



International Plywood (importers) Ltd and the Construction Products Regulation (CPR)

The Construction Products Regulation, which replaces the Construction Products Directive, 2013. This affected manufacturers, importers, merchants and their customers who are required to the end-user of the product to enable correct usage of the product within a construction project. As a supplier of “finished” manufactured products, International Plywood (Importers) Ltd maintains a database of information prepared by the manufacturers and makes this information available to our customers upon request.

The main source of information about manufactured products is a “Declaration of Performance” which is prepared by the manufacturer, and which details the performance characteristics of the product when it is used for its intended end-use. The product must also be marked with a “CE mark” to demonstrate compliance with the CPR. Initially the “Declaration of Performance” needs to be supplied in paper form or equivalent electronic means (via email for example) but it is intended that the CPR will eventually allow a manufacturer to publish their “Declaration of Performance” on their website.

The Harmonised European Standard covering wood based panels for use in construction is EN13986:2004. This refers to other relevant EN Standards specific to the technical properties of wood based panels such as plywood. A “construction product” is defined in the CPR as “any product or kit which is produced and placed on the market for incorporation in a permanent manner in construction works or parts thereof and the performance of which has an effect on the performance of the construction works with respect to the basic requirements for construction works”. In this context “construction works” means “buildings and civil engineering works”, and the key phrase is “in a permanent manner”. Therefore the CPR does not apply to temporary installations or non-construction uses. The full text of the Regulation is available here. The implications of the CPR can be more easily understood by giving examples of how the CPR will affect Companies dealing with wood based panel products:

Example 1

CE marked panels are sold as they have been received by the importer. No changes have been made to the product which could affect the physical properties of the product. The importer must ensure that the product, if it is to be used as a “construction product”, meets the applicable requirements of the CPR. The importer must also supply a document showing their name and contact address and details of the product. In practice, the invoice and delivery notes will give this information. Any relevant instructions for use and safety information should also be made available “in a language which can be easily understood by users”. The manufacturer’s “Declaration of Performance” should meet this requirement. This information must be passed on through the supply chain to the ultimate end-user of the product.

Example 2

CE marked panels are cut into smaller sizes and are then resold in the smaller size. If there is only one CE mark on the original product, some of the cut pieces will not be CE marked. In practice, the performance characteristics of the “new” product have not been altered so the manufacturer’s “Declaration of Performance” document should give the necessary information relating to the safe usage of the product. Other documents are as described in example 1.





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(continued)

Example 3

Panels are “modified” by being treated with wood preservative, or with fire retardant chemicals, or are machined to tongued and grooved profile for flooring panels. In these cases the information supplied by the manufacturer of the “original” product does not cover the “new” properties of the product. The re-seller of the modified product effectively becomes the manufacturer of the “new” product and is responsible for further testing of the product to show that the “new” properties of the product also meet the requirements of the CPR. Other documents are as described in example 1.

International Plywood (Importers) Ltd is in most cases the importer placing construction products on the EU market. We recognise that we have obligations placed upon us and we act in a responsible manner as outlined in the CPR to ensure that our “construction products” are CPR compliant.

Please [contact us](#) if you need further information.

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