European Insulation Manufacturers Association

Ms Katharina Knapton-Vierlich
Head of Unit Construction
Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs
European Commission
Avenue d'Auderghem 45

1040 Brussels

Belgium

Request for European Commission Engagement with Bulgarian Authorities on National Application of Mineral Wool Standard

28/07/2025

Dear Ms Knapton-Vierlich,

On behalf of the European Association for Insulation Manufacturers (EURIMA), I am writing to raise a serious concern regarding the application of technical standards for mineral wool products in Bulgaria, which risks undermining the principles of the Construction Products Regulation (Regulation (EU) No 305/2011) and the harmonized European approach to product performance in the Single Market.

The Bulgarian mineral wool industry, has brought to our attention a problematic "national annex" to the harmonized standard EN 13162:2012+A1:2015, specifically its Bulgarian national application БДС EN 13162:2012+A1:2015/NA:2025. This national annex:

- **Establishes outdated and technically unfounded links between thermal conductivity (λ) and product density.** For instance, DoPs of various glass and stone mineral wool products (tested and verified under AVCP systems 3 and, in some cases, system 1 via voluntary schemes like Keymark) demonstrate that λ-values are independently verified and are not intrinsically linked to density. The annex's attempt to generalize such a relationship is not only misleading, but also inconsistent with harmonized testing and assessment practices. **This practice appears not to be permissible under CEN rules as it would establish a practice that is in competition with the one described in the harmonised product standard, leading to different results**

- **Raises the question** of whether national annexes can introduce application-specific requirements, such as **excluding glass mineral wool from use in pitched** roofs due to compressive strength criteria. Could such requirements on essential characteristics under EN 13162, legally form part of a harmonized standard's national annex? We intend to seek legal clarification on this point and would welcome the Commission's guidance.

- **Is explicitly cited in Bulgaria's national Renovation Program under the EU's Recovery and Resilience Plan**, thus driving procurement based on outdated or technically unsupported criteria.

National Industry Actions and Response

The Bulgarian industry has taken several steps to resolve this issue nationally:

- Submitted formal requests to the Bulgarian Standardization Institute (BIS) for revision of the national annex;

- Presented technical evidence and product samples demonstrating that lambda values are independent of density, in line with EN 13162;

- Provided an industry-drafted update proposal for БДС EN 13162:2012+A1:2015/NA:2025;

However, they have received organized opposition from various institutions advocating to maintain the erroneous link between lambda and density and to mandate density declarations in Declarations of Performance (DoPs)—contradicting the harmonized standard.

Some of these arguments appear to conflate density's indicative role in Eurocode 1 or national fire safety regulations with its status under the CPR. However, the CPR clearly states that **only essential characteristics defined in harmonized technical specifications** (e.g., λD under EN 13162) should be declared in DoPs. Harmonized standards are designed to define **how to declare performance**, while national **building regulations** may define **what performance is required**, a distinction we believe needs legal reinforcement.

Density discussion under CPR Acquis process
The sub group on thermal insulation products of the European Commission CPR Acquis Expert Group (TIP group) is currently discussing national requirements to be included as essential characteristics in the standardisation request for thermal insulation products under the new CPR ((EU) 2024/3110). This ongoing work should address the questionable Bulgarian rule that implies a correlation between density and thermal conductivity.

Request for Commission Support
We respectfully ask the European Commission to engage with the Bulgarian authorities and BIS to:

- Ensure the correct interpretation and application of EN 13162 in line with Regulation (EU) No 305/2011;

- Prevent the use of the national annex to mandate performance criteria (such as density) that are not recognized as essential characteristics in the harmonized standard

- Encourage Bulgaria to remove references to outdated or technically inaccurate national criteria from its renovation program rules.

This case is not only important for restoring fair market access and compliance in Bulgaria, but also for upholding the integrity of harmonized standards across the EU. EURIMA is fully available to provide technical support or further documentation, and we remain committed to constructive collaboration.

This draft is being shared in advance of formal submission to support ongoing engagement with the Bulgarian industry and authorities. EURIMA remains fully available to provide technical input or coordinate further with legal experts as needed.

Yours sincerely,

European Insulation Manufacturers Association



David Kupfer



David Kupfer
Policy Manager
Technology &
Standardisation

eMail:
david.kupfer@eurima.org
Mobile: +32 491 34 47
23

Eurima
rue des deux
Eglises, 29
1000 Brussels -
Belgium
www.eurima.org

mineralwoolinsulation efficient by nature