



Europäische Metall-Union  
European Metal Union  
Union Européenne du Metal

European Commission  
Mr Vicente Leoz-Argüelles  
DG Enterprise and Industry  
Unit G/5: Construction, pressure equipment, metrology  
1049 Brussels

Brussels, 22 September 2011

Dear Mr Leoz-Argüelles,

As representatives of SME metal construction companies and member of UEAPME and NORMAPME we would like to address you today.

The European Commission has published the standard EN 1090 with a coexistence phase to 01.07.2012 in the Official Journal. We have contributed to this standard in the Experts Technical Committees and definitely support quality assurance for our companies and for the consumers on a European harmonized level.

More and more of our member associations complain that the various national implementations strongly vary in quality and intensity. Harsh difficulties arise especially for our companies that mostly produce single piece construction products. These are produced on customer demand with individual requirements and specifications.

Furthermore there are clearly not enough certification bodies to be able to certify according to EN 1090 and the certification approach in itself is not yet very clear. Does it concern the product or the production process that the company produces or uses? Or: How are the requirements of EN 1090 harmonized in the national standardization processes? On which basis an equal European equivalence for our companies is reached to guarantee the security of the products for the consumers?

Without a consistent uniform implementation of EN 1090 there will be no consistent uniform regulation for quality and the attribution of the CE marking.

To allow our SMEs to benefit from fair competition and to guarantee a harmonized implementation of certification, we propose to substantially extend the coexistence phase. The responsible Technical Committee should during that time elaborate recommendations for a European harmonized implementation of. Our experts with pleasure offer their availability to support this work.

Yours sincerely,

Erwin Kostyra  
President

Mariette Wennmacher  
Secretary General