

20/10/2025

BPIE welcomes the publication of the draft Delegated Act setting out a Union framework for the national calculation of life-cycle GWP of new buildings and is generally supportive of its contents.

Harmonisation

The main purpose of the EU framework is to create consistency and comparability across Member States by harmonising whole-life carbon calculation methodologies. Establishing comprehensive minimum requirements, particularly with regards to the included life-cycle modules, building elements and the data hierarchy, supports harmonisation of national WLC regulation implementing the EPBD. This common foundation ensures a baseline level of consistency, enables comparison and brings down cost of compliance while still granting Member States the freedom to customise certain aspects according to their unique national context. In our view, the draft of the Delegated Act adequately fulfils this purpose, which is why we recommend to keep the comprehensive approach taken in it.

Reporting format

It is positive that the results of the GWP calculation are to be reported separately for the different life-cycle stages, but further disaggregation is possible and recommended. BPIE recommends that the Delegated Act also requires Member States to collect and disclose separate values for GWP-fossil, GWP-bio and GWP-LULUC in the EPC, as a complement to the GWP-total. Furthermore, results should be expressed both in absolute (total emissions) and relative (per floor area) values. While not all these values can be displayed on the front label, they can be included in the technical information in the EPC to provide more context, support interpretation of the results and inform decision-making.

BPIE also recommends that Member States collect detailed data beyond the figures displayed in the EPCs. Collecting additional data is an important opportunity for building capacity and raising knowledge about the national building stock, that should not be missed. Such data will be needed for the creation of well-designed policy roadmaps. The Delegated Act should include wording that strongly encourages Member States to collect data beyond what will be disclosed in the EPC.

Supporting circularity

Increasing circularity in construction is an important contributing strategy for bringing the sector in line with climate commitments. In its current form, the Delegated Act makes no reference to supporting circular approaches but relies entirely on the standard EN 15978 in this regard. The Commission must therefore ensure that the standard provides sufficient clarity around how to account for the carbon savings from circular construction approaches. It should facilitate the inclusion and recognition of reused and recycled materials to achieve immediate emission reductions, while encouraging practitioners to model and demonstrate the potential benefits of design-for-disassembly and reuse as additional life-cycle scenarios for the end-of-life stage.

Review

The EU framework for the national calculation of life-cycle GWP will need to be reviewed periodically to reflect future revisions of the EN standard, improved data availability, and changes in market practices. BPIE recommends that wording on such planned reviews is introduced in the Delegated Act.

Further reading

- [INDICATE D4.1 - Guidance and Principles of a WLC Framework](#)
- [Defining a common vision for climate neutral buildings](#)