CONSTRUCTION PRODUCTS EUROPE

LCA information in CE marking - Background document

11 March 2025

Construction Products Europe welcomes the adoption and implementation of the revised Construction Products Regulation (CPR, Regulation 2024/3110) and the declaration of environmental information in the CE marking and Declaration of Performance and Conformity (DoPC).

Back in 2018, we issued a paper highlighting some recommendations as preconditions for the implementation of Environmental Sustainability requirements and we are happy to see that the majority of them have been addressed. Nevertheless, we would still like to highlight certain areas that are very crucial for the successful implementation of the new requirements to create a fair, sustainable and strong single market for construction products in Europe.

1. Secondary background databases

This is a crucial element that is directly connected to the quality and the ability to perform life cycle calculations on the environmental performance of construction products. We would like to highlight the following:

- **Cost Concerns**: The expense of obtaining a single license for background databases remains a significant barrier, particularly for specialized datasets. These costs are subject to yearly fluctuations, adding financial uncertainty for stakeholders.
- **Lack of Harmonization**: Existing background datasets lack standardized modeling approaches, leading to inconsistent results and variable coverage. This inconsistency undermines the reliability and comparability of environmental assessments.
- **Variability**: The quality of data within these databases varies widely, with no universally applied criteria for assessment. Harmonizing data quality criteria and methodologies is essential to ensure fair and reliable evaluations.
- **Impact of Poor Data Quality**: Inferior data quality often leads to exaggerated impacts, which may misguide decisions and practices. For example, in Declarations of Performance and Compliance (DoPC), such discrepancies compromise trust and utility.

Monopoly Concerns

- **Non-Mixing Practices**: Due to inconsistencies between databases, practitioners avoid combining datasets, inadvertently fostering monopolies. This lack of competition restricts innovation and exacerbates cost concerns.

Suggested approach

What we would like to request is for the European Commission to establish one common EU background database that will be free and available to all manufacturers with all the necessary default life cycle inventory datasets needed from the product categories that will be required to publish in their DoPC the Environmental Sustainability performance. We understand that the ideal situation will be when all products will be covered by DPP. In the meantime, reliable primary data from suppliers shall be preferred over default secondary datasets.

2. Worst-Case Scenario Declaration

Depending on the granularity and the complexity of the product manufacturing and supply chain, fulfilling the common CPR principle of “worst case scenario” can lead to a variety of approaches in the life cycle analysis (LCA) context.

The main difference is that the calculation of environmental sustainability based on LCA is not a straightforward lab test with one variable – but based on multiple variables and multiple indicators. The worst-case approach will define how complex and costly a calculation could potentially become and the possible implications to manufacturers particularly for SMEs.

Suggested approach

We would suggest applying the current principle of weighted average within 1 year production data per default. This approach has been established for years in the context of EPDs and ensures a reliable, representative and cost-effective approach.

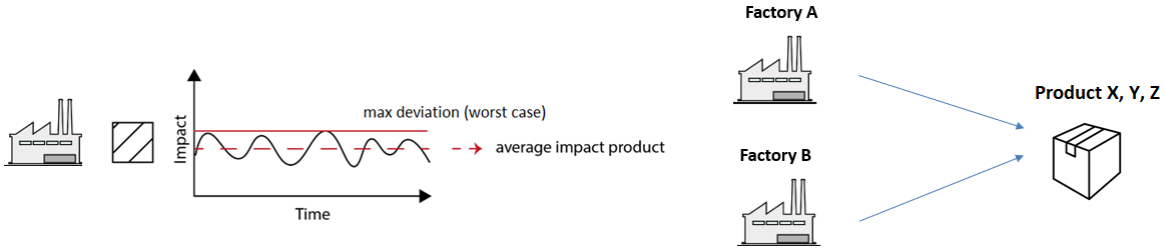

Figure 1 Overview of the weighted average approach

3. New Product Types and Technologies

In the coming years, innovation will play a key role in the construction sector and many new products and technologies will be introduced. Today, there is no clear framework on how environmental performance could be declared for such cases. It would be very important to declare the minimum requirements to apply the CE marking for such products.

Suggested approach

We would require explicit instructions on how to declare environmental sustainability performance for new and emerging products and technologies. Ambiguities in this area could stifle innovation and lead to inconsistent compliance.

4. Physical Inspection

This is a requirement as described in the Delegated Act for the definition of AVS 3+. CPE in general, supports the approach but only when deemed necessary or when the notified body has concerns of fraud by the manufacturer. Such principle is commonly used in the current framework of EPDs and that ensures transparency and reliability of the declarations.

Suggested approach

To manage the growing demand for inspections under new regulations, we would suggest to clearly define a decision tree with a list of elements that would require inspection. The same should be clarified regarding responsibilities between a manufacturer and a notified body. The inspection should be physical or remote. Allowing the remote inspection would alleviate pressure on AVS 3+ experts, avoid further costs for the manufacturers and streamline further the validation process.

When several production lines produce the same product category, inspections should be carried for randomly selected production lines. The same could be applied for light changes in the production process, that could only require a simple remote validation by the notified body.

Conclusion

To address these challenges, stakeholders must prioritize harmonization, flexibility, and transparency in regulations and practices. Clear guidance, equitable definitions, and the adoption of innovative inspection methods will foster an environment that supports both compliance and progress in environmental sustainability and will support the transition.

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