

## Final chance to revise the Construction Products Regulation (CPR) for decade of decarbonisation

The Environmental Coalition on Standards (ECOS), and the European Environmental Bureau (EEB), thank the European Commission for their efforts so far in evaluating the existing CPR, and developing a range of interesting ideas for the forthcoming proposal. Regrettably however, our understanding is that this lengthy process will conclude with a legislative proposal that will fall short. While relevant information and product requirements aligned with the Sustainable Products Initiative, assessment, and controls on environmental impacts will be omitted from the CPR revision legislative proposal now being finalised.

### Today

According to [EEA data](#) and estimates quoted by [EU and Member State policymakers](#), buildings account for approximately 1412 Mt CO<sub>2</sub> per year, equivalent to the footprint of the African continent. Energy-intensive industries that supply many of the building materials we use today account for 1530 Mt CO<sub>2</sub>, a substantial share of which can be attributed to buildings as the key demand sector.

### Vision

By 2050, all buildings are zero carbon and climate neutral. The large majority of the buildings (built already today, many before energy performance standards existed) have undergone intense renovation, and the remaining 20% will have been newly constructed to achieve high-performance specification. Both processes have occurred without further depleting our carbon budget, helping to avoid runaway global warming and climate disaster. All future construction and renovation use existing products and materials to rebuild without impact.

**This is an ideal vision of 2050 that requires carbon embodied in construction products to be eliminated. However, embodied carbon in the construction sector is today not directly regulated at EU level, and the current revision of the CPR is set kick-the-embodied-CO<sub>2</sub>-can past 2030, jeopardising the viability of this vision.**

The 'Fit for 55' package aims to orient existing policies to deliver rapid decarbonisation by 2030, but construction product policy must also be fit for 55 for the package to truly succeed, and for a sustainable built environment to be possible by 2050. In this regard, if the renovation wave goes ahead unchecked, and new construction is not addressed, the EU is likely to succeed in locking itself into a climate trajectory that overshoots 2050 targets. Inaction on these front risks a substantial shift, not reduction, in emissions from energy-use related to buildings, so we must act now.

In this decade of decarbonisation, the CPR is the lynchpin between energy-intensive industries and the built environment, two of the biggest contributors to EU emissions. Today, no environmental performance, or information requirements exist that truly support EU climate targets by driving decarbonisation of construction products. The current revision process will likely result in a new CPR that enters into force in several years' time, with the end of a transitional period not until the mid-late 2020's.

The world is already halfway between our 1990 baseline and 2050 goal. If provisions for establishing CO<sub>2</sub> performance requirements are not included in the legislative proposal, the EU risks not addressing a sector contributing substantial amounts of embodied carbon until we are at least 10 years closer to 2050, with half the time we have today to transform relevant sectors. Information on sustainability alone for the coming 10 years, will not be enough to make change.

From an economic perspective, Europe will also miss the unique opportunity to create a leading market low-carbon intensity intermediary products such as metals, cement, chemicals that are essential for the decarbonization of energy intensive industries.

**Consequently, our organisations strongly believe the legislative proposal for revision of the CPR must include EU-level requirements across three key pillars as described below:**

- **Performance:** A basis for EU legislative product requirements that can establish maximum carbon footprint and environmental impact values, circularity requirements, and functional performance requirements for each product groups, set by regulators, and not pseudo-regulated by industry through standards.
- **Information:** Structured legislative product information requirements within the CPR itself to require communication of full lifecycle information that is intelligible, open access, and comparable using PEF as a common guiding basis for data quality and lifecycle assessment.
- **Governance and implementation:** Legislative provisions for developing implementing legislation that formalise a clear governance framework to support development of the requirements outlined above through implementing measures per product group (e.g., one for structural products, and one for insulation products).

On this basis, the below 'CPR revision checklist' summarises essential ingredients under each pillar:

- **Structured product information requirements within the CPR itself, NOT reliant upon a simple reference to EPD Core Rules (EN 15804+A2) and complementary Product Category Rules (cPCR).**
  - Minimum requirements to disclose environmental performance cradle-to-grave (modules A-C) including product phase use-phase and end-of-life estimations to prevent varied estimations of product impacts when estimating environmental sustainability of buildings i.e., different LCA software using different values leading to a potentially large variation in total GHG emissions measurement according to LEVEL(s)/EN 15978.
  - Requirements to express the environmental performance of products according to a performance-based functional unit (e.g., strength in MPa) to show the environmental footprint relative to the measured performance delivered.
  - Requirements on a common approach to measure and express embodied carbon emission and measure the anticipated carbon footprint of products that enables comparability between solutions, and to foster demand for lower-carbon products, typically produced by energy-intensive industries. This requires legislative structure, not flexible standards.
  - Requirements for information such as a bill of materials and instructions for maintenance and disassembly to support circular use of products, with priority placed on extending service life and reuse, above recycling.
- **Common basis for product requirements to support circularity and EU sustainable product policy, not established by industry standardisers, but in the form of common legislative performance requirements.**
  - Requirements for circularity based on performance indicators including durability, repairability, reusability, and recyclability as is being proposed under the SPI, with standards being developed by industry today in support by providing harmonised assessment methods (see attached overview of new committee on circular economy in the construction sector).



- Provisions to establish maximum carbon footprint limit-values for products (see stee example below based on the functional unit in terms of volume of material and the functionality delivered (e.g., strength in MPa) to minimise environmental footprint and resources used to deliver required performance levels.
- Provisions confirming the exclusion of hazardous substances, complemented by limits according to REACH restrictions and authorisations which major economies such as Germany are highly concerned about today (see VOC construction product agenda).
- Legislative provisions for developing implementing legislation that formalise a clear governance framework to support development of general and specific performance and information requirements in the form of an implementing measure per product group, for example structural products that embody the largest volumes of carbon upfront in the construction of buildings.
- Implementing process inspired by Ecodesign & Energy Labelling Consultation forum, involving a wider range of stakeholders, and based on a broader range of expertise and information beyond solely incumbent large construction product producers, for example firms with business models focused on reuse and recycling of products and materials. Implementing measures under scrutiny of EU Parliament and the Council, and submitted for scrutiny to WTO, offering a more open process to the closed standards development process today which requires great resources and low levels of transparency compared to ecodesign.

ECOS and EEB therefore urge the European Commission, Member States, and the construction sector one final time to unite and revise the CPR to tackle embodied carbon head-on before time runs out to contribute to the EU's 55% by 2030 climate law.

