

Date: 18thApril 2023

Subject: recommendations for an environmentally ambitious Construction Products Regulation (CPR)

To Ministry representatives in the Council

Cc Environment & Energy attachés

The signatories of this letter call on you to support ambitious environmental provisions for construction products in the revised Construction Products Regulation (CPR).

Construction products represent some of the highest energy and carbon intensive products on the EU market, averaging to a **carbon footprint of 250 million tonnes every year**. In addition to CO₂ emissions, construction products require 1.6 billion tonnes of raw materials, representing half of the EU's consumption, and at end of life a third of EU's waste generated annually¹.

Considering that the most effective way to bring down embodied carbon in buildings is through materials, **the CPR represents the main legislative instrument to supply decarbonised, circular and toxic-free construction materials to the EU market**. This is all the more important since Member States are and will increasingly set limits to the climate impacts of buildings as part of national building policies.

Moreover, acknowledging that circularity and the effective use of secondary materials is a key pillar towards decarbonisation, **a revised CPR is a critical opportunity to bridge the gap between fragmented product and waste legislation** to deliver on the joint objectives of the European Green Deal and the Circular Economy Action Plan. What is more, some construction materials can contribute to enhancing the carbon sink effect of the construction sector². This is the case for materials which sequester carbon captured from the atmosphere in greater quantity than is emitted to produce them, and which store this carbon for many decades or potentially centuries.

To ensure this vision realises, **23 organisations** call on you to support **three priority measures** in the revision of the CPR:

- 1. A functioning governance, where requirements are established through a transparent, democratic and participative process.** This includes:
 - a strong oversight from the Commission, with EU-level requirements on key environmental indicators (i.e. recycled content and limits on embodied carbon) set in legislation and based on a scientific assessment.

¹ Source: [CPR impact assessment](#).

² This is the case of materials which sequester carbon captured from the atmosphere in greater quantity than is emitted to produce them, and which store this carbon for many decades or potentially centuries.

- the revision of all standards not compliant with the performance-based approach of the CPR or posing barriers to competition (as in the case of cement).
2. A structured approach to developing environmental and climate requirements under the CPR in secondary legislation:
- a. **Robust information must be disclosed as a priority and on the basis of Environmental Product Declarations (EPDs).** To secure effective decarbonisation, data must be disclosed all **along products' life cycle** and be **product specific**, with information not only on CO₂, but also covering circularity and toxicity.
 - b. **Ecodesign requirements must be gradually developed in secondary legislation, based on scientific evidence, tackling most polluting products first.** Ecodesign policies have a proven track record, with 150 Mt CO₂ saved every year under the Ecodesign Directive³. To ensure these benefits can be leveraged for construction products, the CPR must provide the right tools to ensure Ecodesign requirements are established through a structured, participative and **evidence-based** process. This effort must be guided by clear definitions (i.e. for recycled content or reusability) and carried out in **three steps**:
 - Step 1: to mirror the Ecodesign for Sustainable Products Regulation (ESPR), an **ad-hoc forum under the CPR Acquis Technical Expert Group should be created** and tasked for the development of requirements. A preparatory study should be conducted to select priority products and relevant environmental aspects to regulate.
 - Step 2: a working plan over a 5-year period to ensure the gradual but effective development of requirements.
 - Step 3: the Commission comes forward with delegated acts for relevant products.
3. **Mandatory EU-Green Public Procurement (GPP)** criteria for construction products must be swiftly developed: the public sector is in a key position to influence and support the decarbonization of the construction industry, accounting for 40 to 60% of purchase and 20-30% of revenues of some of the most energy intensive construction industries (i.e. concrete)⁴. Despite its importance, GPP remains largely fragmented within and across Member States, thus limiting its potential. Setting criteria through the CPR represents a key opportunity to ensure a large-scale demand for sustainable construction products driving the European construction market.

We strongly believe that working towards this vision will mean an EU construction sector that is internationally competitive, innovative, and will guide investments into a market which supports the transition towards sustainable construction products being the norm.

⁴ Source: SEI – [Green Public Procurement : a key to decarbonize the construction and road sector in the EU](#).

