

Position of the EPS Insulation Industry on the EU Housing Simplification Package

The EPS insulation industry welcomes the European Commission's initiative to identify regulatory simplification opportunities that can support housing supply and affordability.

Europe urgently needs more affordable, energy-efficient housing. While Construction Products Regulation must continue to ensure safety, quality and environmental protection, unnecessary regulatory complexity, duplication and fragmentation increase costs, delay innovation and create barriers to the efficient delivery of housing.

The Housing Simplification Package should therefore focus on measures that reduce unnecessary administrative and compliance burdens throughout the construction value chain, strengthen the Single Market and create predictable conditions for investment in innovative and sustainable housing solutions.

1. Simplify construction product requirements and ensure regulatory coherence

The Housing Simplification Package should address the growing burden of overlapping EU legislation, divergent national requirements and unnecessary testing obligations affecting construction products.

The number of essential characteristics required for construction products should be minimised and limited to those genuinely necessary to achieve regulatory objectives. Every additional characteristic can generate testing, documentation and certification costs, ultimately contributing to higher construction costs and affecting housing affordability.

Equally importantly, additional national testing requirements for harmonised construction products should be abolished. A genuine European Single Market cannot function if manufacturers must repeat tests or comply with different national procedures for products already assessed under harmonised EU requirements.

The future Delegated Act on Dangerous Substances should likewise ensure proportionate and feasible testing requirements. Manufacturers should only be required to test for substances reasonably likely to occur in the specific product, avoiding unnecessary costs from broad or indiscriminate testing.

We therefore call on the relevant CPR Acquis Process groups, including the Thermal Insulation Products Group and the Dangerous Substances Horizontal Group, to address these issues and take the necessary action to deliver genuine simplification, regulatory coherence and a functioning Single Market.

2. Simplify sustainability assessment without compromising meaningful information

Sustainability assessment requirements for construction products should be practical, proportionate and sufficiently flexible to avoid unnecessary administrative burdens.

Where scientifically justified, manufacturers should have the possibility to use representative or average sustainability assessments for product families rather than being systematically required to rely on worst-case scenarios or highly product-specific calculations.

A simpler and more proportionate approach would reduce compliance costs while maintaining reliable environmental information. This is particularly important for affordable housing, where sustainability requirements should support, rather than unnecessarily increase, the cost of delivering energy-efficient homes.

3. Accelerate standardisation to support innovation and housing delivery

Slow standardisation processes remain a significant barrier to innovation in the construction sector. Although recent initiatives under EN 15804 and the CPR Acquis process are welcome, chronic delays in the development and revision of standards continue to slow down the market uptake of innovative, productive and sustainable construction products.

This directly affects the ability of the construction sector to deploy innovative solutions that can improve building performance and support cost-efficient housing delivery.

The Simplification Package should streamline standardisation procedures, provide clearer requests and ensure sufficient technical capacity to accelerate the development and revision of standards.

5. Ensure interoperability and apply the "report once, use many times" principle

Digitalisation should reduce administrative burdens rather than create new reporting systems operating alongside one another. The Housing Simplification Package should ensure full interoperability between the Construction Products Regulation (CPR), Digital Product Passports, Digital Building Logbooks, Level(s) and EPBD reporting requirements.

A clear **"report once, use many times"** principle should be applied. Information provided by manufacturers should be capable of being reused across relevant regulatory systems, avoiding parallel and potentially conflicting reporting obligations.

This would reduce administrative costs while improving the availability of information for public authorities, building owners and recyclers. The CPR should remain the primary product-specific framework, with horizontal initiatives closely aligned with it.

6. Avoid New Regulatory Burdens and Cost Increases for Construction and Renovation

To ensure that the European affordable housing agenda succeeds, it is essential to **avoid new bureaucratic hurdles or cost increases** for renovation and construction. Any new EU legislation—including initiatives related to the circular economy—must refrain from imposing additional requirements on the construction value chain. Excessive regulation risks slowing down urgently needed building and renovation projects and undermining affordability goals.

Conclusion

The Housing Simplification Package should recognise that regulatory complexity has a direct impact on the cost and speed of delivering housing.

A simpler, more coherent and genuinely harmonised regulatory framework can reduce unnecessary compliance costs, accelerate innovation, facilitate the availability of construction products across borders and create stronger conditions for investment.

For the EPS insulation industry, simplification should therefore mean fewer unnecessary tests, the elimination of national barriers within the Single Market, proportionate sustainability requirements, faster standardisation, interoperable digital reporting and harmonised rules supporting circularity.

These measures would help create a more efficient construction sector and support the wider objective of delivering **more affordable, sustainable and energy-efficient housing across Europe**.

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