



Think Concrete, Go precast

## Statement on the Product Environmental Footprint Guide

BIBM took note of the publication of the European Commission (EC) Communication on “Building the Single Market for Green Products” (COM/2013/0196) on 9 April 2013, and welcomes its aim to “contribute to improving the availability of clear, reliable and comparable information on the environmental performance of products and organisations to all relevant stakeholders”.

The key part of this Communication is the Product Environmental Footprint (PEF) guide which uses a life cycle analysis (LCA) approach to measure the environmental performance of a product or organisation throughout its life cycle.

BIBM agrees that LCA approach is the appropriate tool for sustainability assessment for construction works.

However, BIBM has doubts about the PEF methodology for assessment of construction products, and instead advocate the use of CEN/TC 350 standards, which have been developed on LCA basis as well.

1. The proposed PEF allows one to calculate the environmental footprint of a *product*. In the construction context, the product in question is the building. In other word, construction products are intermediate products, so it makes no sense to assess them outside the building context.
2. BIBM believes that the CEN/TC 350 environmental assessment methodology should be considered as the valid reference document for the Product Environmental Footprint assessment of Buildings. These voluntary horizontal standardised methods have been developed as a result of a mandate of the European Commission, and they assess the sustainability aspects of construction works.

It includes in particular the following documents:

- EN 15643-1 and EN 15643-2 “sustainability of construction works - sustainability assessment of buildings Part 1: general framework and Part 2: framework for the assessment of environmental performance”
- EN 15804 “Sustainability of construction works - environmental product declarations - core rules for the product category of construction works”
- EN 15942 - “Sustainability of construction works - environmental product declarations - communication format Business-to-Business”
- EN 15978 “Sustainability of construction works - assessment of environmental performance of buildings - calculation method”

Since the PEF guide recommends the development of sector-specific rules (PEFCRs), the Precast Concrete industry is willing to work with the Commission with to using the CEN/TC 350 methodology as the PEFCR for buildings.



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3. Because of the specificities of the assessment of a building, the PEF methodology would require some fine-tunings if applied to our sector:
  - As indicated above, CEN/TC 350 environmental assessment methodology and PEF can be considered as equivalent, provided that PEF does not look at construction products individually but at the building as a whole. The PEF methodology requires using the NACE codes as the reference for product categories. However, the NACE codes do not provide a reference code for buildings, which is why this requirement cannot be fulfilled.
  - The approach of CEN/TC 350 environmental assessment methodology is slightly different from PEF when it goes beyond the end of life of the system. The long life and complexity of construction works mean that the end of life stage cannot be considered in the same way as for short-lived consumer products.
4. We consider it essential that the indicators required for construction products and the methodologies used to calculate them be the same all across Europe.
5. Despite the large efforts made by the industry to build a quality database of construction products EPDs, the current situation does not allow the fulfilment of the PEF data quality requirement (up to 10% of use of generic data).

**The use of the PEF could be acceptable for construction products, if and only if PEFCRs for construction sector were wholly based on CEN/TC 350 standards and all contradictory elements of the PEF were ignored.**