



Think Concrete, Go Precast

BIBM comments on the Public Consultation on Sustainable Buildings

BIBM welcomes the initiative of the Commission to improve the sustainability of buildings. However, BIBM notes, that the title of the consultation doesn't correspond to the content, because it concentrates only on the environmental axe of sustainability, while the social and economic axes are missing, therefore this is misleading.

If these social and economic aspects are not considered in conjunction with the environmental aspects, there is a risk that the result will not be truly sustainable.

Therefore, BIBM calls the Commission to enlarge the scope of the consultation and include all the three aspects of sustainability. Considering only the environmental aspects gives a false image of sustainability and causes further confusions.

If the Commission decides not to widen the scope of the consultation and the future communication, BIBM believes that it is more appropriate to rename the future communication "Green Buildings", which clearly refers to the environmental impacts only.

Also, when it comes to the environmental impacts, BIBM sadly note that the energy efficiency of buildings has been excluded from the scope and addressed separately. There are risks in this approach. Embodied energy and in-use energy of a building must be assessed and addressed in combination, otherwise the result could be very different from the intended aim. For example, if a construction product with lower embedded impacts leads to higher impacts over the use phase of the building, then it is not preferable to another product with higher embedded impacts. The simple example of a double-glazed window compared to a single-glazed one demonstrates this: two panes means twice the embedded energy but also considerably lower energy use over the life of the building.

BIBM welcomes the recognition that life-cycle analysis (LCA) methods receive. The questionnaire focuses on Environmental Performance Declarations) and assessment at the level of construction products specifically, we suggest that the Commission is referring to Environmental Product Declarations here.

As correctly stated in the questionnaire, EPDs do not necessarily lead to better performance. In addition, they should not be used to compare products based on selective reading of their contents, as this would be misleading. The point of EPDs is not to achieve "better performing construction products" – rather they are for facilitating building-level assessment in order to achieve better performing buildings.

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