



Mutual Recognition of LCA Methodologies in the transposition of the Energy Performance of Buildings Directive

JOINT CALL

On behalf of the undersigned industry associations representing the Heating, Ventilation, Air Conditioning and Cooling (HVAC) sector, this is to express our **full support for a harmonized and effective implementation of the revised Energy Performance of Buildings Directive (EPBD)**.

To comply with the requirement to report the whole-life carbon emissions of new buildings from 2030 onwards (and from 2028 for public buildings above 1,000 m²), **manufacturers need clarity and consistency in the recognition of Life Cycle Assessment (LCA) methodologies** used to communicate the environmental impact of HVAC products installed in buildings.

Currently, two well-established and standardised approaches are already widely used across Europe:

- **PEP Ecopassport®**, based on EN 50693 (replaced by IEC 63366 since August 2025), especially for electrical and HVAC products.
- **Environmental Product Declarations (EPD)**, based on EN 15804, for construction products.

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

Prior to the delivery of harmonisation under the ESPR and the Construction Products Regulation (CPR), we respectfully urge Member States to adhere to the approach recommended by the Commission in paragraph 4 of Section 3.2.2 in the Guidance Notice on the implementation of EPBD Articles 7(2) and (5):

- Ensure that EPD based on EN50693 (replaced by 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 recognized and robust LCA schemes already in place.

This approach will facilitate a fair and efficient implementation of the EPBD, reduce compliance costs for industry, and accelerate the availability of reliable environmental data for low-carbon building design — all in line with the ambitions of the EU Green Deal and the Circular Economy Action Plan.

We stand ready to collaborate with public authorities on the path toward a more harmonised, transparent and future-proof framework for environmental product data.

Sincerely,

Pierre Cruveillé, EVIA President

Russell Patten, EPEE Director General

Federica Sabbati, EHI Secretary General

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.

For more information: <https://www.evia.eu/>

About EPEE

EPEE represents the refrigeration, air-conditioning and heat pump industry in Europe. Founded in the year 2000, EPEE's membership is composed of over 50 member companies as well as national and international associations from three continents (Europe, North America, Asia). With manufacturing sites and research and development facilities across the EU, which innovate for the global market, EPEE member companies realize a turnover of over 30 billion Euros, employ more than 200,000 people in Europe, and create indirect employment through a vast network of small and medium-sized enterprises such as contractors who install, service and maintain equipment.

For more information: www.epeeglobal.org

About EHI

EHI, the Association of the European Heating Industry, represents 90% of the European market for heat and hot water generation, heating controls and heat emitters, 75% of the hydronic heat pump market, 80% of the biomass central heating market (pellets, wood) and 70% of the solar thermal market. EHI Members produce advanced technologies for heating in buildings, including: heating systems, burners, boilers, heat pumps, components and system integrators, radiators, surface heating & cooling and renewable energy systems. In doing so, they employ about 120,000 people in Europe and invest over a billion Euros per year in energy efficiency.

For more information: www.ehi.eu