



FIEC STATEMENT

EN 206 / Ready-Mixed Concrete (RMC)

Brussels, 03/06/2026

Key Messages

- **The existing framework for concrete in Europe is a coherent, well-established and effective system that ensures safety, durability and sustainability while providing a balanced allocation of responsibilities across the value chain.**
- **Cross-border trade remains structurally limited due to the short transport and delivery constraints of the material.**
- **The added value of harmonisation remains unclear, while potential impacts include increased regulatory complexity, higher compliance costs, additional burdens on SMEs, and reduced regulatory flexibility.**
- **Partial harmonisation limited to selected characteristics risks creating an internally inconsistent framework and legal uncertainty.**
- **RMC must be considered within a full system perspective. Any intervention limited to the pre-delivery stage risks disrupting the coherence between product specification, structural design (Eurocodes) and execution standards.**
- **At the current Milestone III stage, the added value of the initiative should be critically reassessed, and all options, including adaptation, limitation or discontinuation of the process, should remain open**



FIEC is the European Construction Industry Federation, which through its 32 national member associations in 27 countries (24 EU countries, Norway, Switzerland, and Ukraine) represents construction companies of all sizes, i.e., small, and medium-sized enterprises and "global players", carrying out all forms of building and civil engineering activities.

The *European Construction Industry Federation* (FIEC) would like to thank the European Commission for the work undertaken in the framework of the CPR Acquis process and, in particular, for the development of the Milestone III draft proposal on *Ready-Mixed Concrete* (RMC).

FIEC has engaged constructively throughout this process and welcomes the opportunity to contribute to the ongoing reflection on the potential harmonisation of EN 206 under the *Construction Products Regulation* (CPR).

At the same time, FIEC considers it essential, at this stage of the discussion, to move beyond detailed technical considerations and revisit the fundamental questions that should guide any further work.

- Is EU-level intervention necessary in this case?
- Is the added value of harmonisation clearly demonstrated?
- Is the approach consistent with the Commission's own better regulation principles?

These questions are particularly important given the strategic role of the construction sector in the European economy. The sector generates about 10.6% of *Gross Domestic Product* (GDP) in the EU and provides almost 12 million direct jobs, accounting for 31.2% of total industrial employment¹.

Founded in 1905, FIEC represents construction companies of all sizes, from one-person craftsmen and *Small and Medium-sized Enterprises* (SMEs) to large international firms operating in a competitive global market. They carry out all forms of building and civil engineering activities and are engaged in all kinds of working methods (whether operating as main or sub-contractors). With its wide-ranging representativeness, FIEC is the officially recognised Social Partner representing the employers in the European Sectoral Social Dialogue "Construction".

¹ Statistical Report (FIEC, 1 July 2025, <https://fiec-statistical-report.eu/>)

A Well-Functioning Existing System

FIEC recalls that the current framework, based on EN 206 (voluntary standard on concrete specification, performance, production and conformity), EN 1992 (Eurocode 2 Design of Concrete Structures) and EN 13670 (Execution of Concrete Structures), constitutes a coherent, well-established and effective system for the design, production and use of concrete in Europe.

This framework has demonstrated its effectiveness over many years by ensuring high levels of safety, durability and sustainability. It provides a balanced allocation of responsibilities across the value chain, is adapted to national conditions and construction practices, and operates on the basis of proportionate and practical solutions that avoid unnecessary administrative burdens.

Furthermore, environmental performance is already effectively addressed through existing European and national regulatory and standardisation frameworks. FIEC therefore sees no evidence of a regulatory gap that would justify a fundamental redesign of the current system.

Key Considerations regarding the Existing System

- ✓ EN 1992 is fundamentally built upon EN 206, providing a **comprehensive framework** for specifying and standardising concrete as **a material/product that is fit for its intended use**. It forms an essential basis for design provisions contained in Eurocode 2.
- ✓ The **durability provisions** contained in EN 206 are equally essential to the functioning of EN 1992. These provisions are **closely linked to concrete composition** requirements and established deemed-to-satisfy values, which play a critical role in ensuring the long-term performance and reliability of concrete structures.

In contrast, a **CPR-harmonised approach** focused primarily on establishing procedures for deriving a *Declaration of Performance and Conformity* (DoPC) **would represent a significant departure from the current integrated system**. Such an approach **risks reducing the usability and practical value of the standards** for designers, contractors and other users **across the construction value chain**.

EN 1992 was not developed to operate in conjunction with a harmonised concrete standard under the CPR. The safety and reliability assumptions embedded in Eurocode design are based on **performance characteristics and (!) on procedures** defined in EN 206.

Limited Need for Harmonisation (Necessity Test)

FIEC remains concerned that the necessity of a harmonised approach for RMC has not been demonstrated.

The nature of RMC inherently limits its geographical market. Due to technical and logistical constraints, the product typically has a transport range of approximately 10-30 kilometres and must generally be delivered and placed within a period of around 90 minutes after production. As a result, cross-border trade is confined largely to specific border regions and represents only a limited share of the overall market.

At the same time, concrete is the most widely used construction material in Europe and forms the basis of a vast and interconnected construction ecosystem. Any modification to the regulatory or standardisation framework would therefore affect a very broad range of actors, including producers, contractors, designers, engineers and clients across all Member States, irrespective of their involvement in cross-border trade.

FIEC therefore questions whether a harmonised approach at EU level is justified in this case. Based on the information available, the proposed initiative appears to introduce EU-wide obligations and administrative requirements in order to address what is, in practice, a limited internal market issue affecting only a small proportion of market operators.

Limited Added Value and Risk of Adverse Effects

FIEC notes that the added value of the harmonisation of RMC under the CPR remains unclear, while the potential negative consequences for the construction sector are significant.

Throughout the CPR Acquis process, FIEC has consistently highlighted that harmonisation would increase regulatory complexity, generate additional compliance costs and introduce additional obligations for contractors and SMEs. It could also lead to the duplication of existing requirements or the displacement of well-functioning national and European provisions. Such outcomes would be difficult to reconcile with the European Commission's objective of reducing administrative burdens and improving regulatory efficiency.

Furthermore, transforming EN 206 into a harmonised standard would risk undermining the coherence of the existing framework linking product specification, structural design and execution standards. Many provisions currently integrated within EN 206 would need to be transferred to other documents, creating fragmentation and increasing complexity for users. Rather than simplifying the regulatory landscape, such an approach could make the framework more difficult to understand and apply in practice.

FIEC is also concerned about the potential impact on innovation and the transition towards more sustainable construction solutions. The current system enables the relatively rapid incorporation of new materials, technologies and construction practices, including low-carbon concrete solutions, while allowing Member States to respond to local conditions and emerging developments. By contrast, a harmonised framework would be subject to significantly longer European standardisation and regulatory cycles, potentially slowing the uptake of innovation and reducing the flexibility currently available within national systems.

Structural Limitation of Partial Harmonisation

FIEC understands that harmonisation under the CPR should be based on a coherent and sufficiently comprehensive set of essential characteristics, ensuring legal certainty, consistency and practical usability across the single market.

However, it is noted with particular attention that the current approach appears to envisage the harmonisation of a limited set of characteristics, notably those relating to the properties of fresh concrete. The performance of ready-mixed concrete depends on a combination of interrelated characteristics, including fresh concrete properties, hardened concrete properties and durability-related requirements. FIEC is therefore concerned that **the selective harmonisation of only certain characteristics could result in an incomplete framework that does not adequately reflect the way concrete performance is assessed and used in practice.**

FIEC is concerned about the long-term stability of the proposed approach and questions whether the harmonisation of a restricted set of characteristics is compatible with the objectives of legal clarity, regulatory coherence and predictability for stakeholders. It also raises questions as to whether such an approach is consistent with the principle of proportionate and well-targeted EU intervention. **Clarification from the European Commission on how it intends to ensure that the scope of any harmonisation exercise remains clearly defined and stable over time would therefore be welcomed.**

Main Concerns regarding Partial Harmonisation

- × **Incomplete regulatory framework:** A selective or partial harmonisation of only certain characteristics risks creating an incomplete and internally inconsistent framework, in particular where the performance of the product, as placed on the market, depends on characteristics not covered by the harmonised system (e.g. hardened properties and durability).
- × **Unclear division of responsibilities:** Partial harmonisation risks blurring the regulatory logic of the CPR, as it becomes unclear which characteristics are regulated at EU level, which remain subject to national requirements, and how these interact in practice.
- × **Risk of progressive scope expansion:** Once harmonisation is initiated, there may be structural pressure to extend the list of harmonised characteristics in order to address gaps, ensure enforceability and respond to regulatory needs.
- × **Reduced legal certainty and predictability:** Stakeholders require clarity regarding the long-term scope and implications of any harmonisation exercise. A limited initial scope does not necessarily provide assurance that future expansion will not occur.

Whole-System Perspective (Value Chain Implications)

FIEC stresses that RMC must be considered from a full system perspective. It is a semi-finished construction product whose final performance is not determined solely at the point of delivery, but depends equally on placement, curing, and execution on site.

The current framework reflects this reality through a clear and well-established allocation of responsibilities across the value chain. Manufacturers are responsible for the conformity of the concrete as supplied, designers define structural requirements within the Eurocode framework, and contractors are responsible for execution on site. This distribution of roles is consistent with the integrated system established by EN 206, EN 1992 and EN 13670.

A harmonised CPR approach limited to the pre-delivery stage of RMC does not cover the full system and risks creating inconsistencies and additional burdens for users.

Alignment with the Commission's Better Regulation Principles

FIEC recalls the European Commission's Communication "*A Simpler, Clearer and Better Enforced EU Rulebook*"², which emphasises the importance of simplicity by design, the reduction of administrative burden, subsidiarity and proportionality, and EU action only where it delivers clear added value. In particular, the Better Regulation agenda underlines that EU-level intervention should be limited to areas where it is necessary, evidence-based and proportionate, and where it demonstrably improves regulatory outcomes compared to existing frameworks.

Against this background, FIEC questions whether the current initiative on RMC satisfies the necessity test, demonstrates clear added value, and is consistent with the objectives of simplification and burden reduction set out in the Better Regulation framework.

Final Remarks

FIEC considers that the current debate should not be limited to refining technical aspects of the proposal. It should instead address the fundamental policy question of whether a harmonised EU approach for RMC is justified at all.

At the current Milestone III stage, the added value of the initiative requires a critical reassessment. All options should remain open, including the possibility to adapt, limit or discontinue the process if necessary. This would be fully consistent with the European Commission's own approach of ensuring that EU legislation remains proportionate, efficient, and fit for purpose.

FIEC stands ready to continue the constructive dialogue with the European Commission.

² Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the regions, *A Simpler, Clearer and Better Enforced EU Rulebook*, COM(2026) 380 final