “Given the existing regulatory framework and related procedures, how effectively do you think that the EOTA organisation is elaborating ETA Guidelines (ETAGs)?”

The MS were fairly positive about EOTA’s elaboration of ETAGs. The average rating was 3.33 out of 5 (67%), with 44% of respondents rating this at 4 out of 5 (80%).



Nevertheless in common with the manufactures and trade associations comments by Member States focused on the slowness of the process, as the process is aimed at "innovative" products" it was felt that the time-frames should be as short as possible.

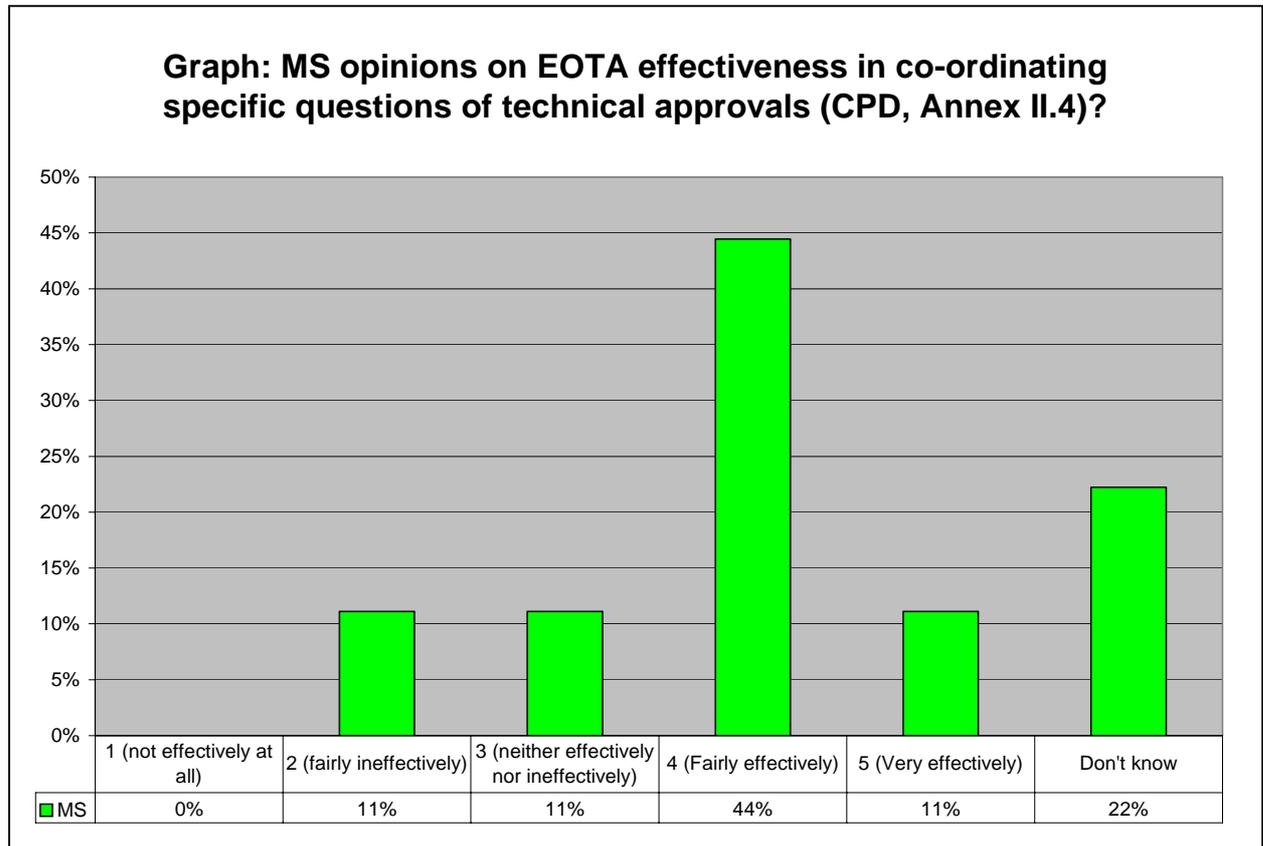
It was felt that EOTA should concentrate on "small" ETAGs. It was suggested that EOTA collect national regulations and then analyse the real need for characteristics covering national regulations. It was then suggested that EOTA negotiate with Member States regarding new test or assessment methods⁴. Finally it was felt that Member States should

⁴ This is actually done in the framework of the elaboration of an ETAG or a CUAP.

amend any conflicting regulations. However it was felt that EOTA has too much of a committee culture, which makes the product too expensive.

6.2.2. Findings & results regarding EOTA co-ordination of technical approvals

MS question 2 was: “How effectively do you think that EOTA is co-ordinating on specific questions of technical approvals (CPD, Annex II.4)?”



MS were also positive about EOTA’s effectiveness in co-ordinating specific questions of technical approvals (CPD, Annex II.4). The average rating was 3.71 out of 5 (74%) – the joint highest rating by MS, with 44% of respondents rating this at 4 out of 5 (80%).

There were no comments made by MS respondents regarding this question.

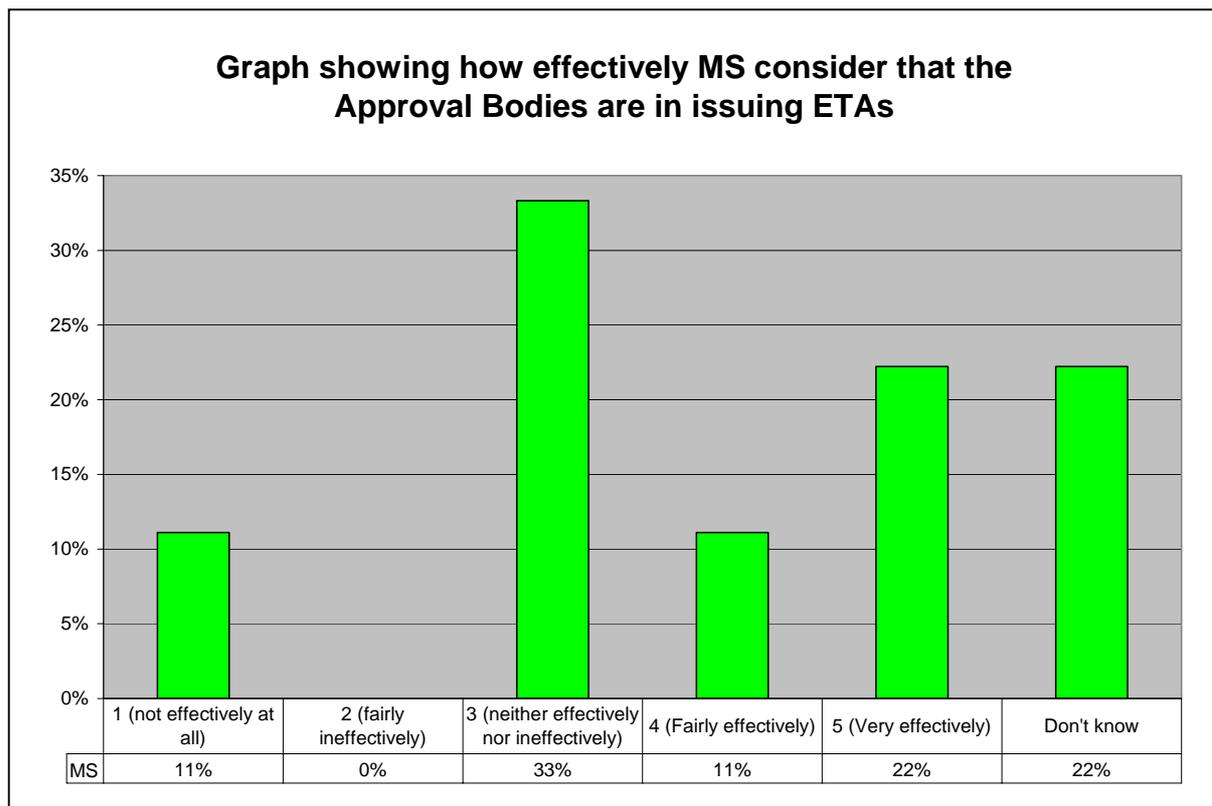
6.2.3. Findings & results regarding the effectiveness of ABs in issuing ETAs.

MS question 3 was: “Given the existing regulatory framework and related procedures, how effectively do you consider that the Approval Bodies are in issuing ETAs?”

MS were quite positive about AB’s effectiveness in issuing ETAs. The average rating was 3.43 out of 5 (69%). Nevertheless the largest single group of rating was 3 out of 5 with 33% of respondents rating at this level.

When asked what improvements could be made these again included the issue of the process taking too long. One respondent wondered why so few ETAs were issued – was it

the case that there was no demand or was it because national approvals still apply. Broader application was encouraged, combined with promotion efforts, shorter procedures and lower prices.



6.2.4. Findings & results regarding the procedures for processing applications

MS question 4 was: “To what extent do you consider that the procedures for processing applications for ETAs are satisfactory?”

This question rated the satisfaction of MS with the processing of applications for ETAs. The result of this query brought one of the lower ratings produced by the MS survey, an overall assessment of 2.88 out of 5 (which still represents 58% however). This reflects the wide spread of opinions on this subject, with 11% rating this at 1 out of 5, 33% at 3, 11% at 4, and 22% at 5 (with 22% of “don’t knows”).

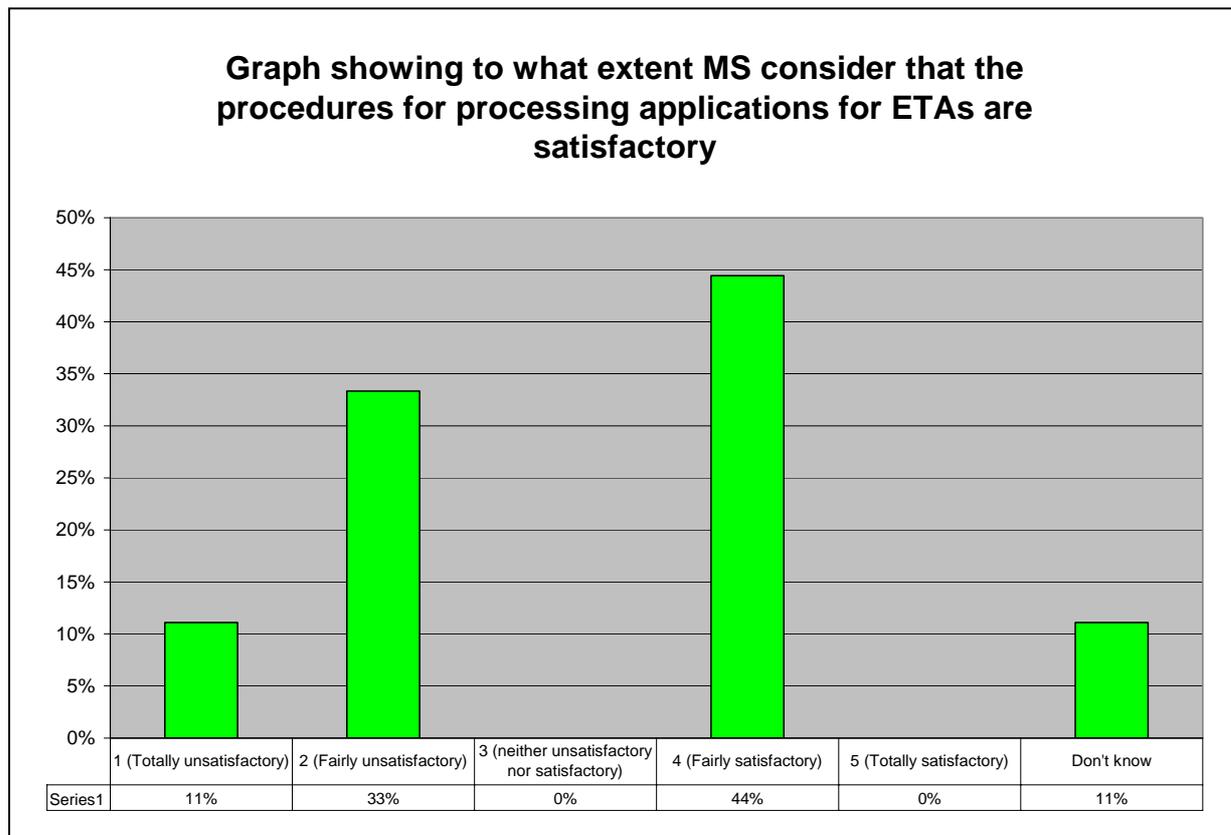
When asked what improvements could be made these again included issues of speed, though it was felt to be better since the handling over Internet (CIRCA) started. However the ‘green light’ from the Commission was felt to take much too long.”

One MS pointed out that they EOTA had not taken take notice of their criticisms their mandate models and ETAGs⁵. It was felt that EOTA tries to create a direct link from essential requirements to products concerned without recognising national regulations.

The ETAG elaboration was also an area that respondents felt could be improved, and it was suggested that it would be more effective to harmonise from bottom up than top down.

⁵ EOTA and the Commission are already considering to simplify the ETAG format and to ameliorate the mandate model.

Therefore (it was suggested) if a producer wanted an ETA, the CUAP procedure could be followed. If a second producer wanted an ETA for the same subject, this body could then use the test methods of the first ETA⁶. It was felt that EOTA board should establish a committee for harmonisation questions.



6.2.5. Findings & results regarding the effectiveness of the various bodies

MS question 5 was: “How effectively do you consider that the bodies involved in the above procedures are carrying out their tasks?”

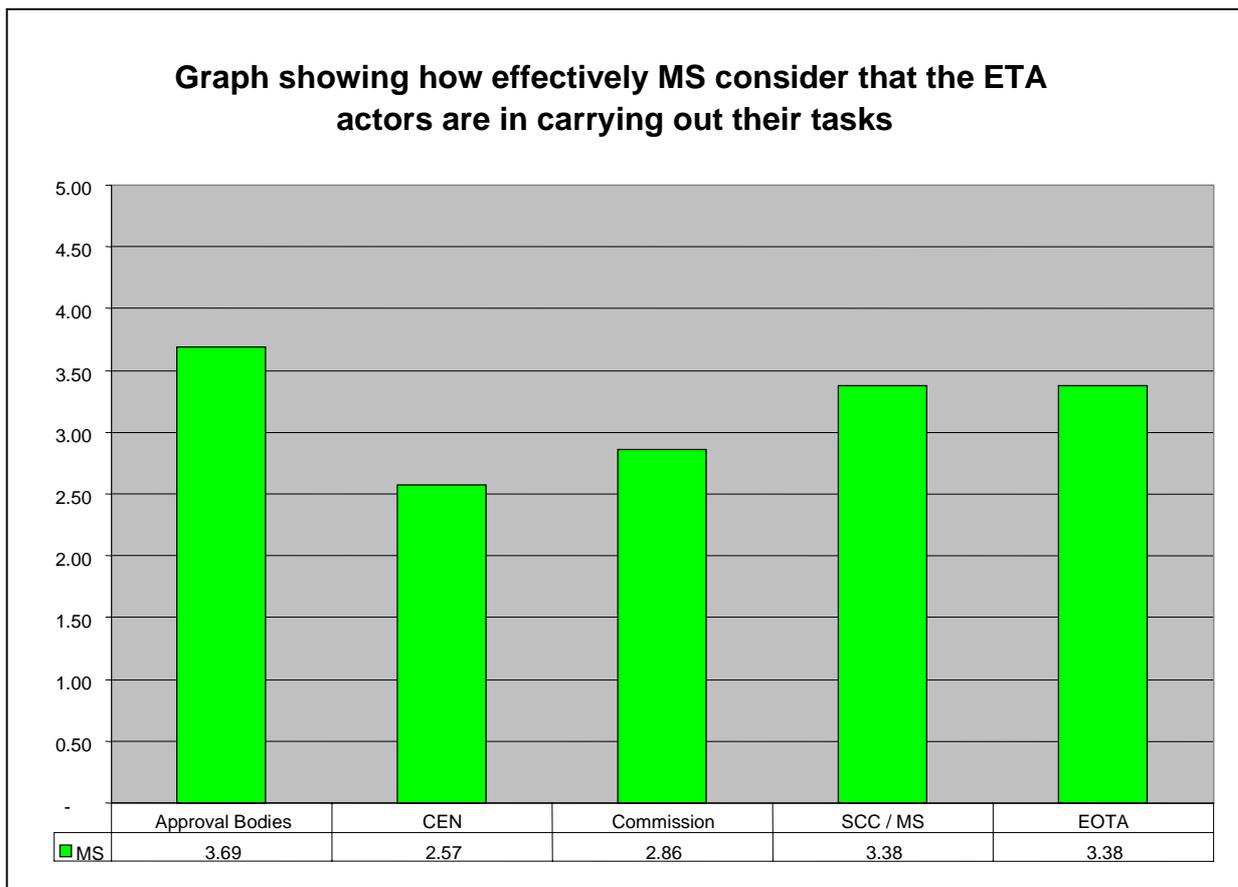
This question asked the MS to rate the effectiveness ETA system actors (ABs, CEN, Commission, SCC/MS, and EOTA) separately. The results varied quite extensively. The highest approval rating was for ABs (3.69 out of 5, or 74%) the lowest for CEN (2.57 out of 5, or 51%) respectively the joint highest and the lowest ratings in this survey. Likewise the largest lower rating (57% of respondents rating 2 out of 5) and the largest higher rating (56% rating 4 out of 5) were also for CEN and ABs respectively.

When asked what improvements could be made these once again included the issue of slow procedures.

CEN was felt to be reluctant to take on new tasks at what they felt was the periphery of their mandates. In other cases CEN is very protective; they would make standard but there would be no working group. Discussions in SCC were felt to be too technical and too detailed, which often meant no decision was taken. CEN was felt to be carrying out its tasks

⁶ This is already applied by EOTA Approval Bodies.

unsatisfactorily as it tried to apply its standards where this was not technically possible, and as their answers to the Commission were given late and/or were incorrect. This was felt to cause delays and refusals and thus reduce confidence in the system.



It was suggested that the Commission should not rely as much on CEN opinions and that it should automatically give "green lights" for the issue of ETAs if the hEN will not be available within a certain delay. It was also suggested that it should allow the issue of ETAs according to Art. 9.2 of the CPD while an ETAG is still under preparation⁷. It was further suggested that the Commission provide a written procedure to the SCC for the endorsement of ETAGs and that it speed up decisions regarding Conformity Attestations which are needed for ETAs by involving the SCC in a written procedure. Finally it was suggested that the Commission avoid interference in EOTA work in all cases where the CPD does not give a specific task to the Commission.

Feelings regarding the Commission’s handling of SCC were mixed; some felt it was weak while others that it was OK.

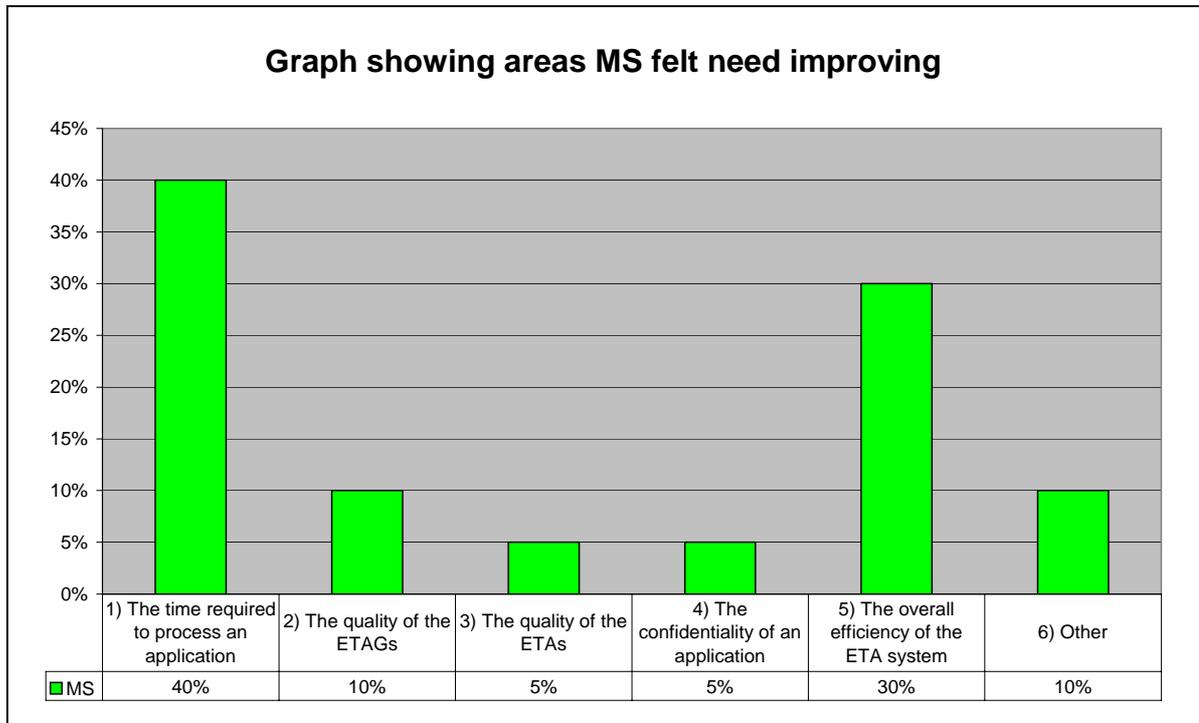
6.2.6. Findings & results in regard to the areas that need improvement

MS survey question 6 was: “Please indicate whether you think that any of the following aspects of the ETA system should be improved?”

⁷ This suggestion is already operational.

Responses to this question showed clearly that MS felt that the time required to process an application was the major area that needed improving (40% of all responses), closely followed by the overall efficiency of the ETA system, them with the quality of the ETAGs and other issues scoring 10%.

The speed of reaction by CEN and the Commission was criticised, while transparency was



also mentioned as an area for improvement. MS felt that the quality of ETAGs varied too much, some being too detailed and very complicated, while others are too poor. With regard to an “other” area for improvement it was felt that there might be a lack of confidence in regard to and within EOTA.

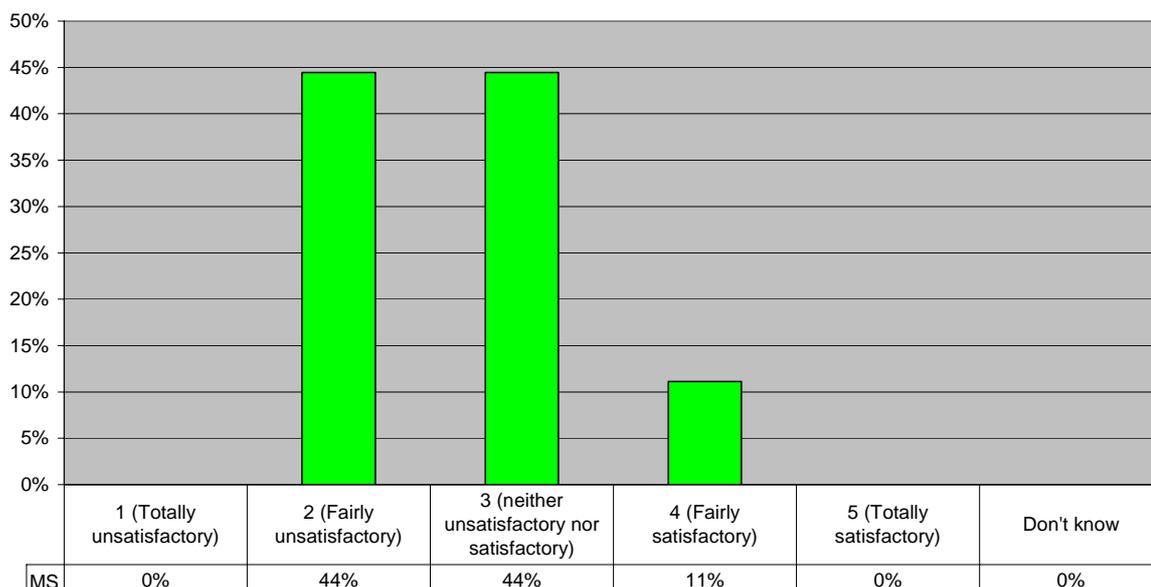
6.2.7. Findings & results in regard to Commission/CEN consultation

MS survey question 7 was: “To what extent do you consider that the consultation on ETA applications between the Commission and CEN is working satisfactorily?”

The MS rated the Commission/CEN consultation at 2.67 out of 5 (53%), one of their lower ratings. It should be noted that 44% of MS respondents rated this at 2 out of 5, and another 44% rated it at 3 out of 5.

Some MS felt that this consultation had improved recently, all respondents did not share this optimism though and even those that stated this also said it could still be faster. MS felt that it was also important to listen to remarks from industry. CEN's responses were not always felt to be reliable or efficient, and it was felt that CEN should make an effort to respond more rapidly.

Graph showing the extent that MS consider that the consultation on ETA applications between the Commission and CEN is working satisfactorily



6.2.8. Findings & results in regard to EC/SCC consultation

MS survey question 8 was: “To what extent do you consider that the consultation on ETA applications or on other EOTA issues between the Commission and Standing Committee is working satisfactorily?”

The MS rated the Commission/SCC consultation at 2.88 out of 5 (58%). It should be noted that 33% of MS respondents rated this at 2 out of 5, and another 33% rated it at 3 out of 5. In addition 22% rated this at 4 out of 5.

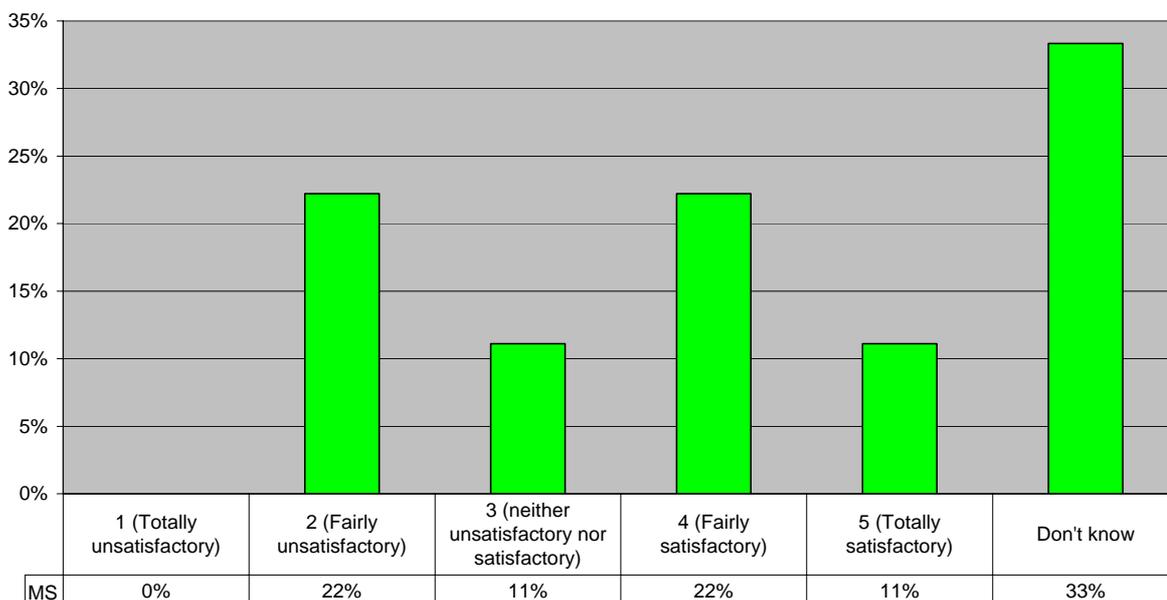
This was also an area that was felt to have improved, but there were still problems. Specifically it was felt that there was still too much discussion in the SCC. The "Circa" procedure was praised but some complained that they could see the opinion of other MS.

There was felt to be a problem regarding some people being members of both SCC and EOTA, they therefore would be a lack of resources dealing with this issue in the Member States. Some felt it was too early to see results and that patience was needed.

6.2.9. Findings & results in regard to co-operation between ABs

MS survey question 9 was: “To what extent do you consider that the co-operation on ETAs or on other EOTA issues between the Approval Bodies is working satisfactorily?”

Graph showing to what extent MS consider that the co-operation on ETAs or on other EOTA issues between the Approval Bodies is working satisfactorily



There were quite a lot of “don’t know” answers to this question (33%), nevertheless the average rated response was 3.33 out of 5, or 67%. There was a fairly symmetrical spread of ratings from 1 to 5, as shown in the graph above.

A perceived problem regarding the understanding of the CPD within EOTA was highlighted. It was suggested that there be a financial threshold for applying for an ETA, and that EOTA should concentrate to those cases which ETA can be really useful and where it would be feasible⁸.

6.2.10. Results & Findings in regard to the justification of the price of ETAs

MS survey question 10 was: “To what extent do you consider that the prices of ETAs are justified?”

Given the substantial majority of MS respondents (63%) answered “don’t know” to this question, it is hard to draw any reliable findings from this question. The average rating for those that replied was 2.67 out of 5 (53%).

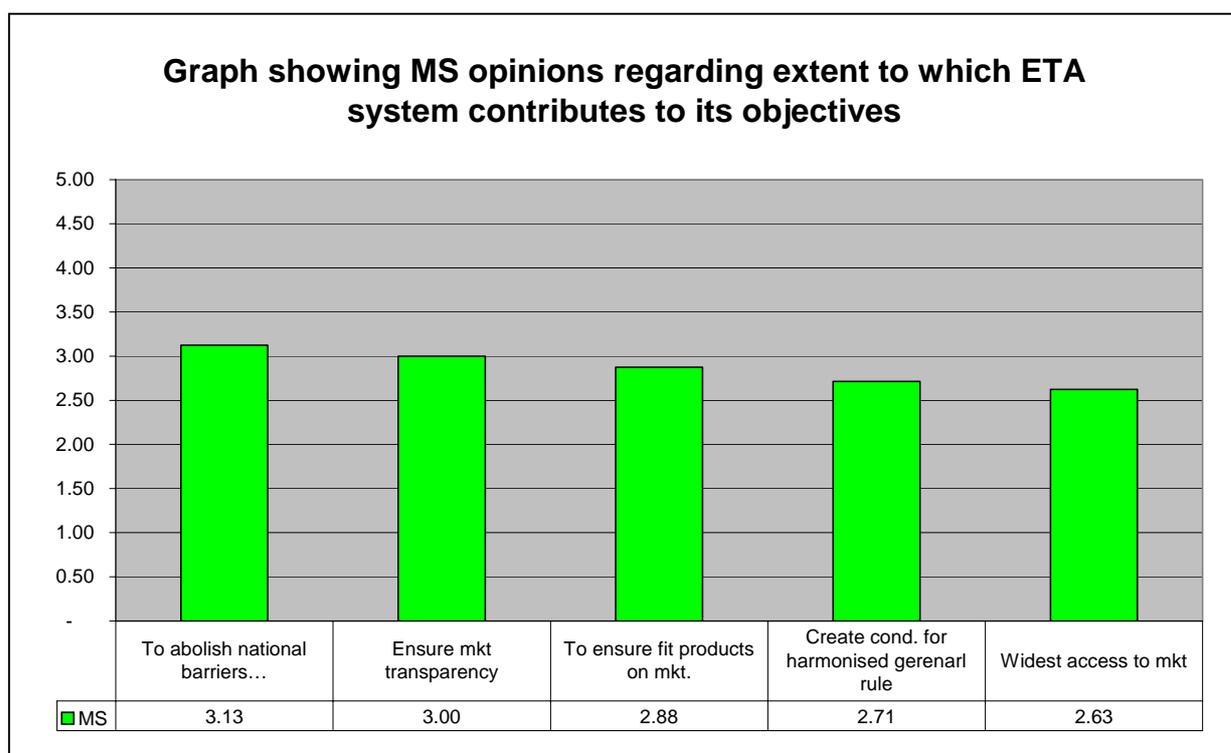
⁸ The respondent has obviously misunderstood the status of the ETA as a regulatory proof and not as a marketing instrument.

One MS pointed out that prices for ETAs are laid down by each Approval Body according to its specific conditions so that a general answer to that question is not possible. It was also pointed out that price comparisons with hENs were not directly possible. It was felt that ETAs should not function as a means for big companies to compete with SME companies on the price level. The SME structure in the building sector is reality (more than 80% of the companies in the EU).

6.2.11. Findings & results regarding the contribution to achieving objectives

MS survey question 11 was: “To what extent do you consider that the ETA system contributes to the achievement of the following objectives?”

As shown above the MS considered that the ETA system contributes most to abolishing

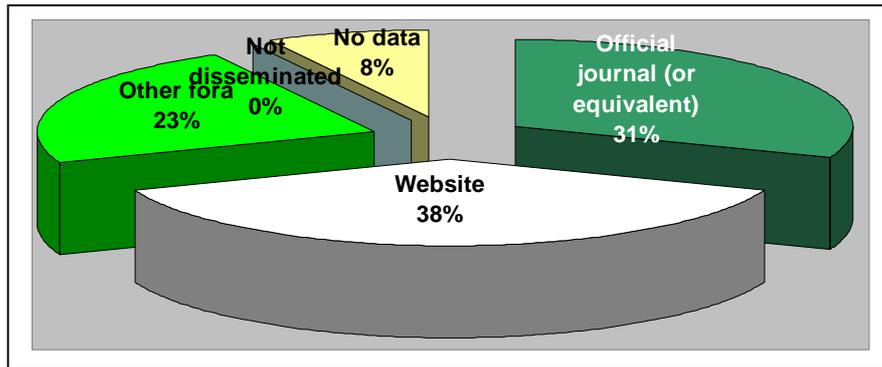


national barriers, but least to ensuring the widest access to the market. The variation between the marking was close, however, ranging from 3.13 to 2.63 out of 5. There was no comment field for this question.

6.2.12. Findings & results regarding the way Member States disseminate information on the adopted ETA Guidelines

Question 12 of the MS survey asked: “How do you disseminate information on the adopted ETA Guidelines in your Member State? Please, provide details and address of the website(s) (if relevant):”

This question was designed to find out how each MS disseminated information on adopted ETAGs. Responses show that the most widely used means of dissemination is the internet, being 38% of the total responses, closely followed by Official Journal or equivalents (31%). Some MS use both of these dissemination media. Other means, including seminars, are also used.



6.2.13. Findings & results regarding ETAs at the end of the co-existence period

Question 13 of the MS survey asked: “13) Concerning products covered by an ETAG, does the legislation in your Member State oblige the manufacturer to have an ETA for his product after the end of the relevant ETAG co-existence period?”

In their answers to the questionnaire:

- 3 Member States responded YES
- 4 Member States responded NO
- 2 Member States provided no answer

As shown from the above answers the majority of those respondents who provided data on this issue did not oblige the manufacturer to have an ETA for his product after the end of the relevant ETAG co-existence period.

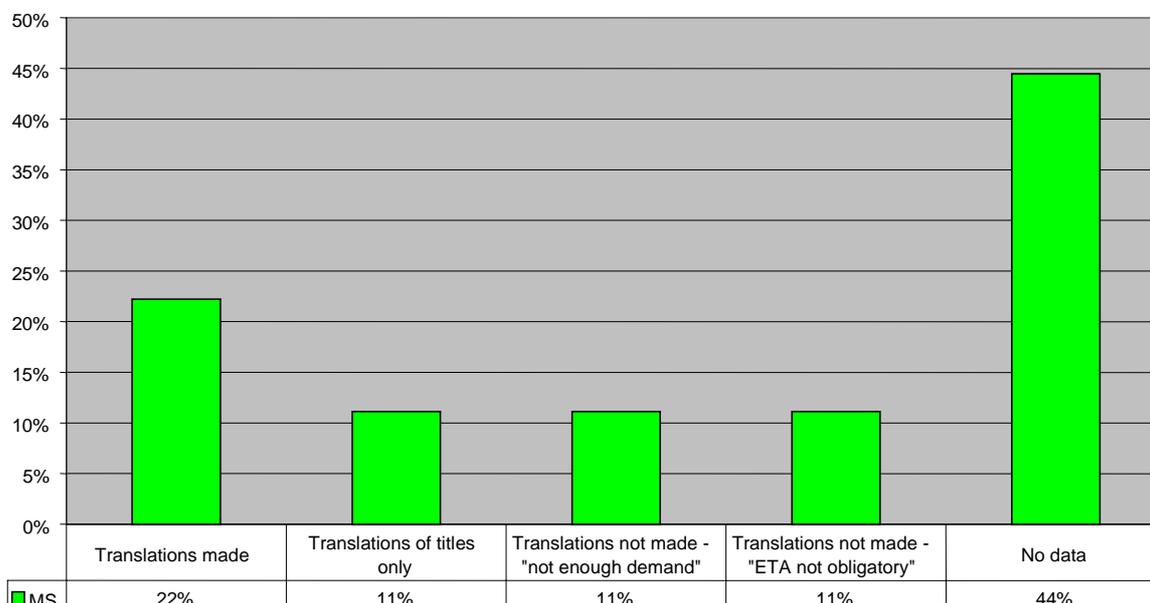
6.2.14. Findings & results regarding the translation of endorsed ETAGs

Question 14 was: “In case your Member State has not yet published the texts of the endorsed ETAGs in your official language(s), please indicate the reasons for this.”

The question was designed to discover the reasons why MS did not translate ETAGs into their official language(s). Nearly half the respondents did not respond to the question, and two-fifths of those that did in fact translated the ETAGs into their official language(s) and one other indicated that the Commission had told them they only had to translate the titles.

The small number of respondents that stated that they did not translate endorsed ETAGs indicated that it was either due to lack of demand (compared to the cost of doing so) or this was not done as an ETA was not obligatory under their legislation.

Reasons why ETAGs are not published in official language(s)



6.2.15. Other points to be considered from the MS survey

MS survey question 15 was: “Are there any other points you feel the evaluators should take into consideration?”

Several MS used this question to put forward proposals/suggestions for improving the ETA system. These suggestions included the idea that ETAs become voluntary marks and certifications together with or in addition to the CE mark. Another was that the relations and the flow of answers and information between CEN, EOTA and the Commission should be speeded up.

One MS felt that it was important to emphasise that ETAs established as envisaged in the CPD are indispensable in cases in which construction products are not covered by harmonised standards.

Another MS stressed that there were two reasons why they believed EOTA activities were not satisfactory. Firstly there were reasons outside EOTA’s control; the low progress on CEN has created pressure to use EOTA as an alternative; the unclear position of the Commission, the fact that EOTA is a supplementary system to CEN; the fact that the elaboration of some large ETAGs have been started too early and that basic hENs under scope of ETAG should be developed first. Secondly there were reasons inside EOTA: unrealistic expectations; the fact that the position and tasks of EOTA are unclear; and the possibility that EOTA has misunderstand the CPD (in that EOTA has neglected to take national regulations into account).

6.3. Findings & results of the AB survey

The third and final questionnaire was sent to all the Approval Bodies. However EOTA, on their behalf, indicated that it did not feel this procedure was appropriate and raised the following objections:

"Not only are the deadlines given to respond extremely short but moreover the enquiry seems to have been prepared in an inappropriate way, resulting in vague, oriented questions, not appropriate to the audience they have been addressed to and possibly resulting in ambiguous and arbitrary answers.

Only as example we can indicate that in the enquiry form for manufacturers, only manufacturers having obtained an ETA are in a position to fill in the form with the necessary background, whilst the questionnaire seems to have been addressed to a much broader audience including industrial associations for which a different set of questions would have been appropriate.

Moreover, Approval Bodies are concerned that the enquiry performed goes beyond the aim expressed in your introductory notes to this enquiry, namely reviewing possibly the Framework Agreement, which links EOTA to your services for performing its duties envisaged in the framework of the CPD.

Despite their serious concerns on this EC enquiry, EOTA and its members would nevertheless like to underline their collective readiness to continue to co-operate to the evaluation exercise of EOTA the EC is undertaking at present, in order to make the system even more efficient.

In this spirit the European Technical Approval Bodies have decided not to respond individually to the enquiry form sent but to prepare a collective response through EOTA (the legal counterpart of the EC in the Framework Agreement). Such a collective answer, prepared on the basis of a more in depth analysis of the present functioning of the system and its possible improvements, will be sent to your services by the end of May."

The following findings are therefore reproduced verbatim from EOTA's answer on behalf of the Approval Bodies, [explanations are added in parenthesis where appropriate]:

6.3.1. Results and Findings regarding the elaboration of ETAGs

Responses to question 1: "Given the existing regulatory framework and related procedures, how effectively do you think the EOTA organisation is in elaborating ETA Guidelines (ETAGs)?"

"Most members [i.e. the EOTA Approval Bodies] indicate a score of 3 or 4 [out of 5, where 1 = not effectively at all, and 5 = very effectively]

Comments from members:

- To start the process of drafting ETAGs, EOTA is totally "[sic] depending on the elaboration procedure of the mandates, judged as a time consuming process, with the additional difficulty that the regulatory framework, needed for this elaboration, differs from country to country and the related procedures have unclear boundaries.

- Also the EC adoption of the Work programmes of the WGs in response to the mandates should be shortened.
- Once the mandating process is achieved, the work in the WG can at present start quickly and today progresses also quickly.
- Nevertheless improvements could be made if more suitable experts and more approval bodies could be involved which would require increased resources, mostly from the Member States, as at present EOTA depends practically totally on the efforts made by its members and their available resources.
- Finally continuous formation and technical support to the experts in the WGs and attention to leadership competence of WG convenors are elements to consider for continuous improvement."

6.3.2. Results and Findings regarding EOTA's co-ordination of tech. approval

Responses to question 2: How effectively do you think EOTA is in co-ordinating specific questions of technical approvals (CPD, Annex II.4)?

"Most members indicate a score of 4 or 5 [out of 5, where 1 = not effectively at all, and 5 = very effectively]

Comments from members: judged effective, considering the number of parties involved, but the Secretariat needs to be strengthened with more people in order to meet the increasing workload."

6.3.3. Results and Findings regarding the procedures for processing ETAs

Responses to question 3: To what extend do you consider that the procedures for processing applications for ETAs are satisfactory?

"In average a score of 3 is given [out of 5, where 1 = Totally unsatisfactorily, and 5 = Totally satisfactorily]

Comments from members:

- In general it is considered that the procedure is far too slow and lengthy, in particular for obtaining green lights for applications in new areas where no CUAP or ETAG green light has yet been given nor an AoC decision taken, mostly due to the long procedure of consultation within CEN and the EC, not for reasons inside EOTA itself.
- Possible solutions mentioned are that consultations outside EOTA should strictly be restricted to cases envisaged by the CPD itself (the rest could be handled directly inside EOTA) or that more cases could be handled by giving confidence to EOTA and its Approval Bodies in direct contact to the EC services, that precedents (of already given green lights) could be used in particular product areas for giving green lights in a faster way and that 9.2 procedures should always be favoured as starting points for work, leading afterwards to ETAG areas.

6.3.4. Results and Findings regarding the effectiveness of the various bodies

Responses to question 4: How effectively do you consider that the bodies involved in the above procedures are carrying out their tasks?

"Approval Bodies: score obtained mostly 3 or 4 [out of 5, where 1 = Totally unsatisfactorily, and 5 = Totally satisfactorily]

CEN: score of 2 [scoring system as per approval bodies]

Commission: score obtained mostly 3 [scoring system as per approval bodies]

SCC/MS: score obtained mostly 2 or 3 [scoring system as per approval bodies]

EOTA: score obtained mostly 4 or 5 [scoring system as per approval bodies]

Comments from members:

- For Approval Bodies the main issues seem to be increased involvement of competent experts, higher prioritisation of ETA related work within the Approval Bodies and increase of performance by higher financial support from their government (Approval Bodies act in many areas on behalf of their Member State and their difference in financial support for these efforts explain in a way their difference in involvement in the process).
- CEN is considered not performing its tasks satisfactorily for various reasons amongst others:
- CEN's working programmes based on mandates normally suggest that any type of product, performance level and intended use of the product can be covered by a standard even in cases where this is not possible for technical reasons (e.g. durability cannot be covered for innovative products or intended uses);
- CEN answers to the EC enquiry are too late, not correct or reliable and/or later requisitioned by CEN/TCs or some of their interested parties (also revealing a lack of management possibility of the CEN Management Centre);
- As a result Approval Bodies cannot, for a long time, give clear information to applicants whether an ETA is possible or not, which demotivates applicants for getting ETAs and undermines their confidence in the system.
- The work of the EC services is often perceived as being a bottleneck in the system due to a reduced staffing and the consequent lack of possible commitment to EOTA but mainly due to the complicated procedures decided upon so far: the EC services should act firmer and quicker and in line with what is possible even today, according to the application of the CPD clauses:
- automatically give green light for issuing an ETA if the hEN is not available within a certain period (e.g. where the period of coexistence of an hEN cannot begin earlier than in 3 years time);
- leave the decision for issuing ETAs according to art 8.2b cases of the CPD to EOTA;

- allow issue of ETAs according to art 9.2 even whilst drafting an ETAG.
- In general the EC services should make more use of written procedures (e.g. for A/C decisions or green lights) and should avoid to interfere in EOTA work in all cases where the CPD does not give a specific task to the EC.
- In general it is noted that SCC/Member States should act faster and more responsive by avoiding lengthy discussions on small technical issues. The use of written consultation procedures is perceived as a possible solution.
- The EOTA office is quoted as working well but understaffed."

6.3.5. Results and Findings regarding aspects that need improvement

Responses to question 5: Please indicate whether you think that any of the following aspects of the ETA system should be improved?

"All boxes have been ticked, but box 1 [The time required to process an application] in all cases, whereas boxes 2 [The quality of the ETAGs], 5 [The overall efficiency of the system] and 6 [Other] have been indicated in several cases, boxes 3 [The confidentiality of an application] and 4 [The overall efficiency of the ETA system] rarely.

Comments from members:

- For box 1 [The time required to process an application] it is recognised, as stated under comments to other questions of the enquiry, that the process time is much too long, mainly due to the consultation difficulties mentioned elsewhere (CEN/EC/SCC) and to the high involvement of all these actors in technical details and endorsement procedures.
- For boxes 2 [The quality of the ETAGs] and 3 [The confidentiality of an application] and, the quality is not questioned but rather their complexity and consistency (problem of component/kits and systems); solutions are to simplify the formats, in particular the one for ETAGs, in order to enhance their readability, to better focus on products already on the market when drafting the ETAGs and to pay particular attention in them for describing testing really needed and their potential costs for SMEs. Additionally the possibility of addressing installation in ETAs in relation to the use of the product was mentioned as an not clarified issue.
- No comments were expressed regarding box 4 [The overall efficiency of the ETA system].
- For box 5 [The overall efficiency of the system], remarks on other questions can be reconsidered: the overall efficiency could be improved amongst others if the CPD was applied in its complete reading (no intervention of EC/SCC where not needed, when Approval Bodies' authority and responsibility were better recognised (e.g. circulate immediately the draft ETA and its evaluation report instead of having to make CUAPs) and by improving the communication between EOTA members and their respective Member State.

- For box 6 [Other], besides elements already covered under previous items, also the financial support element of Approval Bodies was mentioned as an issue for enhancing the overall efficiency of the system towards a well balanced approach, the risk being indeed that otherwise only strong very "well sponsored" institutes would be able to participate in the harmonisation process and hence impose their views. Some Approval Bodies are indeed receiving more or less support from their MS and might have more tasks than others with or without financial support from their MS. So Member States and EC should pay attention to maintain fair rules to allow a durable and healthy co-operation and competition between the Approval Bodies without on the other hand to forget that ABs act in many occasions on behalf of the MS for the implementation of the CPD."

6.3.6. Results and Findings regarding Commission/CEN Consultation

Responses to question 6: To what extent to you consider that the consultation on ETA applications between the Commission and CEN is working satisfactorily?

"Mean score: 2 [out of 5, where 1 = Totally unsatisfactorily, and 5 = Totally satisfactorily]."

Comments from members:

- In general the process takes too long. Moreover, in many cases, CEN seems to act in a self protective way, the introduction of an ETA request leading to the start of a duplication of work within CEN, or the competitive situation between different types of products leads to a blockade to the disadvantage of the innovative products (not yet covered by a standard but can not get a green light for an ETA either).
- Solution to some of these problems can be found in the limitation to a 3-months commenting period and the systematic application of the 'no-answer = consent' rule."

6.3.7. Results and Findings regarding EC/Standing Committee consultation

Responses to question 7: To what extent do you consider that the consultation on ETA applications or on other EOTA issues between the Commission and Standing Committee is working satisfactorily?

"Average score of 3 (sometimes 2 or 4) [out of 5, where 1 = Totally unsatisfactorily, and 5 = Totally satisfactorily]."

Comments from members:

- Again this is judged a too lengthy process.
- SCC also claims sometimes to have difficulty of receiving enough information material needed to make judgements, but it was questioned whether EC and SCC have really to embark in so many technical details and should not more rely on the competence of the Approval Bodies they have nominated for handling these matters.

- Moreover Preparatory Group and SCC have an important role in validating the mandatory characteristics or administrative provisions allowing ABs to work efficiently. This analysis seems not always to be performed in an efficient way.
- Solutions could be to perform short written enquiry procedures on the SCC with more direct decision power at the level of the EC services."
-

6.3.8. Results and Findings regarding co-operation between ABs

Responses to question 8: To what extent do you consider that the co-operation on ETAs or on other EOTA issues between the Approval Bodies is working satisfactorily?

"Mostly a score of 4 is obtained [out of 5, where 1 = Totally unsatisfactorily, and 5 = Totally satisfactorily].

Comments from members:

- The co-operation is usually judged satisfactorily; in particular for the issue of ETAs; improvements have already been introduced to speed up the internal process e.g. introduction of the 'no- answer = consent' rule but involvement could still be improved although it is partially related to the unequal financing schemes for these activities of the Approval Bodies."

6.3.9. Results and Findings regarding achievement of objectives

Responses to question 9: To what extent do you consider that the ETA system contributes to the achievement of the following objectives?

"a) [To abolish national barriers to trade between EU member states in order to create the internal market for construction products] score of 3 and 4 [where 1 = no contribution and 5 = significant contribution].

b) [To ensure that only products fit for use are put on the market] score of 4 and 5 [scoring as per a)]

c) [To afford access to the market for as many manufacturers as possible] scattered score with an average of 4 [scoring as per a)]

d) [To ensure the greatest possible degree of market transparency] score of mostly 4 and 5 [scoring as per a)]

e) [To create the conditions for a harmonised system of general rules in the construction industry] score of 4 and 5 [scoring as per a)]

Comments: some members judge it premature to express an opinion in particular on points a) to d) or expressed that point e) was unclear.

To point 9b) it was also underlined that fitness for use is decided by the building designer, enterprises or actors on the field or market, according to the applicable building regulations and on the bases of harmonised regulated characteristics; the CE marking offers the tool for providing the necessary information in relation to this second aspect."

6.3.10. Results and Findings regarding applications for an ETA

Responses to question 10: “How many manufacturers/agents have applied to your Approval Body for an ETA?”

"At the moment some 400 applications in total were announced.

Comments from members: some earlier applications have been withdrawn since the manufacturers did not market their product any longer; some manufacturers are unsatisfied to have to wait 2-3 years before the total procedure is finalised".

6.3.11. Other points to be considered

Responses to question 11: “Are there any points you feel the evaluators should take into consideration?”

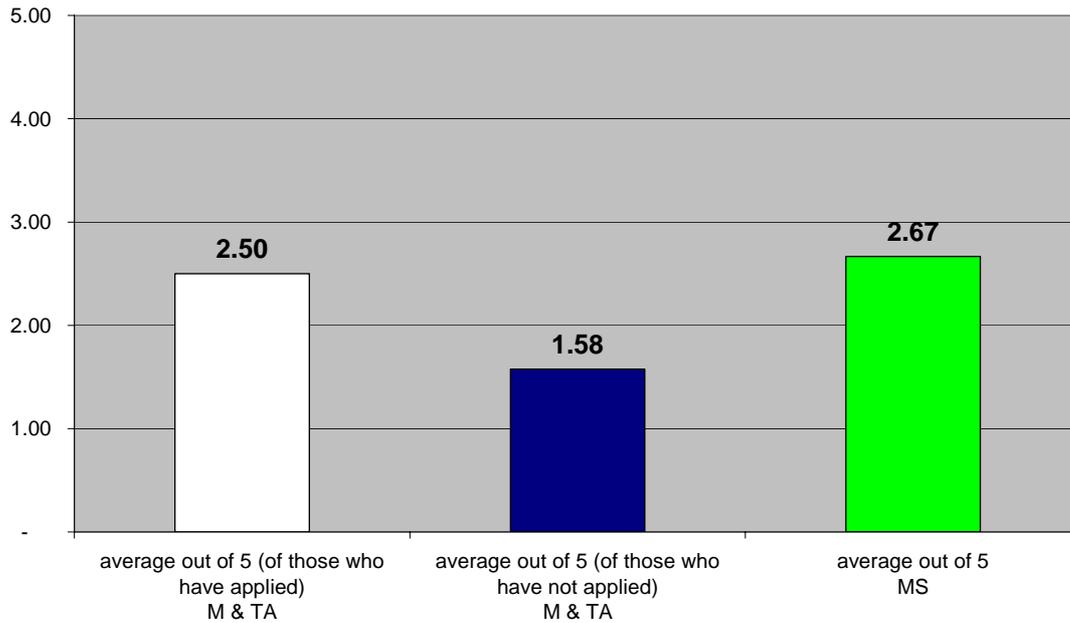
"Comments expressed by members:

- the system can not really be evaluated properly at this stage as the sample of issued ETAs is too small; the all [sic] system will only work when CE marking is really enforced as being compulsory as well as sufficient for putting on the market and use of construction products in all Member States; otherwise players will continue to hesitate to jump on and will rather stick to well known national systems;
- another element of this industrial uncertainty is introduced by the lack of progress in the fire safety related area (Essential Requirement 2), which is heavily regulated in almost every Member State: as long as the system of classification and tests standards and fire scenarios are not laid down a manufacturer will hesitate to undergo costly assessments;
- ETAs could be a better instrument to the market if voluntary aspects could be added in a same document (separated voluntary part, clearly distinguished from the part leading to CE marking, to satisfy the one-stop shopping principle);
- usability of CE marking is still questioned by a part of industry; there is a need for continuous awareness raising on this aspect and on the role ETAs have to play in the CPD ("as long as there is no hEN available this is "the" alternative route to CE marking"); the approval process should be seen by all actors as a valuable element of the harmonisation process; collaboration of industry should further be pursued but the problem is that in many cases the most innovative product domains are produced by SMEs having not the necessary resources to be involved (problem of representativity of industrial representation in harmonisation effort)
- cost is an overestimated issue compared to the cost for obtaining conformity to a standard or to obtain a national approval recognised in one or more countries;
- the system can only function well if there is support from and communication with the EC/SCC, Member States, CEN and the GNB.

6.4. Comparing the results of the surveys

6.4.1. M&TA & MS on the cost vs. benefit of an ETA

Graph showing average opinions on the benefit vs. cost of an ETA

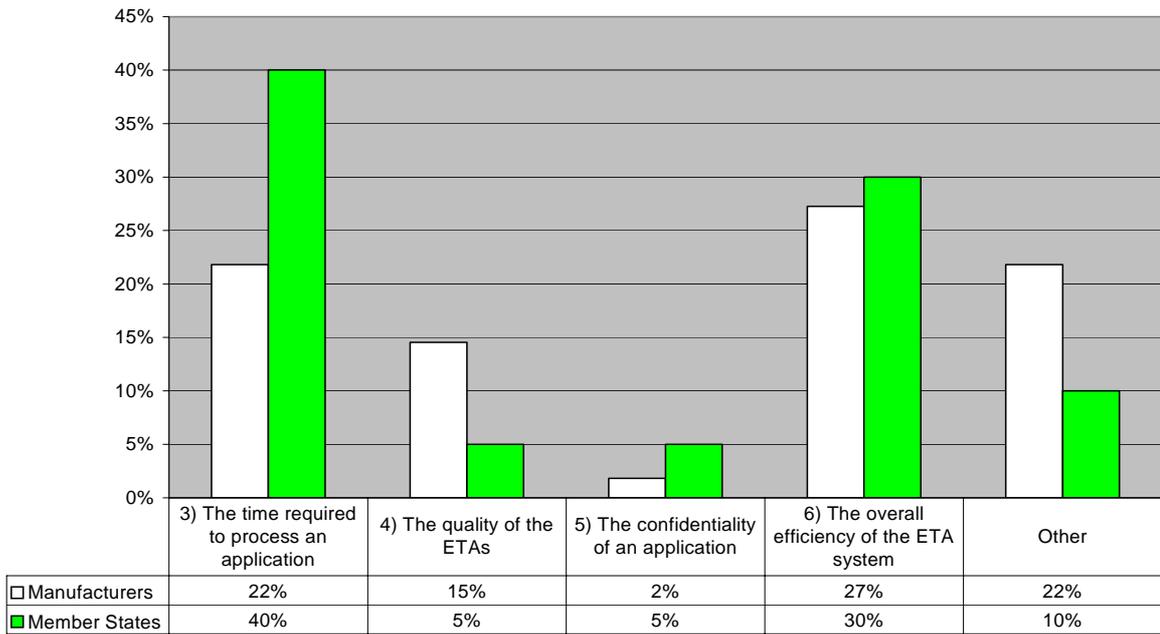


As shown in the graph below the opinions expressed by M&TA (who have applied for an ETA) and MS regarding the cost of an ETA were broadly comparable at around 2.5 out of 5. It should be noted that the questions posed in this regard were not exactly the same. The question posed to M&TA was as follows:

“To what extent do the benefits of obtaining an ETA outweigh the costs?” While that posed to MS was: *“To what extent do you consider that the prices of ETAs are justified?”* Nevertheless the correlation is quite close, so it could be assumed that the opinions are broadly similar.

6.4.2. M&TA and MS on areas that could be improved

Graph showing M&TA & MS opinions on areas of ETA system that could be improved

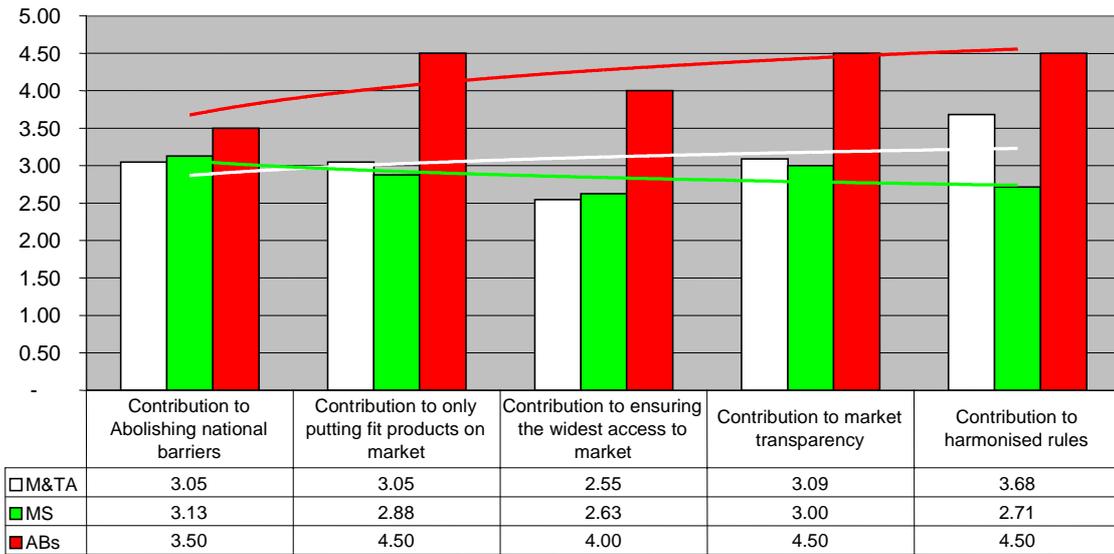


The parameters for response to this question were not identical in the two surveys, as questions, but those shown in the graph were the same. At first glance it could be believed that the graph shows a fairly wide divergence in between areas where M&TA think there is room for improvement, and those where MS do. But in fact the two areas that both groups have signalled need improvement the most are the same: the time required to process an application and the overall efficiency of the ETA system. M&TA respondents have flagged the quality of the ETAs to be an area of more concern that MS have though.

6.4.3. M&TA, MS and AB's on how the system meets its objectives

As shown in the graph below there is a wide divergence of opinion regarding to what extent the ETA system meets its objectives.

Graph showing all respondents opinions regarding how ETA system meets its objectives



As regards general trends it is clear that the ABs rate the effectiveness of the ETA system in meeting its objectives higher than either M&TA or MS. In fact MS's rating response to this question was lowest in each case, while ABs were highest and M&TA were always between the two (though almost always closer to MS than ABs).

All groups rated the contribution to the objective of ensuring the widest access to the market lower than the others (except for ABs who rated the contribution to abolishing national barriers even lower – in contrast to MS who rated this the highest). M&TA rated the contribution to creating harmonised rules highest – as did ABs (though they rated the system's contribution to two other objectives equally highly).

A table showing some of the combined survey results is included in Annex IV.

7. FINDINGS OF THE DESK ANALYSIS OF EXISTING INFORMATION

7.1. Findings concerning the provisions of the CPD:

The text of the CPD does not clarify the status of the ETAG in the national regulatory provisions of the Member States. This contributes to the confusion concerning obligatory compliance to ETAs. So, the CPD does not allow the Commission to require from Member States to implement ETA Guidelines. This means that it is not possible to implement the relevant part of the CPD in a common way across all Member States and to require that ETAs shall obligatory cover the relevant products at the end of an agreed ETAG co-existence period.

An additional problem is that, where products are not covered by a harmonised EN or an ETA Guideline, the CPD does not make the issuing of an ETA obligatory. Only if the manufacturer applies for an ETA can the product be covered by such an ETA. If not, the manufacturer may continue to place the product on the market as before without the CE marking. This means that national ABs can continue to issue national approvals for these products.

Therefore, regulatory provisions on selling construction products in the various Member States remain fragmented and even if Member States will not refuse CE marked products, manufacturers that use national provisions may face regulatory barriers when selling in another Member State because barriers to trade continue to exist for those products.

7.2. Findings concerning the transposition of the CPD

The majority of the Member States have transposed the Directive providing for obligatory CE marking (this being the only means to show compliance with the Directive) except four Member States where the CE marking of the product is not obligatory.

This difference has effects on the positions taken by the delegations concerning the implementation of the CPD concerning the obligation of products not covered by hENs to be covered by ETAs.

7.3. Findings concerning difficulties in the CEN/TCs consultation

Due to the fact that we are still in the initial period of the implementation of the CPD, the majority of the required hENs to cover construction products do not exist and therefore the basis to verify if a product deviates from the future hEN is not yet available. This fact obliges the Commission to consult CEN in order to clarify if a future harmonised EN will cover the items proposed By EOTA. It also obliges CEN/TCs to have detailed discussions in order to answer to the Commission's request. Although it has been agreed that the CEN consultation should take maximum of 3 months, this is often not the case because the answers received are not precise to enable the allocation of the work. The time for the consultation procedure and the quality of the information transmitted by CEN must be substantially ameliorated. It is evident that the industries active in CEN/TCs have no interest to facilitate the access to the CE marking of competing products via EOTA and vice versa.

Later, when the scope covered by hENs will be clear, these problems are expected to disappear as all partners in the system will know directly if the product is expected to be covered by a hEN and the ABs will be in position to follow the ETAGs or the CUAPs in order to deliver the ETAs for products for which such decisions have already taken.

7.4. Findings concerning the Approval Bodies:

Many Approval Bodies participate fully in the EOTA procedures but have not yet issued any ETAs.

Not all designated Approval Bodies seem "able to assess the fitness for use of new products" in all areas. This is suggested by the fact that only a very small number of Approval Bodies have issued ETAs for metal anchors in line with the adopted ETA Guideline.

EOTA has reported to the Commission that it considers that "the assessment is an expert job demanding particular qualifications and expertise which it would be counterproductive to dilute amongst too many bodies; it would moreover also not be economically viable to have a large number of institutes."

From the analysis of applications received and the ETAs issued (see Annex VIII) it appears that 2-3 Approval Bodies dominate the system. They concentrate a large number of producer' applications and have issued several ETAs.

A large number of EOTA ABs are also notified bodies under the CPD. The CPD does not require independence between ABs and notified bodies. The manufacturer is therefore attracted (in order to keep the cost as low as possible) to use as a notified body for AoC purposes the same body that has issued the ETA and undertook the initial assessment of the product and is in possession of all the necessary data from the initial testing of the product.

7.5. Findings concerning ETAGs / CUAPs:

ETAGs are considered as unnecessarily complex, and there are complaints that they include far more testing than is really necessary to assess the fitness for use of the products. For example the Metal Anchors Guideline requires 300 to 1000 tests according to the intended use of the anchors and examines the possibility of failure of the product if the installer has not applied the installation instructions of the manufacturer. Problems of consistency between Guidelines have also been reported. The "serviceability requirements" are a further point of complexity and must be reduced to the minimum.

The complexity and detail of product assessment could provide to certain manufacturers competition advantages over competitors, which cannot cover the testing costs.

A small number of manufacturers expressed concerns regarding the respect of confidentiality during the EOTA consultation and the ETAG/CUAP elaboration procedures. It was claimed that experts (from competing companies) may receive confidential information in the framework of the technical work within EOTA and that they may impose additional assessment requirements.

The CPD provides that the Member States will publish the ETAGs in their official language or languages, but the provisions concerning their status are vague. Although several ETA

Guidelines have been adopted in English most of them have not been translated and published in other languages (with some exceptions).

CUAPs elaborated by the Approval Bodies are common agreements on a European way to evaluate and impose acceptance requirements on products. They are used for products which cannot be covered by ETA Guidelines and which are manufactured by a limited number of manufacturers.

CUAPs are therefore considered as a first draft of an ETAG and they are important European regulatory documents. EOTA considers them as internal EOTA documents and they are not circulated to Member States authorities.

The elaboration of ETA Guidelines is currently a very long procedure. From the moment of the green light for the elaboration of an ETA until its final endorsement at SCC the average time elapsed is 4-5 years. Taking into account the time necessary for consultations (CEN, etc.) before the green light and the time necessary to issue an ETA after the endorsement of the ETAG, this means that an ETA takes around 6 years to be issued.

For areas where EOTA is working without a mandate (ETAs without Guideline) the preparation of CUAPs (pre – ETAGs) and the issuing of ETAs also experiences significant delays. Of the 46 items attributed to EOTA until September 2000 for ETAs without Guidelines, 15 CUAPs had not yet been adopted till April 2003. ETAs have been issued in 9 CUAP areas only while another 11 items have been withdrawn.

Although CE marking is now possible for several ETAGs, only a very small number of ETAs have been issued (with the exception of the ETAG on metal anchors). The ETAs have only been issued to a small number of manufacturers (27 in all, around half of which produce metal anchors).

(Situation in April 2003)

	Endorsed	Under preparation	ETAs issued
ETAGs	15	17	73*
CUAPs	24	78	23**

* Out of which 67 (90%) for metal anchors

** Out of which 13 (56%) ETAs on insulation products made of plant fibres

As it can be seen from the above, for many of the adopted ETAGs and CUAPs no ETAs have been issued yet. According to EOTA this is due to the fact that for many products the test regime required to assess the "reaction to fire" performance of a product has not been determined yet or was only determined after a long delay. This justification can only partially be accepted as the relevant EN has been adopted for more than one year without resulting in a massive adoption of delayed CUAPs or issuing of ETAs in many fields covered by CUAPs.

Concerning the elaboration of ETAGs, delays have been noted (in comparison to the time limit foreseen in the relevant contract between Commission and EOTA) in some ETAGs, which amount to 18 months in average. The time actually necessary for the adoption of CUAPs is from 6 months to more than 2 years.

A detailed analysis of the available data can be found on Annex VIII of the present report.

7.6. Findings concerning the effectiveness of the consultation procedure within EOTA

Some of the ETAGs received a number of comments from Member States delegations during the final consultation of the SCC (after their adoption at EOTA). EOTA corrected them and presented them to the Member States for agreement again. This led to an average delay of 6 months. This fact implies that better consultation is necessary between the ABs and the regulators of their Member States and/or that EOTA Approval Bodies need to ameliorate their performance within EOTA. These issues must be detected and corrected at EOTA level before the adoption of the ETAG.

7.7. Findings concerning the cost of ETAs:

Several manufacturers consider ETAs to be very expensive. In the case of the Metal Anchors complaints were made by manufacturers/agents that the ETAG is so complicated that the cost they must pay for the testing of their products does not allow them to approve products which are already legally on the market. They complained that only big multinational companies with the necessary financial resources can afford ETAs for metal anchors.

7.8. Findings concerning EOTA delegates in the SCC

The Framework Agreement between the Commission and EOTA states that:

"In order to avoid any overlapping of interests between the tasks of the Standing Committee on Construction and those of EOTA, EOTA will, to the extent possible, ensure that persons having a function within EOTA (members of the Executive Commission) and taking part in the SCC will not take part in any consultation and decision of the SCC on questions regarding EOTA.

EOTA shall inform the Chairman of the Standing Committee if any such overlapping of interest may occur."

To date EOTA has not informed the Chairman of the SCC of any such incompatibilities.

Some executives of EOTA ABs participate in meetings of the SCC (in the consultative and in the regulatory part of the SCC work) in the official delegations of the MS. This is the case in the delegations of 5 Member States (in 3 of them they act as Heads of Delegation).

NB: In the opinion of the EOTA officers this particular situation relates only to 2 heads of Member States delegation in the SCC which are also members in the EOTA Executive Commission. In their opinion, this is not an issue they should be concerned about, because their function in the SCC is as members of their respective delegation and not as representatives of EOTA. This situation is, in their opinion, also due to scarcity of experts to participate in the delegations of the Member States in the SCC.

7.9. Findings concerning the activities of UEAtc:

UEAtc's website (www.ueatc.com) describes its technical approval activities as:

"favourable assessments of the fitness for use and durable quality, of innovative products and systems or products and systems that deviate otherwise from established specifications"

This could be confusing for construction product manufacturers, which are trying to find the most appropriate way to put their products on the market without barriers to trade.

Due to the fact that almost all spokes-bodies (with the exception of those from Austria, Greece and Luxembourg) are also members of UEAtc, the separation of their function and their interests in EOTA and in UEAtc is unclear.

UEAtc signed a Memorandum of Co-operation with EOTA in January 2003 which specifies that UEAtc can undertake approval activities (including regulatory aspects of products performance) in those areas for which a ETA is not yet possible.

7.10. Findings from the financial analysis

- 1) EOTA is an AISBL (Association Internationale Sans But Lucrative), therefore an analysis of the accounts could not be carried out in comparison with traditional standard ratios.
- 2) Financial accounts revealed:
 - a financial deterioration between 1991 and 1994 (losses);
 - a more favourable situation making positive results profits between 1995 and 1997;
 - a new deterioration between 1998 and 2000 (loss of more than 100,000 Euro in 2000);
 - a positive result in 2001 (34,976 Euro) and in 2002 (86.898 Euro).

The cumulated net result (1991-2002) was about Euro -32,000.

- 3) The Commission intervened in the financing of the EOTA by means of a gradually declining "structural support" and issued contracts with EOTA by means of Order Vouchers. It must be stressed that for the years 2001 and 2002, no structural support was granted.
- 4) Comparison of the situation at the end of 2001 in relation to that noted at the end of 2000:
 - increase in total expenditure: Euro 456,661 vs. 388,288 (i.e. + 18%),
 - increase in the personnel costs: Euro 204,540 vs. 189,119 (i.e. + 8%)
 - increase in the "Liquidation provisions": Euro 94,536 vs. 38,733 (i.e. + 144%).
- 5) The "reserve for liquidation" was intended for covering "future possible costs". It is met rather usually in the accounts of the organisations receiving subsidies. It was justified

by the fact that in the event of liquidation, the personnel could not claim a financial contribution of the "closure fund of the companies".

The accounting policy has stated clearly "a provision, equal to the total current expenses of liquidation, will be created over a ten-year period on a cumulative basis and at the first time in the annual accounts closed on 31 December 1997. The level of the annual provision may be varied but at the end of each year will not be less than a cumulative rate of 10% per annum of the current estimate of the expenses of liquidation."

The limit of 10% of the costs of liquidation used by the EOTA seems reasonable.

- 6) With regard to the compatibility of the subsidy with the new financial regulation, no real problem arose insofar as this involved a subsidy supported by a legal basis (Directive 89/106 which envisaged the creation of the EOTA and the Commission 94/23/EC Decision). This involved therefore a permitted ad hoc subsidy, which did not have to be published in the form of a specific theme.

8. CONCLUSIONS

8.1. Main Survey conclusion: The ETA system is perceived as being slow

This is a serious concern as, in a system designed to approve innovative products, an approval procedure lasting, in certain cases, many years is far from ideal and might be detrimental to the efficiency of the market.

Certain links in the consultation chain, especially CEN, are seen as causing delays (a majority of MS felt that CEN's performance was unsatisfactory). It was felt that CEN did not prioritise ETA procedures and that its responses were often late and sometimes incorrect. The Commission is seen as relying too much on CEN when giving a "green light". There are also problems in CEN/Commission communication (nearly 90% of MS respondents rated CEN/Commission communication as below average) and the Commission Unit (G-5) dealing with the CPD is also perceived as being under-resourced.

8.2. Main Survey Conclusion: The ETA system is perceived as being complex:

M&TA respondents who had applied for an ETA felt that it was the overall efficiency of the system that could be improved more than any other area. ETAGs in particular were singled out for criticism from both manufacturers and some Member States (33% of MS rated their satisfaction with ETAGs as only being 2/5), as they were felt to be too wide and overly complex. It was suggested that EOTA should concentrate on "" ETAGs with a smaller scope and a more simple format.

8.3. Main Survey Conclusion: The ETA system is perceived as being expensive:

22% of M&TA that had applied for an ETA felt that there were no benefits of the system in relation to cost, 55% rated the cost/benefit as 3 out of 5 or less. The reasons for the perceived high cost of an ETA are unclear. However some respondents felt that the fact that there are only a limited number of Approval Bodies (and that there is little or no competition in the sector) might be an explanation. On the other hand it should be borne in mind that the cost for manufacturer to obtain an ETA includes also an extensive initial type testing cost. In the case of compliance to a hEN, the manufacturer still has to pay the initial type testing cost for his product.

Nevertheless it is clear that the expense of the ETA system is a major issue for SMEs. Both manufacturers and Member States feared that the cost issue would have a detrimental affect on SMEs and that this would only be beneficial for larger companies (see below). For some having to buy ETAGs in their mother tongue was also an issue.

8.4. Main Conclusion: CPD needs amendments in some points

Not all Member States have transposed the CPD making the CE marking obligatory. The status of the ETAG in the regulatory provisions of the Member States is not clear and ETAs according to Art 9.2 are voluntary. These ambiguities do not allow for a coherent and common approach in order to achieve the Internal Market for products not covered by hENs.

8.5. ETAGs / CUAPs need to be ameliorated

The quality and consistency of ETAGs needs improvement. Complexity of ETAGs and the extent of product assessment (ETAGs and CUAPs) create concerns (e.g. serviceability aspects).

CUAPs must also be notified to SCC for information of Commission, national regulators and the market surveillance authorities of Member States.

8.6. Member States need to ameliorate their performance

Consultations between Member States' regulators and their ABs need to be better coordinated and more effective in order to avoid corrections / clarifications on regulatory issues at the SCC stage.

Member States do not commit themselves to CE marking via the ETA route. ETAGs are not usually published in the language(s) of the Member States, as required by CPD (Art 11.3).

Certain executives of EOTA Committees or of EOTA ABs represent their corresponding Member State in the Standing Committee 89/106/EEC (and its Preparatory Group) where decisions also related to the ETA system are taken.

8.7. EOTA internal consultation procedures need to be ameliorated

EOTA internal consultation procedures must be ameliorated in order to avoid delays in the adoption of ETAGs/CUAPs and further comments from regulators when the adopted ETAGs are presented to the SCC.

8.8. The conditions for the participation of industry in EOTA's technical work need to be re-examined

The participation of industry in EOTA Working Groups should guarantee the transparency in EOTA procedures, but issues regarding confidentiality and fairness of treatment concerning competing products must be ensured. On the other hand one must recognise that finding industry representatives to participate in the EOTA work may be difficult in the case of certain innovative or very complex products, which are produced by very small number of manufacturers.

Industry representatives participating in EOTA work would automatically accept the responsibility of informing the members of their associations on the development of the work but are obliged to respect confidentiality concerning the product under assessment.

8.9. UEAtc activities may be confusing the market

The promotion of the UEAtc activities concerning the "fitness for use and durability of products" are confusing for construction product manufacturers, which are trying to find the most appropriate way to put their products on the market without barriers to trade.

8.10. Conclusions on EOTA's financing by the Commission

The EOTA accounts do not seem to be the source of particular concerns. The declining structural support of the Commission is in line with the requirements of the new financial regulations.

The lack of precise information, justification and preparation on both sides (Commission / EOTA) has not allowed in the past the financing of specific actions not directly foreseen by the CPD (e.g. seminars, etc.) and resulted in EOTA losing financing opportunities for such specific actions.

8.11. Conclusions on the overall impact of ETAs on the Internal Market

Only a very small number of manufacturers (less than 30 and mainly on metal anchors) have received ETAs till now. For this reason the impact of the ETA system in the implementation of the Internal Market is for the moment very limited.

It must be stressed that one Member State did not allow one manufacturer to place a product on the market although an ETA covered the product.

8.12. Other Survey Conclusions:

8.12.1. The ETA system is dominated by a handful of players

The survey and the analysis of available information both indicate that the ETA system is dominated by a few Approval Bodies only from very few Member States. ABs from other Member States issue very few ETAs. If the other ABs have limited resources and know-how in order to issue ETAs the dominance of certain Approval Bodies is unlikely to be challenged for the moment.

8.12.2. SMEs find it hard to benefit from the ETA system

SMEs do not see the ETA system as affordable. As 80% of the companies in the building sector are SMEs, the ETAs should not, therefore, be a way to enable larger companies to out-compete with SMEs. One SME pointed out that the costs of an ETA represented one whole year's turnover for them, and this sort of investment was therefore extremely hard (if not impossible). The time issue was also very problematic for small companies, who often operate in fast-moving markets. The rise in costs as SMEs passed the extra cost of an ETA on to the market would also not benefit the client.

8.12.3. Member States must do more to promote the ETA system

Member States did not promote the system well enough and this might be one of the reasons why relatively few ETAs have been issued. National approvals continue to exist and to be issued in parallel to ETAs. Some respondents felt that Member States think ETAs are just another complication, others also felt that some Member States had little confidence in EOTA.

8.12.4. EOTA procedures should be more transparent

Some respondents indicated that they found the EOTA procedures to be too opaque. It was felt that working documents should be made available.

8.12.5. EOTA and ABs should co-operate more with industry

It was felt that EOTA and the ABs should co-operate more with industry. Certain manufacturers invest heavily in certified testing procedures. Therefore manufacturers consider logical if, for example, they would be able to undertake some tests at their premises under AB supervision. This possibility is already applied by the EOTA Approval Bodies (Guidance Document Nr. 4 on the EOTA website) but it seems that it is not broadly known to manufacturers. Therefore the relevant information must be adequately disseminated.

The fact that industry is, in certain areas, not adequately represented within EOTA was also criticised. EOTA is also seen as being dominated by national bodies and laboratories.

8.12.6. EOTA ABs are too often part of other bodies

Several survey respondents found that EOTA ABs also represent Member States in the SCC and/or are notified bodies, and that there might be a certain level of conflict within this arrangement. It was felt that that the fact that some members of SCC are also members of EOTA might lead to a tendency not to self-criticise.

9. RECOMMENDATIONS

The recommendations formulated by the Evaluation Team correspond to the findings and conclusions of the evaluation and are made in order to make the ETA system faster, simpler, more affordable for the producers and in order to increase its effectiveness and transparency on the basis of the existing provisions of the CPD. Recommendation have also been formulated concerning necessary amendments in order to clarify certain provisions of the CPD in order to obtain a unique and coherent transposition of the directive in the Member States.

Depending on their objectives, these recommendation may be incorporated by the responsible Unit of DG Enterprise (G-5) in the proposals to amend the Directive 89/106/EEC, the new Framework Agreement between the Commission and EOTA and the Commission Decision 94/23/EC on the procedure to issue ETAs.

9.1. Recommendation to speed up the issuing of ETAs:

The Commission should:

- apply a written procedure via the SCC Circa (restricted access Internet facility) for the consultation of the SCC in order to decide:
 - if ETAs are appropriate for a certain area,
 - on the system of Attestation of Conformity for ETAs, and
 - on the endorsement of finalised ETAGs;
- refrain from consulting CEN in areas where the CEN/TCs replies to the mandates clearly state that the corresponding CEN/TCs will not elaborate harmonised European standards in this area⁹;
- examine the possibility to give automatically "green lights" for the issue of ETAs if no hEN are envisaged within a reasonable time (e.g. when the availability of the hEN is not envisaged earlier than 5 years);

EOTA should:

- use a written procedure via the EOTA CIRCA (restricted access Internet facility) to speed up the circulation of information and consultation of its members in ALL stages of EOTA internal consultations;
- Provide electronically the necessary information files on new EOTA items to the Commission AND to CEN simultaneously. This should start the CEN consultation period;

⁹ It should be noted that the Commission services have already agreed to allow automatically the issue of ETAs according to Art. 9.2 of the CPD as long as a corresponding ETAG is under preparation and that the Commission need not to be consulted for products deviating from existing harmonised ENs.

- Shorten substantially the ETAG and CUAP elaboration period. In case of lack of agreement between ABs the issues should be referred to SCC as foreseen in CPD.

CEN should:

- use a written procedure by e-mail and should speed up the circulation and examination of EOTA proposals;
- shorten the CEN consultation period to 2 months MAXIMUM. The answer should be conveyed electronically to the Commission as soon as it is available;
- answer precisely and rapidly when the question "Can a harmonised EN be elaborated for this product" is posed, and should provide specific information on which Work Item (existing or new) will cover the product accompanied by a credible and binding timetable. An imprecise answer should be considered by the Commission as a refusal to elaborate harmonised ENs for the specific product;

9.2. Recommendation to simplify the ETA system:

EOTA / Approval Bodies should:

- revise the ETAG model in order to simplify it and avoid unnecessary repetitions;
- stress to the manufacturers the possibility to use the NPD option (No Performance Determined) in ETAs if manufacturers target the markets of only some Member States; CUAPs and ETAs should be drafted accordingly;
- assure that only regulatory requirements of the Member States are included in the CUAPs and assure a harmonisation between these requirements; serviceability requirements should be kept to a minimum;
- abolish the last examination by the other EOTA ABs of the draft ETA after its preparation by the AB that received the manufacturer's application (last phase of the procedure). Such an examination should only be maintained for the first ETA issued under an ETAG or CUAP.

9.3. Recommendation to make the ETA system less expensive

The above simplifications of the ETA system are also expected to make ETAs less expensive for the manufacturers. In addition to the above:

- The assessment testing foreseen in ETAGs / CUAPs should be defined taking into account the cost as a principal issue;
- EOTA should ensure that ETAs will be affordable for manufacturers (e.g. by proper consultation of representative industrial associations) before the adoption of the ETAGs;
- The EOTA consultant should also be asked to examine that the envisaged costs will remain reasonable before the finalisation of ETAGs and CUAPs.
- Manufacturers must be well informed of the fact that ABs accept results of tests provided by manufacturers under certain conditions. This possibility should be adequately advertised on the EOTA website and included in the information provided to manufacturers by ABs.

- EOTA should use as much as possible CEN or ISO standardised test methods.

9.4. Recommendations concerning the CPD

The Directive 89/106/EEC should be amended in order to:

- clarify the obligatory character of the CE marking;
- oblige Member States to incorporate the ETA Guidelines in their regulatory framework and to impose that products covered by the scope of a Guideline (after the envisaged co-existence period) may be placed on the market only by compliance to a corresponding ETA;
- impose that products not covered by harmonised ENs, or ETA Guidelines may be placed on the market only by compliance to an ETA without Guideline.

The Commission:

- should publish at regular intervals the complete list of products for which CE marking has become obligatory under the CPD

9.5. Recommendations concerning qualifications of the EOTA ABs

The Commission (on the occasion of the amendment of the CPD) should:

- clarify that the criteria of Annex IV of the CPD also apply for the EOTA ABs.

Member States should:

- examine in which areas the EOTA ABs capable of delivering ETAs as required by the CPD;
- examine if their ABs continue to comply with the requirements of the CPD and re-designate them accordingly;

EOTA should:

- undertake the obligation to organise the exchange of experience and know how between the EOTA ABs (internal workshops, seminars, exchange of professionals). The objective of the exercise is to increase the number of ABs able to issue ETAs for the various product families and could contribute to a decrease of the cost of the ETAs.

9.6. Recommendations concerning CUAPs

EOTA should keep the Commission and the SCC updated on the preparation and the content of the CUAPs. The finalised CUAPs need to be sent (for information) to the regulators and market surveillance authorities of the Member States.

The Commission's EOTA consultant should also be asked to examine the CUAPs (before their adoption in EOTA) concerning consistency in their approach and their content in order to assure compliance with the CPD principles.

9.7. Recommendations concerning the participation of industry in the work of EOTA and amelioration of internal consultation procedures

EOTA should:

- choose as industry representatives only bodies that are really representative of the industry in the corresponding sector to participate in the technical work for the preparation of ETAGs / CUAPs;
- Take all necessary measures to assure that this participation will not effectively compromise the confidentiality of product technical details and fairness of treatment of competing products;

Member States should:

- co-operate closely with their EOTA ABs in order to assure constructive and not obstructive consultation on the draft ETAGs and CUAPs in order to avoid delays and the refusal of documents and/or products at a later stage;

Industrial associations participating in EOTA work must:

- prove that they represent the relevant industrial sub-sector in Europe and undertake the responsibility to adequately inform their members on the developments in the area of ETAs.

9.8. Recommendations concerning the promotion of the ETA system by the Member States

Member States should:

- disseminate information to construction products manufacturers and their associations on the obligations / possibilities offered by the ETA system;
- translate the adopted ETAGs in their language(s) and make them available to the interested parties;
- incorporate the ETAGs in their regulatory system
- require their ABs not to issue national approvals as soon as for those products ETAs are possible;

9.9. Recommendations concerning EOTA representatives in SCC

Member States need to re-examine their internal arrangements and undertake the necessary steps in order to avoid that executives of EOTA Committees or of EOTA ABs act as Head of Delegations in the Standing Committee 89/106/EEC or as Member States' representatives in the Preparatory Group of the SCC (for EOTA related questions).

9.10. Recommendations concerning EOTA financing

The EOTA budget should be able to finance the expenses for the required increase of the personnel in the EOTA Secretariat. The necessary additional financing should be covered from fees and contributions of the Approval Bodies.

Concerning financing of EOTA, it should be noted that the EOTA request and the financing rules of the Commission for such a financing must be communicated to the other party in the appropriate time in order to allow for the proper preparation and implementation of the envisaged actions.

9.11. Recommendations concerning other issues

The Commission should:

- request UEAtc not to undertake approval activities in the regulated areas concerning construction products not yet covered by European specifications and to modify accordingly its website and information material;
- examine to allow purely voluntary product performance aspects to be covered by the responsible EOTA AB in a voluntary addendum to the ETAs (only if the manufacturer wishes so).

10. ANNEX I: THE SURVEYS (UNCOMPELETED SAMPLES)

For information uncompleted examples of the survey questionnaires are included, in the following order:

- (1) M&TA
- (2) MS
- (3) ABs

NB: The questionnaires are as per those sent to potential respondents bar 1 element, that being that the header (“Questions”) of page 2 of each questionnaire has been slightly modified in order that they be more clearly listed in the Table of Contents of this report.



10.1. QUESTIONNAIRE TO MANUFACTURERS AND TRADE ASSOCIATIONS/FEDERATIONS

AS YOU MAY BE AWARE, THE EUROPEAN COMMISSION IS UNDERTAKING AN EVALUATION OF THE OPERATIONS OF THE EUROPEAN ORGANISATION FOR TECHNICAL APPROVALS (EOTA) AND OF THE SYSTEM OF EUROPEAN TECHNICAL APPROVALS (ETA), INCLUDING THE CURRENT PROCEDURES THAT APPLY IN THE ISSUING OF EITHER EUROPEAN TECHNICAL APPROVALS OR THEIR GUIDELINES. THE MAIN PURPOSE IS TO ASSESS IF THERE ARE CERTAIN ASPECTS THAT NEED TO BE IMPROVED. THE EVALUATION ALSO INTENDS TO SERVE AS A BASIS FOR THE PREPARATION OF A NEW FRAMEWORK AGREEMENT BETWEEN THE EOTA AND THE COMMISSION.

WE HAVE THEREFORE PREPARED THE ATTACHED DOCUMENT THE ANSWER TO WHICH WE HOPE WILL PROVIDE US WITH BOTH A BROAD APPRECIATION OF THE CURRENT STATE OF PLAY WHILST HIGHLIGHTING ANY PARTICULAR PROBLEMS FACED BY STAKEHOLDERS.

WE WOULD THEREFORE BE VERY GRATEFUL IF YOU COULD RESPOND TO THE QUESTIONS RAISED AND SEND THESE BY EMAIL TO georgios.katsarakis@cec.eu.int **NO LATER THAN 25/4/03**.

THANK YOU FOR YOUR KIND CO-OPERATION!

This document is an MS Word-form. If you are not familiar with Word-forms, please note that there are two types of fields to be completed:

- *Tick boxes: in which you click to tick*
- *Text fields: in which you can write what you like*

IF YOU HAVE ANY QUESTIONS REGARDING THIS DOCUMENT OR THE SURVEY ITSELF, PLEASE CONTACT georgios.katsarakis@cec.eu.int

***While all individual responses will be held in confidence, we intend to make the main findings of this exercise public and place them onto the DG Enterprise, Construction Web-site at:
<http://europa.eu.int/comm/enterprise/construction/index.htm>***

M&TA Questions:

1) Have you ever applied for an ETA?

Yes

No

2) How satisfied are you with the procedures for processing of applications for ETAs?

Totally dissatisfied ←————→ Totally satisfied

1 2 3 4 5

Don't know

Optional: If you answered 1, 2, or 3 to question 2 please explain how and why it could be improved (<100 words):

3) Given the existing regulatory framework and related procedures, how effectively do you consider that the Approval Bodies are in issuing ETAs?

Not effectively at all ←————→ Very effectively

1 2 3 4 5

Don't know

Optional: If you answered 1, 2, or 3 to question 3 please explain how and why it could be improved (<100 words):

6) To what extent do you consider that the ETA system contributes to the achievement of the following objectives?

1 = no contribution 5 = significant contribution	1	2	3	4	5	Don't know
a) To abolish national barriers to trade between EU member states in order to create the internal market for construction products	<input type="checkbox"/>					
b) To ensure that only products fit for use are put on the market	<input type="checkbox"/>					
c) To afford access to the market for as many manufacturers as possible	<input type="checkbox"/>					
d) To ensure the greatest possible degree of market transparency	<input type="checkbox"/>					
e) To create the conditions for a harmonised system of general rules in the construction industry	<input type="checkbox"/>					

7) Are there any other points you feel the evaluators should take into consideration?

If so, please add your comments here (<100 words):



THANKS AGAIN, PLEASE SAVE THIS QUESTIONNAIRE UNDER [YOURNAME].DOC, AND RETURN IT BY E-MAIL TO: georgios.katsarakis@cec.eu.int



10.2. QUESTIONNAIRE TO MEMBER STATES

AS YOU MAY BE AWARE, THE EUROPEAN COMMISSION IS UNDERTAKING AN EVALUATION OF THE OPERATIONS OF THE EUROPEAN ORGANISATION FOR TECHNICAL APPROVALS (EOTA) AND OF THE SYSTEM OF EUROPEAN TECHNICAL APPROVALS (ETA), INCLUDING THE CURRENT PROCEDURES THAT APPLY IN THE ISSUING OF EITHER EUROPEAN TECHNICAL APPROVALS OR THEIR GUIDELINES. THE MAIN PURPOSE IS TO ASSESS IF THERE ARE CERTAIN ASPECTS THAT NEED TO BE IMPROVED. THE EVALUATION ALSO INTENDS TO SERVE AS A BASIS FOR THE PREPARATION OF A NEW FRAMEWORK AGREEMENT BETWEEN THE EOTA AND THE COMMISSION.

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<http://europa.eu.int/comm/enterprise/construction/index.htm>***

Not effectively at all ←————→ Very effectively

1	2	3	4	5
<input type="checkbox"/>				

Don't know

Optional: If you answered 1, 2, or 3 to question 3 please explain why and how it could be improved:



4) To what extent do you consider that the procedures for processing applications for ETAs are satisfactory?

Totally unsatisfactory ←————→ Totally satisfactory

1	2	3	4	5
<input type="checkbox"/>				

Don't know

Optional: If you answered 1, 2, or 3 to question 4 please explain why and how it could be improved (<100 words):



5) How effectively do you consider that the bodies involved in the above procedures are carrying out their tasks?

Totally unsatisfactory ←————→ Totally satisfactory

	1	2	3	4	5
Approval Bodies	<input type="checkbox"/>				
CEN	<input type="checkbox"/>				
Commission	<input type="checkbox"/>				
SCC / MS	<input type="checkbox"/>				
EOTA	<input type="checkbox"/>				

Optional: If you answered 1, 2, or 3 for some bodies please explain why and how it could be improved:



6) Please indicate whether you think that any of the following aspects of the ETA system should be improved?

8) The time required to process an application

9) The quality of the ETAGs

10) The quality of the ETAs

11) The confidentiality of an application

12) The overall efficiency of the ETA system

13) Other

Please specify:

Optional: If you have indicated that any of the aspects above could be improved please say why and if possible how (<100 words):

7) To what extent do you consider that the consultation on ETA applications between the Commission and CEN is working satisfactorily?

Totally unsatisfactory ←————→ Totally satisfactory

1 2 3 4 5

Don't know

Optional: If you answered 1, 2, or 3 to question 7 please explain why

and how it could be improved (<100 words):

8) To what extent do you consider that the consultation on ETA applications or on other EOTA issues between the Commission and Standing Committee is working satisfactorily?

Totally unsatisfactory ←————→ Totally satisfactory

1 2 3 4 5

Don't know

Optional: If you answered 1, 2, or 3 to question 8 please explain why and how it could be improved (<100 words):

9) To what extent do you consider that the co-operation on ETAs or on other EOTA issues between the Approval Bodies is working satisfactorily?

Totally unsatisfactory ←————→ Totally satisfactory

1 2 3 4 5

Don't know

Optional: If you answered 1, 2, or 3 to question 9 please explain how and why it could be improved:

10) To what extent do you consider that the prices of ETAs are justified?

The prices are not justified at all ←————→ The prices are way too low

1 2 3 4 5

Don't know

Optional: If you answered 1, 2, or 3 to question 10 please explain how and why it could be improved (<100 words):

11) To what extent do you consider that the ETA system contributes to the achievement of the following objectives?

1 = no contribution 5 = significant contribution	1	2	3	4	5	Don't know
a) To abolish national barriers to trade between EU member states in order to create the internal market for construction products:	<input type="checkbox"/>					
b) To ensure that only products fit for use are put on the market	<input type="checkbox"/>					
c) To afford access to the market for as many manufacturers as possible	<input type="checkbox"/>					
d) To ensure the greatest possible degree of market transparency	<input type="checkbox"/>					
e) To create the conditions for a harmonised system of general rules in the construction industry	<input type="checkbox"/>					

12) How do you disseminate information on the adopted ETA Guidelines in your Member State? Please provide details and address of the website(s) (if relevant):

13) In case your Member State has not yet published the texts of the endorsed ETAGs in your official language(s), please indicate the reasons for this (<100 words):

14) Are there any other points you feel the evaluators should take into consideration?

If so, please add your comments here (<100 words):

THANKS AGAIN, PLEASE SAVE THIS QUESTIONNAIRE UNDER **[YOURNAME].DOC, AND RETURN
IT BY E-MAIL TO: georgios.katsarakis@cec.eu.int**



10.3. QUESTIONNAIRE TO EOTA APPROVAL BODIES

AS YOU MAY BE AWARE, THE EUROPEAN COMMISSION IS UNDERTAKING AN EVALUATION OF THE OPERATIONS OF THE EUROPEAN ORGANISATION FOR TECHNICAL APPROVALS (EOTA) AND OF THE SYSTEM OF EUROPEAN TECHNICAL APPROVALS (ETA), INCLUDING THE CURRENT PROCEDURES THAT APPLY IN THE ISSUING OF EITHER EUROPEAN TECHNICAL APPROVALS OR THEIR GUIDELINES. THE MAIN PURPOSE IS TO ASSESS IF THERE ARE CERTAIN ASPECTS THAT NEED TO BE IMPROVED. THE EVALUATION ALSO INTENDS TO SERVE AS A BASIS FOR THE PREPARATION OF A NEW FRAMEWORK AGREEMENT BETWEEN THE EOTA AND THE COMMISSION.

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<http://europa.eu.int/comm/enterprise/construction/index.htm>

Totally unsatisfactory ←————→ Totally satisfactory

1 2 3 4 5

Don't know

Optional: If you answered 1, 2, or 3 to question 6 please and how it could be improved (<100 words):

7) To what extent do you consider that the consultation on ETA applications or on other EOTA issues between the Commission and Standing Committee is working satisfactorily?

Totally unsatisfactory ←————→ Totally satisfactory

1 2 3 4 5

Don't know

Optional: If you answered 1, 2, or 3 to question 7 please explain why and how it could be improved (<100 words):

8) To what extent do you consider that the co-operation on ETAs or on other EOTA issues between the Approval Bodies is working satisfactorily?

Totally unsatisfactory ←————→ Totally satisfactory

1 2 3 4 5

Don't know

Optional: If you answered 1, 2, or 3 to question 8 please explain why and how it could be improved:

█

9) To what extent do you consider that the ETA system contributes to the achievement of the following objectives?

1 = no contribution 5 = significant contribution	1	2	3	4	5	Don't know
a) To abolish national barriers to trade between EU member states in order to create the internal market for construction products:	<input type="checkbox"/>					
b) To ensure that only products fit for use are put on the market	<input type="checkbox"/>					
c) To afford access to the market for as many manufacturers as possible	<input type="checkbox"/>					
d) To ensure the greatest possible degree of market transparency	<input type="checkbox"/>					
e) To create the conditions for a harmonised system of general rules in the construction industry	<input type="checkbox"/>					

10) How many manufacturers/agents have applied to your Approval Body for an ETA?
Applications received from █ manufacturers/agents. █

11) Are there any other points you feel the evaluators should take into consideration?
If so, please add your comments here (<100 words): █

█

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11. ANNEX II: TABLE OF OVERALL RESULTS OF M&TA SURVEY:

	YES	NO	Overall	YES	NO	Overall
1) Have you ever applied for an ETA?						
Yes	100%		39%			
No		100%	61%			
<i>Total responses</i>						
2) How satisfied are you with the procedures for processing of application for ETA's?				2.50	2.25	2.42
1 (Totally dissatisfied)	18%	17%	17%			
2 (Fairly dissatisfied)	36%	23%	29%			
3 (neither satisfied nor dissatisfied)	14%	7%	10%			
4 (Fairly satisfied)	18%	10%	13%			
5 (Totally satisfied)	9%	0%	4%			
Don't know	5%	43%	27%			
<i>Total responses</i>						
3) Given the existing regulatory framework and related procedures, how effectively do you consider that the App				2.55	2.67	2.65
1 (not effectively at all)	18%	9%	13%			
2 (fairly ineffectively)	32%	18%	24%			
3 (neither effectively nor ineffectively)	18%	15%	16%			
4 (Fairly effectively)	18%	15%	16%			
5 (Very effectively)	9%	0%	4%			
Don't know	5%	42%	27%			
<i>Total responses</i>						
4) Please indicate whether you think that any of the following aspects of the ETA system should be improved?						
6) The overall efficiency of the ETA system	27%	20%	37%			
3) The time required to process an application	22%	16%	30%			
Other	22%	14%	29%			
1) The comprehensiveness of the info. provided by the AB	15%	15%	22%			
2) The clarity of the information provided by the AB	13%	16%	21%			
4) The quality of the ETAs	13%	15%	20%			
5) The confidentiality of an application	2%	2%	3%			
5) To what extent do the benefits of obtaining an ETA outweigh the costs?				2.50	1.96	2.33
1(There are no benefits)	23%	39%	33%			
2) (benefits do not outweigh costs)	18%	18%	18%			
3 (the cost/benefit ratio is about right)	18%	6%	11%			
4 (The benefits outweigh the costs)	23%	12%	16%			
5 (benefits greatly outweigh the costs)	9%	3%	5%			
Don't know	9%	21%	16%			
<i>Total responses</i>						
6) To what extent do you consider that the ETA system contributes to the achievement of the following objectives?						
a) To abolish national barriers to trade between EU member states in order to create the internal market for construction products				3.05	2.07	2.75
1 (no contribution)	14%	39%	30%			
2 (small contribution)	9%	15%	13%			
3 (some contribution)	9%	9%	9%			
4 (bigger-than-average contribution)	27%	9%	16%			
5 (significant contribution)	27%	12%	18%			
Don't know	14%	15%	14%			
<i>Total responses</i>						
b) To ensure that only products fit for use are put on the market				3.05	2.55	2.77
1 (no contribution)	9%	30%	23%			
2 (small contribution)	27%	12%	18%			
3 (some contribution)	27%	21%	23%			
4 (bigger-than-average contribution)	23%	15%	18%			
5 (significant contribution)	14%	12%	13%			
Don't know	0%	9%	5%			
<i>Total responses</i>						
c) To afford access to the market for as many manufacturers as possible				2.55	1.62	2.14
1 (no contribution)	27%	45%	39%			
2 (small contribution)	18%	21%	20%			
3 (some contribution)	27%	6%	14%			
4 (bigger-than-average contribution)	5%	6%	5%			
5 (significant contribution)	18%	3%	9%			
Don't know	5%	18%	13%			
<i>Total responses</i>						
d) To ensure the greatest possible degree of market transparency				3.09	2.21	2.58
1 (no contribution)	18%	42%	34%			
2 (small contribution)	9%	12%	11%			
3 (some contribution)	32%	15%	21%			
4 (bigger-than-average contribution)	27%	12%	18%			
5 (significant contribution)	14%	9%	11%			
Don't know	0%	9%	5%			
<i>Total responses</i>						
e) To create the conditions for a harmonised system of general rules in the construction industry				3.68	2.69	3.08
1 (no contribution)	14%	32%	26%			
2 (small contribution)	0%	13%	7%			
3 (some contribution)	18%	16%	17%			
4 (bigger-than-average contribution)	41%	16%	26%			
5 (significant contribution)	27%	16%	20%			
Don't know	0%	6%	4%			
<i>Total responses</i>						
<i>Total responses</i>				22.95	18.02	20.73
No of questions with averages				8.00		
Overall Average				2.87	2.25	2.59

12. ANNEX III: OVERALL RESULTS OF MS SURVEY:

Country	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15		
1) Given the existing regulatory framework and related procedures, how effectively do you think that the EOTA organisation is elaborating ETA Guidelines (ETAGs)?																	
1 (not effectively at all)	0%										1					0	
2 (fairly ineffectively)	33%			1										1		3	
3 (neither effectively nor ineffectively)	11%						1									1	
4 (Fairly effectively)	44%		1		1					1				1		4	
5 (Very effectively)	11%															1	
Don't know	0%															0	3.33 = average out of 5
Total responses																9	67% expressed as %
2) How effectively do you think that EOTA is co-ordinating on specific questions of technical approvals (CPD, Annex II.4)?																	
1 (not effectively at all)	0%															0	
2 (fairly ineffectively)	11%			1												1	
3 (neither effectively nor ineffectively)	11%						1									1	
4 (Fairly effectively)	44%		1		1					1				1		4	
5 (Very effectively)	11%					1										1	
Don't know	22%										1			1		2	3.71 = average out of 5
Total responses																9	74% expressed as %
3) Given the existing regulatory framework and related procedures, how effectively do you consider that the Approval Bodies are in issuing ETAs?																	
1 (not effectively at all)	11%			1												1	
2 (fairly ineffectively)	0%															0	
3 (neither effectively nor ineffectively)	33%						1				1				1	3	
4 (Fairly effectively)	11%				1											1	
5 (Very effectively)	22%					1				1						2	
Don't know	22%		1											1		2	3.43 = average out of 5
Total responses																9	69% expressed as %
4) To what extent do you consider that the procedures for processing applications for ETAs are satisfactory?																	
1 (Totally unsatisfactory)	11%														1	1	
2 (Fairly unsatisfactory)	33%			1						1				1		3	
3 (neither unsatisfactory nor satisfactory)	0%															0	
4 (Fairly satisfactory)	44%		1		1	1	1									4	
5 (Totally satisfactory)	0%															0	
Don't know	11%									1						1	2.88 = average out of 5
Total responses																9	58% expressed as %
5) How effectively do you consider that the bodies involved in the above procedures are carrying out their tasks?																	
<i>Approval Bodies</i>																	
1 (Totally unsatisfactory)	0%															0	
2 (Fairly unsatisfactory)	13%			1												1	
3 (neither unsatisfactory nor satisfactory)	19%						0.5								1	2	
4 (Fairly satisfactory)	56%		1		1		0.5			1				1		5	
5 (Totally satisfactory)	13%					1										1	74% expressed as %
Total responses																8	3.69 = average out of 5
<i>CEN</i>																	
1 (Totally unsatisfactory)	0%															0	
2 (Fairly unsatisfactory)	57%				1	1	1	1						1		4	
3 (neither unsatisfactory nor satisfactory)	29%			1						1						2	
4 (Fairly satisfactory)	14%		1													1	
5 (Totally satisfactory)	0%															0	51% expressed as %
Total responses																7	2.57 = average out of 5
<i>Commission</i>																	
1 (Totally unsatisfactory)	0%															0	
2 (Fairly unsatisfactory)	29%													1	1	2	
3 (neither unsatisfactory nor satisfactory)	57%			1	1	1	1									4	
4 (Fairly satisfactory)	14%		1													1	
5 (Totally satisfactory)	0%															0	57% expressed as %
Total responses																7	2.86 = average out of 5
<i>SCC / MS</i>																	
1 (Totally unsatisfactory)	0%															0	
2 (Fairly unsatisfactory)	25%													1	1	2	
3 (neither unsatisfactory nor satisfactory)	25%		1				1									2	
4 (Fairly satisfactory)	38%			1	1					1						3	
5 (Totally satisfactory)	13%					1										1	68% expressed as %
Total responses																8	3.38 = average out of 5
<i>EOTA</i>																	
1 (Totally unsatisfactory)	0%															0	
2 (Fairly unsatisfactory)	25%			1											1	2	
3 (neither unsatisfactory nor satisfactory)	25%						1							1		2	
4 (Fairly satisfactory)	38%		1		1					1						3	
5 (Totally satisfactory)	13%					1										1	68% expressed as %
Total responses																8	3.38 = average out of 5
6) Please indicate whether you think that any of the following aspects of the ETA system should be improved?																	
1) The time required to process an application	40%		1	1	1	1	1			1	1			1	1	8	
2) The quality of the ETAGs	10%			1										1		2	
3) The quality of the ETAs	5%			1												1	
4) The confidentiality of an application	5%		1													1	
5) The overall efficiency of the ETA system	30%			1		1				1	1			1	1	6	
6) Other	10%					1				1						2	
Total responses																20	
7) To what extent do you consider that the consultation on ETA applications between the Commission and CEN is working satisfactorily?																	
1 (Totally unsatisfactory)	0%															0	
2 (Fairly unsatisfactory)	44%				1	1				1	1					4	
3 (neither unsatisfactory nor satisfactory)	44%			1		1								1	1	4	
4 (Fairly satisfactory)	11%		1													1	
5 (Totally satisfactory)	0%															0	
Don't know	0%															0	2.67 = average out of 5
Total responses																9	53% expressed as %
8) To what extent do you consider that the consultation on ETA applications or on other EOTA issues between the Commission and Standing Committee is working satisfactorily?																	
1 (Totally unsatisfactory)	0%															0	
2 (Fairly unsatisfactory)	33%		1	1										1		3	
3 (neither unsatisfactory nor satisfactory)	33%			1		1									1	3	
4 (Fairly satisfactory)	22%					1	1			1						2	
5 (Totally satisfactory)	0%															0	
Don't know	11%									1						1	2.88 = average out of 5
Total responses																9	58% expressed as %

14.13.

9) To what extent do you consider that the co-operation on ETAs or on other EOTA issues between the Approval Bodies is working satisfactorily?												
1 (Totally unsatisfactory)	0%											0
2 (Fairly unsatisfactory)	22%		1					1				2
3 (neither unsatisfactory nor satisfactory)	11%				1							1
4 (Fairly satisfactory)	22%			1						1		2
5 (Totally satisfactory)	11%				1							1
Don't know	33%		1					1		1		3
<i>Total responses</i>												
												9
10) To what extent do you consider that the prices of ETAs are justified?												
1 (The prices are not at all justified)	0%											0
2 (The prices are rather high)	13%							1				1
3 (The prices are neither too high nor too low)	25%		1			1						2
4 (The prices are fairly low)	0%											0
5 (The prices are way too low)	0%											0
Don't know	63%			1	1			1		1	1	5
<i>Total responses</i>												
												8
11) To what extent do you consider that the ETA system contributes to the achievement of the following objectives?												
<i>a) To abolish national barriers to trade between EU member states in order to create the internal market for construction products</i>												
1 (no contribution)	6%										0.5	1
2 (small contribution)	38%		1	1								3
3 (some contribution)	19%				1						0.5	2
4 (bigger-than-average contribution)	13%									1		1
5 (significant contribution)	25%					1			1			2
Don't know	0%											0
<i>Total responses</i>												
												8
<i>b) To ensure that only products fit for use are put on</i>												
1 (no contribution)	11%											1
2 (small contribution)	33%		1	1			1					3
3 (some contribution)	11%										1	1
4 (bigger-than-average contribution)	22%				1			1				2
5 (significant contribution)	11%					1						1
Don't know	11%							1				1
<i>Total responses</i>												
												9
<i>c) To afford access to the market for as many manufacturers as possible</i>												
1 (no contribution)	13%										1	1
2 (small contribution)	50%		1	1	1							4
3 (some contribution)	13%									1		1
4 (bigger-than-average contribution)	13%							1				1
5 (significant contribution)	13%				1							1
Don't know	0%											0
<i>Total responses</i>												
												8
<i>d) To ensure the greatest possible degree of market transparency</i>												
1 (no contribution)	13%								1			1
2 (small contribution)	38%		1	1					1			3
3 (some contribution)	0%											0
4 (bigger-than-average contribution)	38%				1					1	1	3
5 (significant contribution)	13%					1						1
Don't know	0%											0
<i>Total responses</i>												
												8
<i>e) To create the conditions for a harmonised system of general rules in the construction industry</i>												
1 (no contribution)	25%			1					1			2
2 (small contribution)	13%										1	1
3 (some contribution)	25%		1		1							2
4 (bigger-than-average contribution)	13%									1		1
5 (significant contribution)	13%					1						1
Don't know	13%								1			1
<i>Total responses</i>												
												8
12 How do you disseminate information on the adopted ETA Guidelines in your Member State? Please provide details and address of the website(s)												
Official journal (or equivalent)	31%			1	1	1			1			4
Website	38%		1		1				1		1	5
Other fora	23%			1	1				1			3
Not disseminated	0%											0
No data	8%						1					1
<i>Total responses</i>												
												13
13 Does your legislation oblige manufacturers to have an ETA after the end of the relevant ETAG co-existence period												
Yes	33%				1	1	1			1		3
No	44%			1						1	1	4
No data	22%		1				1					2
<i>Total responses</i>												
												9
14) In case your Member State has not yet published the texts of the endorsed ETAGs in your official language(s), please indicate the reasons for this												
Translations made	22%		1							1		2
Translations of titles only	11%										1	1
Translations not made - "not enough demand"	11%				1							1
Translations not made - "ETA not obligatory"	11%		1									1
No data	44%					1	1			1		4
<i>Total responses</i>												
												9

13. ANNEX IV: COMPARATIVE DATA FROM THE 3 SURVEYS

	M & TA (overall)	MS	M & TA average out of 5 (of those who have applied)	M & TA average out of 5 (of those who have not applied)	MS average out of 5	AB stated average out of 5
3) Given the existing regulatory framework and related procedures, how effectively do you consider that the Approval Bodies are in issuing ETAs?						
1 (not effectively at all)	13%	11%				
2 (fairly ineffectively)	24%	0%				
3 (neither effectively nor ineffectively)	16%	33%				
4 (Fairly effectively)	16%	11%				
5 (Very effectively)	4%	22%				
Don't know	27%	22%	2.55	1.52	3.43	
<i>Total responses</i>						
4) Please indicate whether you think that any of the following aspects of the ETA system should be improved?						
1) The comprehensiveness of the information provided by the Approval Bodies	37%	N/A				
2) The clarity of the information provided by the Approval Bodies	30%	N/A				
3) The time required to process an application	29%	40%	22%			
4) The quality of the ETAs	22%	5%	15%			
5) The confidentiality of an application	21%	5%	2%			
6) The overall efficiency of the ETA system	20%	30%	27%			
Other	3%	10%	22%			
5) To what extent do the benefits of obtaining an ETA outweigh the costs?						
1 (There are no benefits)	33%	0%				
2) (there are some benefits but they do not outweigh the costs)	18%	13%				
3 (the cost/benefit ratio is about right)	11%	25%				
4 (The benefits outweigh the costs)	16%	0%				
5 (The benefits greatly outweigh the costs)	5%	0%				
Don't know	16%	63%	2.50	1.58	2.67	
<i>Total responses</i>						
6) To what extent do you consider that the ETA system contributes to the achievement of the following objectives?						
<i>a) To abolish national barriers to trade between EU member states in order to create the internal market for construction products</i>						
1 (no contribution)	34%	6%				
2 (small contribution)	14%	38%				
3 (some contribution)	10%	19%				
4 (bigger-than-average contribution)	14%	13%				
5 (significant contribution)	14%	25%				
Don't know	14%	0%	3.05	1.94	3.13	3.50
<i>Total responses</i>						
<i>b) To ensure that only products fit for use are put on the market</i>						
1 (no contribution)	26%	11%				
2 (small contribution)	18%	33%				
3 (some contribution)	24%	11%				
4 (bigger-than-average contribution)	16%	22%				
5 (significant contribution)	12%	11%				
Don't know	4%	11%	3.05	2.39	2.88	4.50
<i>Total responses</i>						
<i>c) To afford access to the market for as many manufacturers as possible</i>						
1 (no contribution)	44%	13%				
2 (small contribution)	18%	50%				
3 (some contribution)	14%	13%				
4 (bigger-than-average contribution)	4%	13%				
5 (significant contribution)	8%	13%				
Don't know	12%	0%	2.55	1.45	2.63	4.00
<i>Total responses</i>						
<i>d) To ensure the greatest possible degree of market transparency</i>						
1 (no contribution)	36%	13%				
2 (small contribution)	12%	38%				
3 (some contribution)	18%	0%				
4 (bigger-than-average contribution)	18%	38%				
5 (significant contribution)	12%	13%				
Don't know	4%	0%	3.09	2.06	3.00	4.50
<i>Total responses</i>						
<i>e) To create the conditions for a harmonised system of general rules in the construction industry</i>						
1 (no contribution)	28%	25%				
2 (small contribution)	8%	13%				
3 (some contribution)	16%	25%				
4 (bigger-than-average contribution)	22%	13%				
5 (significant contribution)	22%	13%				
Don't know	4%	13%	3.68	2.52	2.71	4.50
<i>Total responses</i>						

14. ANNEX V: ISSUED ETAs (TILL APRIL 2003):

(Information published on the EOTA website: www.eota.be)

ETA Numbers	Product	Holder of the approval	Approval Body	Generic Type and Use
ETA-98/0001 (amendment)	Hilti Durchsteckanker HST	Hilti Aktiengesellschaft Business Unit Anchors FL - 9494 Schaan	DIBt	Torque-controlled expansion anchor made of galvanized steel of sizes M8, M10, M12, M16, M20 and M24 for use in concrete
ETA-98/0002 (amendment)	Hilti Durchsteckanker HST-R	Hilti Aktiengesellschaft Business Unit Anchors FL - 9494 Schaan	DIBt	Torque-controlled expansion anchor made of stainless steel of sizes M8, M10, M12, M16, M20 and M24 for use in concrete
ETA-98/0003	RAWL R-HPT	The Rawlplug Company Ltd. Skibo Drive Thornliebank Industrial Estate Glasgow G46 8JR United Kingdom	CSTB	Torque-controlled expansion anchor, made of zinc electroplated steel, for use in concrete: sizes M8, M10, M12, M16 and M20.
ETA-98/0004 (amendment)	fischer - Zykon - Anker FZA	Artur Fischer GmbH & Co, KGD - 72178 Waldachtal Germany	DIBt	Undercut anchor made of galvanized steel of sizes M6, M8, M10, M12 and M16 for use in concrete.
ETA-98/0005 (amendment)	fischer - Zykon - Anker FZA A4	fischerwerke Artur Fischer GmbH & Co, KGD - 72178 Waldachtal Germany	DIBt	Undercut anchor made of stainless steel of sizes M6, M8, M10, M12 and M16 for use in concrete.
ETA-98/0006	RAWL R-SPT Throughbolt	The Rawlplug Company Ltd. Skido Drive Thornliebank Industrial Estate Glasgow G46 8JR United Kingdom	BBA	Zinc plated steel torque-controlled expansion anchor in sizes of M8, M10, M12, M16 and M20 for use in non-cracked concrete.
ETA-98/0007	Herawool-F-040 Herawool-NP-040 Herawool-NAP	Deutsche Heraklith GmbH Heraklithstrasse 8 D-84359 Simbach/Inn	DIBt	Thermal and/or acoustic insulation boards and thermal and/or acoustic insulation material made of sheep's wool fibres
ETA-98/0008	Herawool-BP-040 Herawool-BF-040	Deutsche Heraklith GmbH Heraklithstrasse 8 D-84359 Simbach/Inn	DIBt	Thermal and/or acoustic insulation boards and thermal and/or acoustic insulation mat made of flax, jute and polyester fibres
ETA-98/0009 (Amendment)	Heraflax-SP-040 Heraflax-SAP Heraflax-SF-040	Deutsche Heraklith GmbH Heraklithstrasse 8 84359 Simbach am Inn	DIBt	Thermal and/or acoustic insulation boards and thermal and/or acoustic insulation mat made of flax, jute and polyester fibres
ETA-98/0010	Upat U-IMC	Upat GmbH & Co. Freiburger Strasse 9 Postfach 1320 D - 79303 Emmendingen Deutschland	CSTB	Torque-controlled expansion anchor, made of zinc electroplated steel, for use in non cracked concrete: sizes M8, M10, M12, M16 and M20
ETA-98/0011 (amendment)	fischer - FBN	fischerwerke Artur Fischer GmbH & Co, KG Weinhadle 14-18 Postfach 1152 D-72176 Deutschland	CSTB	Torque-controlled expansion anchor, made of zinc electroplated steel, for use in non cracked concrete: sizes M8, M10, M12, M16 and M20
ETA-99/0001 (amendment)	HILTI HSA	HILTI AG, Business Unit Anchors FL-9494 Schaan	CSTB	Torque-controlled expansion anchor, made of galvanised steel, for use in non cracked concrete: sizes M6, M8, M10, M12, M16 and

ETA Numbers	Product	Holder of the approval	Approval Body	Generic Type and Use
nt)		Principality of Liechtenstein		M20
ETA-99/0002	Spit FIX Z	Sociit Spit Route de Lyon F-26501 Bourg-Les-Valence	CSTB	Torque-controlled expansion anchor, made of zinc electroplated steel, for use in concrete : sizes M8, M10, M12 and M16
ETA-99/0003 (amendment)	fischer High-Performance Anchor FH	fischerwerke Artur Fischer GmbH & Co. KG Weinhalde 14-18 D-72178 Waldachtal	DIBt	Torque-controlled expansion anchor, made of galvanised steel of sizes M6, M8, M10, M12 and M16 for use in concrete
ETA-99/0004 (amendment)	Upat PS High-Performance Anchor	Upat GmbH & Co Freiburger Stasse 9 D-79312 Emmendingen	DIBt	Torque-controlled expansion anchor, made of galvanised steel of sizes M6, M8, M10, M12 and M16 for use in concrete
ETA-99/0005	Upat MAX Express-Anker	Upat GmbH & Co. Freiburger Strasse 9 D-79312 Emmendingen	DIBt	Torque controlled expansion anchor, made of galvanised steel of sizes M8, M10, M12 and M16 for use in concrete
ETA-99/0006	Upat MAX Express-Anker A4	Upat GmbH & Co. Freiburger Strasse 9 D-79312 Emmendingen	DIBt	Torque controlled expansion anchor, made of galvanised steel of sizes M8, M10, M12 and M16 for use in concrete
ETA-99/0007	EJOT Wetterschalensicherung WSS	EJOT Kunststofftechnik GmbH & Co. KG FL-9494 Adolf-Böhl-Strasse 7 D-57319 Bad Berleburg	DIBt	Special anchor made of stainless steel for the fastening of additional securing in a permanent manner of external weather resistant skins of three-layer external wall panels made of concrete
ETA-99/0008	HILTI HSA-R	Hilti AG, Business Unit Anchors FL-9494 Schaan Principality of Liechtenstein	CSTB	Torque-controlled expansion anchor, made of stainless steel, for use in non-cracked concrete: sizes M6, M8, M10 and M12.
ETA-99/0009	HILTI HDA	Hilti AG, Business Unit Anchors FL-9494 Schaan Principality of Liechtenstein	CSTB	Self-cutting undercut anchor, made of galvanised steel, for use in concrete: sizes M10, M12 and M16.
ETA-99/0010 (amendment)	MKT Bolzenanker Z A4	MKT Auf dem Immel 2 D-67685 Weilerbach	DIBt	Torque controlled expansion anchor made of stainless steel of sizes M8, M10, M12 and M16 for use in concrete
ETA-99/0011(a amendment)	Würth Fixanker W-FAZ A4	Adolf Würth GmbH & Co. KGw Reinhold-Würth-Strasse 12-16 D-74653 Künzelsau	DIBt	Torque controlled expansion anchor made of stainless steel of sizes M8,M10,M12 and M16 for use in concrete
ETA-00/0001 (amendment)	fischer Ankerbolzen FAZ	fischerwerke Artur Fischer GmbH & Co. KG Wienhalde 14-18 D-72178 Waldachtal	DIBt	Torque controlled expansion anchor made of galvanised steel of sizes M8, M10, M12, M16, M20 & M24 for use in concrete
ETA-00/0002 (amendment)	Upat EXA-CT Express-Anker	Upat GmbH & Co. Freiburger Strasse 9 D-79312 Emmendingen	DIBt	Torque controlled expansion anchor made of galvanised steel of sizes M8, M10, M12, M16, M20 & M24 for use in concrete
ETA-00/0003	NOOD trap mounted in gully type PURUS ODEN	Sjöbo Bruk ab Södorgatan 7 S-27521 Sjöbo	ETA-DK	Trap with partially mechanical closure, mounted in a non-trapped gully.
ETA-00/0004	Upat EXA Express-Anchor	Upat GmbH & Co. Freiburger Strasse 9 Postfach 1320 D-79312 Emmendingen	CSTB	Torque controlled expansion anchor made of zinc electroplated steel, for use in non-cracked concrete: sizes M8, M10, M12,M16 and M20
ETA-00/0005	FIVE'S	Atelier du Verre s.a. Rue du Parc, 50	MCI-UBAtc	Structural sealant glazing kit for use in curtain walling

ETA Numbers	Product	Holder of the approval	Approval Body	Generic Type and Use
		B-4432 Alleur		
ETA-00/0006 (amendment)	Sormat S-KAD kiila-ankkurit	Sormat Oy Harjutie 5 FIN-21290 Rusko	VTT	Torque controlled expansion anchor made of galvanized steel of sizes M10, M12 and M16 for use in concrete.
ETA-00/0007	HILTI-X-IE 6	Hilti Aktiengesellschaft Business Unit Direktmontage FL-9494 Schaan	DIBt	Powder actuated fastener for the fixing of bonded thermal insulation composite systems in un-coated concrete
ETA-00/0008	TAC-TSA MC	TAS-TAC Anchor System SRL Via A,Moro N,232 66020, S.Giovanni Teatino Fraz. Sambuceto (Chieti) - Italy	STC	Torque controlled expansion anchor made of zinc electroplated steel for use in non-cracked concrete of sizes M8, M10, M16, M20 - Class 8,8
ETA-01/0001	SISMO	SISMO NV Drapstraat 1 B-9270 Kalken - Laarne Belgium	DGV	Permanent insulating shuttering kit for whole buildings
ETA-01/0002	Eltete Cubical Partition systems for sanitary applications	Eltete Oy/Ab PO Box 94 Fin-07901 Loviisa	VTT	Partition Wall kit for Sanitary applications
ETA-01/0003	Sormat S-KAH kiila-ankkurit	Sormat OY Harjutie 5 FIN-21290 Rusko	VTT	Torque controlled expansion anchor made of stainless steel of sizes M8, M10, M12 & M16 for use in concrete
ETA-01/0004	Sormat S-KA kiila-ankkurit	Sormat OY Harjutie 5 FIN-21290 Rusko	VTT	Torque controlled expansion anchor made of galvanized steel of sizes M8, M10, M12 & M16 for use in concrete
ETA-01/0005	DC 993 and DC895	Dow Corning Parc Industriel Zone C B-7180 Seneffe	DGV	Structural Sealants for use in Structural Sealant Glazing Systems
ETA-01/0006	Mungo Stahlbolzendübel M3	Mungo Befestigungstechnik AG Bornfeldstrasse 2 4603 Olten Schweiz	DIBt	Torque controlled expansion anchor made of coated steel of sizes M8, M10 and M12 for use in concrete
ETA-01/0007	SPIT FIX II A4	Société Spit Route de Lyon F-26501 Bourg -Les-Valence	CSTB	Torque-controlled expansion anchor, made of stainless steel, for use in non cracked concrete: sizes M8, M10, M12 & M16
ETA-01/0008	SPIT FIX II	Société Spit Route de Lyon F-26501 Bourg -Les-Valence	CSTB	Torque-controlled expansion anchor, made of galvanized steel, for use in non cracked concrete: sizes M8, M10, M12 , M16 & M20
ETA-01/0009	FM 753 A4 M8	Società FRIULSIDER SpA 33048 San Giovanni al Natisone Via Trieste, 1 (Udine) Italy	CSTB	Torque controlled expansion anchor, made of stainless steel, for use in non cracked concrete: size M8
ETA-01/0010	WDVS-Setzdübel X-FV 6	Fachverband Wämedämm-Verbundsysteme e.V. Fremersbergstrasse 33 76530 Baden-Baden	DIBt	Powder actuated fastener for the fixing of bonded thermal insulation composite systems in un-coated concrete
ETA-01/0011	Liebig Superplus	Heinrich Liebig GmbH Wormser Strasse 23 Postfach 1309 D-64312 Pfungstadt	CSTB	Torque-controlled expansion anchor, made of galvanized steel, for use in cracked or non cracked concrete sizes M8, M12 and M16
ETA-	PFG Expansion	SORMAT PFG bv	CSTB	Torque-controlled expansion anchor, made

ETA Numbers	Product	Holder of the approval	Approval Body	Generic Type and Use
01/0012	bolt type HAC/TAC	Boscheweg 38-40 5740 AA Beek en Donk Holland		of galvanised steel, for use in non cracked concrete: sizes M6, M8, M10 and M12
ETA-01/0013	MKT Bolt Anchor B	MKT Metal-und Kunststofftechnik Gmbh & Co KG Auf dem Himmel 2 67685 Weilerbach	DIBt	Torque controlled expansion anchor made of galvanised steel of sizes M8, M10, M12, M16, and M20 for use in non-cracked concrete
ETA-01/0014	FM 753	Società FRIULSIDER SpA 33048 San Giovanni al Natisone Via Trieste, 1 (Udine) Italy	CSTB	Torque controlled expansion anchor, made of galvanized steel, for use in non cracked concrete: sizes M6, M8, M10, M12 and M16
ETA-01/0015	fischer Ankerbolzen FAZ A4	Fischerwerke Artur Fischer Gmbh & Co , KG Weinhalde 14-18 D-72178 Waldachtal Germany	DIBt	Torque controlled expansion anchor made of stainless steel of sizes M8,M10,M12 and M16 for use in concrete
ETA-01/0016	Hanf-Dämmwolle "HDW1A"	EUROHANF Alois Högler Grafendorf 11 8510 Stainz	OIB	Loose fill thermal and/or acoustic material made of hemp fibres
ETA-02/0001	Würth Fixanker W-FA/S	Adolf Würth Gmbh & Co. KG Postfach D-74650 Künzelsau	DIBt	Torque-controlled expansion anchor made of galvanised steel of sizes M8,M10, M12, M16 and M20 for use in non-cracked concrete
ETA-02/0002	MKT Bolzenanker-Innengewinde BZ-IG A4	MKT Metall-Kunststoff-Technik GmbH & Co. KG Auf dem Himmel 2 D-67685 Weilerbach	DIBt	Torque controlled Expansion Anchor with internal thread made of stainless steel of sizes M6, M8, M10 and M 12 for use in concrete
ETA-02/0003	ATS TESTANERA	Società FRIULSIDER SpA 33048 San Giovanni al Natisone Via Trieste 1(Udine) Italy	CSTB	Torque controlled Expansion anchor, made of galvanised steel, for use in non-cracked concrete: sizes M6, M8, M10, M12 and M16
ETA-02/0004	SPIT MEGA Z	Società SPIT Route de Lyon BP 104 26501 Bourg le Valence	CSTB	Torque controlled Expansion anchor, made of galvanised steel, for use in cracked and non-cracked concrete: sizes M8, M10 and M12
ETA-02/0005	fischerwerke-Zykon-Anker FZA C	Fischerwerke Artur Fischer GmbH & Co, KG D - 72178 Waldachtal Germany	DIBt	Undercut Anchor made of stainless steel 1.459 of sizes M6, M8, M10, M12 and M16 for use in concrete
ETA-02/0006	PEIKKO HPM/L Anchor Bolt	Teräspeikko Oy Vipusenkatu 20 151 01 Lahti Finland	DIBt	PEIKKO HPM/L Anchor bolt for the connection of prefabricated reinforced concrete columns
ETA-02/0007	fischer Eurobond with anchor rod	Fischerwerke Artur Fischer GmbH & Co, KG Otto-Hahn-str 15 D-79211 DENZLINGEN	CSTB	Bonded Anchor made of galvanised steel for use in non cracked concrete: sizes M8, M10, M12, M16, M20, M27 & M30
ETA-02/0008	CanaTherm - Dämmplatte	Bioinnova Verbundbauteile GmbH Industriegelände 2 A-7561 Heiligenkreuz	OIB	Thermal and/or acoustic insulation board made of hemp fibres
ETA-02/0009	FLORAPAN Isover Integra ZKP 1 FLORAPAN	Bioinnova Verbundbauteile GmbH Industriegelände 2 A-7561 Heiligenkreuz	OIB	Thermal and/or acoustic insulation board made of hemp fibres

ETA Numbers	Product	Holder of the approval	Approval Body	Generic Type and Use
	Zwischensparren-Klemmplatte Isover Integra UKP 1 FLORAPAN Untersparren-Klemmplatte Isover Kontur HBP 1 FLORAPAN Holzbau-Klemmplatte emfa-Hanf Typ ST			
ETA-02/0010	Canatherm Fassaden dämmplatte	Bioinnova Verbundbauteile GmbH Industriegelände 2 A-7561 Heiligenkreuz	OIB	Thermal and/or acoustic insulation board made of hemp fibres
ETA-02/0011	FLORAPAN Fassade Isover Kontur FSP 5 FLORAPAN Fassaden-Dämmplatte	Bioinnova Verbundbauteile GmbH Industriegelände 2 A-7561 Heiligenkreuz	OIB	Thermal and/or acoustic insulation board made of hemp fibres
ETA-02/0012	Canastep Trittschalldämmplatte	Bioinnova Verbundbauteile GmbH Industriegelände 2 A-7561 Heiligenkreuz	OIB	Impact sound insulation material in form of boards made of hemp fibres
ETA-02/0013	FLORAPAN Floor Isover Integra UKP2 Florapan Untersparren Klemmplatte Isover Integra EP6 Florapan Estrich-Dämmplatte	Bioinnova Verbundbauteile GmbH Industriegelände 2 A-7561 Heiligenkreuz	OIB	Impact sound insulation material in form of boards made of hemp fibres
ETA-02/0014	Canatherm L Canatherm Universalrolle	Bioinnova Verbundbauteile GmbH Industriegelände 2 A-7561 Heiligenkreuz	OIB	Thermal and/or acoustic insulation boards, mats made of hemp fibres
ETA-02/0015	FLORAPAN L, Isover Integra ZKP 2 FLORAPAN Zwischensparren-Klemmplatte Isover Integra HBP 2 FLORAPAN Holzbau-Klemmplatte FLORAROL	Bioinnova Verbundbauteile GmbH Industriegelände 2 A-7561 Heiligenkreuz	OIB	Thermal and/or acoustic insulation boards, mats made of hemp fibres
ETA-02/0016	HILTI HDA-R	Hilti Aktiengesellschaft Business Unit Anchors FL - 9494 Schaan Principality of Liechtenstein	CSTB	Self-cutting undercut anchor, made of stainless steel, for use in concrete: sizes M10, M12 and M16
ETA-02/0017	Würth Fixanker W-FAZ-IG A4	Adolf Würth GmbH & Co KG Reinhold-Würth-Strasse 12-16 74653 Künzelsau	DIBt	Torque-controlled expansion anchor with internal thread made of stainless steel of sizes M6, M8, M10 and M12 for use in concrete

ETA Numbers	Product	Holder of the approval	Approval Body	Generic Type and Use
ETA-02/0018	EJOT Screwed - in anchor ejothem ST-U and ejothemSK-U	EJOT Kunststofftechnik GmbH & Co Postfach 12 60 57302 Bad berleberg Germany	DIBt	Screwed-in anchor for fixing of external thermal insulation composite systems with rendering in concrete and masonry
ETA-02/0019	fischer TERMOZ 8U	Fischerwerke Artur Fischer GmbH & Co, KG D - 72178 Waldachtal Germany	DIBt	Screwed-in anchor for fixing of external thermal insulation composite systems with rendering in concrete and masonry
ETA-02/0020	MKT Einschlaganker E	MKT Metall-Kunststoff-Technik GmbH & Co KG Auf dem Himmel 2 D-68675 Weilerbach	DIBt	Deformation-controlled expansion anchor made of galvanised steel of sizes M8, M10, M12, M16 and M20 for use in non-cracked concrete
ETA-02/0021	UPAT UPM 44 Verbundmörtel mit Ankerstange	Fischerwerke Artur Fischer GmbH & Co, KG D - 72178 Waldachtal Germany	DIBt	Bonded anchor (injection type) with anchor rod made of galvanised steel of sizes M6, M8, M10, M12, M16, M20, M24 and M30 for use in non-cracked concrete
ETA-02/0022	UPAT UPM 44 Verbundmörtel mit Ankerstange A4	Fischerwerke Artur Fischer GmbH & Co, KG D - 72178 Waldachtal Germany	DIBt	Bonded anchor (injection type) with anchor rod made of stainless steel of sizes M6, M8, M10, M12, M16, M20, M24 and M30 for use in non-cracked concrete
ETA-02/0023	UPAT UPM 44 Verbundmörtel mit Ankerstange C	Fischerwerke Artur Fischer GmbH & Co, KG D - 72178 Waldachtal Germany	DIBt	Bonded anchor (injection type) with anchor rod made of stainless steel 1,4529 of sizes M6, M8, M10, M12, M16, M20, M24 and M30 for use in non-cracked concrete
ETA-02/0024	fischer FIS V Verbundmörtel mit Ankerstange A4	Fischerwerke Artur Fischer GmbH & Co, KG D - 72178 Waldachtal Germany	DIBt	Bonded anchor (injection type) with anchor rod made of stainless steel of sizes M6, M8, M10, M12, M16, M20, M24 and M30 for use in non-cracked concrete
ETA-02/0025	fischer FIS V Verbundmörtel mit Ankerstange C	Fischerwerke Artur Fischer GmbH & Co, KG D - 72178 Waldachtal Germany	DIBt	Bonded anchor (injection type) with anchor rod made of stainless steel 1,4529 of sizes M6, M8, M10, M12, M16, M20, M24 and M30 for use in non-cracked concrete
ETA-02/0027	HILTI HSC	Hilti Aktiengesellschaft Business Unit Anchors FL - 9494 Schaan Principality of Liechtenstein	CSTB	Self-cutting undercut anchor, made of galvanised steel, for use in concrete: sizes M6, M8, M10 & M12
ETA-02/0028	HILTI HSC-R	Hilti Aktiengesellschaft Business Unit Anchors FL - 9494 Schaan Principality of Liechtenstein	CSTB	Self-cutting undercut anchor, made of stainless steel, for use in concrete : sizes M6, M8, M10 & M12
ETA-02/0029	fischer Ankerbolzen FAZ C	Fischerwerke Artur Fischer GmbH & Co, KG D - 72178 Waldachtal Germany	DIBt	Torque controlled expansion anchor made of stainless steel 1,4529/1,4565 of sizes M8, M10, M12 & M 16 for use in concrete
ETA-02/0030	MKT Schwerlastanker SZ	MKT Metall-Kunststoff-Technik GmbH & Co KG Af dem Himmel 2 D-68675 Weilerbach	DIBt	Torque controlled expansion anchor made of galvanized steel of sizes M10, M12 and M 16 or use in concrete
ETA-02/0031	Würth Hochleistungsanker W-HAZ	Adof Würth GmbH & Co, KG Reinhold-Würth-strasse 12-16 74653 Künzelsau	DIBt	Torque controlled expansion anchor made of galvanized steel for sizes M10, M12 & M16 for use in concrete
ETA-02/0032	Hilti HKD	Hilti Aktiengesellschaft Business Unit Anchors FL - 9494 Schaan Principality of Liechtenstein	DIBt	Deformation-controlled expansion anchor made of galvanised steel of sizes M6, M8, M10, M12, M16 & M20 for use in non-cracked concrete
ETA-	Hilti-	Hilti Aktiengesellschaft	DIBt	Deformation-controlled expansion anchor

ETA Numbers	Product	Holder of the approval	Approval Body	Generic Type and Use
02/0033	Kompaktdübel HKD-R	Business Unit Anchors FL - 9494 Schaan Principality of Liechtenstein		made of stainless steel of sizes M8, M10, M12, M16 & M20 for use in non-cracked concrete
ETA-02/0034	emfa-Hanf Typ ST	Bioinnova Verbundbauteile GmbH Industriegelände 2 A-7561 Heiligenkreuz	OIB	Thermal and/or acoustic insulation board made of hemp fibres
ETA-02/0035	emfa-Hanf Typ TSP	Bioinnova Verbundbauteile GmbH Industriegelände 2 A-7561 Heiligenkreuz	OIB	Impact sound material in form of boards made of hemp fibres
ETA-02/0036	emfa-Hanf Typ SW	Bioinnova Verbundbauteile GmbH Industriegelände 2 A-7561 Heiligenkreuz	OIB	Thermal and/or acoustic insulation boards, mats made of hemp fibres
ETA-02/0037	fischer FBN A4	fischerwerke Artur Fischer GmbH & Co, KG Weinhalde 14-18, Postfach 1152 D - 72176 Waldachtal Germany	CSTB	Torque controlled expansion anchor, made of stainless for use in non cracked concrete: sizes M6, M8, M10, M12 and M16
ETA-02/0038	emfa-Hanf Typ ST Universaldämplatte	Bioinnova Verbundbauteile GmbH Industriegelände 2 A-7561 Heiligenkreuz	OIB	Thermal and/or acoustic insulation board made of hemp fibres
ETA-02/0040	fischer Eurobond with anchor rod A4	fischerwerke Artur Fischer GmbH & Co, KG Otto-Hahn-str 15 D-79211 DENZLINGEN	CSTB	Bonded Anchor made of stainless steel for use in non cracked concrete: sizes M8, M10, M12, M16, M20, M24, M27 & M30
ETA-02/0041	fischer Eurobond with anchor rod C	fischerwerke Artur Fischer GmbH & Co, KG Otto-Hahn-str 15 D-79211 DENZLINGEN	CSTB	Bonded Anchor made of high corrosion resistant steel for use in non cracked concrete: sizes M8, M10, M12, M16, M20, M27 & M30
ETA-02/0042	HILTI HSL-3	Hilti AG Business Unit Anchors FL - 9494 Schaan Principality of Liechtenstein	CSTB	Torque controlled anchor, made of galvanised steel, for use in concrete: sizes M8, M11, M12, M16, M20 and M24
ETA-02/0043	fischer FIS V Verbundmortel mit Ankerstange	fischerwerke Artur Fischer GmbH & Co, KG D - 72178 Waldachtal Germany	DIBt	Bonded Anchor (injection type) with anchor rode made of galvanised steel of sizes M6, M8, M10, M12, M24 & M30 for use in non cracked concrete
ETA-02/0044	Würth - Einschlagdübel W-ED/S	Adolf Würth GmbH & Co KG Postfach 74650 Künzelsau	DIBt	Deformation controlled expansion anchor made of galvanised steel of sizes M8, M10, M12, M16 and M20 for use in non-cracked concrete
ETA-02/0045	ELEMATIC ETD Z	ITW CONSTRUCTION PRODUCTS ITALY SRL Viale Regione Veneto 5 I-35127 Padova Italy	CSTB	Torque controlled expansion anchor, made of zinc electroplated steel, for use in concrete: sizes M8,M10,M12 and M16
ETA-02/0046	ELEMATIC ETD II	ITW CONSTRUCTION PRODUCTS ITALY SRL Viale Regione Veneto 5 I-35127 Padova Italy	CSTB	Torque controlled expansion anchor, made of galvanised steel, for use in non cracked concrete: sizes M8,M10,M12, M16 and M20
ETA-02/0047	ELEMATIC ETD II A4	ITW CONSTRUCTION PRODUCTS ITALY SRL Viale Regione Veneto 5 I-35127 Padova Italy	CSTB	Torque controlled expansion anchor, made of stainless steel, for use in non cracked concrete: sizes M8,M10,M12, and M16

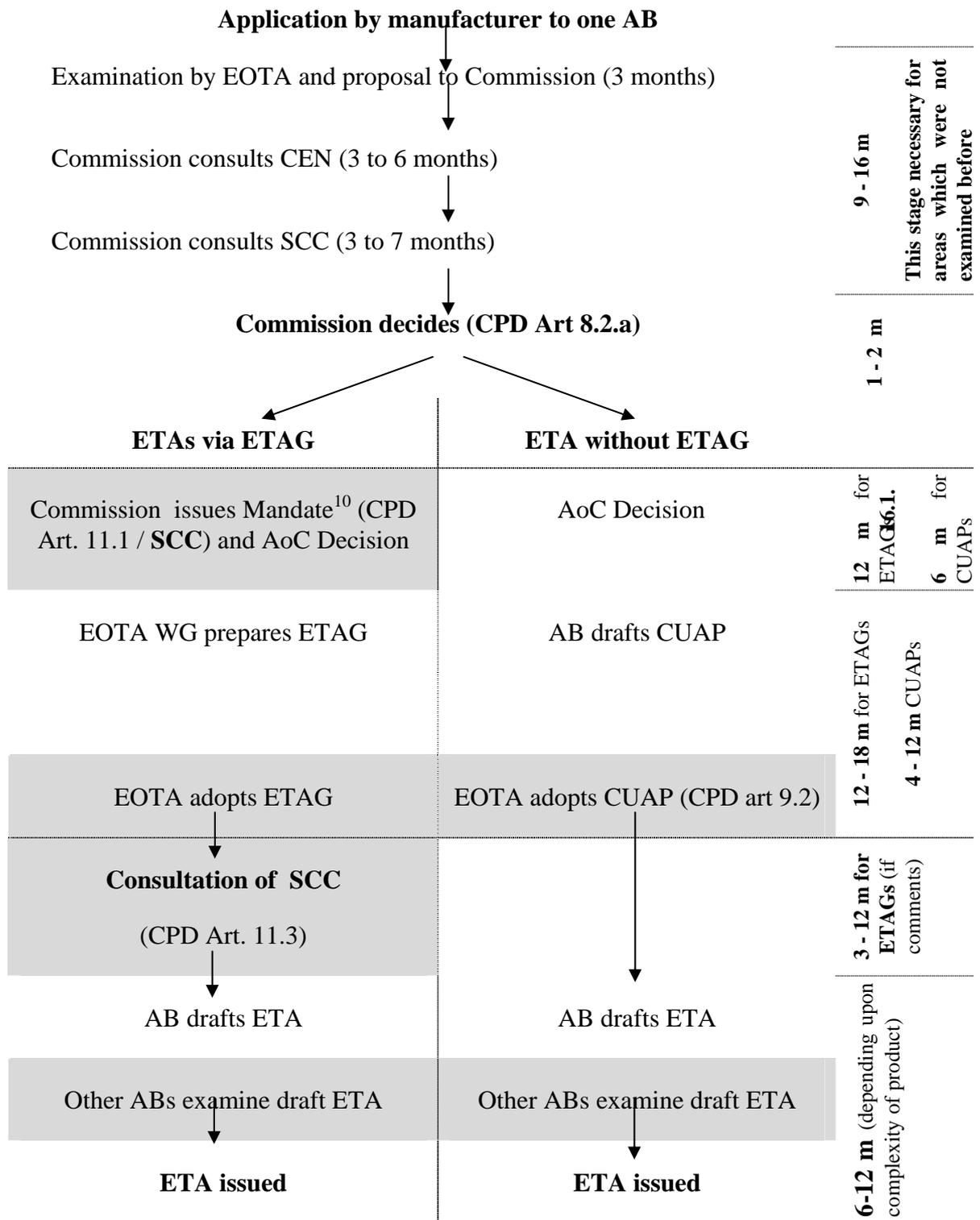
ETA Numbers	Product	Holder of the approval	Approval Body	Generic Type and Use
ETA-02/0048	RED HEAD ATZ	Red Head 22-24 rue du Président Wilson F-26501 Bourg-Les-Valence France	CSTB	Torque controlled expansion anchor, made of zinc electroplated steel, for use in concrete: sizes M8,M10,M12 and M16
ETA-02/0049	RED HEAD ATX	Red Head 22-24 rue du Président Wilson F-26501 Bourg-Les-Valence France	CSTB	Torque controlled expansion anchor, made of galvanised steel, for use in non cracked concrete: sizes M8,M10,M12, M16 and M20
ETA-02/0050	RED HEAD ATX-SS	Red Head 22-24 rue du Président Wilson F-26501 Bourg-Les-Valence France	CSTB	Torque controlled expansion anchor, made of stainless steel, for use in non cracked concrete: sizes M8,M10,M12, and M16
ETA-03/0002	DEKO partition type 1090, 1290, 1090-PF & 1290-PF	DEKO loft + vaeg a/s Markaervej 11 DK-2630 Tastrup	ETA-DK	Lightweight relocatable partition kit
ETA-03/0007	YTONG Separatie panelen type G4/600 en G5/800	YTONG Nederland bv Postbus 23 NL-4200 AA Gorinchem The Netherlands	IKOB-BKB BV	Internal partition kit with large-sized panels of autoclaved aerated concrete (AAC) (thickness 70 and 100 mm) for use as non - loadbearing walls

15. ANNEX VI: BUDGETARY COMMITMENTS MADE FOR EOTA BY DG III/DG ENTERPRISE

(in ECUs/Euros)

Year	Committed (mandates)	Structural Support	Comments
1993	169000		
1994	0		
1995	337000	126000	
1996	583000	100000	
1997	276000	75000	
1998	438000	25000	
1999	514000	20000	
2000	450000	20000	
2001	390000		Structural support refused by DG Enterprise
2002	175000		Structural support refused by DG Enterprise
Total (to 2002)	3332000	366000	
Forecast for 2003	(foreseen) 350000	(foreseen) 50000	

16. ANNEX VII: ETA ISSUING PROCEDURE (COMMISSION DECISION 94/23/EC)



¹⁰ Grey shading is covering steps in which Member States or Approval Bodies check compliance with their national regulatory provisions.

17. ANNEX VIII: MANUFACTURERS' APPLICATIONS AND ISSUED ETAs (SITUATION APRIL 2003):

APPROVAL BODY	APPLICATIONS		ETAs BASED ON ETAGs				ETAs Art 9.2	TOTAL ETAs ISSUED		ETA Holders
	Number	%	Metal Anchors	SSGS *	Internal Partition kits	Other ETAGs		Number	%	
DIBt (DE)	346	68.8 %	32			2	7	41	42.7 %	10
CSTB (FR)	52	10.3 %	30					30	31.3 %	8
BBA (UK)	7	1.4 %	1					1	1.0 %	1
OIB (AU)	48	9.5 %					13	13	13.5 %	2
VTT (FIN)	14	2.8 %	3		1			4	4.2 %	2
STC (IT)	17	3.4 %	1					1	1.0 %	1
ETA DK (DA)	11	2.2 %			1		1	2	2.1 %	2
BKB (NL)	1	0.2 %			1			1	1.0 %	1
UBAtc (B)	4	0.8 %		1			2	3	3.1 %	3
ITC (IT)	2	0.4 %								
ITeC (ES)	2	0.4 %								
TOTAL	504	100 %	67	1	3	2	23	96	100 %	27**
% of all ETAs			69.8 %	1.0 %	3.1 %	2.1 %	24.0 %	100 %		

* Structural Sealant Glazing Systems

** The total number of ETA holders is not obtained by addition because some manufacturers received ETAs (for different products) from different Approval Bodies