

Position Paper

Construction Products Regulation (CPR) Environmental Sustainability indicators

26 June 2023

Product level information is required to measure building performance

In 2019, the European Commission (EC) published the EU Green Deal that has been the cornerstone of our 2050 climate neutrality strategy. The construction ecosystem played its part, with the Renovation Wave, the revision of both the Energy Performance of Buildings Directive (EPBD) and the Construction Products Regulation (CPR).

For over a decade, our industry has made great use of the Environmental Product Declarations (EPDs) scheme to deliver product information to the market on a voluntary basis. EPD indicators are based on a European standard (EN15804+A2) and allow for a holistic assessment at building level. Like its customers, SMEs and multinational companies have embraced EPDs, which are now part of the construction ecosystem.

As EPDs are voluntary, the information is excluded from the products Declaration of Performance (DoP), a legal document defined by the CPR. This dual approach, mandatory and voluntary, has impacted the credibility of the EPD data, and for many years we have called for the implementation of the CPR Basic Requirements for Construction Works number 7 (BRCW 7) in compliance with EN15804+A2. This would allow designers and architects to make holistic, whole lifecycle assessments of building.

The revision of the Construction Products Regulation (CPR) launched in April 2022 proposes to solely include Global Warming Potential (GWP) in the DoP. Climate Change is indeed our biggest challenge, but we believe that focusing on a single environmental performance may lead to misleading conclusions in terms of sustainable construction, and potentially fail to achieve other environmental targets.

We recommend that the full set of the EN15804 indicators be made mandatory in the revised CPR (Annex I part B), as requested by the European Parliament Environment Committee, and urge the European Parliament to support these amendments at the Plenary vote scheduled for July.

We remain at the disposal of Members of the European Parliament for further information ahead of the plenary vote scheduled for July.

Founded in 1988, Construction Products Europe is a Brussels-based international non-profit making association. The association is made up of national and European associations that represent Small and Medium-size Enterprises and world-leading companies. Construction Products Europe aims to promote the European construction industry, to share information on EU legislation and standardisation and to provide input in all European construction-related initiatives.

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