

# **Will EPDs become mandatory?**

**Olympia Dolla – ASSA ABLOY  
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## A bit of background..



Olympia Dolla

- Head of Sustainability Program at ASSA ABLOY EMEA since 2022.
- Responsible for anything that has to do with sustainability ☺ both operational and product sustainability, transparency etc.
- Environmental scientist with specialization in Energy and Materials. Work experience with EU associations and Public affairs for construction and chemicals industries.
- Actively involved in World Green Building Council (WGBC) European Regional Network.
- Involved for several years in standardization. Currently representing ARGE at CEN TC 350.
- Sustainability Task Group convenor at Construction Products Europe (CPE) for the last 3 years. Member of the Horizontal expert group Environmental Sustainability of the CPR (representing both CPE and ECO Platform).
- VP at ECO – Platform (European EPD community) representing industry.

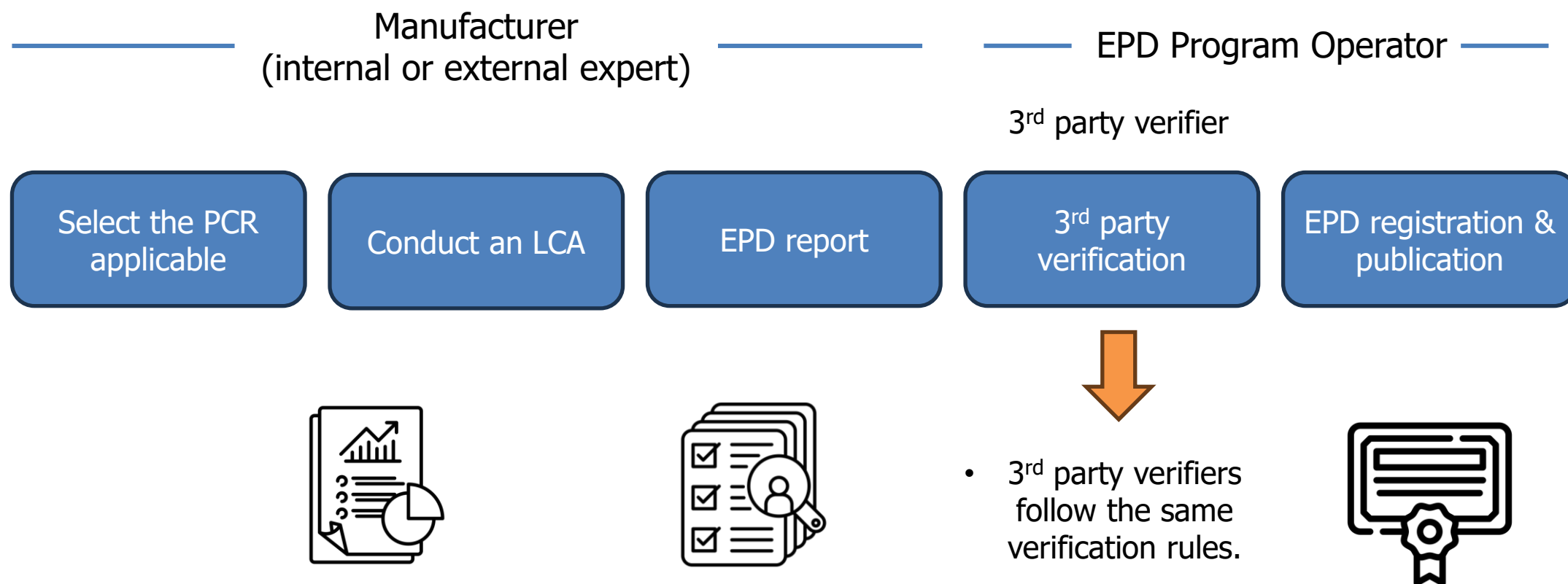
## Questions to answer

- What will become mandatory with the CPR and when?
- What are the main challenges?
- How can we prepare for what is coming?

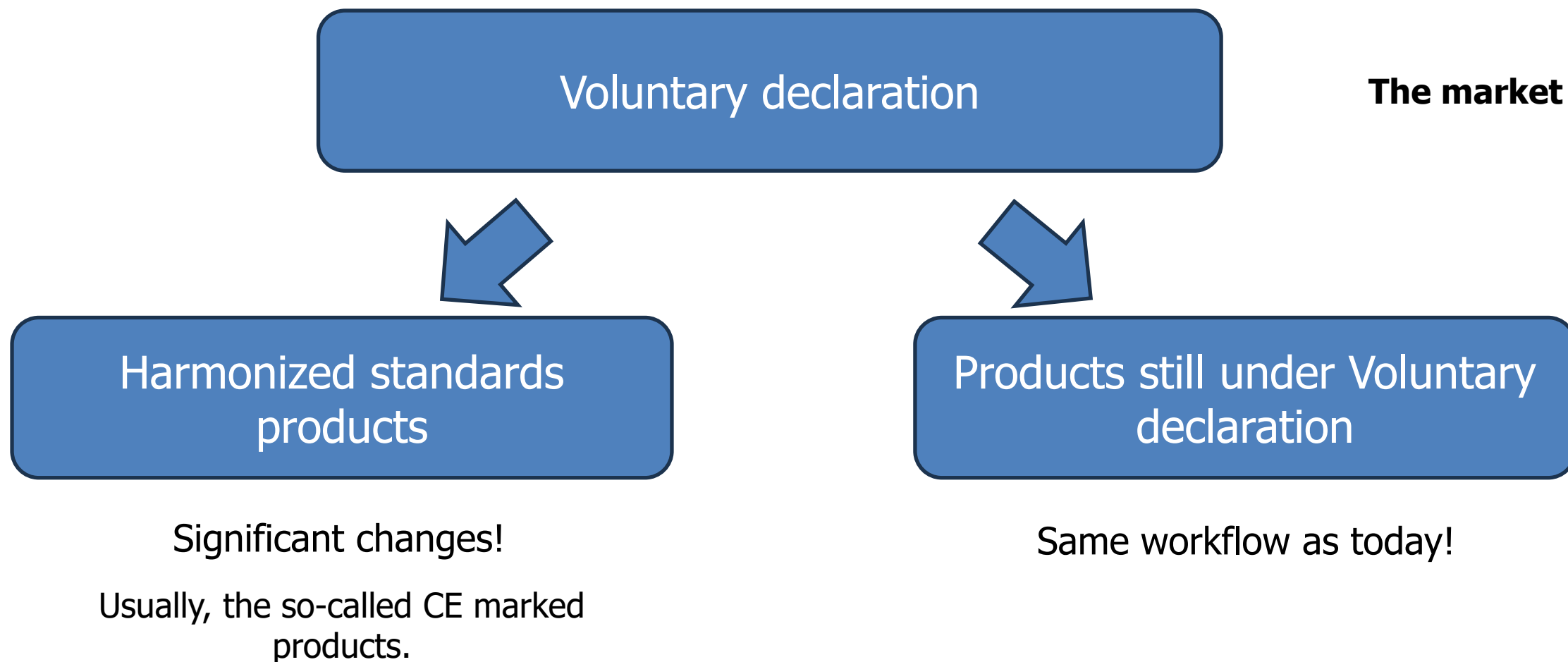
**“ Will EPDs become mandatory?”**

# What is the process to issue an EPD today?

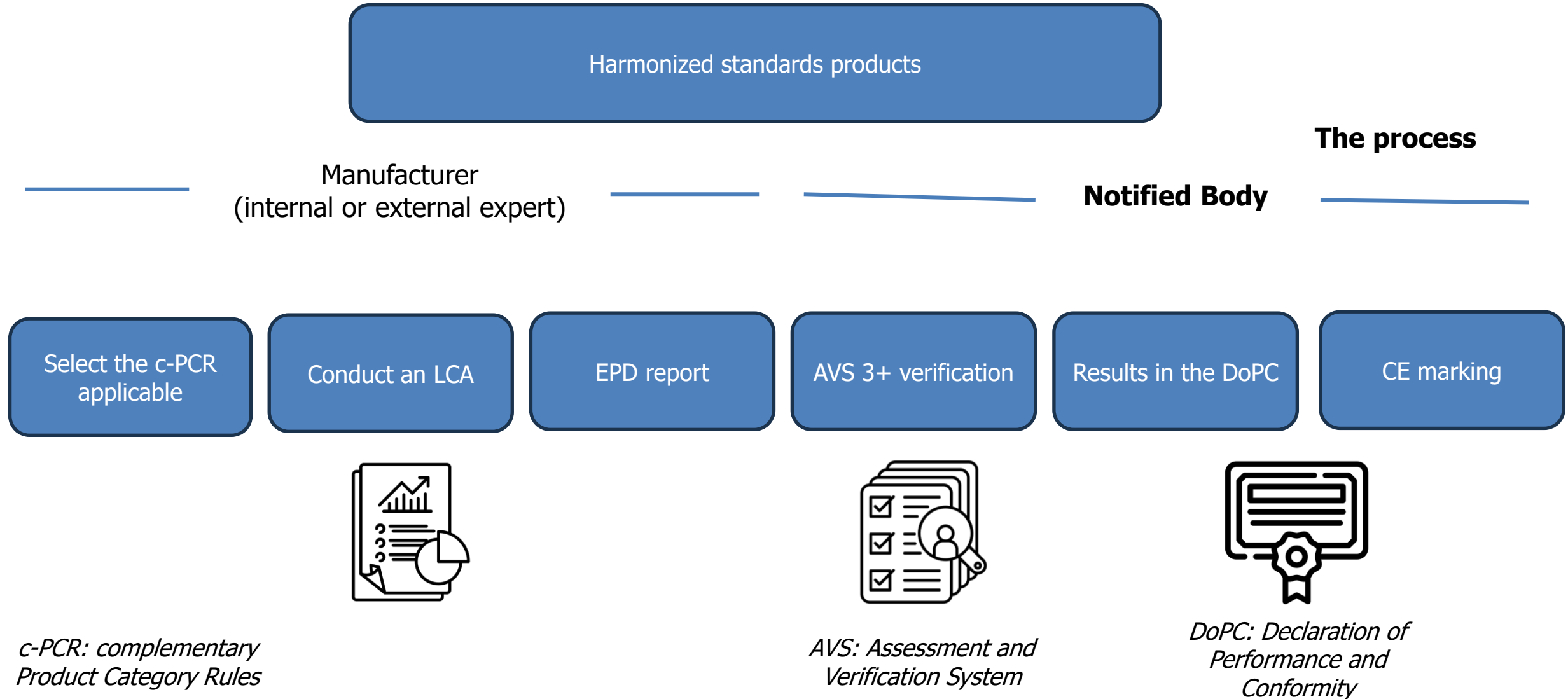
- An EPD is a voluntary declaration today - not an entry point to market a product.



## What will change once CPR is in force?

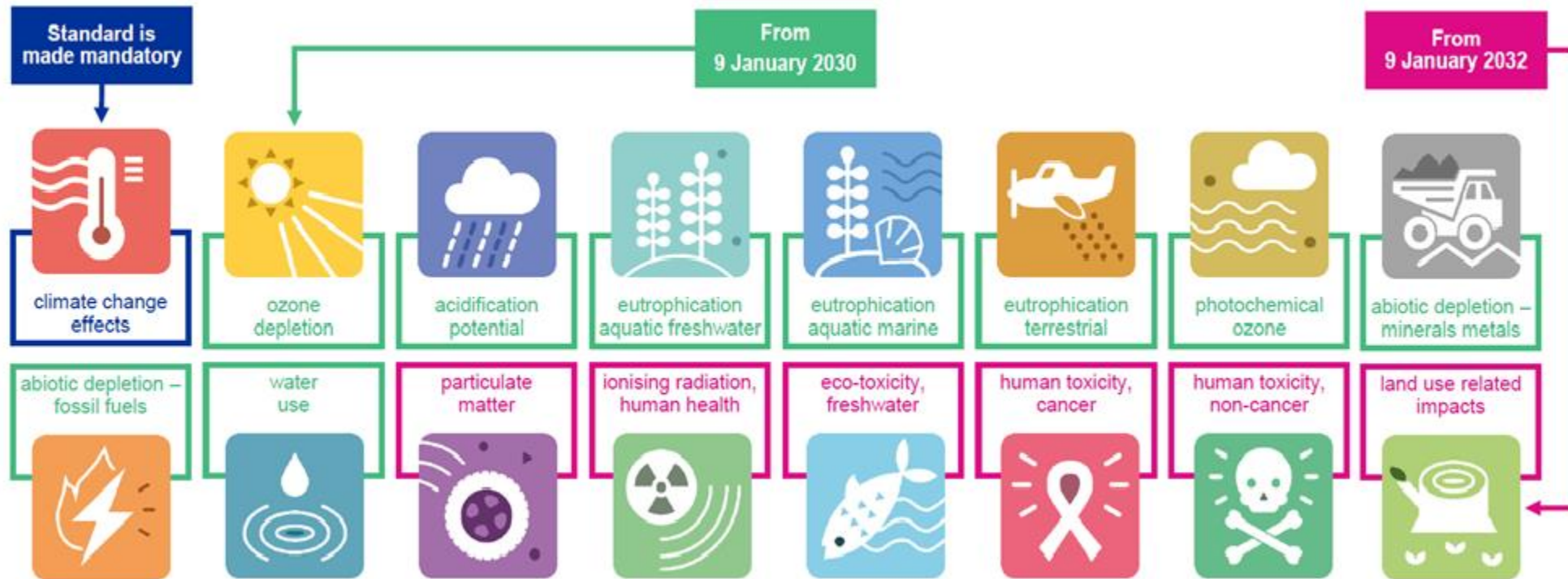


# What will change once CPR is in force?



# What will become mandatory?

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



**Performance based indicators.**

# What will become mandatory?

- Up to each product group to define additional conformity requirements.
- A first indication of potential requirements – example: minimum 30% recycled content per product.

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.

**Declaration of Performance**  
*Declaration de performance*  
*Leistungserklärung*  
**No.: DoP-DC500.01**

**ASSA ABLOY**

**1. Identification code of the product type**  
Code d'identification du type de produit  
Kenncode des Produkttyps

Controlled door closing devices  
*Ferme Porte*  
*Türschließer mit kontrolliertem Ablauf*

**2. Type number**  
Reference de produit  
Produkttyp

DC 500 EN1-4 Overhead door closer with guide rail arm  
*DC 500 EN1-4 Ferme-porte avec bras glissière*  
*DC 500 EN1-4 Obergangsschließer mit Gleitschiene*

**3. Intended use**  
Usage prévu  
Verwendungszweck

On fire and smoke compartmentation doors  
*Portes de compartimentation feu/fumée*  
*An Feuer- und Rauchschutztüren*

**4. Manufacturer**  
Fabricant  
Hersteller

ASSA ABLOY  
Abloy Oy  
Wahlforsinkatu 20  
80101 Joensuu  
FINLAND

**5. System of assessment and verification of constancy of performance**  
Système d'évaluation et de vérification de la constance des performances  
System zur Bewertung und Überprüfung der Leistungseinständigkeit

System 1  
*Système 1*  
*System 1*

**6. The construction product is covered by a harmonised standard**  
Le produit de construction est couvert par une Norme harmonisée  
Das Bauprodukt wird von einer harmonisierten Norm erfasst

Notified Body <small>Organisme notifié</small> <small>Notifizierte Stelle</small>	Harmonised Standard <small>Norme EN Harmonisée</small> <small>Harmonisierte EN Norm</small>	CE Certificate / Certification Date <small>Certificat CE / émiss le</small> <small>CE Konformitätszertifikat, Zertifizierungsdatum</small>
Warrington Certification Limited Holmesfield Road, Warrington Cheshire, WA1 2DS, UK	EN1154:1996 + A1:2002 + AC:2006	1121-CPR-AD5241 18/04/2016

- 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?

Fire	1 Precast normal/ lightweight/ autoclaved aerated concrete products 1	17 Masonry and related products - Masonry units, mortars, and ancillaries. 9	5 Structural bearings - Pins for structural joints 17	7 Gypsum products 25	6 Chimneys, flues and specific products 33
Dangerous substances	20 Structural metallic products and ancillaries 2	24 Aggregates 10	34 Building kits, units, and prefabricated elements 18	33 Fixings 26	32 Sealants for joints 34
Environmental sustainability	16 Reinforcing and prestressing steel for concrete Post-tensioning kits 3	10 Fixed fire fighting equipment 11	21 Internal & external wall and ceiling finishes. Internal partition kits 19	3 Membranes, including liquid applied and kits 27	35 Fire stopping, sealing and protective products - Fire retardant products
	2 Doors, windows, shutters, gates and related building hardware 4	23 Road construction products 12	27 Space heating appliances 20	30 Flat glass, profiled glass and glass block products 28	29 Construction products in contact with water intended for human consumption
	15 Cement, building limes and other hydraulic binders 5	19 Floorings 13	22 Roof coverings, roof lights, roof windows, and ancillary products. roof kits 21	8 Geotextiles, geomembranes, and related products 29	36 Attached ladders
	4 Thermal insulation products - Composite insulating kits/systems 6	4 Thermal insulation products - Composite insulating kits/systems 14	12 Circulation fixtures: road equipment 22	11 Sanitary appliances 30	
	13 Structural timber products/elements and ancillaries 7	9 Curtain walling/cladding/structural sealant glazing 15	18 Wastewater engineering products 23	28 Pipes-tanks and ancillaries not in contact with water for human consumption 31	
	26 Products related to concrete, mortar and grout 8	14 Wood based panels and elements 16	25 Construction adhesives 24	31 Power, control and communication cables 32	

- Horizontal subgroups
- Standardisation request adopted
- CPR Acquis ongoing work
- CPR Acquis not started yet
- Fast track ongoing
- 1 Priority

- Note! The new Regulation is in force already since 7<sup>th</sup> January 2025.
- For our product group that roughly means end of 2027-beg 2028.



# Challenges ahead



# What could be these challenges?



## **Manufacturers**

A lot of declarations will be needed to be issued and verified



## **Verifiers**

Limited amount of experts to verify LCA information



## **Building practitioners**

More building LCA assessments, more data



## Declaration in the context of the CPR

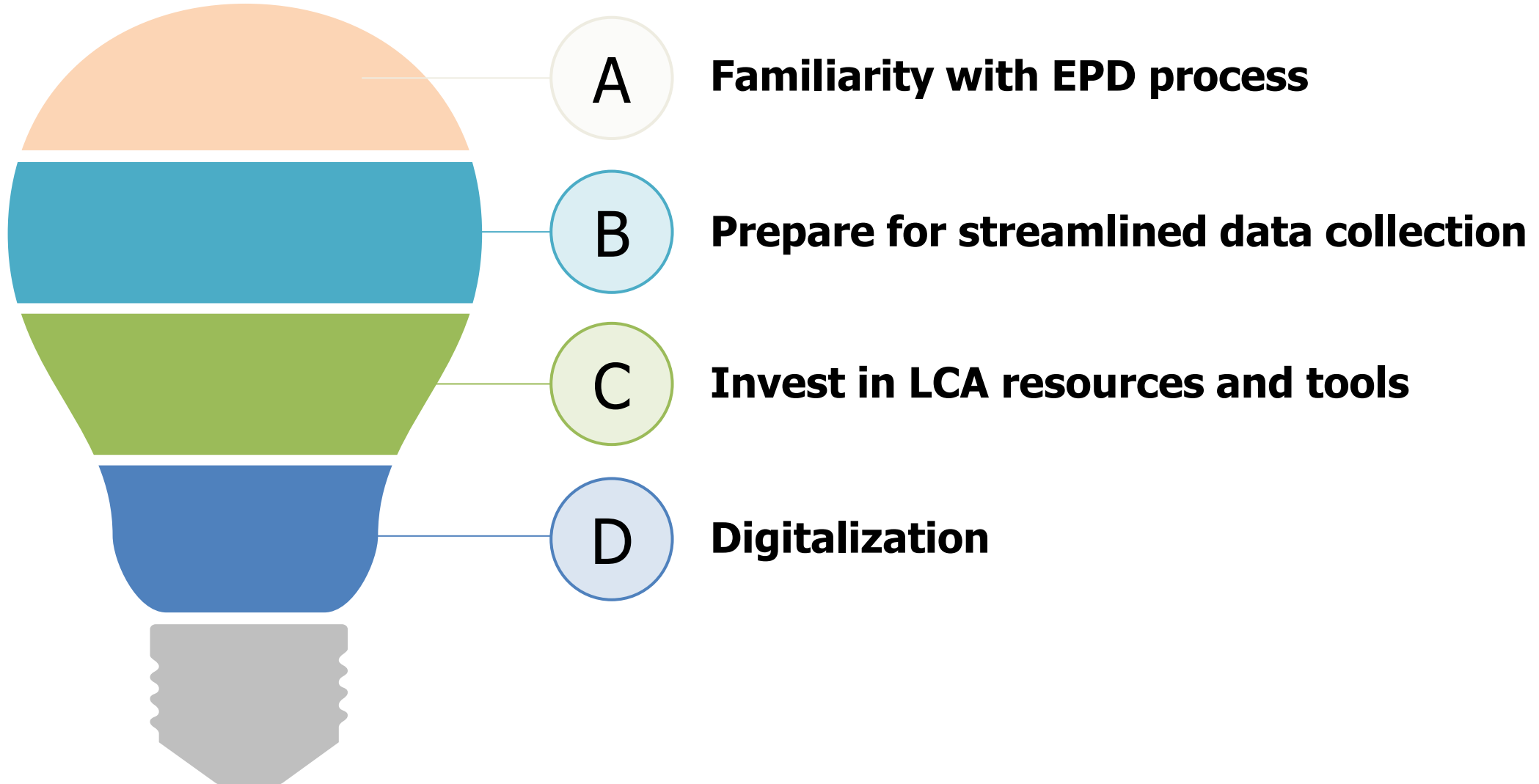
- Ensure that my DoPC results are representative.
- Worst case scenario is recommended principle. No weighted average results are allowed anymore.
- Subject to market surveillance and legal enforcement in case of greenwashing.



## How to best prepare?



## How to prepare?



# **What is the role of ARGE?**



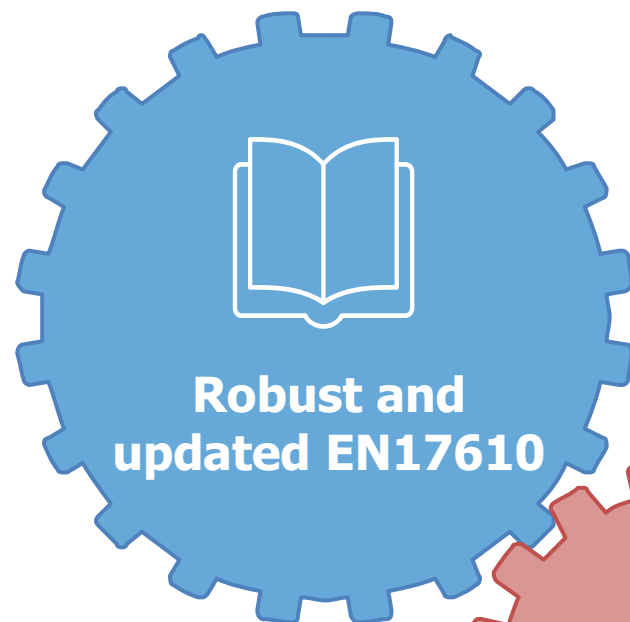
To enable members to achieve minimum compliance.



# How to achieve minimum compliance?

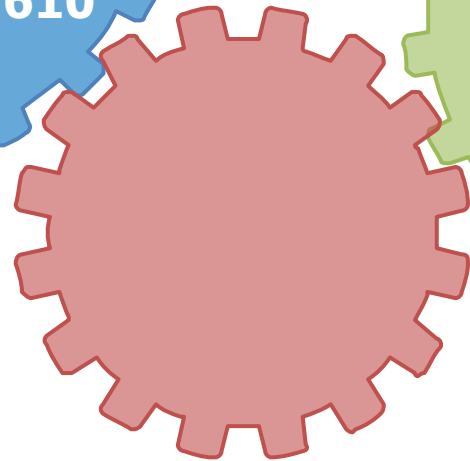
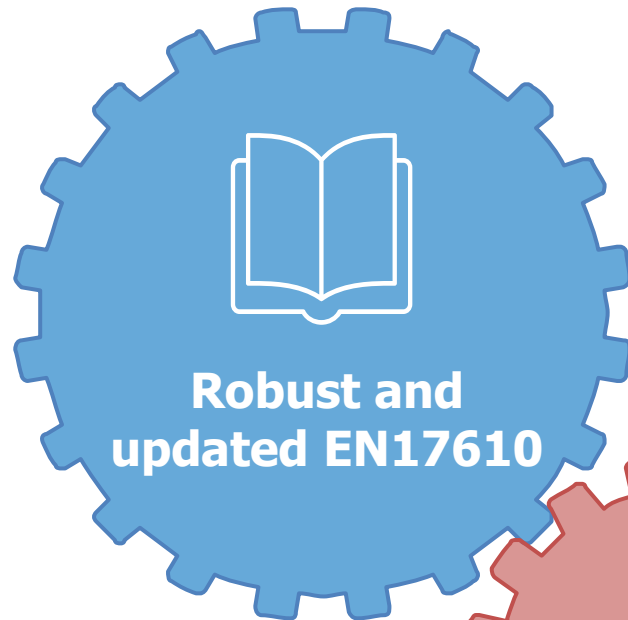


# How to achieve minimum compliance?



- ✓ Probably to split between the rules of CE marked (c-PCR) and non-CE marked products.
- ✓ More detailed scenarios on default values, transportation scenarios etc.
- ✓ More rules – less open for interpretation from a verifier -> less costly and time consuming.
- ✓ Level playing field with voluntary zone products.

# How to achieve minimum compliance?



- ✓ ARGE EPDs must be audited against the additional criteria that will be set horizontally for all product groups.
- ✓ From EPDs -> ready made declarations of Env Sustainability for all categories of Building Hardware.
- ✓ The declarations shall cover all CE marked product categories.

# Conclusions

**EPDs will not become “mandatory” but their results will be.**

Non-CE marked categories will increase the demand for EPD data.

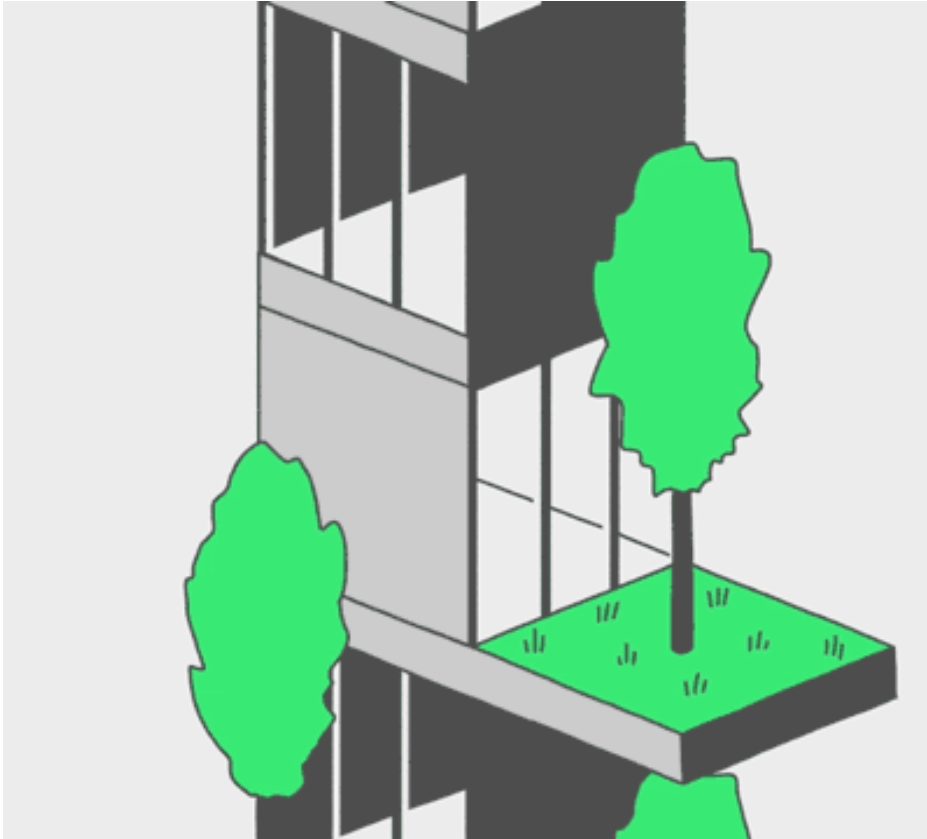
**Changes** in the usual EPD process as we know it today!

**Main challenges** – big volumes of declarations, limited verifiers and experts, more building LCA needs and requirements.

**Suggested solutions** – get familiar, invest, streamline and digitalize.

**Potential light revision** of ARGE EPDs to cover all CE marked categories and EN17610 standard to comply with the latest requirements.





**Thank you very much for your  
attention! 😊**