



DPC: 25/30512040 DC

BSI Group Headquarters

389 Chiswick High Road London W4 4AL

Tel: +44 (0)20 8996 9000

Fax: +44 (0)20 8996 7400

www.bsigroup.com

Date: 15 May 2025

Origin: European

Latest date for receipt of comments: 08 July 2025

Project No. 2025/00994

Responsible committee: B/542/8 Light transmitting plastics sheeting for roofing and cladding. Prefabricated accessories for roofing

Interested committees:

Title: Draft BS EN 18189 BS Rooflights and roof hatches. Environmental Product Declarations. Complementary product category rules (cPCR) to EN 15804.

Please notify the secretary if you are aware of any keywords that might assist in classifying or identifying the standard or if the content of this standard

- i) has any issues related to 3rd party IPR, patent or copyright
- ii) affects other national standard(s)
- iii) requires additional national guidance or information

WARNING: THIS IS A DRAFT AND MUST NOT BE REGARDED OR USED AS A BRITISH STANDARD. THIS DRAFT IS NOT CURRENT BEYOND 08 July 2025

This draft is issued to allow comments from interested parties; all comments will be given consideration prior to publication. No acknowledgement will normally be sent. **See overleaf for information on the submission of comments.**

No copying is allowed, in any form, without prior written permission from BSI except as permitted under the Copyright, Designs and Patent Act 1988 or for circulation within a nominating organization for briefing purposes. Electronic circulation is limited to dissemination by e-mail within such an organization by committee members.

Further copies of this draft may be purchased from BSI Shop <http://shop.bsigroup.com> or from BSI Customer Services, Tel: +44(0) 20 8996 9001 or email cservices@bsigroup.com. British, International and foreign standards are also available from BSI Customer Services.

Information on the co-operating organizations represented on the committees referenced above may be obtained from <https://standardsdevelopment.bsigroup.com/>.

Responsible Committee Secretary: Mr Christopher Starr (BSI)

Direct tel:

E-mail: christopher.starr@bsigroup.com

Full document details: 25/30512040 DC

Introduction

This draft standard is based on national and international discussions. Your comments on this draft are invited and will assist in the preparation of the consequent standard.

For international standards, comments will be reviewed by the relevant UK national committee before sending the consensus UK vote and comments to the international committee, which will then decide appropriate action. If the international standard is approved, it is usual for the text to be published as a British Standard.

For national standards, comments will be reviewed by the relevant UK national committee and the resulting standards published as a British Standard.

UK Vote

Please indicate whether you consider the UK should submit a negative (with supporting technical reasons) or positive vote on this draft. Please indicate if you are aware of any reason why this draft standard should not be published as a British Standard.

Submission of Comments

- **Annotated drafts are not acceptable and will be rejected.**
- All comments should be submitted online at <https://standardsdevelopment.bsigroup.com/>. You will need to register in order to comment.

Template for comments and secretariat observations

Date: xx/xx/20xx	Document: ISO/DIS xxxx
------------------	------------------------

1	2	(3)	4	5	(6)	7
MB	Clause No./ Subclause No./Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note	Type of comment	Comment (justification for change) by the MB	Proposed change by the MB	Secretariat observations on each comment submitted
	3.1	Definition 1	ed	Definition is ambiguous and needs clarifying.	Amend to read '...so that the mains connector to which no connection...'	
	6.4	Paragraph 2	te	The use of the UV photometer as an alternative cannot be supported as serious problems have been encountered in its use in the UK.	Delete reference to UV photometer.	

English Version

**Rooflights and roof hatches - Environmental Product
Declarations - Complementary product category rules
(cPCR) to EN 15804**

Dachoberlichter und Dachluken -
Umweltproduktdeklarationen - Ergänzende
Produktkategorieregeln zur EN 15804

This draft European Standard is submitted to CEN members for enquiry. It has been drawn up by the Technical Committee CEN/TC 128.

If this draft becomes a European Standard, CEN members are bound to comply with the CEN/CENELEC Internal Regulations which stipulate the conditions for giving this European Standard the status of a national standard without any alteration.

This draft European Standard was established by CEN in three official versions (English, French, German). A version in any other language made by translation under the responsibility of a CEN member into its own language and notified to the CEN-CENELEC Management Centre has the same status as the official versions.

CEN members are the national standards bodies of Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Republic of North Macedonia, Romania, Serbia, Slovakia, Slovenia, Spain, Sweden, Switzerland, Türkiye and United Kingdom.

Recipients of this draft are invited to submit, with their comments, notification of any relevant patent rights of which they are aware and to provide supporting documentation.

Warning : This document is not a European Standard. It is distributed for review and comments. It is subject to change without notice and shall not be referred to as a European Standard.



EUROPEAN COMMITTEE FOR STANDARDIZATION
COMITÉ EUROPÉEN DE NORMALISATION
EUROPÄISCHES KOMITEE FÜR NORMUNG

CEN-CENELEC Management Centre: Rue de la Science 23, B-1040 Brussels

Contents	Page
European foreword	4
1 Scope	5
2 Normative references	5
3 Terms and definitions	6
3.1 Complementary terms of construction product	6
3.2 Product dimension	8
4 Abbreviations	9
5 General aspects	9
5.1 Objective of this complementary PCR	9
5.2 Life cycle stages relevant for the EPD	9
5.3 Comparability of EPD for construction products	10
5.4 Additional environmental information	10
5.4.1 General	10
5.4.2 Additional impact indicators	10
5.4.3 Additional information on carbon offset, carbon storage and delayed emissions	10
5.4.4 Additional Information not derived from LCA	10
5.5 Ownership, responsibility and liability for the EPD	10
5.6 Communication formats	10
6 Product Category Rules for LCA	10
6.1 Product category	10
6.2 Life cycle stages and their information modules to be included	10
6.2.1 General	10
6.2.2 A1-A3, Product stage, information modules	10
6.2.3 A4-A5, Construction process stage, information modules	10
6.2.4 B1-B5, Use stage, information modules related to the building fabric	11
6.2.5 B6-B7, Use stage, information modules related to the operation of the building	11
6.2.6 C1-C4, End-of-life stage, information modules	11
6.2.7 D, Benefits and loads beyond the system boundary, information module	11
6.3 Calculation rules for the LCA	11
6.3.1 Functional or declared unit	11
6.3.2 Functional unit	11
6.3.3 Declared unit	11
6.3.4 Reference service life (RSL)	12
6.3.5 System boundaries	13
6.3.6 Criteria for the exclusion of inputs and outputs	16
6.3.7 Selection of data	16
6.3.8 Data quality	17
6.3.9 Developing product level scenarios	17
6.3.10 Units	17
6.4 Inventory analysis	17
6.4.1 Collecting data	17
6.4.2 Calculation procedures	17
6.4.3 Allocation of input flows and output emissions	17
6.4.4 Information on biogenic carbon content	17
6.5 Impact assessment	17
6.5.1 General	17
6.5.2 Core environmental impact indicators	17
6.5.3 Additional environmental impact indicators	17
7 Content of the EPD	17
7.1 Declaration of general information	17
7.2 Declaration of environmental indicators derived from LCA	18
7.3 Scenarios and additional technical information	18

7.3.1	General	18
7.3.2	Construction process stage	18
7.3.3	Use stage	20
7.3.4	End-of-life	25
7.4	Additional information on release of dangerous substances to indoor air, soil and water during the use stage	30
7.5	Aggregation of information modules	30
8	Technical documentation	30
8.1	General	30
8.2	LCA-related elements of the technical documentation	30
8.3	Documentation on additional information	30
8.4	Data availability for verification	30
9	Verification and validity of an EPD	30
Annex A (informative)	Guidance for defining a representative product within a product range	32
Bibliography		33

European foreword

This document (prEN 18189:2025) has been prepared by Technical Committee CEN/TC 128 "Roof covering products for discontinuous laying and products for wall cladding", the secretariat of which is held by NBN.

This document is currently submitted to the CEN Enquiry.

1 Scope

This document provides product category rules (PCR) for Type III environmental declarations for rooflights and roof hatches to be used on upstands in flat and slightly inclined roofs.

This document complements the core rules for the product category of construction products as defined in [1]. This document is used in conjunction with [1] and does not replace it.

The core PCR:

- defines the parameters to be declared and the way in which they are collected and reported;
- describes which stages of a product's life cycle are considered in the EPD and which processes; are to be included in the life cycle stages;
- defines rules for the development of scenarios;
- includes the rules for calculating the Life Cycle Inventory and the Life Cycle Impact Assessment underlying the EPD; including the specification of the data quality to be applied;
- includes the rules for reporting the predetermined, environmental and health information that is not covered by Life Cycle Assessment (LCA) for the product, construction process(es) and construction service(s), as relevant;
- defines the conditions under which construction products can be compared based on the information provided by EPD.

For the EPD of construction services the same rules and requirements apply as for the EPD of construction products.

This document applies to rooflights and roof hatches with upstands as well as rooflights and roof hatches supplied without an upstand, intended for use on upstands. The rooflights and roof hatches may be individual or continuous types.

The main purpose of rooflights is to transmit daylight into the building. Roof hatches provide mainly access to the roof. But beside their primary purposes these products can be used for different additional functions e.g.

- natural ventilation;
- fire compartmentation and smoke control;
- emergency exit;
- natural smoke and heat exhaust ventilation in accordance with [2].

So the functions and the products are not fixed linked to each other.

Construction products covered by these complementary product category rules are:

- individual rooflights and individual rooflights with upstands;
- roof hatches;
- continuous rooflights and continuous rooflights with upstands.

2 Normative references

The following documents are referred to in the text in such a way that some or all of their content constitutes requirements of this document. For dated references, only the edition cited applies. For

undated references, the latest edition of the referenced document (including any amendments) applies.

EN 12101-2:2003, *Smoke and heat control systems - Part 2: Specification for natural smoke and heat exhaust ventilators*

EN 15942:2021, *Sustainability of construction works - Environmental product declarations - Communication format business-to-business*

EN 15804:2012+A2:2019, *Sustainability of construction works - Environmental product declarations - Core rules for the product category of construction products*

3 Terms and definitions

For the purposes of this document, the terms and definitions given in EN 15804:2012+A2:2019¹ and the following apply.

ISO and IEC maintain terminology databases for use in standardization at the following addresses:

- IEC Electropedia: available at <http://www.electropedia.org/>
- ISO Online browsing platform: available at <http://www.iso.org/obp>

3.1 Complementary terms of construction product

3.1.1

rooflight

fixed or openable light transmitting construction product intended to be installed externally on upstands in flat and slightly inclined roofs to admit daylight and solar gains and potentially for ventilation

Note 1 to entry: Rooflights consist of one or several [light transmitting part\(s\)](#) and may include some opaque infill(s), as well as associated profiles and accessories.

Note 2 to entry: Openable rooflights and/or openable parts of rooflights may be manually and/or power operated.

Note 3 to entry: Rooflights may be individual or continuous.

Note 4 to entry: The term [rooflight](#) does not include an [upstand](#).

3.1.1.1

rooflight with upstand

[rooflight](#) supplied with a suitable [upstand](#)

Note 1 to entry: Rooflights with upstand consist of one or several [light transmitting part\(s\)](#), an [upstand](#) and may include some opaque infill(s), as well as associated profiles and accessories.

¹ As impacted by EN 15804:2012+A2:2019/AC:2021.

3.1.2

roof hatch

openable, opaque or light transmitting construction product intended to be installed externally on upstands in flat or slightly inclined roofs to provide access for persons, goods, and services as well as possibly ventilation and light transmittance

Note 1 to entry: Roof hatches consist of one or more openable or removable [lid\(s\)](#) and may include base frames, as well as associated profiles and accessories.

Note 2 to entry: Roof hatches may be manually and/or power operated.

Note 3 to entry: Roof hatches are usually fully factory assembled and supplied as one unit. Joining of factory-made connections e.g. between the light transmitting part(s) and the opening frame or between the light transmitting part(s) themselves may be done at site due to the manufacturer's instructions.

Note 4 to entry: The size of roof hatches is limited to 2,50 m by 4,00 m [base size of the upstand](#).

Note 5 to entry: The term [Roof hatch](#) does not include an [Upstand](#).

3.1.2.1

roof hatch with upstand

[roof hatch](#) supplied with a suitable [upstand](#)

Note 1 to entry: Roof hatches with upstand consist of one or more openable or removable [lid\(s\)](#), an [upstand](#) and may include base frames, associated profiles and accessories.

Note 2 to entry: Roof hatches with upstand are usually fully factory assembled and supplied as one unit. Joining of factory-made connections e.g. between the [lid](#) and the [upstand](#) may be done at site due to the manufacturer's instructions.

3.1.3

lid

openable or removable uppermost part of a [roof hatch](#) or an openable [rooflight](#) that covers all or part of the opening

Note 1 to entry: A lid can be formed as a single opaque component without associated profiles or it can consist of one or more [light transmitting part\(s\)](#) and/or opaque infill(s) with associated profiles and accessories.

Note 2 to entry: In an equivalent manner the words flap or leaf may be used.

3.1.4

light transmitting part

light transmitting construction element made of light transmitting materials (e.g. GF-UP, PC, PMMA, PVC, glass) which consists of at least an outside skin which ensures water run off by form or orientation and several additional light transmitting sheets below optionally

3.1.5

hardware

connection equipment, opening and locking device and/or seal for the assembly of e.g. [rooflight](#), [roof hatch](#), [light transmitting part\(s\)](#), [upstand](#) and profiles

3.1.6

power operating accessories

are operational components equipped to the [rooflights](#) or [roof hatches](#) for power operation of built-in functions incorporated in the products e.g. for power operated opening and closing of openable elements or power operated shading

3.1.7

upstand

construction component which lifts a [rooflight](#) or a [roof hatch](#) out of the roof-plane and provides area for the fixture and the connection to the roof waterproofing layer

Note 1 to entry: Rooflights and roof hatches are always intended for installation on an upstand but may be supplied with or without an upstand.

Note 2 to entry: The upstand transmits the loads acting upon the rooflight or roof hatch into the substructure.

Note 3 to entry: Upstands may include ventilation devices.

Note 4 to entry: The upstand is single or multi-walled or composite with vertical and/or pitched sides; with or without thermal insulation.

3.1.7.1

base dimension of the upstand

intended dimension of the roof opening at the outer surface of the roof for which the [upstand](#) of a [rooflight with upstand](#) or a [roof hatch with upstand](#) is designed as shown in [Figure 2](#) for the width

Note 1 to entry: Usually the base size of the upstand corresponds to the opening dimension of the upstand at its base.

3.1.8

clear opening dimension

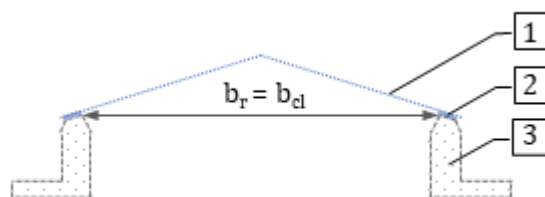
dimension of the minimum opening of the [upstand](#) for [rooflights](#) or [roof hatches](#) with upstand as shown in [Figure 1](#) and [Figure 2](#) for the width

Note 1 to entry: For rooflights or roof hatches without upstand the clear opening dimension correspond to the opening dimension of the rooflight or roof hatch. It may be reduced by the on-site upstand.

Note 2 to entry: A base frame if any can reduce the clear opening dimension.

3.2 Product dimension

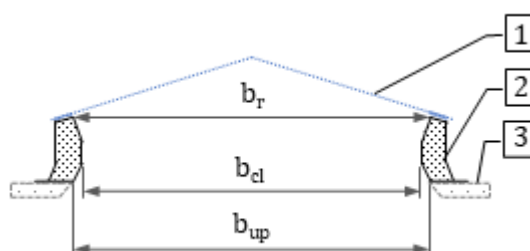
The definition of the general product dimension is shown in [Figure 1](#) and [Figure 2](#) for the width.



Key

- 1 rooflight or roof hatch
- 2 connection of the rooflight or roof hatch
- 3 on-site upstand and roof
- b_r opening dimension (width) of the rooflight or roof hatch
- b_{cl} clear opening dimension (width)

Figure 1 — Rooflight or roof hatch without upstand



Key

- 1 rooflight or roof hatch
- 2 upstand
- 3 intended on-site roof opening
- b_r opening dimension (width) of the rooflight or roof hatch
- b_{up} base dimension (width) of the upstand
- b_{cl} clear opening dimension (width)

Figure 2 — Rooflight or roof hatch with upstand

4 Abbreviations

The abbreviations of EN 15804:2012+A2:2019 apply.

5 General aspects

5.1 Objective of this complementary PCR

This complementary product category rules provide specific guidance about the modelling approach of [1] to be applied to the processes related to the product family of [rooflights \(3.1.1\)](#) and [roof hatches \(3.1.2\)](#). This complementary product category rules therefore:

- give guidance about the modelling approaches to be applied to the processes related to the product family;
- provide information for functional and declared units to ensure harmonization;
- recommend system boundaries to achieve a high degree of harmonization;
- specify harmonized scenarios for the modules transport, installation and the modules of the use stage and the end-of-life stage as well as for Module D, benefits and loads;
- offer default data for processes, inputs, and outputs in accordance with the worst-case scenario principle to be used only if more reliable data are not available;
- provide information for the reference service life (RSL) of the specific construction products.

5.2 Life cycle stages relevant for the EPD

EN 15804:2012+A2:2019 shall apply.