



EuroWindoor position on Worst-case LCA values reported in the future DoPC under the new CPR

The new Construction Products Regulation (EU) 2024/3110 (CPR) requires environmental sustainability declaration in the DoPC giving the European Commission the task to establish harmonised rules on how to express the environmental performance of construction products in relation to their essential characteristics, including on life cycle assessment on Basis of Annex II. Recital 7 clearly states that new requirements should not become disproportionately burdensome, particularly for SMEs. The implementation of the regulation should therefore be based on proportionality and functional equivalence, rather than strictly conservative assumptions.

In contrast to this, the outcome of Milestome B from the CPR Acquis process – Sub-group on Environmental Sustainability introduces a significant shift by requiring manufacturers to declare Life Cycle Assessment (LCA) values in the Declaration of Performance and Conformity (DoPC) either based on the worst-performing variant across production sites or through product-specific assessments. This change raises concerns over compliance complexity, a lack of clear methodology for determining worst-case values, and the risk of overestimating environmental impacts. It may also create inconsistencies in building-level LCA assessments and disadvantage manufacturers investing in more sustainable production. Furthermore, by enforcing worst-case declarations in certain cases, the regulation distorts competition based on Global Warming Potential (GWP) values, as products with identical functions may be benchmarked using different methodologies. This position explores these challenges and suggests advocating the principles of the weighted average method as a more accurate, practical, and fair approach to environmental performance reporting.

1 General Background

Unlike the current voluntary Environmental Product Declaration (EPD) framework according to EN 15804 with EN 15941 and EN 17213 (c-PCR for windows and doors), allows manufacturers to report average environmental performance based on reference product sizes, mostly based on production volume-weighted average calculations, the CPR acquis Mil. B "Product type concept" mandates that declared LCA values in the DoP must reflect the worst-performing variant within a product type across sites. This change fundamentally alters the way environmental sustainability characteristics will be declared and has far-reaching implications for compliance and market positioning by increasing disproportionately bureaucracy and costs for economic operators.

The core issue lies in CPR's strict definition of a product type. According to the regulation, a product type is "the abstract model of individual products, determined by the intended use and a set of characteristics that exclude any variation in performance or compliance with product requirements set out in or in accordance with this Regulation, while identical products from different manufacturers belong to different product types".

This means that the product placed on the market shall fit to purpose and the declared performances are as good as or better than declared. Sometimes it is interpreted more strictly that the declared values must be met exactly. Under the new CPR acquis concept, manufacturers can no longer rely on averaging LCA values e.g. between different production sites. As doing so could result in some individual products failing to meet the declared performance values. Instead, they must either identify the worst-case scenario for each product type and declare LCA values accordingly or be able to generate product type and plant-specific LCA values. This requirement reshapes the approach to environmental performance declarations, shifting from an industry-wide norm of reporting representative or average values to a far more conservative approach.

Moving forward, the flexibility of average environmental performance values based on reference product sizes, which was previously allowed under the voluntary EPD framework, will no longer be applicable under the new CPR. Manufacturers will need to adopt more precise, conservative,



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or site-specific approaches to LCA reporting, ensuring that each declared value aligns with the strict definition of a product type. This shift necessitates that manufacturers will need to develop more precise, conservative or site-specific approaches to LCA reporting, ensuring alignment with the evolving regulatory landscape.

2 Implications

As a result of the changes under the revised CPR, window manufacturers are likely to face a range of implications that could impact their operations, compliance strategies, and market positioning. These challenges stem from the shift in how environmental performance is calculated and declared, with potential consequences for both product development and regulatory adherence. We recognise the following issues:

- There is no clear definition and standard of what constitutes a worst-case approach. Should
 it apply to the life cycle inventory, be determined by the background datasets used, account
 for annual production data across multiple facilities, or focus on a single indicator (e.g., GWP)
 versus multiple indicators? The absence of a clear definition, framework and calculation rules
 would create uncertainty, making it more challenging for manufacturers to comply and for
 notified bodies to validate the assessments accurately based on a consistent approach.
- The worst-case approach risks diverting manufacturers' resources away from innovation and product improvement, forcing them to prioritize costly and complex compliance calculations instead. This burden is particularly detrimental to SMEs, which may struggle with the financial and administrative strain, ultimately hindering progress toward genuinely more sustainable products.
- If the assessment of environmental characteristics based on standard sizes for windows (see EN 17213) will no longer be possible, each single window will need its own calculation and declaration of environmental characteristics which causes a huge burden and costs to the manufacturer. Additionally, the user of the declared values on building level will have to put for each single window different values in the calculation instead of multiplying the window area with the functional unit today. The evaluation of buildings will become much more complicated and costly.
- Windows are composed of various components (glass, steel, aluminium, PVC, wood, etc.), and it is likely that the suppliers of these materials will also be required to apply the worstcase approach to some extent. This would result in overestimated values being passed downstream to the final window product. Meanwhile, window manufacturers seeking to use supplier-specific data would face limitations, as they would be unable to use "average" EPDs LCA values from their upstream supply chain, to avoid methodological inconsistencies and adhere to the new concept.
- LCA values in the DoP would become less representative of the actual product environmental performance, resulting in an overestimation of environmental impacts solely for regulatory compliance. This approach offers no real benefit for building assessments and undermines the goal of accurate sustainability evaluation.
- Overestimating the environmental performance of construction products will significantly
 impact LCA calculations at the building level, potentially forcing architects and developers to
 alter their designs to achieve the biggest carbon reductions. This issue becomes even more
 critical with the upcoming EPBD requirements, which will require Member States to establish
 limit values and decarbonization roadmaps starting in 2027.
- This approach will create an uneven playing field at the building level, as some products will be required to disclose worst-case LCA values in the DoP, while others can continue reporting their environmental performance through EPDs using, for example, the weighted average



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method. Hence, competing products that could deliver the similar or reduced function in the building would be benchmarked based on environmental impacts calculated with different approaches.

- A manufacturer may produce the same product type across multiple factories. Under the new Acquis concept, the environmental sustainability characteristics will directly reflect each plant's performance, including factors such as manufacturing processes, supplied materials, and production waste (gate-to-gate). As a result, manufacturers will have to declare the same product differently depending on the factory with the implication that customers will always ask for the product coming from the "best performing" factory or the worst case needs to be declared with the previously explained implication.
- Manufacturers that have invested heavily in building new, state-of-the-art factories or new and more efficient ways of manufacturing in existing factories designed to minimize environmental impacts may find their efforts undermined by the worst-case scenario approach. Instead of being able to showcase the improved sustainability performance of these advanced facilities, they may be required to declare LCA values based on the worst-performing plant for the same product types across multiple production sites. Instead of prioritizing innovation and sustainability, they must first upgrade older facilities to avoid worse DoP values. This diverts resources and present developments away from low-impact production and contradicts the CPR's goal of fostering competition in environmental performance. Without recognizing these investments, the regulation risks slowing progress toward decarbonization.

3 **Proposed Solution**

We recommend facilitating the assessment of environmental characteristics based on standard sizes for windows (see EN 17213) to ensure proportionality and fairness – especially for SMEs as requested in Recitel 7 of the new CPR.

The worst-case scenario approach under the revised CPR introduces significant compliance challenges and risks overestimating environmental impacts. Manufacturers will struggle to define and apply worst-case values consistently across production sites, leading to inaccurate data. This could also discourage investments in more sustainable production, as companies may be forced to report the worst-performing plant instead of reflecting their overall environmental improvements. Clear guidance is needed.

Instead of enforcing a worst-case LCA declaration, the regulation should maintain the existing weighted average approach used in Environmental Product Declarations (EPDs). This method provides a more accurate and fair representation of a product's environmental impact by declaring production volume-weighted LCA values. This approach ensures that sustainability data remains reliable, comparable, and meaningful for building-level assessments while aligning the values reported in both EPDs and DoPs.

We would also support an adjustment to the weighted average approach to allow for variation thresholds between sites. This adjustment would acknowledge acceptable differences in environmental performance across plants while maintaining the integrity of the averaged LCA declaration. Such flexibility would reduce compliance burdens and allow manufacturers to report data that better reflects real-world variations, fostering innovation and ensuring fair competition within the industry.

To reduce confusion, cost, and methodological inconsistencies, the Commission should explicitly allow LCA data in the DoPC to be calculated using the same principles as for EPDs — such as production volume-weighted averages in accordance with EN 15804. This would ensure a consistent basis for building-level climate assessments and make the requirements more practical and manageable, especially during the transition period.

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About EuroWindoor AISBL – EuroWindoor AISBL was founded as an international non-profit Association, in order to represent the interests of the European window, door and facade (curtain walling) sector. Our 19 national associations speak for European window, door and facade manufacturers that are in direct contact with consumers, and thereby having large insights on consumers' demands and expectations. We are at the forefront interacting with dealers, installers and consumers buying windows and doors, and the companies behind the associations cover selling all over Europe.

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