

- **CPE supports a clear and comprehensible EuroClass system for indoor air emissions** and welcomes the proposal to declare the EU LCI ratio within a class-based system for construction products, including a separate subclass for Formaldehyde.
- **A risk-based approach should be central** to the proposed system, taking exposure scenarios into account. Emission classes for indoor air should be aligned with health criteria to ensure relevance and effectiveness.
- **The current proposal is overly complex** for non-experts, with excessive methodologies and data. CPE urges the Commission to conduct an impact assessment and a feasibility study to evaluate the system's added value for architects and designers. Additionally, CPE seeks clarification on how to prevent overlaps between the different proposed methodologies.
- **A harmonized framework is essential** to strengthen the single market and ensure consistency across member states.
- **The financial impact is expected to be significant**, with potential cost burdens cascading down to consumers. Transition periods must be adequate to accommodate these changes. Costs may further escalate depending on the AVS system chosen for compliance with the various criteria.

Construction Products Europe acknowledges the European Commission's intention to address the issue of Indoor Air Quality through the development of a transparent and **comprehensible EuroClass system for indoor air**. While we fully support the objective, it is crucial that the process for defining the methodology remains inclusive and considers the perspectives of all stakeholders in the construction sector to ensure that the resulting standards are practical and effective.

As representative of EU Construction products manufacturers, **we welcome the proposal of the declaration of the EU LCI ratio converted into class system for construction products with a separate subclass for Formaldehyde**. We believe that such a declaration based on EU LCI with a separated subclass for Formaldehyde will fulfil the objective of the European Commission while, being reasonably manageable and implementable by economic operators. We would like to reiterate that **substances should be firstly regulated by REACH**. We would also like to recall the importance of the **consistence between the current proposed system with existing regulations**.

We would like to present the following key elements to the European Commission:

- **Health: A risk-based approach should be at the heart of the proposed system, considering exposure scenarios.** Scientific evidence¹ proves that the proposal to include TVOCs does not fully fulfil such an objective. As also stated in the ECA report No 29², TVOC does provide supplementary information when combined with the health-based evaluation using the EU-LCI concept and the limitation of CMR compounds. **To avoid excessive overestimation of the Sum of EU LCI ratio, the properties and modes of action of each**

¹ Salthammer, T., 2022. TVOC – Revisited. Environment International 167, 107440

² Kephapopoulos S. 2013, EUROPEAN COLLABORATIVE ACTION URBAN AIR, INDOOR ENVIRONMENT AND HUMAN EXPOSURE, [Report No 29](#): Harmonisation framework for health based evaluation of indoor emissions from construction products in the European Union using the EU-LCI concept. EUR 26168 EN

substance should be taken into account. The proposed emission classes for indoor air environment should be placed back in the context of the health criterion.

- **Scope:** We call the Commission to remain fit for purpose in its proposal and **distinguish indoor air quality from construction products emissions.** We also request the European Commission to clarify which products will fall under the scope of the declaration and how to distinguish indoor and outdoor applications as well as for products having very limited impact on indoor air quality.
- **Declaration without testing:** We call the European Commission to **develop guidance for the declarations without testing.** The concepts of rules for similar products or 'declaration without further testing' were not mentioned during the SGDS meeting on February 17, 2025.
- **Complexity:** The initial objective of the Euroclass System for Indoor Air was aimed at supporting the architects and designers to get informed about the potential contribution of construction products to the indoor air environment. **We think the current proposal is too complex for non-experts with too many methodologies and data.** The original intent must be rediscovered. In this context, the proposed system should adhere to a uniform and standardised naming convention, using the same format as the Fire Euroclass one. The complexity in implementation for manufacturers should also be considered.
- **Enforceability/implementability:** The proposal should secure the existence of a robust testing methodology and technologies to reach the levels established. We call the EU Commission to **conduct an impact assessment of the measures** (values and methodologies) and **a feasibility study on the added value** of such a system for architects and designers (possibly within the framework of the EU Competitiveness Compass). This is even more necessary if subclasses are currently not based on health criteria.

Significant costs are expected, with **financial consequences** that could ripple down to consumers :

- Transition periods will have to be sufficient given the expected impacts. If the sum of the EU LCI ratios is chosen, a 2-stage implementation of the sub-classes would be desirable.
- Moreover, these costs could multiply depending on the AVS system selected for all these criteria.
- **Manageability:** The EU LCI list is currently composed of more than 150 substances (including isomers). **We call the Commission to secure this list to remain stable and propose a manageable system in case of revision.** The construction industry requires clear, actionable guidelines that facilitate compliance and bring out legal clarity. Therefore, it is essential to specify which standards should apply to different types of products. In case the consideration of the declaration of the EU LCI ratio as well as the sum will be maintained, **we call the Commission to consider the possibility to implement the declaration in two stages with the sum of the ratios in a second phase.** The revision of the values per class should be increased in case of addition of substances to be tested. Lastly, **the requirement to declare exact figures and not a range within the class system could lead to the obligation to systematically test all products and then multiply costs.** A range enables to take into account the worst cases.
- **Double testing and overlaps:** We expect the EU Commission to clarify how to **avoid overlaps between the different proposed methodologies** (e.g. EU LCI ratio, Sum of EU LCI, CMRs and TVOC). If all methodologies are maintained, how to secure the end user will understand that, for example, formaldehyde will be declared in all classes?
- **Single Market:** There is a concern about the implementation of a system for which real values would be requested to be declared under the CPR while Member States could set their own provisions based on national classes. Such an approach goes against the idea of a

simplification and a comparability across Member States. **The industry recalls the importance of a common framework reinforcing the single market.**

- **Formaldehyde:** The relevance of the subclass for formaldehyde is noted, especially since a REACH Annex XVII restriction is already in force. As the proposal refers to the Restriction, **we support proceeding with a clear reference to the two main methods used for products emitting Formaldehyde, namely EN 16516 for all non-wood products and the EN 717-1 for wood-based ones.** We reiterate that we do not support the declaration of exact values as such a measure will be extremely detrimental for products manufacturers being forced to test every single products.
- **CMRs: Exposure assessments are conducted under REACH and therefore sufficiently robust to secure the safety of building occupants.** Should CMRs remain in the proposed Euroclass system, we would then welcome the clear reference to CMRs 1A and 1B listed in the appendices 1, 2, 3, 4, 5, 6 of Annex XVII of the REACH regulation. We would like to recall the Commission the importance of existing regulations, particularly for chemical substances/mixtures under REACH, CLP and the CMR directive concerning the protection of workers (CMD Directive 2004/37/EC). The CPR should not generate a conflict or confusion with the mentioned legal texts.
- **SVOCs:** Scientific evidence is missing to prove the robustness of this methodology in terms of analytical measurements. Therefore, **we call the Commission to not consider this criterion but rather secure the EU LCI list** to be adapted and derive substances being identified as relevant.