



Making environmental performance declarations work

European construction industries call for practical and effective rules to declare the environmental performance of their products

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Background

Trustworthy information about the environmental impacts of construction products is crucial for the effort of decarbonising Europe's building stock, promoting sustainable construction practices, and providing consumers with reliable information. Therefore, we fully support the Commission's efforts to ensure that the declared environmental performance of the products is as accurate as possible.

The new Construction Products Regulation (CPR), which came into force in January 2025, aims to harmonise the rules for declaring the performance of construction products within the EU Single Market. One of the key changes introduced by the revised CPR is that **environmental characteristics**¹ are now considered essential characteristics and will be included in the Declaration of Performance and Conformity (DoPC), as a condition for CE marking products under the new Regulation.

Until the transition to the new CPR is complete, environmental characteristics are published on a voluntary basis through **Environmental Product Declarations** (EPDs), in line with the EN 15804+A2 standard. Under the current rules, it is allowed (and remains **common practice**) to declare a **weighted average** of these environmental characteristics, regardless of which specific production site the product was manufactured in. This allows for taking due account of the realities of supply chains and avoids competition between two production sites of the same manufacturer, whose differences could be purely due to external factors.

In the most recent version of its Milestone B document (February 2025), the **Sub-group on Environmental Sustainability (SGEnv)** reminds that it is the manufacturer's responsibility to define product types adequately and ensure the accuracy of the declarations. While indicating that weighted average calculations for variations stemming from seasonal changes or production fluctuations within a production site are still considered acceptable, it states that "worst-case" or "conservative" values should be used to account for the inevitable variations in certain characteristics (so that variation can always be for the best). The variations to which this "worst-case" approach shall be applied could be understood as including variations related to different production sites.

¹ Environmental impact indicators in accordance with EN 15804+A2



For environmental characteristics, such limitations on the use of weighted average calculations and declarations would be particularly problematic, as life-cycle assessment methodologies are based on averages accounting for the numerous varying impacts of production processes. Yet, the SGENv refrains from providing additional clarifications, e.g., regarding the possibility of doing a weighted average between the production sites that produce the same product type.

Considering this, the manufacturers would currently be faced with two options to ensure that they comply with the new CPR:

1. Declaring **production site-specific performances**
2. Declaring the **worst performance across production sites**

In this paper, we aim to present the potential pitfalls of both options and possible solutions.

Two options under the worst-case approach

Option 1: Declaring production site-specific performances

In light of the Milestone B document, the safest option for all manufacturers would be to declare site-specific environmental performance to ensure the declared performance is not better than actual performance. However, this option would lead to a **significant increase in the number of DoPCs**. Given that one DoPC corresponds to one product type, such a situation would trigger a **vast rise in the number of product types** that fulfil the same technical performance but differ solely in their environmental characteristics. The result would be a sharp **increase in the cost and workload** required for data collection, processing, reporting, and verification, with the additional burden falling not only on manufacturers but also on notified bodies, who would need to process an inflated volume of product declarations. Inevitably, these greater burdens translate into higher costs for construction products overall, at a moment when other policy initiatives are aiming at mitigating increases of construction costs, as part of the EU competitiveness drive. For construction products composed of other CE-marked products, the multiplication effect would be even more pronounced, since new DoPCs and DPPs would need to be issued for every environmental variation in every sub-product, leading to an astonishingly high number of declarations.

Beyond the administrative challenges, this proliferation of product types would also **complicate the work of all users**—architects, transformers, contractors, and other actors in the construction sector—who would be forced to manage a dramatically increased volume of data. Such complexity raises the risk of confusion, errors in processing or reporting, and difficulty in predicting and planning the environmental performance of products, especially, but not exclusively, in the case of commodity products. Importantly,



this outcome would also undermine clarity for end-users, who would be confronted with **multiple DoPCs for technically identical products**, differing only in environmental performance. This would not help the uptake of sustainable solutions, another topic which is at the core the Clean Industrial Deal agenda.

While production site-specific declarations may bring benefits in certain limited cases—such as for niche products or in specific project contexts—**making them the general rule would create disproportionate problems on a large scale**. A more balanced approach would be to allow for site-specific or weighted-average declarations, leaving the option for production site-specific reporting where it is genuinely useful without imposing it across the board.

Option 2: Declaring the worst performance across production sites

To avoid the enormous administrative burden of declaring production-site-specific performance for all sites, the manufacturers would face the alternative of declaring the worst performance across production sites. This option would distort the picture of the environmental performance of construction products, artificially **inflating the worst-case scenarios**. Currently, the EPDs contain more than 30 environmental indicators. The combination of the worst results for all of them would result in a worst-case performance, which is **worse than the performance of any actual product** or the average performance across production sites.

Adopting this approach would **disincentivise effective use of investments in the decarbonisation** of production sites. If efforts into decarbonising plants other than the worst-performing one would not be reflected in the declared product performance, the businesses would be incentivised to place disproportionate efforts on decarbonising the worst-performing sites, even if such investments would not be most effective on the global scale. This issue can be easily illustrated with the following simplified example. Let us assume that product “X” is manufactured in three different production sites – with Production site A producing most of the products and being the most efficient, and Production site C being the oldest, least efficient and producing a very small percentage of the products. Under the “worst case approach”, the environmental performance declared in the DoPC for all products “X” would be based on the data from Production site C (the worst performing one), even though it accounts for merely 5% of the total production.

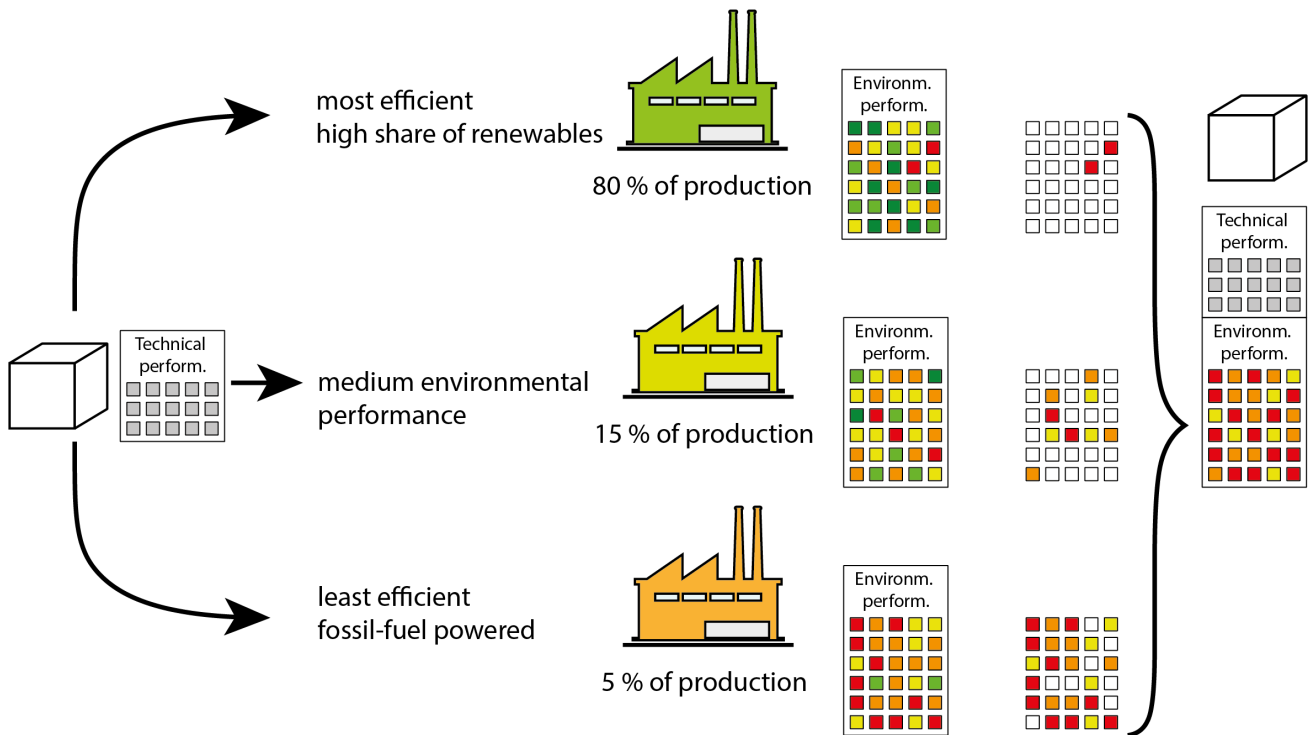


Figure 1: Example of determination of worst environmental data for a product with identical technical performance that would be manufactured in three different sites and would constitute a single product type with a single DoPC.

This situation would lead to **inefficient use of investment**. Given that the environmental characteristics would be based solely on the data from Production site C to improve the performance declared in the DoPC, the producer would be incentivised to focus on improving the processes in Production site C. However, from the point of view of wider decarbonisation efforts and fulfilment of the EU 2030 climate ambition, it would make much more sense to further invest in the decarbonisation of Production site A, which is responsible for the biggest share of the production. This situation would direct investments into inefficient uses, slowing down the real progress towards decarbonising the construction sector.

One might say the better choice for the manufacturer in the above example would be to declare site-specific environmental performance for products manufactured in site A. However, the example above represents a very simplified example – in reality, the number of different sites producing the same product or its components is often much higher, adding to the complexity of the investment decisions and the burden of potential individual declarations for each site.

Moreover, the data from the DoPCs and the Digital Product Passports (DPPs) will be **used further for the purposes of other pieces of legislation**, e.g. to calculate the life-cycle



global warming potential of new buildings in line with the Energy Performance of Buildings Directive (EPBD). Hence, it is indispensable that the environmental performance data in the DoPCs reflects the most realistic scenario and is not artificially distorted due to the use of the worst-case approach. Basing the calculations on data based on worst-case scenarios will not allow the Member States to achieve the whole-life carbon reduction targets.

Recommendations

As elaborated above, **both options** for the declaration of environmental performance in line with the new CPR **have significant drawbacks and fail to contribute to the achievement of the underlying policy goals**, i.e. improving the environmental performance of the construction products and the building sector at large.

In its current mandate, the European Commission has focused on simplifying the administrative burden on EU businesses to boost competitiveness and enable the achievement of the Clean Industrial Deal's objectives.

In addition, the Commission has launched the **European Affordable Housing Initiative**, underscoring the need to reduce regulatory and cost pressures that could hinder access to sustainable and affordable housing.

In our view, the new-CPR approach to the declaration of environmental performance indicators is a clear example of a **measure that could be simplified without compromising the legislation's objectives** and instead facilitating their achievement.

We call for:

- the European Commission to **allow for the possibility of averaging production site data** (production weighted average) and preserve the freedom for manufacturers to opt for the declaration of average or production site-specific declarations for environmental performance. To guarantee transparency in declarations, manufacturers should disclose whether the performance declared is based on a weighted average or whether it is a site-specific declaration.
- The above-described approach to the declaration of environmental performance to be **aligned** in the **Milestone B document** and the future revision of the **EN 15804+A2 standard** to provide consistency and legal certainty for economic operators.

Our industry associations are at your disposal to discuss this matter in detail and provide any further information necessary.



Signatory associations

BIBM – the Federation of the European Precast Concrete Industry represents Europe’s precast concrete manufacturers, a sector made up mostly of SMEs that provide essential structural and architectural components for buildings and infrastructure across the continent. The sector employs 150.000 workers in around 7.500 plants across Europe, representing a turnover of around 40 B€.

Through its network of national associations, BIBM promotes innovative, safe and sustainable precast solutions, supporting EU objectives on decarbonisation, circularity and resilient construction. The federation contributes technical expertise to European policymaking and standardisation, helping ensure a competitive, high-quality and climate-neutral built environment.

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EU Transparency Register ID: 07055806769-32

Cement Europe is the voice of the cement industry in Europe. Based in Brussels, we represent national cement associations and companies across the European Union (except Malta), as well as Norway, Switzerland and the United Kingdom. Serbia is an Associate Member, and we cooperate closely with partners in Cyprus and Ukraine. [Website](#).

EU Transparency Register ID: 93987316076-63

Concrete Europe: Starting from 2023, six European associations representing the concrete sector and its value chain have chosen to merge under one umbrella organisation: Concrete Europe. These associations consist of BIBM (the Federation of the European Precast Concrete Industry), CEMBUREAU (the European Cement Association), EFCA (the European Federation of Concrete Admixtures Associations), and ERMCO (the European Ready Mixed Concrete Organization), alongside two associate members: Aggregates Europe – UEPG and EUPAVE (the European Concrete Paving Association).

This collaborative effort aims to better communicate to EU stakeholders and those within the construction value chain the concrete sector’s role in attaining the objectives of the EU Green Deal concerning sustainable construction.

Contact: Marco Borroni, President, info@concrete-europe.eu

EU Transparency Register ID: 875740128184-88

EMO is the voice of the European factory made mortar industry. We defend and represent the common interests of the sector towards legislative and non-legislative institutions at European level, such as the European Commission, the Council, the European Parliament, CEN and EOTA. “Mortar” is a generic term comprising masonry & repair mortars, plaster & renders, adhesives, screeds. Besides mortars a large part of our industry also designs and provides thermal insulation composite systems (ETICS) for renovation and new building.

Contact: Antonio Caballero González, General Secretary - info@euromortar.com

EU Transparency Register ID: 775299618501-45



Eurima is the European Insulation Manufacturers Association, representing the interests of all major European mineral wool insulation producers. Established in 1959 to create a favourable business environment for mineral wool insulation and promote improved standards for insulation materials, Eurima is a research-driven organisation whose industry members produce a wide range of mineral wool products for thermal and acoustic insulation, providing fire protection of domestic and commercial buildings and industrial facilities while offering innovative growing media and green-roofing solutions.
 Contact: David Kupfer, Technology and Standardisation Policy Manager – david.kupfer@eurima.org
 EU Transparency Register ID: 98345631631-22

The **European Calcium Silicate Producers Association (ECSPA)** represents national organisations and producers of calcium silicate masonry bricks, blocks and elements in Europe. ECSPA is actively involved in developing and promoting the deployment of innovative, efficient and environment-friendly building materials and structural solutions in Europe, contributing to low-energy and sustainable construction.
 Contact: Antonio Caballero González, Manager - info@ecspa.org
 EU Transparency Register ID: 97717061899-40

Eurogypsum is a European federation of national associations of producers of gypsum products (i.e. plaster and plasterboard). It is one of the few fully integrated industries (from cradle to cradle) within the construction products field. The companies which mine gypsum also process it and manufacture the value-added products and systems used extensively in construction and other industries.
 With a turnover of EUR 7 billion, the European gypsum and anhydrite industry operates some 111 factories and 132 quarries and generates employment directly to 16,000 and indirectly to 300,000 people. The gypsum industry provides jobs to 1,100,000 plasterers and plasterboard installers. It trains around 25,000 people per year across Europe.
 Contact: Tristan Suffys, Secretary General – t.suffys@eurogypsum.org - +32 2 898 98 88
 EU Transparency Register ID: 26369367005-58

Glass for Europe is the trade association for Europe's flat glass sector. Flat glass is the material that goes into a variety of end products, primarily in windows and facades for buildings, windscreens and windows for automotive and transport as well as solar energy equipment, furniture and appliances.
 Glass for Europe brings together multinational firms and thousands of SMEs across Europe, to represent the whole building glass value-chain. It is composed of flat glass manufacturers, AGC Glass Europe, Guardian, NSG-Group, Saint-Gobain, and Şişecam, and works in association with national partners gathering thousands of building glass processors and transformers all over Europe.
 Contact: Justin Loup, Technical Regulations and Product Policy Manager – justin.loup@glassforeurope.com - +32 470 69 44 00
 EU Transparency Register ID: 15997912445-80