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29-1-2026

# From EPD to future Declaration of Performance (DoP) and CE-marking

**VELUX®**



# Agenda

1. Current voluntary EPD market

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2. Provisions of the Construction Products Regulation(CPR) for environmental sustainability of construction products

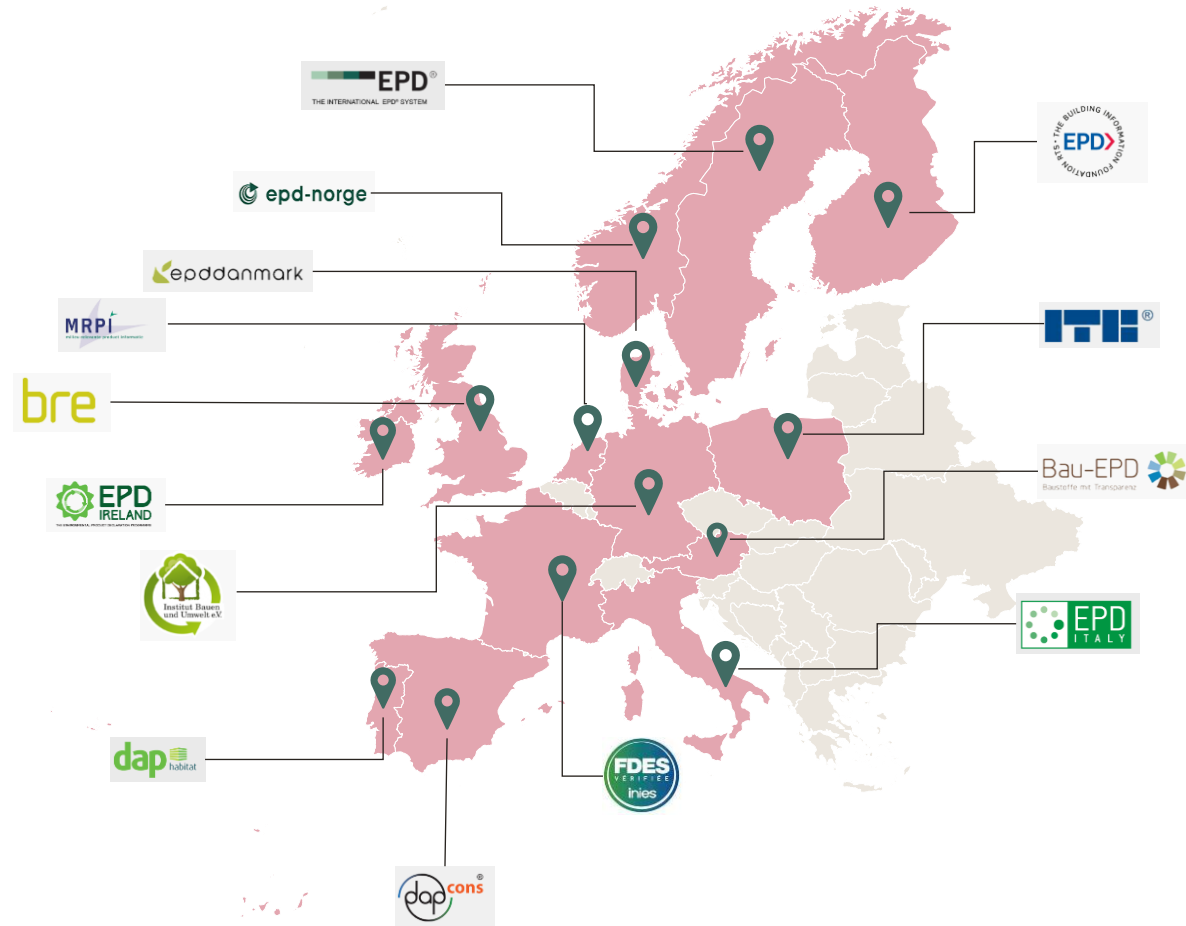
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3. Implementation timeline and relation with other EU policies

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# Current voluntary EPD market

# EPD Scheme in EU



- EPDs in the EU are built on a common technical backbone: **EN 15804** developed under **CEN**, enabling harmonized rules for LCA-based environmental information of construction products.
- National **EPD Programs** operate under this shared standard, coordinated through the **ECO Platform** to enable mutual recognition and cross-border use
- This voluntary, standard-driven ecosystem relies on market pull rather than regulatory obligation – **a key point of change under the new CPR**

# Applications driving EPD demand



- BREAAM
- DGNB
- LEED



- BVB
- Sundahus



- Italy (CAM)



- Denmark
- Sweden
- Norway
- Finland
- France
- Netherlands



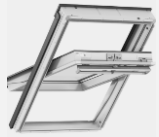
- Reporting
- Informed sourcing



- Verified claims

# VELUX published EPDs

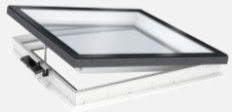
Our EPDs cover the vast majority of our relevant product portfolio, including:



PU and wood roof windows



Accessories



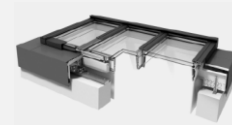
Flat roof windows



Installation products and flashings



Sun-tunnels



VELUX modular skylights



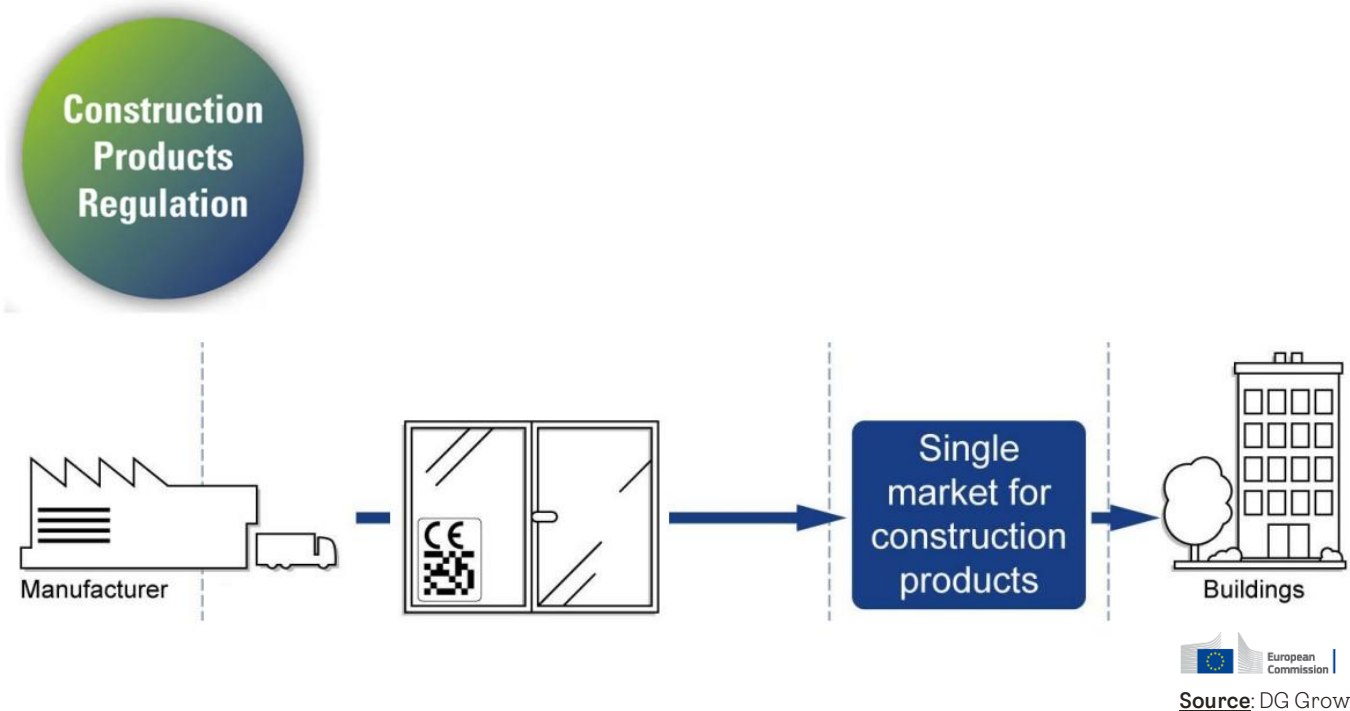
VELUX electric and solar products



Stick systems, DOMEX and CLR

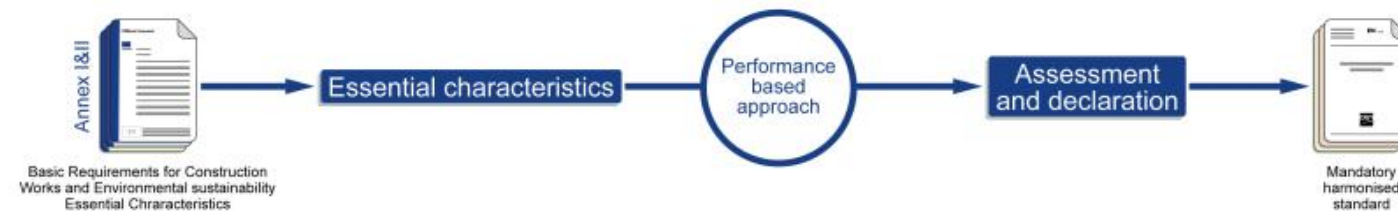
# Provisions of the Construction Products Regulation(CPR) for environmental sustainability of construction products

# What is the Construction Products Regulation (CPR)?



- The Construction Products Regulation (CPR) exists since 1989 as a Directive and as from 2011 as a European Union law. The CPR has been revised and **entered into force January 2025**.
- The CPR provides a list of rules and requirements that shall be met to obtain the **CE-marking** and place products in the single market (EU).
- Among other things, these rules and requirements define how to measure a product's performance in relation to its essential characteristics, which are included in the Declaration of Performance (**DoP**).
- The product is **assessed/verified against its conformity** with the regulation's rules, to obtain the CE-marking.

# Basic Requirements for construction works



Source: DG Grow

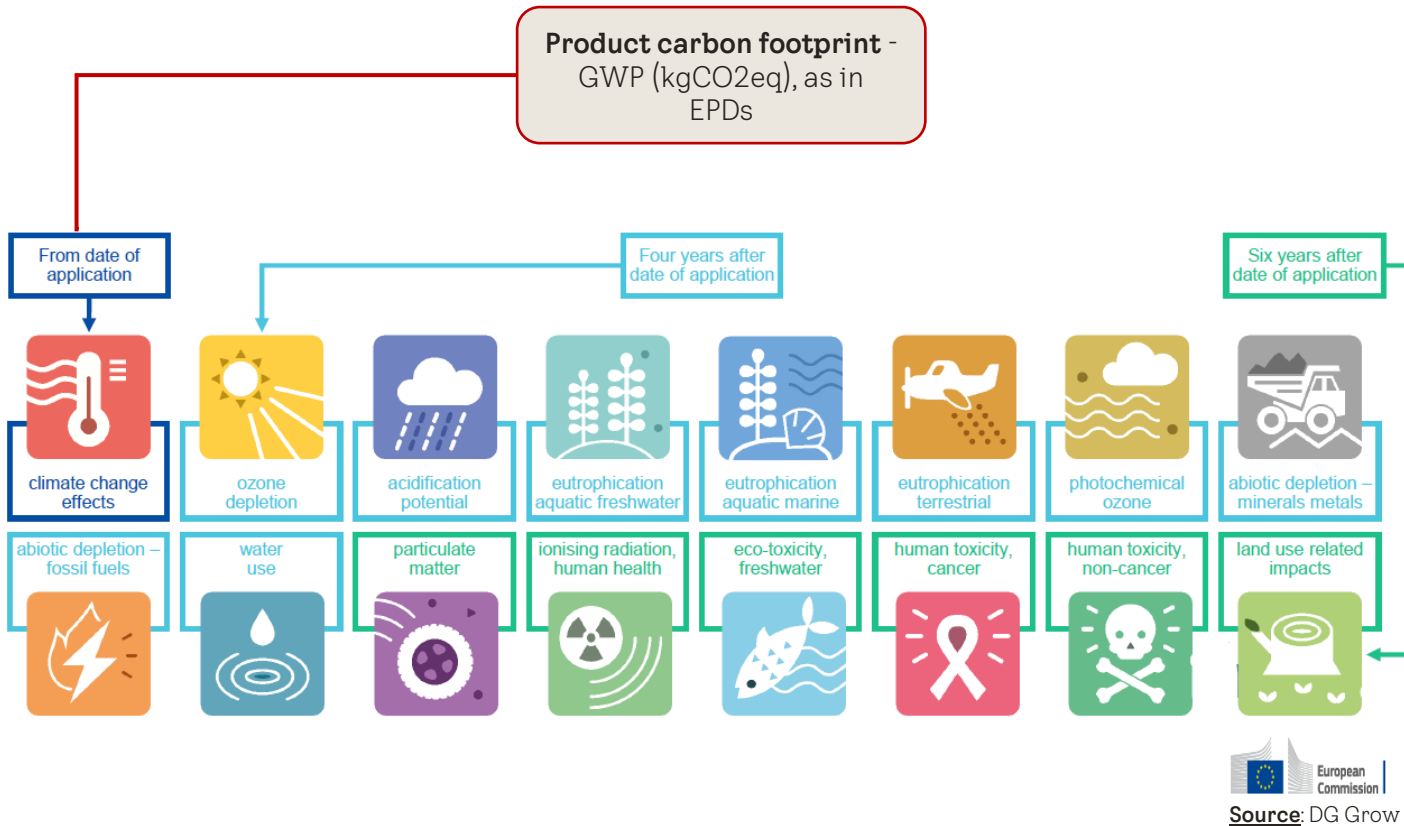
- Construction products must be fit for their intended use, considering the Basic Work Requirements (BWR) of the CPR.

Essential characteristics of construction products relate to the BWR.

- In its recent revision, the CPR has introduced BWR 8 considering **new essential characteristics on environmental sustainability**, to be included in the Declaration of Performance (DoP), and will be **mandatory** to obtain the CE marking.

These characteristics are **already part of EN15804** and are the LCA results of an EPD.

# Environmental Sustainability essential characteristics

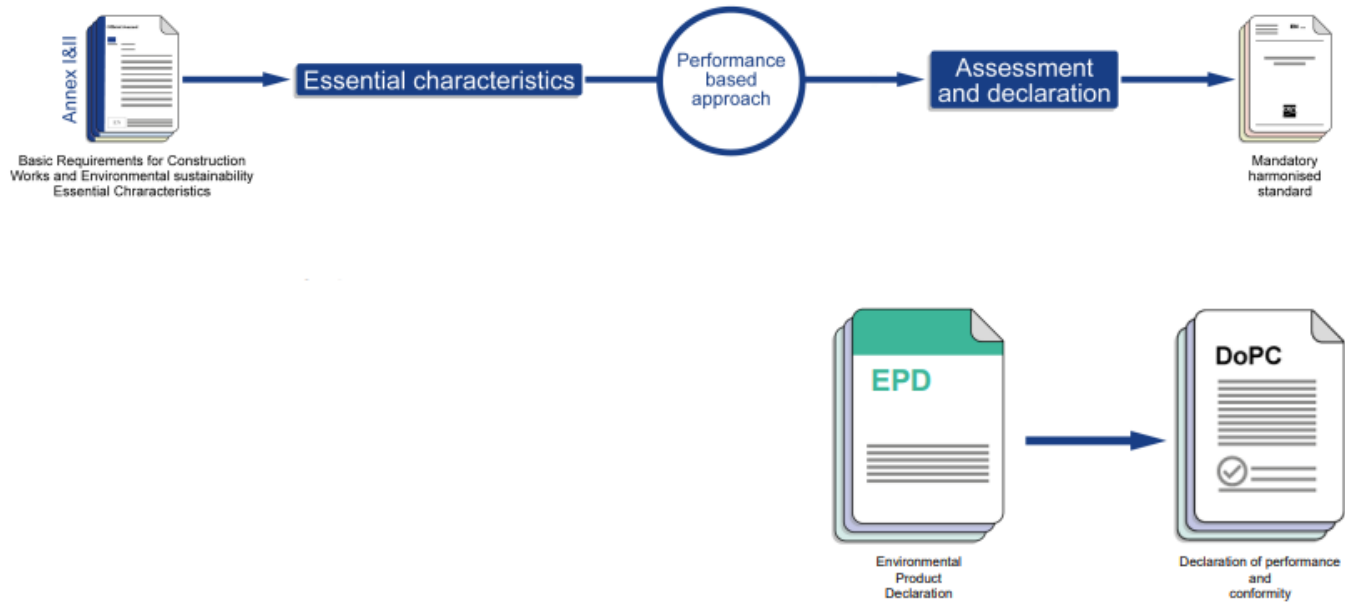


- Similarly to other essential characteristics of VELUX products (like U-value, fire class, etc.), **each product's DoP will include LCA results** like Global Warming Potential, as currently measured in EPDs.

**DoP will be the only way to communicate the carbon footprint of construction products in the future !**

# From voluntary scheme to legal compliance

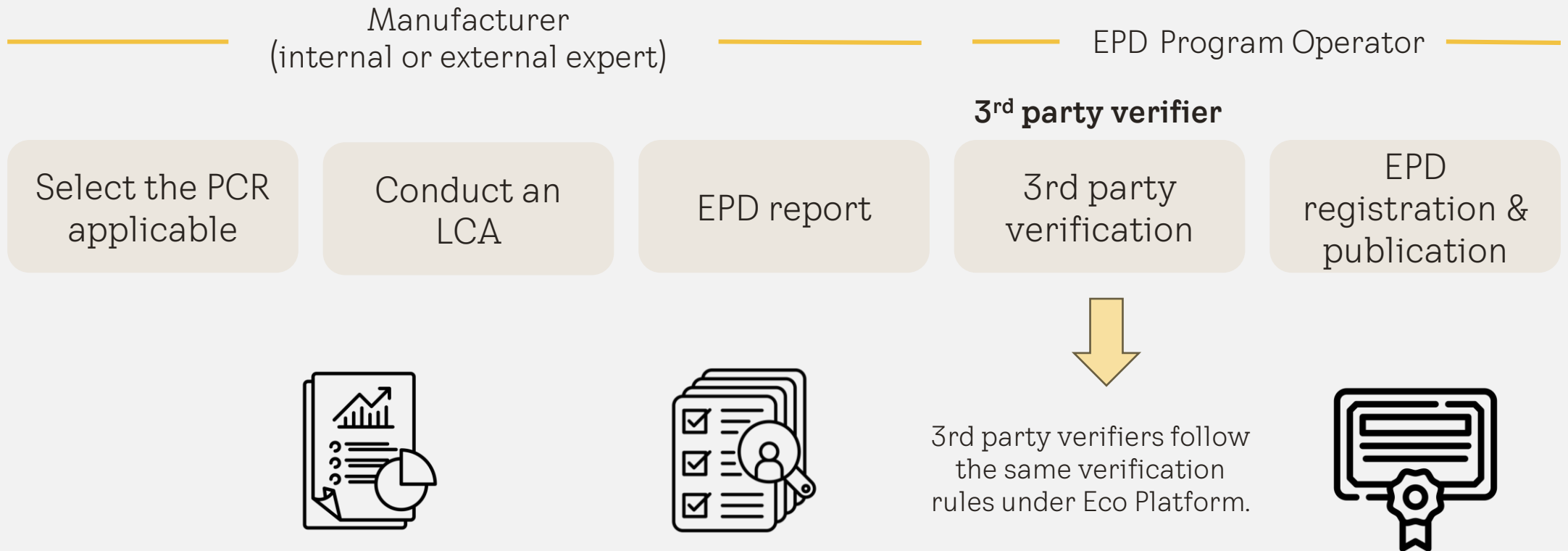
## Performance declaration



- Information regarding the potential environmental performance currently included in Environmental Product Declarations (EPD) is transferred to the DoPC

# Process of issuing an EPD today

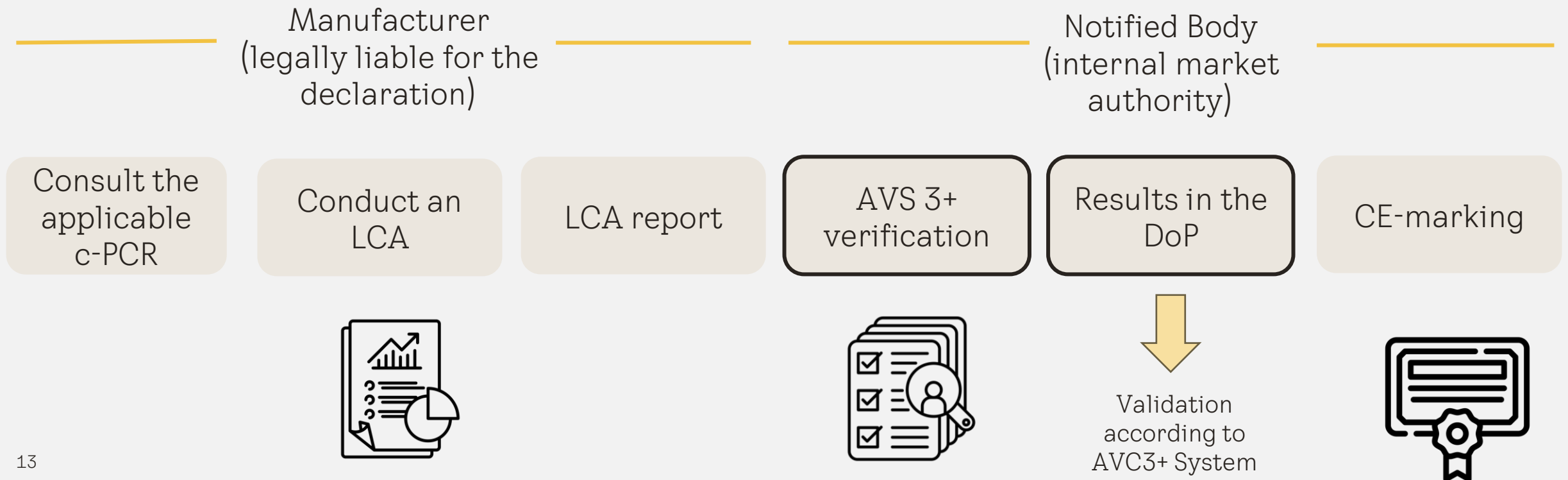
An EPD is a voluntary declaration today - not an entry point to market a product. Although its role is significant on decarbonization efforts in the build environment.



# From EPD to future DoP environmental sustainability

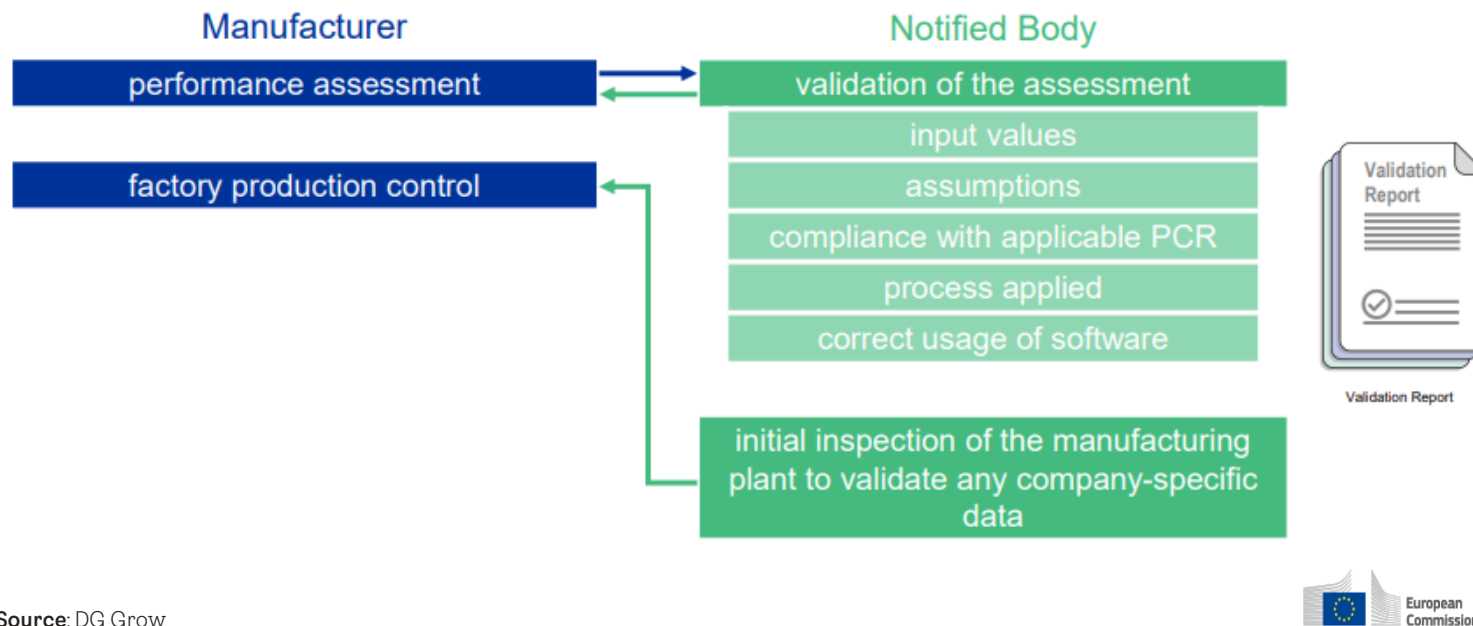
- A Declaration of Performance (DoP) will include LCA results, and it is required to place the product in the EU market.  
The EPD voluntary scheme is transformed into a regulatory compliance aspect.

## The new process



# Assessment of Verification System (AVS) 3+

## Milestone C – AV system 3+

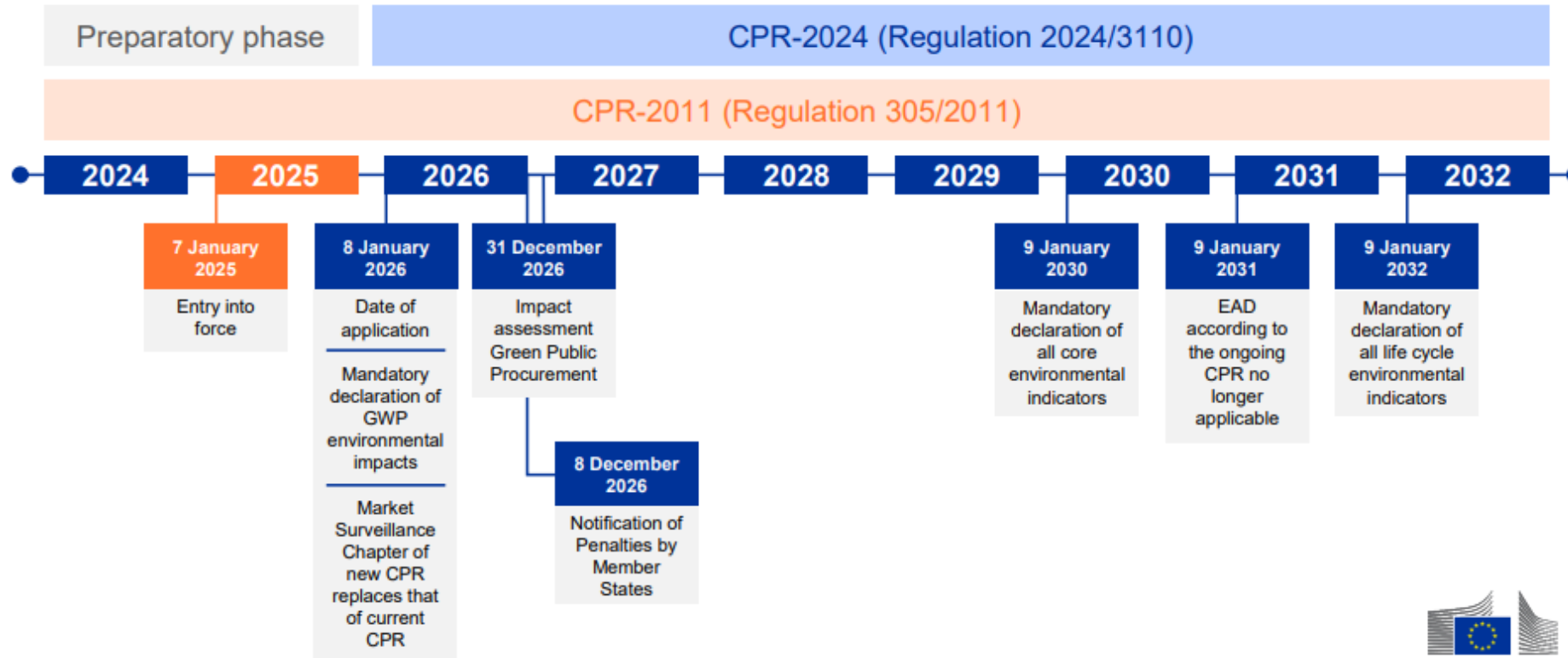


Source: DG Grow

- **Validation** of plausibility of **input values**, e.g., energy bills, Bill of materials, emission reports, databases, etc.
- **Validation of LCA**, such as, conformity with calculation rules, primary data quality (consistency, accuracy, completeness, representativeness), uncertainties and calculation model.
- **Validation of the process** applied, including data collection, allocation, treatment of waste, default values for data gaps.
- **Validation of the LCA software**, regarding its completeness, correctness, appropriateness, security and integrity.
- **Physical factory inspection** to validate specific data.

# Implementation timeline and relation with other EU policies

# Timeline of CPR implementation



- Declaration of **GWP** from **2026** for those product families that have a revised harmonized standard.
- **Member States** may request to include **more indicators than GWP** that are currently part of EPDs (e.g., primary energy is already used in building LCAs).



Source: DG Grow



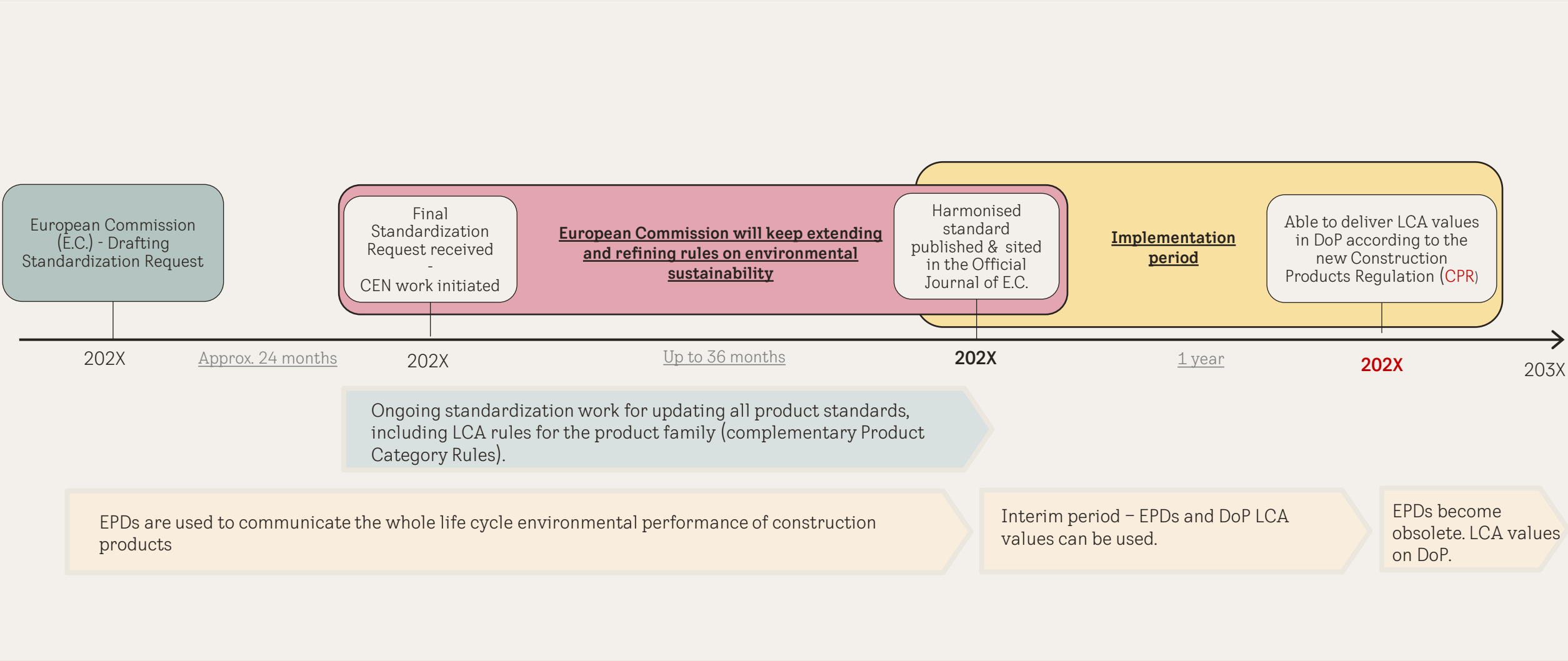
# Timeline of CPR implementation

No. Product family in Annex VII.	Product family	Code	Milestone I	Milestone III	Standardisation request	Standard's delivery deadline	Standard made mandatory and DA adoption	Product requirements DA
1	precast normal/lightweight/autoclaved aerated concrete products	PCR	finished	finished	Q2 2025	Q4 2025	Q4 2025	no
20	structural metallic products and ancillaries	SMP	finished	finished	Q3 2025	Q4 2025	Q2 2026	no
2	doors, windows, shutters, gates and related building hardware	DWS	finished	finished	Q1 2026	2028	2029	2029
16	reinforcing and prestressing steel for concrete (and ancillaries) - post tensioning kits	RPS	finished	Q4 2025	Q2 2026	2029	2029	under discussion
15	cement, building limes and other hydraulic binders	CEM	finished	finished	Q3 2025	Q3 2027	Q4 2027	no
4	thermal insulation products - composite insulating kits/systems	TIP	finished	ongoing	Q3 2026	2029	2029	under discussion
30	flat glass, profiled glass and glass block products	GLA	finished	ongoing	Q1 2026	2028	2029	2028
6	chimneys, flues and specific products	CHI	finished	ongoing	Q3 2026	2028	2028	
13	structural timber products/elements and ancillaries	STP	ongoing	Q1 2026	Q3 2026	2029	2029	
14	wood based panels and elements	WBP						
26	products related to concrete, mortar and grout	CMG	ongoing	Q1 2026	Q4 2026	2029		
17	masonry and related products - masonry units, mortars, and ancillaries	MAS	ongoing	Q2 2026	Q1 2027			

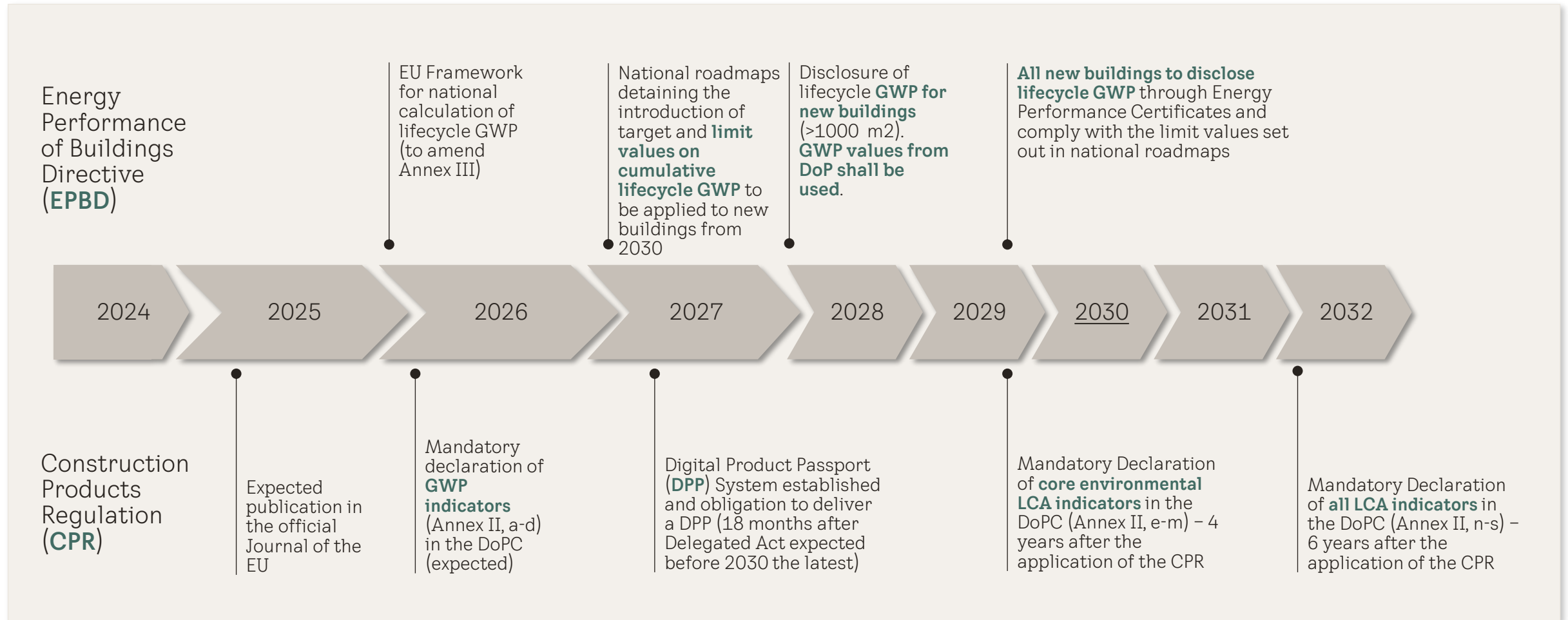


No. Product family in Annex VII.	Product family	Code	Milestone I	Milestone III	Standardisation request	Standard's delivery deadline	Standard made mandatory and DA adoption
24	aggregates	AGG	ongoing	Q2 2026	Q1 2027	2029	
9	curtain walling/cladding/structural sealant glazing	CWP	finished	Q2 2026	Q4 2026	2029	
10	fixed fire fighting equipment (fire alarm/detection, fixed firefighting, fire and smoke control and explosion suppression product)	FFF	Q2 2026	Q1 2027	Q3 2027		
23	road construction products (asphalt etc.)	RCP	Q1 2026	Q3 2026	2027		
19	floorings	FLO	Q2 2026	Q4 2026	2027		
34	building kits, units, and prefabricated elements	KAS	Q2 2026	Q2 2027	2027		
21	internal & external wall and ceiling finishes - internal partition kits	WCF	Q3 2026	Q3 2027	2028		
7	gypsum products	GYP	Q3 2026	Q3 2027	2028		
5	structural bearings - pins for structural joints	SBE	Q4 2026	Q4 2027	2028		
27	space heating appliances and other heating and cooling appliances	SHA	Q4 2026	Q4 2027	2028		
22	roof coverings, roof lights, roof windows, and ancillary products - roof kits, PV Panels	ROC	2027	2027	2028		
12	circulation fixtures: road equipment (paints, traffic signs, road restraint systems)	CIF	2027	2027	2028		
18	waste water engineering products	WWD	2027	2028			
25	construction adhesives	ADH	2027	2028	2029		
32	sealants for joints	SEA	2027	2028	2029		

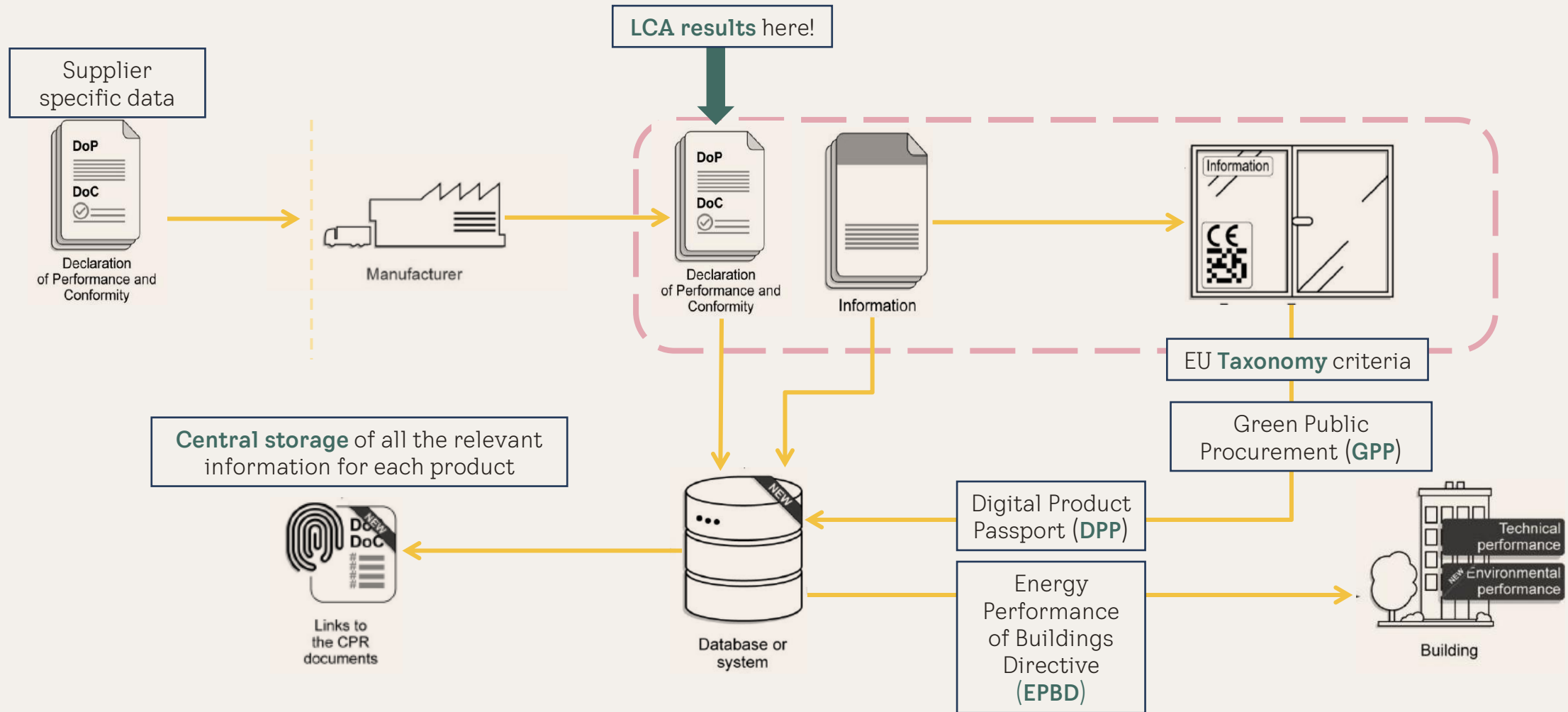
# Activity Roadmap – From SReq to final DoP



# Timeline of CPR and Energy Performance of Buildings Directive (EPBD)



# Relation of CPR with other EU policies



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