

GNB-CPR GNB-AG	Co-ordination of the Group of Notified Bodies for the Construction Products Regulation (EU) No. 305/2011	NB-CPR-24/953 Issued: 06 March 2024 INFORMATION
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Reporting on the work of CPR Acquis sub-groups on environmental sustainability

1. Reporting by the GNB representatives Thematic group on environmental sustainability

The sub-group had one meeting since the last AG-GNB meeting. The meeting that was held on February 8th, 2024 with 80 participants;

The milestones considered during the meeting are:

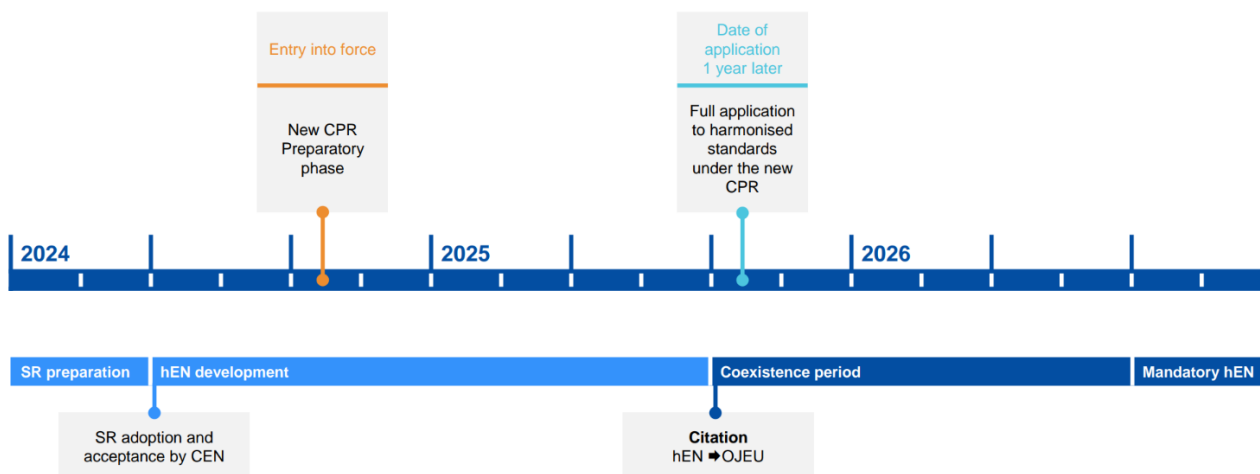
- State of play standardization request (SGEnv0004.02)
- *Milestone A: Essential characteristics and environmental indicators – Task 6 and 7*
- *Milestone B: Assessment methods and declaration – Task 1 to 6*
- *Milestone C: Verification*
- *Milestone D: Datasets and data quality – Task 1 to 3*
- *Milestone E: Compulsory declaration*
- *Milestone F: Guidance dossiers for the declaration without assessment*
- *Documents related to Standardization request and questions from other acquis group: Structural metallic products.*

The work of the Sub group shall be considered as a basis for the other Sub-group to consider the environmental points. On the current CPR, the requirements will apply progressively when the TS will be revised in relation with the output of the Acquis groups.

As a general conclusion of the discussion, the need to have a common approach for all product is stated for all the milestones. Input from the GNB (on points under its remit) shall be considered to reach a level of harmonization between the different product families. This was particularly enhance during the discussions on Milestone B, C and D.

1.1. State of Play standardization requests

The progress on standardization request regarding PCP (Precast Concrete Product) and SMP (Structural Metallic Products) is presented during the meeting (see below extract from the EC presentation for PCP and SMP)



From the availability of the SR (Standardisation Request), there will be 18 months for the issuance of the standard and a 1 year coexistence period. All non-revised hEN will remain under the actual CPR (305/2011): SCC first group for comment then the vote will happen in CEN. The timing for the SR will be agreed between the EC and CEN. All the SR will be in line with the new CPR when the ones already validated (ongoing) will remain in line with the actual CPR (305/2011).

On the process for approval of the SR: They are submitted for vote in CEN and for the first set of SR they should be made available for vote in April 2024.

1.2. Milestone A: Essential characteristics and environmental indicators task 6 and 7 (SGEnv004.04)

A brief update is given on the task 6, as discussion are ongoing regarding the carbon removal. Discussions are postponed to the next meeting where the EC will provide more information (documents could be available in between meetings).

On task 7: Other indicators, a horizontal approach is envisaged and the EC received numerous comments on circularity and recycle content. Reference to Taxonomy¹ should also be considered.

One of the main conclusion of the discussion is that there is a need to remain close to the EPDs and to stay with the indicators from EN 15804.

1.3. Milestone B Essential characteristics and environmental indicators tasks 1 to 6 (SGEnv004.05)

The EC considers that the milestone B is already quite mature with one issue for criteria on waste.

The issue on detailed date against average data remains unsolved and reference to service life seems to be still controversial.

The main conclusions are:

- Information provided at product level need to be useful at building level
- Need of consistency at product level.

¹ EC informed that there will be a revision of the Taxonomy

1.4. Milestone C: Verification

The final proposal for the delegated act should be adopted in the coming months and will be applicable under the current CPR.

ANNEX I

In Annex V to Regulation (EU) No 305/2011 the following new section is inserted between 1.4 and 1.5:

***1.4a System 3+**

- (a) The manufacturer shall carry out:
- (i) the assessment of the performance of the product on the basis of data collection for input values, assumptions and modelling.
 - (ii) factory production control.
- (b) The notified assessment validation body shall decide on the issuing, restriction, suspension or withdrawal of the validation report of constancy of performance of the construction product on the basis of the outcome of the following assessments and verifications carried out by that body:
- (i) validation of the input values, assumptions made and compliance with applicable generic or product category specific rules;
 - (ii) validation of the manufacturer's assessment;
 - (iii) validation of the process applied to generate that assessment;
 - (iv) validation of the correct usage of software appropriate for the assessment;
 - (v) initial inspection of the manufacturing plant to validate any company-specific data.'

In Annex V to Regulation (EU) No 305/2011 the paragraph in point 1.6 is removed and replaced by the following text:

'Notified bodies undertaking tasks under Systems 1+, 1, 3 and 3+ as well as manufacturers undertaking tasks under Systems 2+ and 4 shall consider the European Technical Assessment issued for the construction product in question as the assessment of the performance of that product. Notified bodies and manufacturers shall therefore not undertake the tasks referred to in points 1.1.(b)(i), 1.2.(b)(i), 1.3.(a)(i), 1.4.(b), 1.4a.(a)(i) and 1.5.(a)(i) respectively.'

In Annex V to Regulation (EU) No 305/2011 the following point is added to section 2:

'(4) assessment validation body: a body notified, in accordance with Chapter VII, to validate the assessment of the performance of construction products.'

In Annex V to Regulation (EU) No 305/2011 the following point is added to section 3:

'6. Environmental sustainability'

Under the new CPR the system 3+ (see extract from EC presentation below) as specified in the annex V will be applicable:

4. System 3+ – Notified body's control of environmental sustainability assessment

- a) The manufacturer shall carry out:
 - i. the assessment of the performance of the product on the basis of data collection for input values, assumptions and modelling;
 - ii. factory production control.
- b) The notified body shall decide on the issuing, restriction, suspension or withdrawal of the validation report on the basis of:
 - i. validation of the input values, assumptions made and compliance with applicable generic or product category specific rules;
 - ii. validation of the manufacturer's assessment;
 - iii. validation of the process applied to generate that assessment;
 - iv. validation of the correct usage of software appropriate for the assessment;
 - v. initial inspection of the manufacturing plant to validate any company-specific data.

1.5. Milestone D: Datasets and data quality task 1to 3 (SGEnv004.7)

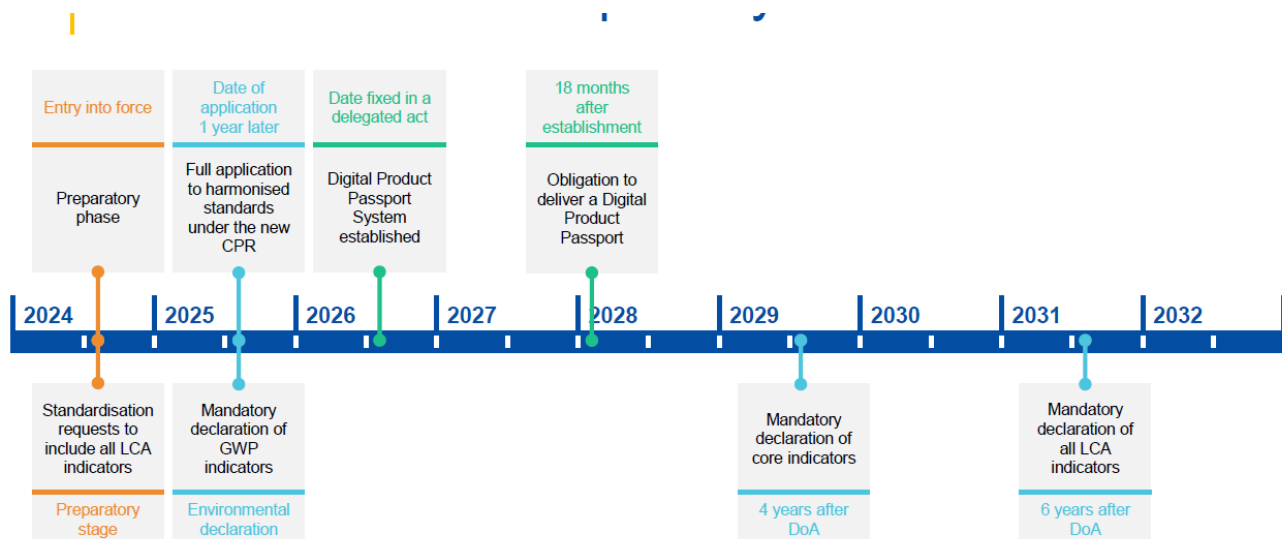
The integration of all the comments received is still ongoing.

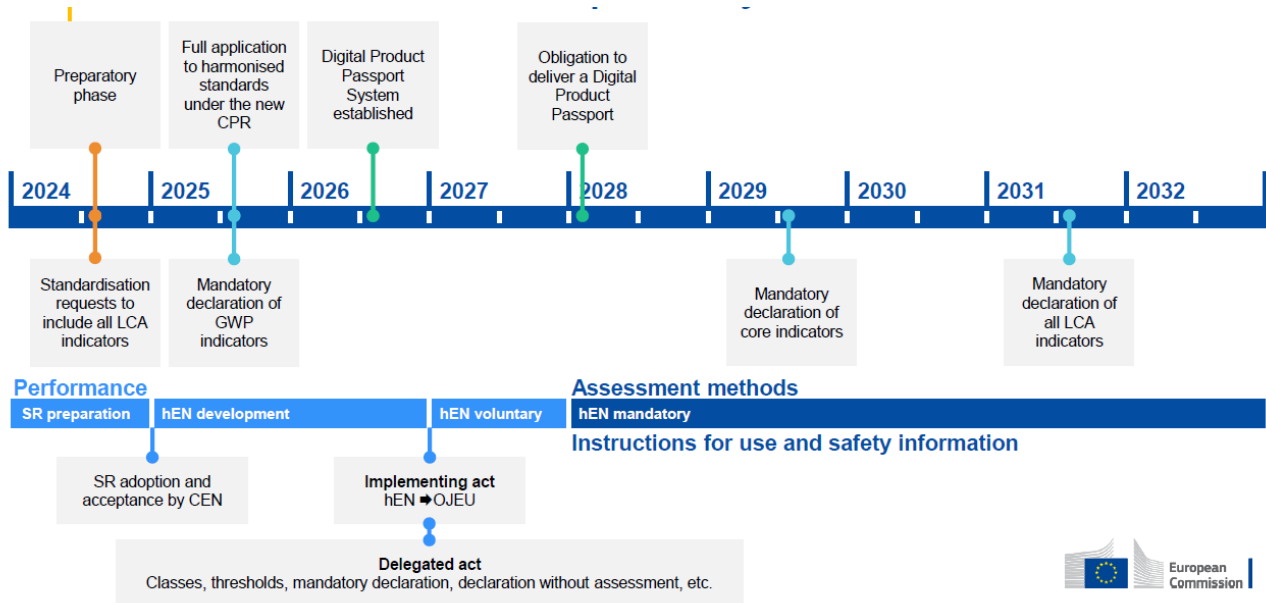
Discussion were focused on the average approach for which the commission is not in favor.

Regarding the LCA, the EC confirmed that the role of NBs will be to verify that the data used are correct and representative of the product considered.

1.6. Milestone E: Compulsory declaration

The time frame for the Compulsory declaration was presented by the EC (see extract from EC presentation below).





1.7. Milestone F: Guidance dossiers for the declaration without assessment

The EC presented the concept of WT and WFT and a draft document issued in September 2023 on Rules related to the declaration of WT and WFT. There was no further discussion