

## **EVIA response to the European Commission's consultation on the draft act on an EU framework for calculating the global warming potential of new buildings**

**The European Ventilation Industry Association (EVIA)** welcomes the European Commission's consultation on the draft delegated regulation and expresses our full support for a harmonized and effective implementation of the revised Energy Performance of Buildings Directive (EPBD). Harmonisation and effective implementation are particularly important for the obligation to report the whole-life carbon emissions of new buildings from 2030 onward (and from 2028 for public buildings above 1,000 m<sup>2</sup>).

To comply with this requirement, manufacturers need clarity and consistency in the recognition of life cycle assessment (LCA) methodologies used to communicate the environmental impact of Heating, Ventilation and Air conditioning (HVAC) products installed in buildings.

Currently, two well-established and standardised approaches are already widely used across Europe to derive so-called Environmental Product Declarations (EPD):

- Environmental Product Declarations (EPD), based on EN 50693 (IEC 63366 since August 2025), especially for energy using electrical and HVAC products (e.g. PEP Ecopassport® in France);
- Environmental Product Declarations (EPD), based on EN 15804, for construction products.

Progressively pursuant to the Ecodesign for Sustainable Products Regulation (ESPR) for energy using HVAC products in scope of Ecodesign, and the Construction Products Regulation (CPR), EU harmonised calculation methodologies are to be established at product-level in product category rules based on the aforementioned generic standards.

Prior to the delivery of harmonisation under the ESPR and the CPR, it is vital to limit internal market fragmentation. As such Member States are urged to adhere to the approach recommended by the Commission in paragraph 4 of Section 3.2.2 in the Guidance Notice<sup>1</sup> on the implementation of EPBD Articles 7(2) and (5) and from when it is applicable the Delegated Act:

- Ensure that EPD based on EN50693 (IEC 63366), on EN15804 or on Product Environmental Footprint (PEF) methodologies are all accepted for the purpose of fulfilling EPBD requirements in each EU Member State,
- Promote mutual recognition of verified LCA data across Member States, to avoid duplication of efforts and unnecessary administrative burden,
- Support a pragmatic transition towards future harmonisation under the ESPR and the CPR while allowing manufacturers to continue using recognised and robust LCA schemes already in place.

In this respect EVIA welcomes the language in both the Guidance Note and the draft Delegated Act (see below) on recognising data obtained from "compatible standards":

*"Member States are encouraged to limit market fragmentation through the recognition of reliable and compatible available data issued in any Member State, including product-specific data and project-specific data calculated in accordance with EN 15804 or a compatible standard".*

However, to ensure clarity EVIA strongly recommends that the references to "EN 15804 or a compatible standard"/"EN 15804 or a standard compatible with standard EN 15804" are systematically amended as

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<sup>1</sup> Commission Notice providing guidance on new or substantially modified provisions of the recast Energy Performance of Buildings Directive (EU) 2024/1275 Life-cycle global warming potential of new buildings (Article 7(2) and (5)) - C(2025) 4132 final Annex 13

follows, as it is not compatibility with EN 15804 that is the objective rather it is compatibility with EN 15978 at the building level:

**“EN 15804 or EN 50693 (IEC 63366), or other equivalent standard compatible with EN 15978”.**

This approach will facilitate a fairer and more efficient implementation of the EPBD requirement in the interim period before ESPR/CPR harmonisation takes place, particularly for energy using HVAC products.

The objective is to reduce compliance costs for industry in the transition period, and accelerate the availability of reliable environmental data for low-carbon building design — all in line with the EU’s decarbonisation objectives for the built environment.

## **About EVIA**

*[The European Ventilation Industry Association \(EVIA\)](#) represents the interests of 39 European mechanical ventilation manufacturers and six national associations across Europe, realising an annual turnover of over EUR 7 billion and employing more than 45,000 people.*

*EVIA aims to promote the implementation of highly energy efficient mechanical ventilation applications across Europe, with high consideration for health and comfort aspects. With Europeans spending 90% of their life indoors, good indoor air quality is a critical element of health that should not be overlooked.*