

#### **CPR Series**



# Will EPDs become mandatory?

March 18, 2025 at 11 AM CET

#### Key take-aways

- What will become mandatory and when?
- What should manufacturers do and when? Why act today?
- What are the main challenges of CPR & DoPc?





1	Introduction ECO Platform
2	The Webinar Idea
3	Some Basics about EPD and LCA
4	Explanation of Construction Product Regulation
5	Questions & Answers







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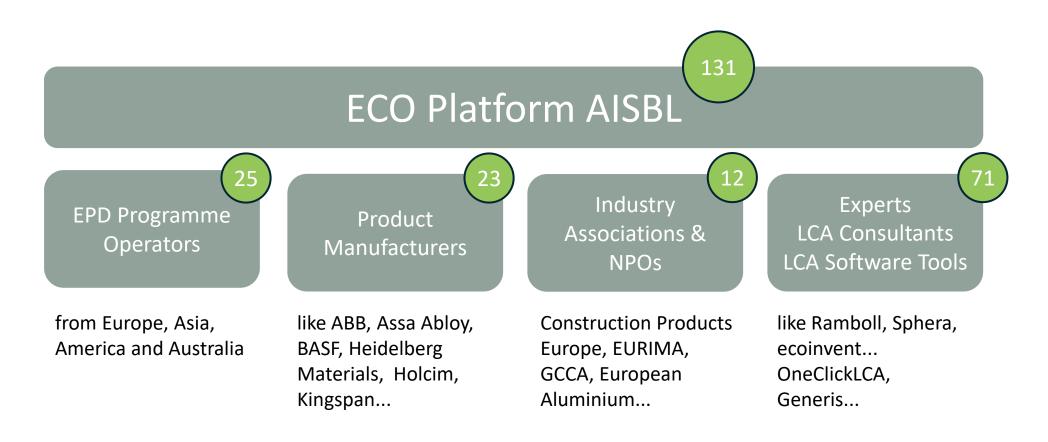


# WHO WE ARE AND WHAT WE DO

ECO Platform aims to promote and to contribute to the sustainable development, including a low-carbon economy and resource efficiency in the construction industry and beyond.



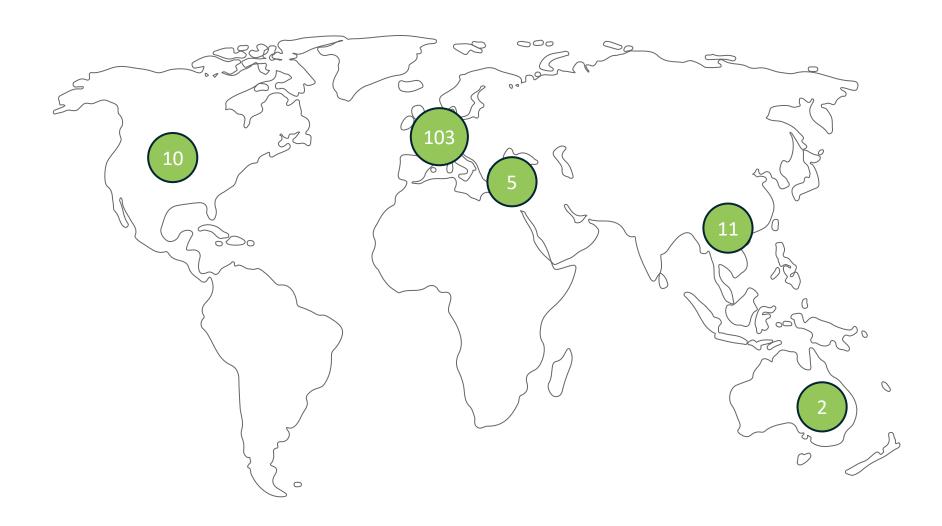
### **OUR MEMBERS**



ECO Platform AISBL is a non-profit association, registered in Brussels.



# **GLOBAL HARMONIZATION**





## **KEY MILESTONES**



Establishment of a common governance with binding rules for all **ECO EPD Programmes** 

Establishment of ECO EPD as globally recognized label for reliable data quality

**ECO PORTAL** 

Establishment of a global data hub offering access to reliable digital data

**NETWORK** 

Recognition as a credible and objective network of experts by authorities and industry



### **OUR WORKING GROUPS**

#### General Assembly

#### **Board of Directors**

#### Management & Head Office

# TEWOG Technical Work

- Ownership of the ECO Platform Standards
- Technical discussions, developments and decisions (position papers)
- >10 Task Groups on specific issues of relevance

# STAWOG Standardization Work

- Monitoring of relevant standardization activities
- Liaisons with ISO and CEN
- Develop common positions for standardization issues
- Proposals to ISO and CEN

# TOOLWOG Tool Working Group

- Definition of requirements from downstream tools
- Advancement of digital data quality and ECO Portal
- Interface to upstream tools

# AGI Advisory Group Industry

- Open for ECO members from manufacturers and industry associations
- Representing Industry in ECO Platform with two Directors on the Board
- Discissions and advice to the BoD on issues of relevance to industry



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# How we got there LinkedIn Post on "mandatory EPD"



Life Cycle Assessment is supposed to be a scientific and transparent methodology. But LCA is not an independent entity that exists on its own, endowed with inherent qualities by nature.

An LCA is the result of a series of human activities. Therefore, LCA and EPDs are only as transparent and trustworthy as the practitioner/ consultant executing the work.

Those who have followed me for some time know my two enemies are dishonesty and #greenwashing.

So, given the growing issue of lack of honesty in the LCA business environment, I have made a top [3] list with the most common lies seen in the last months from some LCA consultants (people/companies that are supposed to be transparent, honest and with a scientific background).

- 1. "Products with an EPD are sustainable." There is no need for me to explain this here. I wrote a post some time ago on the issue. https://lnkd.in/dFHEWfBX
- 2. "You can make a meaningful and accurate LCA in just few clicks". https:// Inkd.in/dxAvjaRa
- 3. "Results from screening LCAs using Al auto LCI mapping are accurate enough". https://lnkd.in/dY4n4dku
- 4. Companies need to create EPDs to comply with the coming ESPR and CPR (European Regulations). New regulations demand an increase for LCA data, that's a fact. But that doesn't mean manufacturers must make EPDs to comply with it. Neither the ESPR nor the CPR (draft) mentions EPDs even once. Yet, some EPD consultants are selling the idea manufacturers will need to make them (hopefully out of ignorance and not as a strategy to catfish clients). https://lnkd.in/dDxHZTCX



Fabian, I appreciate your contributions and follow them. Time to say thanks! On item 4 of your list I need to react. Most of the manufacturers do not understand what is coming with new regulation. You are right that the CPR doesn't make EPD mandatory. However, it makes the declaration of environmental performance mandatory, following the EN15804, which is the EPD standard. Hence, the methodology is the same and the tasks for manufacturers are equal to a large extent. If Consultants are refering to a "mandatory EPD" they are (hopefully) only trying to prepare industry for the right thing, even if legally not 100% precise - but comprehensive.

I don't want to forget mentioning that "EPD" can become mandatory not only directly on product level by the CPR but as well indirectly from building level regulation (EPBD), corporate level (CSRD), finance level (Taxonomy) or by specific corporate and private requirements.

ECO Platform AISBL has just launched courses (ECO EPD Officer) for manufacturers and other stakeholders for really understanding the coming requirements and be prepared, which I recommend to anyone in need of more orientation. (https://www.linkedin.com/feed/update/urn:li:activity:7265663834080612352/)



ECO Platform AISBL on LinkedIn: Flyer Qualified ECO EPD Officer

New Dates for the Qualified ECO EPD Officer Course! Sollowing our first, successful Level 1...





Orientation needed!





# The Idea A Series of Webinars



Webinar 1	Will EPDs become mandatory?
Webinar 2	Are EPDs still needed?
Webinar 3	What is needed on building level?
Webinar 4	How about the DPP?
Webinar 5	Do we need more webinars???





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# **ECO EDUCATION**



https://event.eco-platform.org/eco-platform-eco-education/

# ECO Education Course Offers





FAST-TRACK

#### Level 1:

Thursday, June 5, 2025: 14:00 - 18:00 CEST Friday, June 6, 2025: 09:00 - 17:00 CEST

#### Level 2:

Thursday, June 12, 2025: 14:00 - 18:00 CEST Friday, June 13, 2025: 09:00 - 17:00 CEST

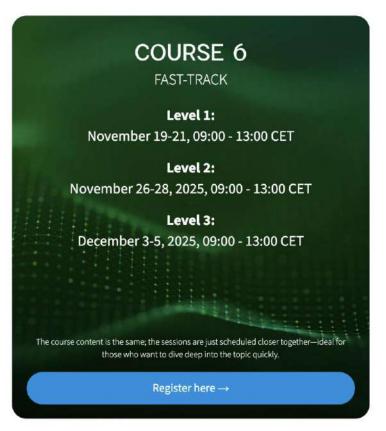
#### Level 3:

Thursday, June 19, 2025: 14:00 - 18:00 CEST Friday, June 20, 2025: 09:00 - 17:00 CEST

The course content is the same; the sessions are just scheduled closer together—ideal for those who want to dive deep into the topic quickly.

Register here →





#### **ECO Conference**

#### 13 May 2025 in Brussels





### CONFERENCE

The Use of Digital EPDs for Building LCA: User Journeys Along the Dataflow



#### Register now:



#### Introduction



#### **CPR Series**



March 18, 2025 at 11 AM CET

#### Key take-aways

- · What will become mandatory and when?
- · What should manufacturers do and when? Why act today?
- · What are the main challenges of CPR & DoPc?







**ASSA ABLOY** 





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29 April 2025





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#### Please share with us:

- 1. Feedback on today's webinar
- 2. Preferences for coming topics

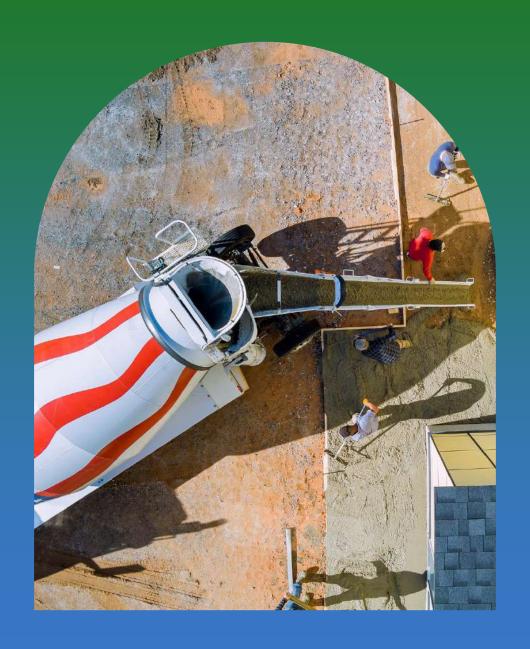






# Climate Earth

EPDs Made Easy





# Our Mission is to drive Concrete's Net-Zero Future through Carbon Measurement, Reporting & Analysis.

8% if a second of carbon emissions

According to the Global Cement and Concrete Association, the concrete industry accounts for approximately 8% of global carbon emissions.

25%

The Global Cement and Concrete Association (GCCA) and 40 leading cement and concrete manufacturers committed to reducing CO<sub>2</sub> emissions by 25% by 2030.



Climate Earth's EPD Generators
Over 1,300 Plants

Climate Earth's EPDs
Over 80,000 EPDs and counting

Ready Mix Europe

Germany, Switzerland, Spain, United Kingdom &

Croatia

Cement

Bulgaria, France, Germany, Spain, Switzerland, Morocco

Ready Mix Asia
Singapore & New Zealand



For Cement, Ready Mix, & Masonry

#### Climate Earth's Network of EPD Generators































# Trusted by industry leaders

"In Climate Earth we have found an ideal partner to provide reliable online EPD information to our customers, empowering them to build low-carbon in a transparent and verified way."

- Edelio Bermejo Holcim's Head of Global R&D





# What Are EPDs?

An Environmental Product Declaration (EPD) delivers essential environmental data, helping stakeholders understand the impact of products on the environment.

- Trusted Standards: Compliant with ISO 14040, ISO 14044, ISO 14025, EN 15804, and/or ISO 21930, establishing credibility and acceptance in the industry.
- Foundation for GHG Reduction: Serves as a crucial first step towards reducing greenhouse gas emissions, demonstrating a company's commitment to sustainability.



#### Typical EPD Workflow

A one-time process that, once completed, ends up in publishing one EPD, or enables you to generate unlimited, instant, & verified EPDs anytime.



1 – Goal & Scope

Selecting PO, EPD type, etc.

2 – Data Collection

Usually, the most resourceconsuming part of any LCA 3 – LC Impact

Assessment

LCA model, iterations based on completeness, consistency, uncertainty checks and LCA Interpretation

4 - Verification

The LCA work and documentation go through a third-party verification process

5 - Publication

EPD Publication under the selected PO



Will EPDs become mandatory?

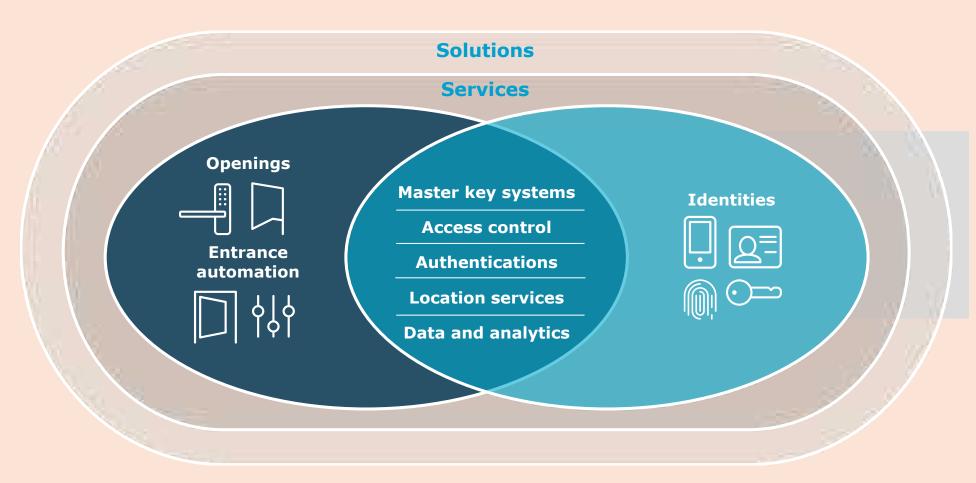
Olympia Dolla – ASSA ABLOY EMEIA

# We are the global leader in access solutions Coun operations Employees Sales, EUR

+70 63,000 13.2 billion countries

# We are experts in access solutions

- Our portfolio includes a complete range of access solutions.
- Our offerings are delivered separately or combined to form a complete, full-service access solution.
- Through continuous and sustainable innovation, we develop products and solutions that meet our customers needs.



#### **Questions to answer**

- What is the CPR?
- What will become mandatory and when?
- Which products fall in the CPR?
- What are the main challenges?
- What can I do as manufacturer to prepare?

### What is the process to issue an EPD today?

An EPD is a voluntary declaration today - not an entry point to market a product.

Manufacturer **EPD Program Operator** (internal or external expert) 3<sup>rd</sup> party verifier EPD registration & Select the PCR 3<sup>rd</sup> party Conduct an LCA EPD report applicable





verification

publication



3<sup>rd</sup> party verifiers follow the same verification rules.



#### What is the CPR?

- Harmonised rules & common technical language: functionality, safety and environment of construction products
- Each product is assessed/verified against its conformity with the rules in order to obtain a CE marking.
- Essential for the Single market and free movement of products.
- It exists since 1989 and as from 2011 is an EU Regulation.



#### What will change once CPR is in force?

Voluntary declaration

The market



Harmonized standards products

Significant changes!

Usually, the so-called CE marked products.



Products still under Voluntary declaration

Same workflow as today!

#### What will change once CPR is in force?

Harmonized standards products

The process

Manufacturer (internal or external expert)

**Notified Body** 

Select the c-PCR applicable

Conduct an LCA

EPD report

AVS 3+ verification

Results in the DoPC

**CE** marking



c-PCR: complementary Product Category Rules



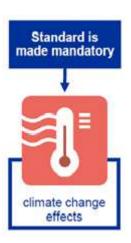
AVS: Assessment and Verification System



DoPC: Declaration of Performance and Conformity

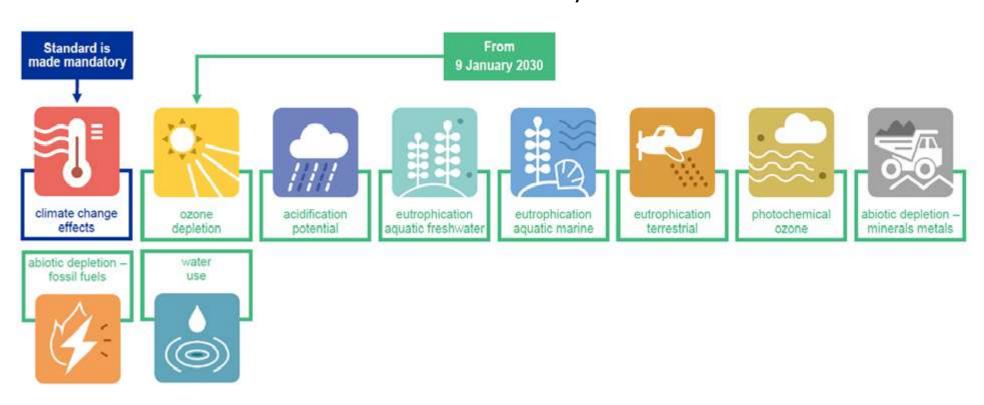
### What will become mandatory?

Mandate is the disclosure of environmental sustainability essential characteristics – in other words indicators.



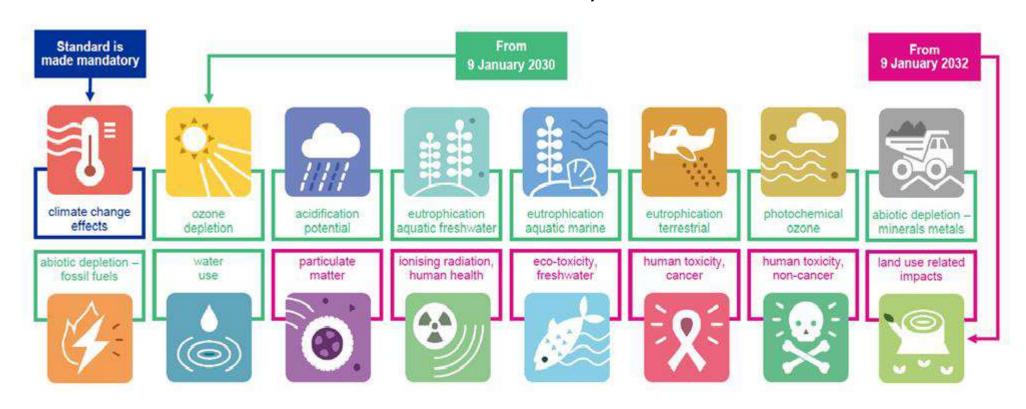
## What will become mandatory?

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Mandate is the disclosure of environmental sustainability essential characteristics – in other words indicators.



**Performance based indicators.** 

## What will become mandatory?

- Not the only set of indicators that will be needed to be disclosed depending on the product type.
- Conformity requirements may be around Functionality, Safety and Environment.

maximising durability and reliability of the product or its components as expressed through a product's technical lifetime indication of real use information on the product, resistance to stress or ageing mechanisms and in terms of the expected average life span, the minimum life span under worst but still realistic conditions, and in terms of the minimum life span requirements and prevention of premature obsolescence

minimising life-cycle greenhouse gas emissions

maximising reused, recycled and by-product content

selection of safe, sustainable-by-design, and environmentally benign substances

energy use and energy efficiency

resource efficiency

modularity

identifying which product or parts thereof and in what quantity can be reused after de-installation (reusability), and in what quantities

#### upgradability

ease of reparability during the expected life span, including compatibility with commonly available spare parts

ease of maintenance and refurbishment during the expected life span

recyclability and the capability to be remanufactured

capability of different materials or substances to be separated and recovered during dismantling or recycling procedures

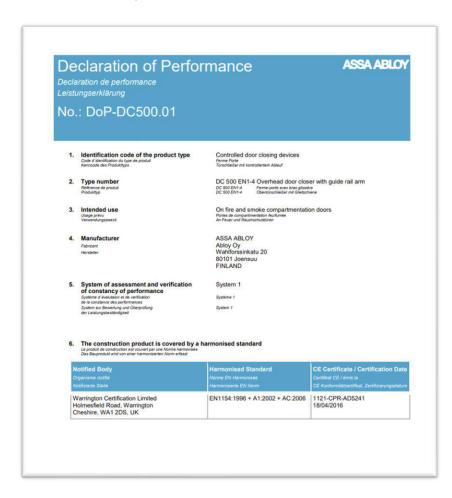
sustainable sourcing

minimising the product-to-packaging ratio

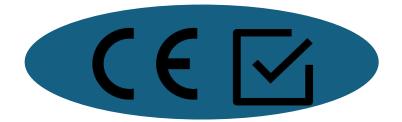
amounts of waste generated, notably hazardous waste

#### Illustration of future DoPC information

**DoPC** means Declaration of Performance and Conformity. Some characteristics are performance based – how much, so are associated to conformity – minimum requirement to pass/conform.



- New chapter in this document called Environmental Sustainability.
- Table of results of all indicators shown before in the typical format we know from our EPD results section.
- Bonus! Depending on the product type extra indicators may be asked to show conformity with.
- No further information will be shown from the EPD reports we have today.

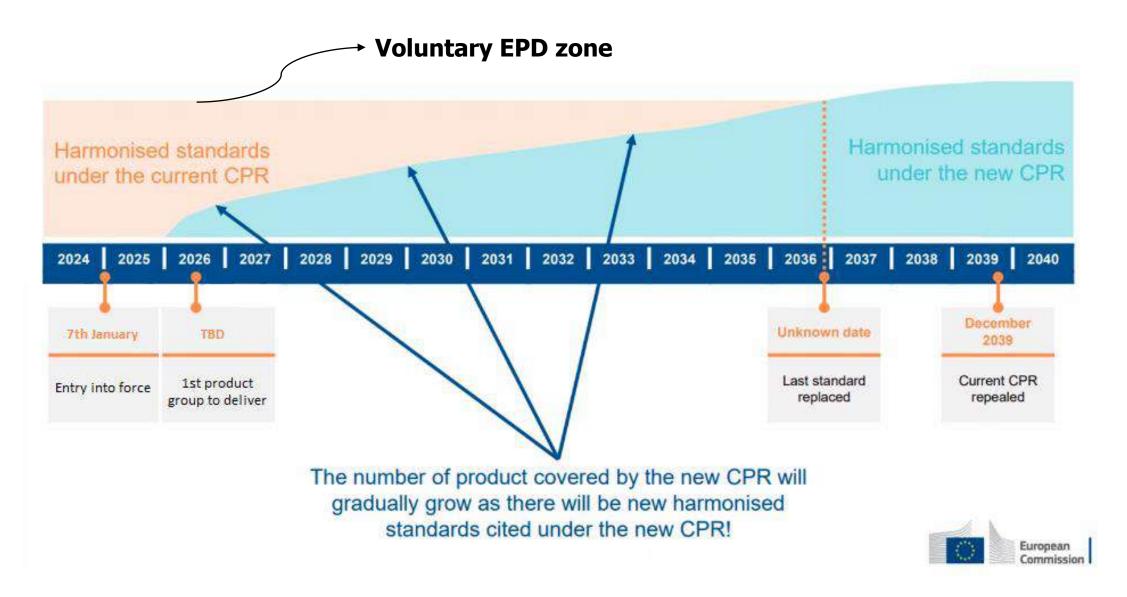


## What will become mandatory and when?

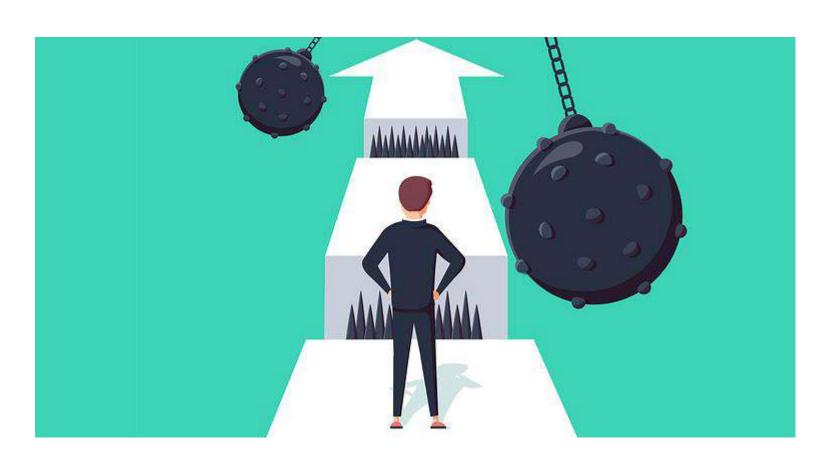


- Note! The new Regulation is in force already since 7<sup>th</sup> January 2025.
- The Regulation is organized in Product families.
- Gradual implementation based on a prioritization made by MS.

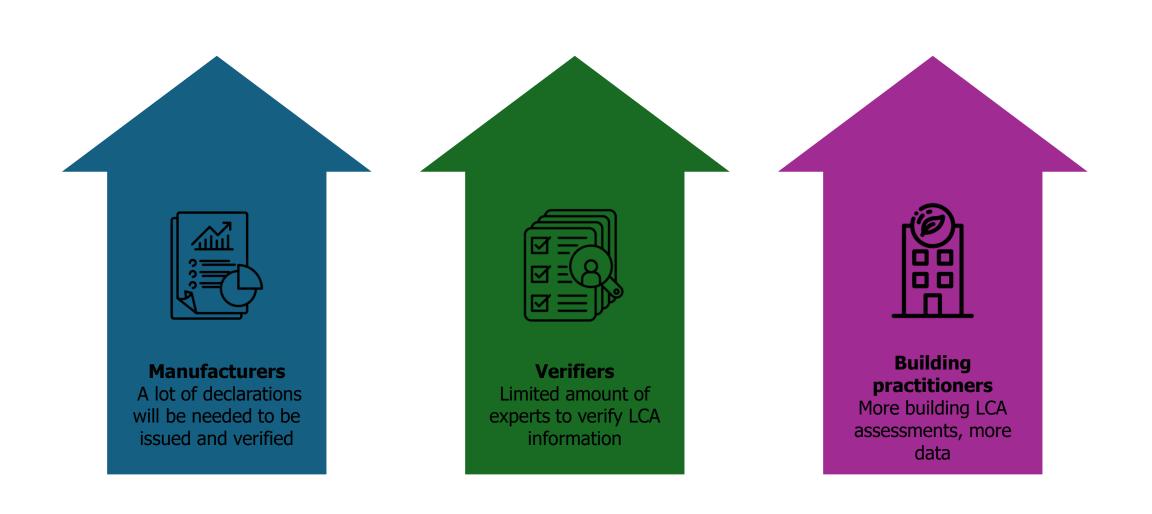
#### What does it look like in terms of Timeline?



# **Challenges ahead**



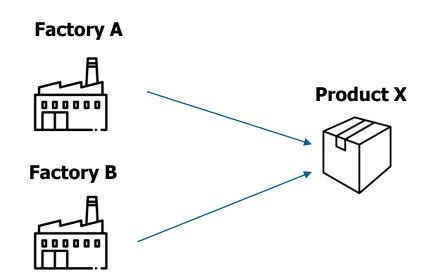
## What could be these challenges?



- Ensure that my DoPC results are representative.
- Worst case scenario is recommended.
- Subject to market surveillance.
- Subject to legal enforcement in case of greenwashing.



Let's go with an example!



#### Till now

Weighted performance between the two factories declared in the EPD for Product X.

- Ensure that my DoPC results are representative.
- Worst case scenario is recommended.
- Subject to market surveillance.

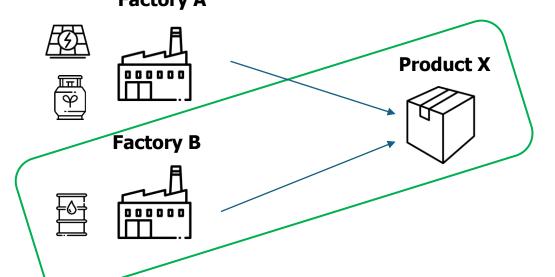
Subject to legal enforcement in case of greenwashing.

Let's go with an example! Till now **Factory A** Weighted average performance between the two factories declared **Product X** in the EPD for Product X. 国设计 **Factory B** My declaration depending on the situation potentially underestimates the real

environmental performance of my

product X.

- Ensure that my DoPC results are representative.
- Worst case scenario is recommended.
- Subject to market surveillance.
- Subject to legal enforcement in case of greenwashing.
   Factory A



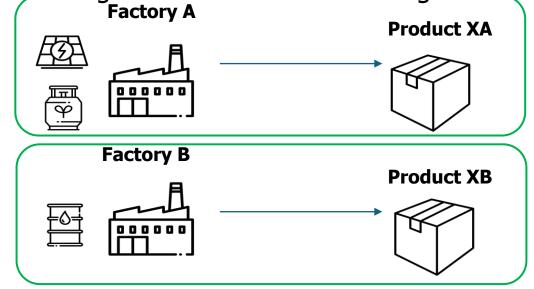


#### **New situation**

Option A. declare the worst-case performance supply chain

- Ensure that my DoPC results are representative.
- Worst case scenario is recommended.
- Subject to market surveillance.

Subject to legal enforcement in case of greenwashing.



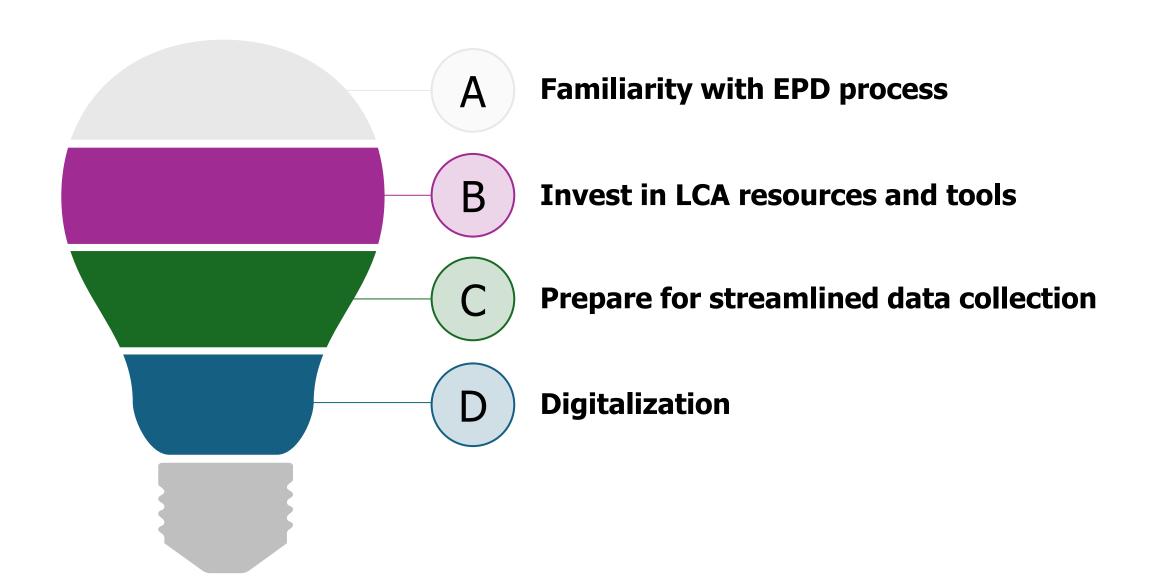
#### **New situation**

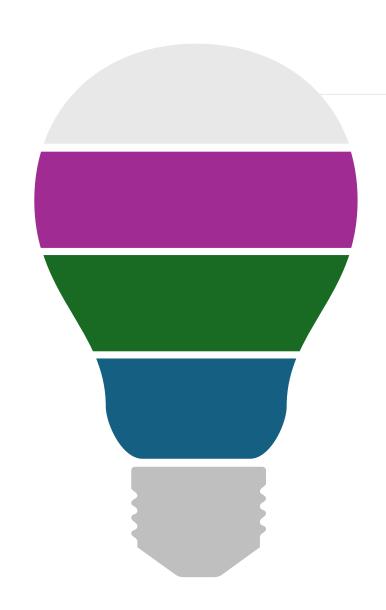
Let's go with an example! Option B. need to separate the data between the Factory A and Factory B and the products produced by each factory.

# How to best prepare?



## **How to prepare?**

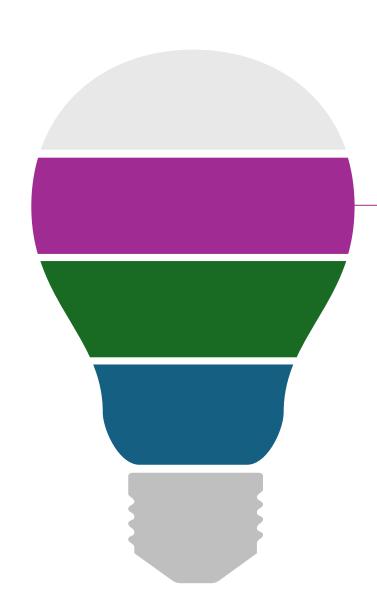




## **Γamiliarity with EPD process**

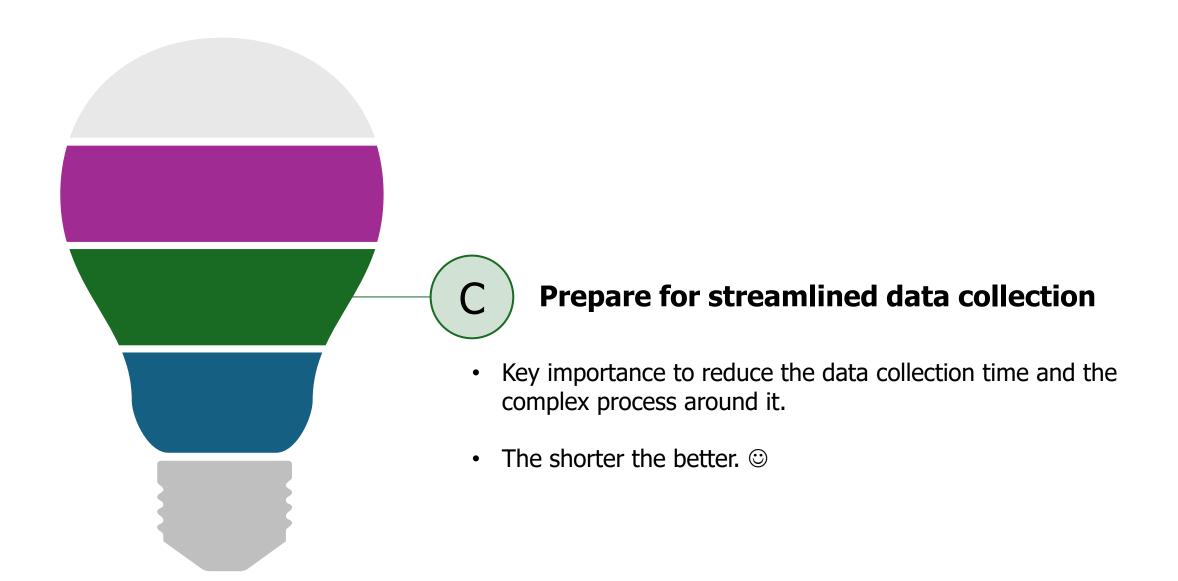
- Understand the steps of an EPD process.
- Which Product Category Rules (PCR) standards apply to my products?
- Are they CE- marked? Imported to Europe?
- Is my product group prioritized?
- What does it take to issue an EPD? Which products can I group in 1 EPD?
- The easier we can answer these questions, the better prepared.

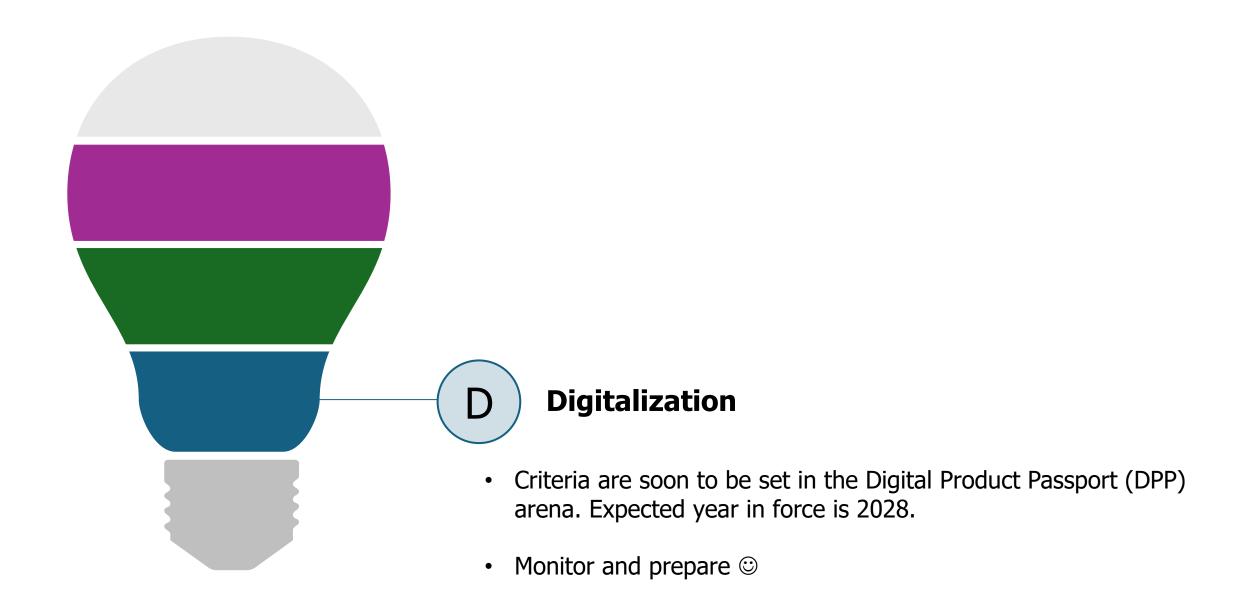
B



#### **Invest in LCA resources and tools**

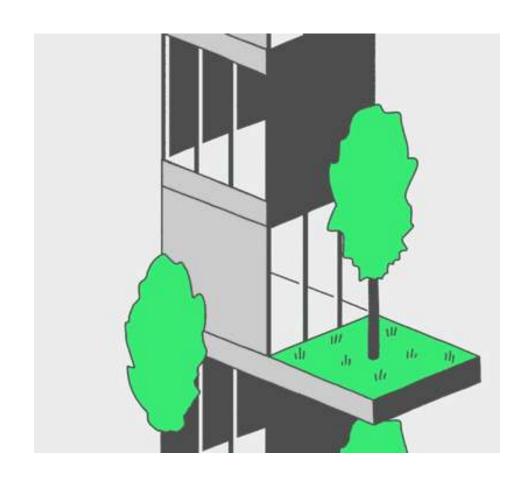
- Internal expert with expert tool or a standardized EPD tool.
- Understand the costs and the benefits/drawbacks of each case.
- Decide based on the complexity of your company and the strategic importance.





## **Conclusions**

- Changes in the usual EPD process as we know it today!
- The new CE marking requirement will apply gradually.
- Main challenges big volumes of declarations, limited experts, more building LCA needs and requirements
- Get familiar with LCA and EPDs the more familiar the more prepared!
- Suggested solutions get familiar, invest, streamline and digitalize.



# Thank you very much for your attention! ©