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PROPOSALS for a proportionate implementation of Environmental Sustainability in the Declaration of Performance and Conformity (DoPC) under CPR-2024:

Data selection, product type definition & performance averaging

03 March 2026

EXECUTIVE SUMMARY

The revised Construction Products Regulation (CPR-2024) makes the declaration of environmental sustainability characteristics mandatory in the Declaration of Performance and Conformity (DoPC). Construction Products Europe (CPE) fully supports the objective of strengthening sustainability, transparency, and reliability in environmental performance reporting across the construction sector.

However, without harmonised and proportionate implementation rules, the new requirements risk creating excessive administrative burden, increased validation costs, and reduced competitiveness — particularly for manufacturers with large and diverse product portfolios.

Environmental performance of products are very dynamic and evolve with technological development, sourcing changes, and process improvements. Clear, practical rules are therefore essential to ensure that sustainability objectives are achieved efficiently.

CPE identifies four key areas where clarification and simplification are necessary to safeguard proportionality while maintaining credibility and robustness.

1. Data Selection & Validation

Environmental calculations rely heavily on background datasets that vary in quality and reliability. Excessive validation of already regulated or standardised data would create unnecessary costs without improving data integrity.

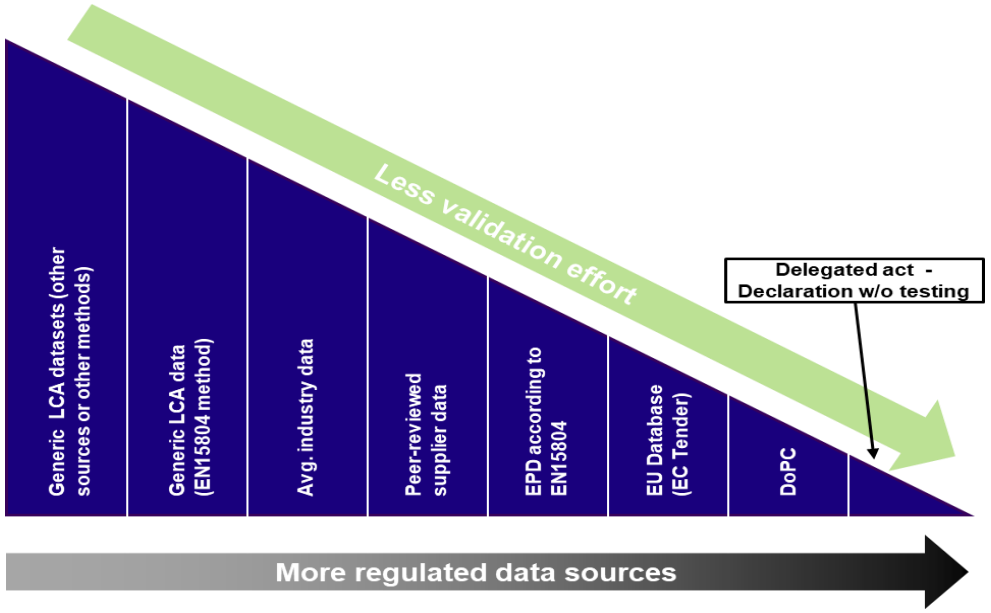


Figure 1: hierarchical approach prioritizes the validation effort across background data sources (non-exhaustive)

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Proposal: Request GNB SH03 to develop a hierarchical, risk-based approach to data validation, providing guidance on recommended validation activities considering the importance of the dataset to the final results. This should include:
- Simplified validation (minimum effort) for highly reliable, standardised, or regulated data sources; and
- More comprehensive validation (higher effort) for less reliable or less transparent data sources

Proposal: Ask the EU Commission through the CPR Acquis Sub-group on Environmental sustainability & TC350 to develop rules on recommended average data quality rating as well as possible minimum data quality rating for datasets with a significant impact on the final results.

2. Product Type Definition & Weighted Averaging

Strict site- or product-specific environmental declarations would significantly multiply product types and validated assessments, increasing costs and limiting sourcing flexibility. Declaring just worst-case performance for a larger group of product variants as an alternative, would significantly discourage environmental improvements for the better performing products.

Proposal: Ask the Commission through the CPR Acquis Sub-group on Environmental sustainability to lay down rules for optional averaging of environmental sustainability product performances, based on weighted product volume, across supplied materials (multiple suppliers) and across production systems (multiple sites).

Further, the solution should be based on averaging on weighted product volumes and defined material flows, permitting averaging for products with identical intended use and for products with differing technical characteristics where environmental impact differences are negligible. This approach preserves environmental integrity while enabling practical compliance and maintaining incentives for continuous improvement.

The solution would ensure that all environmental burdens are accounted for, while providing flexibility for manufacturers to organise the most practical structure for environmental sustainability performance assessment and the best setup for the needed FPC.

3. Factory Production Control (FPC)

Environmental sustainability performance requires clear guidance on monitoring, trigger points, and averaging methodologies to avoid divergent implementation.

Proposal: Ask the Commission through the CPR Acquis Sub-group on Environmental sustainability to establish horizontal guidance on factory production controls for environmental sustainability, including the identification of key controls and trigger points, methodologies for product-weighted averaging, and procedures for defining fixed or rolling averaging periods that should be further specified in standardisation requests and product standards.

The development of such harmonised guidance would support a risk-based and proportionate implementation of FPC, reduce uncertainty and divergent practices among notified bodies, and enable manufacturers to manage environmental sustainability data in a predictable and cost-efficient manner, while maintaining the robustness and credibility of declared environmental performance.

4. Initial Inspection Requirements

Mandatory initial inspection under CPR-2024 Annex IX may impose disproportionate costs when applied to environmental sustainability, as environmental impacts are largely data-driven and often located upstream in the supply chain.

A differentiated, risk-based approach would reduce unnecessary burden while maintaining reliability.

Proposal: Ask the Commission to introduce proportionate deviations or flexibilities from the mandatory initial inspection requirement laid down in CPR-2024, Annex IX for the validation of environmental sustainability characteristics, where such inspections do not provide added value. In particular, the Commission is invited to incentivise digitalization of manufacturer (Module A) data, enable risk-based exemptions, desk-based or remote validation, and the recognition of existing verified systems or assessments, as well as allowing single inspections covering multiple product types or production sites using comparable data and methodologies.

5. Conclusion

CPE supports the sustainability objectives of CPR-2024. To ensure effective implementation, the framework must be harmonised, proportionate, and practically feasible. By introducing risk-based validation, enabling weighted averaging, clarifying FPC requirements, and applying proportional inspection rules, the EU can achieve robust environmental performance declarations while safeguarding competitiveness and supporting the green transition.

The revised Construction Products Regulation (CPR), effective January 2025, underscores the importance of sustainability in construction works by introducing predetermined environmental essential characteristics for construction products for which the manufacturer must declare the performance in the Declaration of Performance and Conformity (DoPC) prior to affixing the CE-marking. For the control by a notified body of the assessment of the environmental sustainability performance, the AVS 3+ (CPR 2024[1]) as well as the AVCP 3+[2] (CPR 2011[3]) have been introduced.

We fully endorse the Commission's efforts to enhance sustainability within the construction sector, and to ensure transparency and accuracy in environmental performance declarations.

We welcome the European Commission's ongoing commitment to reducing the administrative burden on EU businesses to enhance competitiveness and achieve the objectives of the Clean Industrial Deal. However, we also believe that the proposed rules for declaring the environmental performance of products exemplify measures that will impose a significant administrative burden on industry. Especially, as the environmental performances are expected to improve with technological development and improved sourcing and production processes, while existing technical characteristics are of a more constant nature. Because of this, clear rules for determination and simplification are critical to realise the full potential of the green transformation in society.

We would like to highlight four specific areas essential to the functionality of the revised CPR in relation to Environmental Sustainability:

1) Data selection and validation
2) Product type definition in relation to sustainability performance
3) Factory Production Control, and
4) Initial inspection as part of validation

We are convinced that the rules on these topics can be clarified & simplified without compromising the overall goals, thereby making it easier to meet them while minimizing the impact on the competitiveness of our businesses.

[1] Regulation (EU) 2024/3110
[2] Delegated regulation (EU) 2024/2769
[3] Regulation (EU) 305/2011

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1. Data selection & validation

Hierarchical validation approach

The background datasets are an essential part of the environmental sustainability calculation, prescribing the environmental profile of unit processes or activities such as 1 km of transportation, usage of 1 kWh of electricity, and sourcing of 1 kg of a specific material. Without them, the calculation will miss critical elements and will limit the impact assessment of a product. Currently, background data can come from many different sources and can vary a lot in terms of quality and reliability, which may have a significant influence on the result of the final calculated performance of the product.

In the future system, it will be essential to ensure harmonised, efficient, and proportionate validation practices, while avoiding unnecessary verification burdens for manufacturers.

In particular, excessive validation of datasets from reliable and regulated sources, such as a Commission-led database, should be avoided in order to minimise mandatory administrative and cost burdens.

For this reason, CPE strongly recommends:

1) a structured hierarchical approach for background dataset validation to ensure consistency and reliability in environmental sustainability calculations, in combination with
2) a prioritisation of the validation effort towards datasets with the most significant effect on the final assessment results.

This hierarchical approach prioritizes the validation effort based on types of data source, ranging from regulated data (DoPC, EU database, etc.) to datasets from less regulated data sources, also potentially applying diverging calculation methods (Scientific articles, non-verified supplier information, PEF[4], ISO 21930[5] etc.).

[4] European Commission - Product Environmental Footprint: https://green-forum.ec.europa.eu/green-business/environmental-footprint-methods_en

[5] ISO 21930:2017 - Sustainability in buildings and civil engineering works — Core rules for environmental product declarations of construction products and services

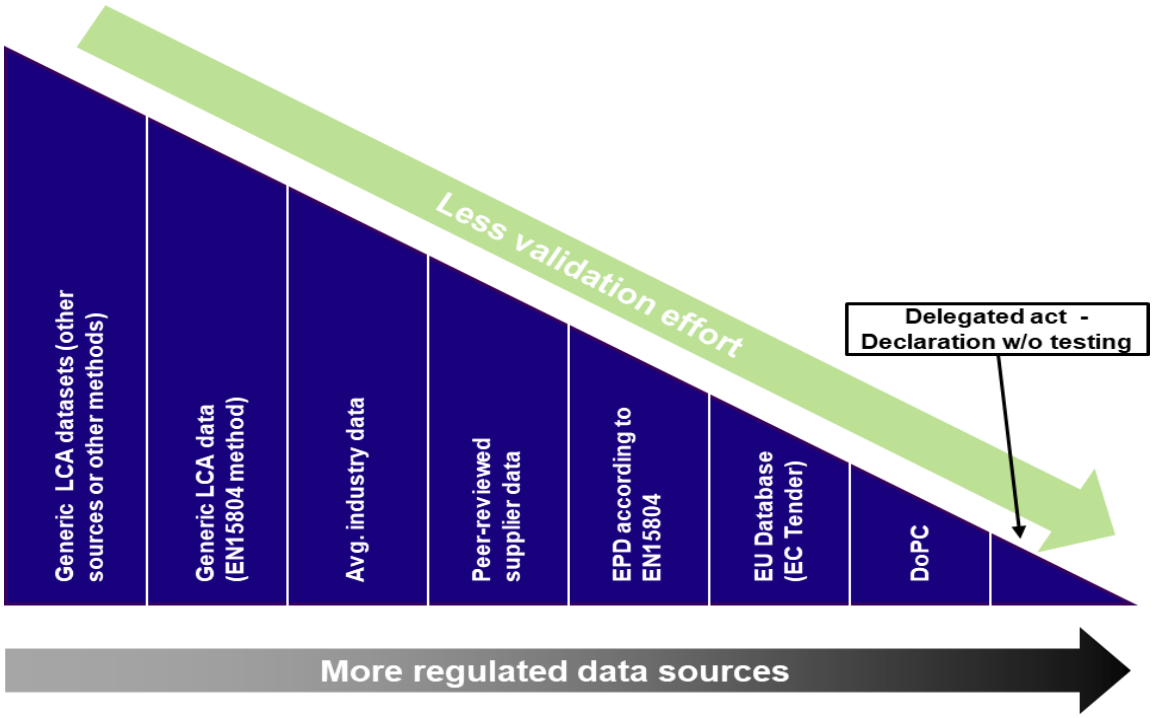


Figure 1: hierarchical approach prioritizes the validation effort across background data sources (non-exhaustive)

This approach aims to reduce verification costs while maintaining robust data integrity, guiding manufacturers in their selection of data sources for cost-efficient validation, and thereby supporting informed decision-making across the construction sector.

Proposal: Request GNB SH03 to develop a hierarchical, risk-based approach to data validation, providing guidance on recommended validation activities considering the importance of the dataset to the final results. This should include:
- Simplified validation (minimum effort) for highly reliable, standardised, or regulated data sources; and
- More comprehensive validation (higher effort) for less reliable or less transparent data sources

Minimum data quality rating

To enhance equal practices by notified validation bodies, it is crucial to address the basis for accepting or rejecting datasets as part of the validation process. A proposal is to develop uniform benchmark criteria as part of Data Quality Rating (DQR) according to EN15941[6] Ch. 6 and 7.

[6] EN15941:2024 - Data quality for environmental assessment of products and construction work – selection and use of data

As the EN 15941:2024 will already become part of the legal basis for Environmental sustainability data in DoPC, it can serve as a basis for 1) manufacturer self-declaration of data quality, and 2) notified bodies' systematic validation of appropriate data for the assessment. However, as neither EN15804 nor EN15941 sets any benchmark or other guidance on what data is permissible, it easily results in uneven practices across notified bodies, as well as the risk of manufacturers being asked to repeat their environmental sustainability assessment, as the "passing criteria" is subjective and unknown.

Therefore, clear rules or guidance on recommended average data quality rating and maybe also a minimum quality rating for datasets with a significant impact on the results should be established.

Proposal: Ask the EU Commission through the CPR Acquis Sub-group on Environmental sustainability & TC350 to develop rules on recommended average data quality rating as well as possible minimum data quality rating for datasets with a significant impact on the final results.

2. Product type definition in relation to sustainability performance & weighted average performances

EPD: Product scope and validity

Within the current EPD approach, the methodology handles the product program segmentation (product variants covered by the EPD), and variation in performance over time by prescribing

- the definition of the product variants to be covered, to be included[7] in the Scope of the EPD, and
- the accepted variation in performance to be within a specific percentage (e.g. 10%) of the declared values without necessarily forcing an update of the declaration [8].

While the EPD programme rules stipulate an obligation of the manufacturer to ensure that products, considered within the scope of the EPD, stay in conformity with the declaration or trigger a reassessment; in practice the 5 year validity period of EPDs is considered the main safeguard both for EPD programme operators and manufacturers that EPDs are reliable and an accurate reflection of the products they represent.

Therefore, the EPD procedure differs from the "Product type" approach as laid down by the CPR, and the validity period of 5 years is replaced by the manufacturer's obligation to implement necessary Factory Production Controls to ensure the constancy of performance and conformity with the DoPC.

CPR & obligations for the manufacturer

Within CPR-2024, the product type definition is the key element in defining possibilities and limitations related to the assessment of sustainability parameters:

> *The abstract model of individual products, determined by the intended use and a set of characteristics which exclude any variation with regard to performance or to the fulfilment of product requirements set out in or in accordance with this regulation, […]*
> *– Art. 3 (27)*

The environmental performance is to be understood as a series of different yet related essential characteristics that each[9] shall fulfil the requirements as laid out by the regulation. This includes obligations of the manufacturer to ensure 1) that procedures are in place to ensure that products fulfil their declared performance[10], and 2) that, for products placed on the market that do not conform to their declared performance(s), necessary corrective measures to bring that product into conformity are immediately taken by the manufacturer[11].

[7] EN15804:2012+A2:2019: Ch. 8.2 (c)
[8] EN 15804:2012+A2:2019: Ch. 9
[9] CPR-2024: Art. 15(2)
[10] CPR-2024: Art. 22(4)
[11] CPR-2024: Art. 22(11)

An interpretation of CPR-2024 rules, in line with already established essential characteristics for various products under the CPR-2011 is that each product shall meet, or even overperform, compared to the declared technical performance to ensure conformity.

While this underlines the legal requirement linking the conformity of each marketed product with its declared performance, the CPR-2024 also emphasises that: "Performance harmonised standards shall where appropriate […] provide methods for assessing the performance of the products in relation to their essential characteristics[12]."

The following examples show how performance harmonised standards further define assessment methods, and in many instances, apply simplified approaches relying on statistical variation and/or artificial representatives of the product assessed:

1) the thermal transmittance of windows and doors relies on the assessment of the performance of an artificial "reference size" product to overcome the endless amount of varying product sizes[13],

2) for the thermal resistance and conductivity of thermal insulation products, thermal resistance, R_D, and thermal conductivity, λ_D, shall be given as limit values representing at least 90 % of the production, determined with a confidence level of 90 %[14], and
3) for the mean compressive strength of masonry units tested and assessed based on a given sample size of units, the individual values of compressive strength shall not be lower than 80% of the declared value.[15].

In all three cases, individual products that would not deliver the declared performance, if individually tested, can be placed on the market in full conformity with the declared performance from a methodological perspective.

Similar approaches should also be adopted for environmental performances. Indeed, environmental performances should be established following assessment methods which are adapted to product and industry specificities and outlined in standards. Then the conformity of a declaration should be assessed against these standards rather than, e.g., against the actual environmental impacts of each individual product.

Problems in declaring environmental performance strictly reflecting actual environmental impacts

[12] CPR-2024: Art. 5(1)
[13] EN 14351-1:2006+A1:2010 Windows and doors – Product standard, performance characteristics – Part 1
[14] DS/EN 13162:2012+A1:2015 Thermal insulation products for buildings – Factory made mineral wool (MW) products – Specification
[15] EN 771-2:2011+A1:2015 Specifications for masonry units – Part 2: Calcium silicate masonry units

Massive and unnecessary increase in administrative burden and costs: If declarations must be strongly correlated with the specific environmental impact of every product, manufacturers will need to drastically increase the number of product types they issue to provide reliable data. For instance, it could result in a need to declare production site-specific environmental performance. This would drastically increase the number of validated assessments and DoPC, as variations between sites' environmental characteristics would demand the creation of separate product types — even if all other technical performances remain identical. Manufacturers and notified bodies would face significantly greater workloads and costs due to the need for extensive and more frequent data collection, processing, reporting, and independent assessment and validation for each site-specific declaration.

The alternative of declaring only the worst-case performance for a larger group of product variants as a single product type, to reduce the number and complexity of assessment reports and DoPCs would generate numerous issues. For instance, it could reduce the incentive for manufacturers to do marginal improvements to "better performing" production lines or "greening up" their the sourcing portfolio.

Significantly limiting the manufacturer's possibility to adjust sourcing and supplier network: Site- & product-specific environmental performance would also be subject to very strict and inflexible sourcing commitments, where even small fluctuations in supply, e.g. between suppliers with different environmental profiles, would easily compromise the constancy of performance short-term, whereas when averaged over a longer period of time would not be a problem.

Implementing simplified methods for the declaration of environmental sustainability performance

The future rules on environmental sustainability should be fit to overcome the above-mentioned problem while ensuring continuity with existing rules and practices regarding assessment and verification of constancy of performance. The basis for the weighting should be determined as part of the rules, and could

- on the input side (material sourcing and utility consumption) be based on equal physical characteristic of the flows (kg, square- or cubic meter, kWh, l etc.), and
- on the output side (product volume) be based on the declared unit (i.e. number of pieces, volume, area or weight of products according to the relevant complementary Product Category Rules).

One example of such a rule outlined by the CPR Acquis sub-group on Environmental Sustainability is the following possibility to average the effect of variation of production fluctuations on the environmental performance assessment:

Variations at the production site due to seasonal changes, process starts or stops, or manufacturing fluctuations can be considered using a weighted average calculation, while maintaining the principles of the declaration.[16]

[16] CPR_Acquis sub-group on Environmental performance – Milestone B.1-6, Ch. 2.2 Product type concept

The proposed rules on weighted average should be acceptable for

- products with the same intended use and otherwise identical technical characteristics across production lines and production sites.

In addition, weighted average calculations would also be beneficial for

- products with the same intended use but with otherwise unequal technical performances, where the environmental performance is not significantly affected, and
- products with different intended uses and otherwise unequal technical characteristics, in case their environmental performances are similar.

As an example of the above, glazing with diverse coatings, resulting in varying technical performances of the products but with minimal effect on the environmental performances, could be considered subject for weighted averaging to simplify assessment and documentation.

Such special considerations could be laid down in the standards per recommendation in the pertinent Standardisation request.

Proposal: Ask the Commission through the CPR Acquis Sub-group on Environmental sustainability to lay down rules for optional averaging of environmental sustainability product performances, based on weighted product volume, across supplied materials (multiple suppliers) and across production systems (multiple sites).

This would ensure that all environmental burdens are accounted for, while providing flexibility for manufacturers to organise the most practical structure for environmental sustainability performance assessment and the best setup for the needed FPC.

Further, it would also ensure a more aligned approach between the legal system of CPR and the EPD system, which will remain in place for many years for product families still not harmonised under CPR-2024. Problems regarding reliability should be addressed via FPC requirements as well as via the established rules for the averaging of data subject to validation.

3. Factory Production Control

To facilitate the effective implementation of Factory Production Control (FPC) requirements and to support the methodological approach to weighted averaging of environmental performance, it is recommended that general rules and guidance on FPC for environmental sustainability performances be developed horizontally as part of the CPR Acquis and detailed within the standardisation requests for the individual product families.

Such guidance would provide standardisers, manufacturers and notified bodies with a common understanding of how environmental data should be managed, monitored, and updated over time, ensuring consistency, transparency, and proportionality in the application of CPR requirements. In particular, the guidance should address the following elements.

- **Identification of key controls and trigger points**, including:
  - Changes in the sourcing of raw materials, components, or energy carriers
  - Modifications to production processes, technologies, or production lines
  - Changes in utility consumption (e.g. electricity, fuels, water) with a potential impact on the environmental performances
  - Variations in production volumes or product mix that may significantly affect weighted environmental performance results.

- **Methodology for product-weighted averaging and ongoing monitoring**, including:
  - Rules for grouping products with comparable environmental profiles and production processes
  - procedures for calculating weighted averages based on production volumes
  - thresholds for determining whether a product conforms to its declared performances, potentially requiring changes to the production or a new assessment and validation to bring an underperforming product into conformity
  - Documentation and traceability requirements to ensure auditability over time.

- **Permissible averaging periods for sourcing and production data**, including clear guidance on:
  - Acceptable averaging timeframes (e.g. annual, semi-annual, quarterly, or rolling 12-month averages)
  - Conditions under which shorter or longer averaging periods may be justified
  - Alignment of averaging periods with existing accounting, procurement, and reporting cycles to minimise administrative burden while maintaining data representativeness.

The development of such harmonised guidance would support a risk-based and proportionate implementation of FPC, reduce uncertainty and divergent practices among notified bodies, and enable manufacturers to manage environmental sustainability data in a predictable and cost-efficient manner, while maintaining the robustness and credibility of declared environmental performance.

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Proposal: Ask the Commission through the CPR Acquis Sub-group on Environmental sustainability to establish horizontal guidance on factory production controls for environmental sustainability, including the identification of key controls and trigger points, methodologies for product-weighted averaging, and procedures for defining fixed or rolling averaging periods that should be further specified in standardisation requests and product standards.

4. Initial inspection as part of validation

Mandatory initial inspection under CPR-2024

Under CPR-2024, Annex IX prescribes initial inspection as a mandatory activity to be performed by the notified validation body. While this requirement has been laid down by the co-legislators, it raises significant concerns regarding both proportionality and practical relevance when applied to mandatory environmental sustainability characteristics.

Firstly, mandatory initial inspection represents a substantial administrative and financial burden for manufacturers, particularly where environmental performance assessment becomes mandatory for all construction products harmonised under CPR-2024. In many cases, the inspection adds limited additional assurance value compared to the effort required, especially where robust documentation, standardised datasets, and harmonised calculation methods, and information digitalization are already in place.

Secondly, initial inspection often provides limited relevant information for notified validation bodies in the context of environmental sustainability assessment. Environmental performance relies predominantly on data aggregation, modelling assumptions, background datasets, and upstream supply chain information rather than on physical manufacturing processes.

Disproportionate cost impact on manufacturers

For manufacturers placing between 5 and 50’000 different product types on the market, each requiring validated environmental information, the cumulative financial impact of mandatory inspections becomes considerable. Today, a verified Environmental Product Declaration (EPD) typically results in costs in the range of EUR 5,000–10,000 per product type. There are currently no clear indicators—other than economies of scale—that the mandatory validation of environmental sustainability characteristics under CPR-2024 will be significantly less costly.

In this context, mandatory initial inspections risk becoming a major cost driver, particularly for small and medium-sized enterprises, and for manufacturers with broad product portfolios or frequent product updates.

Limited effectiveness for complex and decentralised manufacturing

Modern construction product manufacturing is increasingly characterised by multi-site production, complex supply chains, and extensive reliance on external suppliers. Many manufacturers operate across numerous factories, often in different Member States, and source key materials from a large network of suppliers.

In such settings, obtaining a complete and detailed overview of all environmentally relevant activities through physical inspections is neither realistic nor efficient. Any meaningful validation must necessarily be based on risk-based and materiality-based assessments, focusing on the most significant contributors to environmental impacts rather than attempting exhaustive physical verification.

Misalignment with life-cycle environmental impacts

Experience from multiple environmental assessment schemes and regulatory initiatives consistently shows that the dominant environmental impacts of construction products typically occur upstream, in the sourcing of

raw materials and intermediate products (Module A1 / Scope 3). These impacts cannot be effectively verified through on-site inspections of manufacturing facilities alone.
Instead, verification of upstream impacts relies primarily on:

- Documented supplier data and declarations,
- Documentation on product design and production volume
- Background datasets and databases,
- Financial and procurement records,
- Life-cycle modelling assumptions.

This information is generally accessible and shareable through digital means. As a result, mandatory physical inspection adds limited value in validating the most environmentally significant parts of the product life cycle, while substantially increasing compliance costs and administrative complexity.

Need for a proportionate, risk-based approach
Given the above, a uniform mandatory initial inspection for environmental sustainability characteristics risks undermining the proportionality principle embedded in EU product legislation. A more effective approach would differentiate between:

- Product and data characteristics that genuinely benefit from physical inspection, and
- Characteristics where validation can be achieved more efficiently through documentation review, data quality checks, and targeted audits.

Without such differentiation, the current requirement risks creating a system that is costly, resource-intensive, and of limited added value, potentially slowing down market uptake and compliance without materially improving data reliability.

Proposal: Ask the Commission to introduce proportionate deviations or flexibilities from the mandatory initial inspection requirement laid down in CPR-2024, Annex IX for the validation of environmental sustainability characteristics, where such inspections do not provide added value. In particular, the Commission is invited to incentivise digitalization of manufacturer (Module A) data, enable risk-based exemptions, desk-based or remote validation, and the recognition of existing verified systems or assessments, as well as allowing single inspections covering multiple product types or production sites using comparable data and methodologies.