



## **CEIR comments on the lack of harmonisation in the field of materials and products in contact with drinking water in the EU**

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CEIR is the European Committee for the Valve Industry, representing valves and taps manufacturers. It is composed of national associations and individual companies, representing the vast majority of European companies producing industrial valves (including water cycle), building valves and sanitary tapware. All members are designing, manufacturing and selling assembled products; some of them are also formulating polymers, such as rubbers.

This document aims at identifying the main difficulties faced by European manufacturers when introducing on the internal market products destined to be in contact with drinking water due to the lack of harmonisation of practices and rules in Europe. The facts developed below were identified after a survey conducted among all CEIR members.

### **➤ BARRIER TO TRADE**

This is the most obvious difficulty. The lack of harmonisation of approval practices and mutual recognition between Member States makes it impossible to put a product developed for one EU country on the market of another EU country. As an example, a product sold in France in accordance with all requested mandatory approvals cannot be sold in the Netherlands. There are no common understandable and workable approval processes across Europe.

### **➤ HIGH COSTS**

Due to the absence of harmonised practices at European level, several Member States have developed complex schemes based on national and historical practice and expertise. These schemes are generally based on material and/or product testing and certification. Most national test results are not recognised by other Member States, forcing manufacturers to multiply procedures because they must prove the immunity of the product with regard to drinking water quality. This multiplies the costs for tests and certification of each product and entails greater investment for the development of new products. SMEs often simply cannot afford to design products that would be sold on multiple European markets.

Moreover, the lack of requirements for products in contact with drinking water in some countries creates a competitive disadvantage for manufacturers, since it is impossible for them to reflect the cost of product tests and certification on prices in these countries.

### **➤ PRODUCT DEVELOPMENT TOO LONG**

The product approval timeframes are too long. 6 months is the average time necessary to complete the approval process, but delays of up to 12 or even 18 months are common. Such delays have an obvious impact on the costs and availability of products on the market.

Several elements explain these delays. Material approvals usually require full examination of the chemical composition of the product. Material suppliers may be reluctant to provide sensitive information to laboratories. The latter have limited visibility due to the complete lack of harmonisation, and most of them actually only operate in small markets. This problem is worsened by the fact that valve manufacturers are small customers for chemical companies (plastic or rubber components are generally small and light in valves and taps). Consequently, the material formulators see very few advantages in communicating confidential information to valve manufacturers or test laboratories.



The number of approved laboratories in each EU country is relatively small (usually from 1 to 4). The approval schemes typically have a validity period of 5 years, creating a continuous flow of files to be handled. For example, an approval renewal can take up to 18 months in the UK. Problems with renewal delays are extremely common and are the source of many problems in the supplier-customer relationship.



#### ➤ **HUMAN RESOURCES**

Product approval for fitness for contact with drinking water usually requires the involvement of a company's Engineering department, Quality department, Product Management and Procurement. It is very common that at least one specialist is assigned full time to these approval procedures. The qualified personnel assigned to these approvals are generally unavailable for other work, to the detriment of "productive" departments such as R&D or Engineering.

#### ➤ **BARRIER TO INNOVATION**

The cost and duration of approval of new materials/products can certainly discourage companies from developing new concepts and bringing innovative solutions to the water cycle and building markets, especially when they represent a real technological breakthrough. Therefore, the complexity and split of the approval schemes are definitely hindering innovation in these areas.

#### ➤ **MANUFACTURING AND SUPPLY CHAIN COMPLEXITY**

Differences in the schemes are commonly forcing manufacturers to create multiple versions of the same product, one for each national market. This is typically the case for polymers and rubber materials: it is almost impossible to use an inlet flexible hose for sanitary tapware that will pass France's ACS, UK'S WRAS and Germany's KTW. This is obviously creating major difficulties for procurement, with the need to source components with extremely small quantities. The handling of multiple bills of materials is also extremely complicated in manufacturing: who can see the difference between a rubber o-ring with an ACS approval and another with a WRAS approval?

#### ➤ **MARKET SURVEILLANCE**

In each and every country, market surveillance of products in contact with drinking water is very limited. The framework is very complex, and the chain of information is extremely difficult to trace. A common scheme would allow the creation of an information platform (UK's WRAS is a good example), that could be used to check whether a product has an approval or not. Without such a tool, European manufacturers can only observe that rules are often disregarded and that many products on the market are not compliant.

Based on these examples, the European Valve Industry repeats and insists on the need to harmonise procedures relating to the fitness of products in contact with drinking water at European level.

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