

EEB RESPONSE TO THE CPR PROPOSAL OF THE EUROPEAN COMMISSION

The EEB welcomes the European Commission's proposal to revise the Construction Products Regulation (CPR), underlining the effort to align it with the environmental principles included in the Eco-design Regulation for Sustainable Products (ESPR). However, the current proposal is not aligned with the Paris Agreement ambition and does not grant an effective contribution to 2050 carbon neutrality objectives. Lack of clear provisions to actually reduce embodied emissions beyond information is a worrying postponement of necessary efforts. Hence, the CPR revision should be better guided with Europe's environmental objectives for 2030 and 2050. Additionally, a closer alignment with the ESPR should be reflected:

- **Tackling standardisation issues in the CPR by defining the role of the European Commission in setting requirements for construction products.** The introduction of legal acts as a substitute for standardisation processes is envisaged but inappropriately. The European Commission should more systematically intervene to develop legal acts when proposal for standards out of a standardisation request are rejected. Moreover, alignment with the ESPR should be ensured by implementing crucial provisions through legal requirements and ensuring the same level of ambition in both regulations.
- **Defining the scope of the CPR exclusively for construction products, integrating cement under the ESPR.** The proposal ensures that minimum ecological design requirements for manufacturers are applicable only if delegated acts are developed. As such legal acts are not the main route under CPR, there is a huge risk of prolonging the placement on the market of cement with high embodied emissions. Therefore, cement should be integrated into the ESPR with other intermediary products to be regulated with the high-energy intensive intermediary materials as soon as possible.
- **Limiting the environmental impact of construction products, tackling the embodied emissions.** Despite the positive new obligation for manufacturers to assess and disclose the environmental performance of products, it is necessary to adjust the proposal to ensure a consistent approach at the product level and correctly calculate the whole-life carbon at the building level. A harmonised methodology and appropriate reporting system need to be defined to assess and disclose the environmental performance of construction products, ensuring the alignment of EPDs with PEFs, setting effective limits to embodied emissions and environmental performances with a clear timeline for mandatory thresholds and classes of performance of construction products in construction work, setting an ambitious calendar for the development of Delegated Acts to establish a mandatory labelling system.
- **Ensuring reliable and harmonised data on the environmental impact of products.** A list of information requirements on construction products based on the inherent product requirements listed in Annex I part C should be introduced, as well as ensuring their harmonisation with the ESPR products.

European Environmental Bureau

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- **Workplan for developing inherent product requirements**, for which there is no defined timeline and no established implementation process. The inherent requirements should be developed based on the model proposed by the ESPR: defining a plan and the priority construction products to be addressed to define minimum performance (embodied carbon...) and functional (circularity, durability,..) requirements.
- **Boosting circularity in construction materials**. Several measures are needed, such as introducing a centralised database, ensuring the use of Products Passports, integrating EPR schemes to ensure the integration of end-of-life environmental impacts of materials, developing GPP circular criteria and promoting the use of reused materials to reduce their unequal treatment in the market compared to linear products.

For more detailed information, please read the response submitted by ECOS and supported by EEB: [Feedback from: ECOS-Environmental Coalition on Standards \(europa.eu\)](#).

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