

Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW)
European Commission
B-1049 Brussels
Belgium

IC-EUROPE
European Association for Industrialised Construction

14th September 2026

Subject: Development of a harmonised European standard (hEN) for 3D volumetric modular construction.

Dear Mr. Jens SCHUMACHER

I am writing on behalf of the European Association for Industrialised Construction (IC-EUROPE), where I serve as President.

At its most recent Board meeting, IC-EUROPE formally agreed to pursue the development of a harmonised European standard (hEN) for 3D volumetric modular construction.

As a first step, we wish to notify the European Commission of IC-Europe's intention to formally seek the initiation of a standardisation request under the Construction Products Regulation (EU) 2024/3110, with the objective of developing an appropriate harmonised European standard for 3D volumetric modular construction.

The growth of volumetric modular construction across Europe is increasingly highlighting the need for a consistent European framework for the assessment, specification and placing on the market of these systems. At present, differing national approaches can create uncertainty for manufacturers, designers, regulators and clients and can act as a barrier to the cross-border deployment of industrialised construction systems.

IC-EUROPE believes that the development of an appropriate hEN could provide an important foundation for:

- Greater regulatory and technical consistency across Member States;
- Improved certainty for manufacturers, designers, contractors and regulatory authorities;
- Clearer routes for demonstrating product performance and regulatory compliance;
- Increased interoperability and standardisation across the European modular construction sector; and
- The removal of technical barriers to the movement and deployment of volumetric construction systems within the European Single Market.

Before preparing a formal submission, we would welcome the opportunity to meet with the relevant members of the Commission's Construction Products Regulation team to understand the appropriate process under the new CPR.

In particular, we would like to discuss:

- The process through which an industry need for a new harmonised technical specification can be formally brought to the Commission;
- The requirements for proposing a new standardisation activity within the CPR Working Plan;
- The role of the CPR Acquis Expert Group and Member States in considering and defining the regulatory need;
- The evidence, technical information and market justification that should accompany a proposal of this nature;
- The process through which the Commission would subsequently develop and issue a standardisation request to the relevant European Standardisation Organisation; and
- How IC-EUROPE should engage with CEN, Member States, manufacturers and other stakeholders in preparing the technical and regulatory basis for the proposed standard.

IC-EUROPE intends to coordinate industry input into this initiative and can bring together manufacturers, designers, contractors, technical experts and other stakeholders operating within the European industrialised and modular construction sector.

Our objective is to ensure that any proposal brought forward is aligned from the outset with the requirements and processes of the new CPR and responds to an identified European regulatory and market need.

We would therefore greatly appreciate the opportunity to meet with the Commission to discuss the proposed initiative and agree the most appropriate pathway towards a formal standardisation request for a harmonised European standard for 3D volumetric modular construction.

Kind Regards,



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