

REHVA CONTRIBUTION TO THE DELEGATED ACT ON THE EU FRAMEWORK FOR CALCULATING THE GLOBAL WARMING POTENTIAL OF NEW BUILDINGS

30 October 2025

REHVA is the Federation of European Heating, Ventilation and Air Conditioning Associations (HVAC). It represents over 120,000 HVAC designers, building services engineers, and technicians across 24 European Countries.

REHVA agrees on the overall approach proposed by the Commission in the Delegated Act to advance the harmonisation of GWP calculations across Member States. In particular, we agree with other feedback that emphasises the importance of reducing administrative burdens and ensuring a level playing field in the GWP calculation process. To this end, the degree of flexibility granted to Member States should be limited and managed at the EU level.

We would like to raise a question regarding the life-cycle stages listed in Table 2 of the document Annex - Ares(2025)8384118. Specifically, the Maintenance (B2) and Repair (B3) modules are challenging to estimate due to limited data availability and precision. All these phases are related to assumptions, and defining the typical cycle of intervention is not easy. Moreover, their GWP is relatively low compared to other modules. These phases rely heavily on assumptions, and defining a typical intervention cycle is complex. Other modules, such as A5, C1 and D, are also generally calculated using assumptions or generic data. Including these stages in the calculation may risk overcomplicating the procedure without significantly contributing to the decarbonization of buildings, even though the Commission clearly states in the table that Member States may limit the calculation to product-level information and equivalent generic data or default values. The draft regulation states that all data must be sourced from the CPR/ESPR. Under the CPR, no specific background database is designated; this results in large discrepancies between different sources. This should be addressed.

Regarding the Annex - Ares(2025)8384118 document, we also believe that including the building elements and technical equipment listed in Tier 3 of Table 4 as minimum requirements (shell and core categories) could overburden the calculation process. Items such as sanitaryware, IT and data systems, external building-mounted lighting, etc., are typically assessed using generic data; they are now completely lacking, but it is unclear whether they should be considered, because of the considerable impact of the building services components on the embodied carbon of a building.

Furthermore, the allocation of installations for building-related on-site renewable energy generation is unclear. At present, different options appear possible, which will lead to confusion in practice. It may also result in undesirable differences between Member States. The recommendation is to choose the method whereby the entire installation for renewable energy generation is included, but only as it is connected behind the meter. On the other hand: even when EPDs are available, collecting this level of detail at the building level remains burdensome. Therefore, it would be reasonable to fix Tier 2 as the minimum requirement, and Tier 3 can be left voluntary to be decided by Member States