BIBM's position paper on the Draft Report on Resource Efficiency: moving towards a circular economy (2014/2208 INI)

BIBM welcomes the own initiative report on Resource Efficiency: moving towards a circular economy (2014/2208 INI) and agrees that important actions must be taken to moving towards a circular economy.

Indicators on sustainable buildings

When it comes to sustainable building indicators and building passports, we insist that there must be consistency between approaches proposed by different parts of the European Commission, such as between Joint Research Centre's work on GPP criteria for office buildings; the work emerging from the Communication on resource efficiency opportunities in the building sector (COM (2014) 445) and this own initiative report.

BIBM agrees that horizontal approach is the preferred approach and that a full life-cycle assessment including all life-cycle stages of the building is the right option, when it comes to assessing the performance of buildings. Cradle to gate construction product EPDs are therefore relevant only in providing the data for Module A (according to the CEN/TC 350 definition) in this full life-cycle analysis and shall never be used for comparison

The development of such horizontal approach should take into account existing voluntary certification schemes such as LEED (many countries), BREEAM (many countries), Verde (Spain) and DGNB (Germany) in order to converge towards a common scheme or at least to work on the same principles (see EN 15804).

Amendment 1
Draft Report

Proposal for definition

Sustainable building	Sustainable construction1: Application of sustainable development and sustainable architecture principles to the construction process, i.e: use of fewer virgin materials, less energy in construction, less energy in use, less pollution and less waste, leading to a sustainable use of the building/infrastructure.

[1] The definition is from the Sustainable Construction Glossary published by the European Economic and Social Committee, prepared by the European Economic and Social Committee, Architects Council of Europe and European Concrete Platform, revised in 2014. Source: http://www.eesc.europa.eu/resources/docs/qe-01-14-701-4h-n.pdf

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Although the Sustainable Construction Glossary published by the European Economic and Social Committee (mentioned above) doesn't contain a definition for sustainable buildings, a recent study prepared by the Joint Research Centre on "Building Design for Safety and Sustainability" contains some important element that should be taken into account:

"A building is better expressed as a process than a product." "….when referring to sustainable buildings apart from all three aspects of sustainability, the principle of quality and durability of structures should also be taken into account. Enhancing the durability of structures contributes in achieving sustainability since the service life of a building is extended and thus annualized environmental impacts are reduced respectively."[2]

Amendment 2
Draft Report

Proposal for definition

Construction material	Construction material[3]: Material used in the construction industry to create buildings and structures, e.g. steel, timber, aggregates, plaster, concrete and plastic products as well as manufactured products.

Resource Efficiency Indicators

As BIBM expressed during the Public Consultation on Resource Efficiency Indicators at the end of 2012, Resource Efficiency Indicators should not "only captures the material resources aspects" but it is necessary to "deal with other resources or the potential shift of burden across countries such leakage". This is not acceptable and indicators must provide incentives to avoid this.

In order to make the indicator really useful for the desired purposes, two principles should be taken into account:

- The reduction of resource use should be assessed at the (resource) production level, not at the product (use) level.
- The use of a resource should be always seen in comparison to its relative availability (or scarcity)

Further issues that need to be considered are the access to resources (in terms of absolute abundance/scarcity, geographical location of reserves and burden of transporting resources over long distances, geopolitical considerations regarding resource independence, environmental impact of extracting resources). In particular, use of scarce

[2] Joint Research Centre: Building Design for Safety and Sustainability, 2014; page 29. Source: http://publications.jrc.ec.europa.eu/repository/bitstream/JRC93115/lbna27116enn.pdf

[3] The definition is from the Sustainable Construction Glossary published by the European Economic and Social Committee, prepared by the European Economic and Social Committee, Architects Council of Europe and European Concrete Platform, revised in 2014. Source: http://www.eesc.europa.eu/resources/docs/qe-01-14-701-4h-n.pdf

resources is an issue to be addressed. Abundantly available materials doesn't jeopardise the resource independence of Europe.

Amendment 3
Draft Report

Indicators and targets
(New)

	Urges the Commission that when developing new indicators, to take into account indicators such as abundance/scarcity; transportation distance of resources, geographical location of reserves, resource independence and environmental impact of accessing resources.

Ecodesign Directive

The calculation of the environmental performance of construction products has been the subject of extensive standardisation work in CEN/TC350 as mandated by the European Commission[4].

BIBM would like to specify, that construction products have specific features (intermediary products), therefore some principles should be taken into account when assessing their environmental performance:

1. Design and installation of the product/system should be accounted for.
2. Environmental assessment should be carried out at building level.
3. A life-cycle thinking approach, which incorporates all relevant product environmental aspects from cradle to grave, must be promoted.

Furthermore, BIBM has concerns over the secondary route to CE marking (through Ecodesign) without fulfilling the so-called 'essential characteristics', established under the Construction Products Regulation.

We consider it crucial to have a single methodology to assess the environmental performance of construction products and construction works. Therefore, we believe that any future possible measure on construction products should be based on the CEN/TC350 methodology.

Amendment 4
Draft Report

Ecodesign
Point 11

[4] Mandate M350: Development of horizontal standardised methods for the assessment of the integrated environmental performance of buildings.

Urges the Commission to propose a review of the Ecodesign Directive by the end of 2016, incorporating the following important changes: broadening the scope to cover all main product lines; gradually including all relevant resource-efficiency features in the mandatory requirements for product design; introducing a mandatory product passport based on these requirements; implementing self-monitoring and third-party auditing to ensure that products comply with these standards; and defining horizontal requirements on, inter alia, reusability and recyclability;	Urges the Commission to propose a review of the Ecodesign Directive by the end of 2016, incorporating the following important changes: broadening the scope to cover all main product lines ***that are not yet already covered by sustainability principles***; gradually including all relevant resource-efficiency features in the mandatory requirements for product design; introducing a mandatory product passport based on these requirements; implementing self-monitoring and third-party auditing to ensure that products comply with these standards; and defining horizontal requirements on, inter alia, reusability and recyclability;

Waste hierarchy and recycling

BIBM welcomes that waste hierarchy is recognised as one of the six core concepts of resource efficiency.

When applying the waste hierarchy - prevention, reduction, reuse, recycle, recovery, disposal – it is important to note, that future policies shall encourage the options that deliver the best overall environmental, social and economic outcomes, while assessing these options on the basis of life-cycle thinking.

Consequently, it is not always a given that closed-loop recycled material has the least environmental impact. BIBM calls the European Parliament to acknowledge the benefits open-loop recycling as well (reuse in another application leading to the same reduction of use of primary raw materials but with reduced environmental and economic burdens). Both open-loop and closed-loop recycling can have environmental benefits: one is not necessarily better than the other when they both prevent the extraction of virgin raw materials for a given use.

BIBM strongly supports the phasing out toxic substances from the recycling circle, thus this can negatively affect both the environment and human well-being.

Amendment 5
Draft Report

Indicators and targets
Point 5.

Stresses that by 2050 the EU's use of resources needs to be sustainable; this includes fully implementing a cascading use of resources, sustainable sourcing, a waste hierarchy, creating a ***closed loop*** on non-renewable resources, using	Stresses that by 2050 the EU's use of resources needs to be sustainable; this includes fully implementing a cascading use of resources, sustainable sourcing, a waste hierarchy, creating ***the best (closed or open)*** loop on non-renewable resources,

renewables within the limits of their renewability and phasing out toxic substances;	using renewables within the limits of their renewability and phasing out toxic substances;

Legislative and economic incentives

BIBM approves that legislative and economic incentives are necessary in order to create a demand for secondary raw materials and also to set a high quality requirement for them.

BIBM believes that the “polluter pays” principle should be fully implemented and taxes should be paid on pollution.

However, BIBM objects to the taxation of natural resource at extraction, because this has proven to bring market distortion without promoting the use of secondary materials. Focus should be put instead to facilitate the market at the end-of-life, which is the only sustainable path. Easy-to-recycle materials (steel, glass, concrete etc…) are already finding good markets for the reuse in similar applications or for the substitution of primary resources in other applications.

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