

## Q & A from workshop: Embodied Carbon in the building sector – The CPR revision

Online meeting, April 7<sup>th</sup> 2022

Question/Comment	Answer(s)
<p>How will the process concerning the CPR Acquis revision be?</p>	<p>Simultaneously with the preparation of the Commission's proposal for a CPR revision, the Commission has initiated a dialogue with EU countries to plan for and organise future work to adapt the acquis.</p> <p>The CPR Acquis Process is the forum where the harmonised standards, the European assessment documents and the legal acts of the Commission are being discussed and shaped, together with Member States, industry and other relevant parties</p> <p>The acquis consists of the harmonised standards, the European assessment documents and the legal acts of the European Commission.</p> <p>Standards have been hard to develop for basic requirements sufficiency and sustainability though it is part of the scope of a mandate issues by the Commission to CEN.</p> <p>The problem with standardization in CEN has been that participation and positions have not been very transparent nor progressive and has been predominantly led by industry. Only national standardization bodies can vote on standardization proposals.</p> <p>To avoid the same problem and to ensure a structural approach the work, The Commission has launched an expert group open to participation through request to the Commission.</p> <p>The Commission is in its proposal empowered to develop minimum requirements per product group utilizing inputs from the established expert group.</p>

<p>Have you seen any reaction on the Commission's CPR revision proposal from industry typically influencing the debate?</p>	<p>The requirements regulating constructions products presented in the Commission's CPR revision proposal have come as a surprise to ECOS. This is also reflected in the very few released lobbyist responses to the CPR proposal.</p> <p>It appears that the Commission has been politically incentivized to create regulation for sustainability of construction products contributing to climate goals, equivalently to other products.</p> <p>Lobby strategies will most likely be to counter-act the workplan and minimum requirements are to be established in the nearest of future.</p> <p>The Commission's proposal is an opening to thresholds or minimum requirements to products emissions. The text is however too flexible to guarantee that these will be established.</p> <p>Recycling companies have not had a significant presence in the debate. There is room to include another kind of industry that is working positively on this agenda.</p>
<p>What role does ECOS see the Commission playing in developing sustainable criteria and important optimizations to secure life-cycle emission savings? E.g. information requirements, access to information and comparability?</p>	<p>The new expert group that will be created is open participation. This is where the Commission will seek to develop sustainability requirements</p> <p>If any of the workshop participants would like to engage and contribute to the more technical development of the sustainability requirements, they should submit a request for participation</p> <p>It's expected that most discussion will be start on how to bring forward elements of the Commission's proposal and declarations of environmental performance.</p>

<p>What will the processes be in developing delegated acts?</p>	<p>Generally, the Commission’s mandate (right and obligation) to draw-up delegated acts will start with a Commission proposal – as it is currently the case – then this will go through a classic co-decision and legislative process in the European Council and Parliament.</p> <p>Typically, the Commission proposal’s would mandate the Commission to develop delegated acts by a certain timeframe. This is not the case in the CPR proposal. The text only says that the Commission is empowered to draw-up delegated acts.</p>
<p>What is the expected timeline?</p>	<p>There is no timeline in the Commission’s proposal. The process can be quite long in the development of criteria. It could be 1-2 years to develop delegated acts.</p> <p>The Council and parliament have the opportunity to make objections to delegated acts but typically there’s a lack of capacity in EP and member states</p>
<p>Will the proposal apply only to products produced in Europe? Or also products only or also cover products imported to the European market?</p>	<p>The proposal is expected to apply to all products on the European market</p> <p>The new regulations in its proposed form will apply to imported products</p>
<p>Which ministries in the Member States would be leading on the CPR?</p>	<p>Examples:</p> <p>In France it will be the Ecological Ministry leading both the EPBD and the CPR, but different sections of the same ministry</p> <p>In the Netherlands it is expected that it will be the Ministry of Construction leading the CPR</p>

<p>Will it be the same ministries revising the CPR as the EPBD?</p>	<p>It is expected that the EPBD revision will mainly be handled by climate/environment ministries whereas the CPR revision will mainly be handled by construction ministries.</p>
<p>What is the deadline for the public consultation period?</p>	<p>Consultation is currently open until June 2<sup>nd</sup> 2022</p>