



Resource Efficiency – moving towards a circular economy (2208 INI)

SUMMARY

BIBM - the Federation of the European **Precast Concrete** Industry - took note of the Amendments tabled in Committee and would like to share its views.

Supports the principles of Resource efficiency towards a circular economy and its application to construction products

Calls MEPs to use the appropriate (existing) legislative framework for the implementation of these principles in order to reduce the administrative burden for enterprises in the construction materials field (mainly SMEs)

Amendment N.	Vote	Document Page
187	NEGATIVE	3
193	NEGATIVE	4
207	NEGATIVE	5
262	NEGATIVE	6
281	POSITIVE	8
348	POSITIVE	9
353	POSITIVE	10
355	NEGATIVE	11
360	POSITIVE	12
372	POSITIVE	13
376	NEGATIVE	14
377	POSITIVE	15
380	POSITIVE	16
390	POSITIVE	17
392	POSITIVE	18





GENERAL COMMENTS

The European Commission started a fitness check of the construction sector in order to clear the overlapping regulations and additional administrative burden disadvantaging the SMEs.

With this principle in line, BIBM - who represent the precast concrete industry whose companies are at least 95% small and medium enterprises (SMEs) - would like to draw the attention of the Rapporteur, the Shadow Rapporteurs and the Members of the Committee, to avoid creating double burdens and overlapping legislations. This would restraint the development of the European Construction Sector, mainly the construction products manufacturers and their competitiveness.

While BIBM agrees that construction products must have their contribution to resource efficiency - therefore they should be in the scope of the current own initiative report (2208 INI) and the forthcoming new proposal on waste prepared by the European Commission - BIBM believes, that there are already existing legislations which could tackle the mentioned issues (such as sustainable exploitation of natural resources or product design) without adding additional administrative burden.

Below, please find some additional comments linked to actual amendments.

BIBM (from the French acronym “Bureau International du Béton Manufacturé”) is the European Federation of Precast Concrete Industry, established in 1954, representing the interest of precast concrete industry of 15 European countries with a combined industry turnover of 22 billion Euro, directly employing approximately 164,000 European citizens.





Amendment 187
Josu Juaristi Abaunz

Motion for a resolution
Paragraph 10

Motion for a resolution

10. Points out that the amount of resources used by a product over its lifetime is largely determined during the design phase;

Amendment

10. Points out that the amount of resources used by a product over its lifetime is largely determined during the design phase ***and calls on the Commission to implement generic information and design requirements both within the scope of the existing Ecodesign Directive and beyond, tackling other resource-intensive product groups like construction materials, furniture or textiles;***

BIBM's opinion: Negative

Reasoning:

The Construction Products Regulation's (CPR) "7th Basic Requirement: sustainable use of natural resources" already cover the issue of resource efficiency of the construction products. This, and other relevant information, are (or may be) part of the Declaration of Performance (according to CPR). Creating new legislations such as mandatory product passports or broadening the scope of the Ecodesign Directive may bring similar results with additional administrative burden. **The European Commission should ensure the complete and right implementation of the CPR in the field of resource efficiency.**





Amendment 193

Claude Turmes

Motion for a resolution
Paragraph 10 a (new)

Motion for a resolution

Amendment

10a. Calls on the Commission to propose a new Directive on sustainable product design for non-energy related products by the end of 2016, in particular for resource-intensive product groups like construction materials, furniture or textiles with ambitious ecodesign requirements and a mandatory product passport, rather than extend the scope of the existing Ecodesign Directive to non-energy related products, as a Commission study showed that the existing Ecodesign methodology has been specifically developed for energy-related products and cannot be easily transferred to other main product lines without further modifications and updates;

BIBM's opinion: Negative

Reasoning :

See note of the amendment 187. The priority should be the correct implementation of the CPR. This legislation already covers the issue of resource efficiency (extraction, use phase and deconstruction).





Amendment 207

Massimo Paolucci, Simona Bonafè

Motion for a resolution
Paragraph 11

Motion for a resolution

11. 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;

Amendment

11. *Recalls that the Commission's Roadmap to a Resource Efficient Europe (COM(2011)571) had planned for 2012 to extend the scope of the eco-design directive to non-energy related products; regrets that this has not been done; urges the Commission to propose a comprehensive review of the Ecodesign Directive by the end of 2016, incorporating the following important changes: broadening the scope to cover all main product lines, including non-energy related product groups, construction materials, textiles and furnishings; 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;*

BIBM's opinion: Negative

Reasoning:

The environmental assessment of construction products is already covered by standardisation work.

Because of the specific properties of construction products, the CEN/TC350 assessment methodology was developed to meet the following conditions:

- The methodology takes into account the design and installation of the product/system.
- The assessment of the performance of construction products must be carried out at building level (based on the product's environmental information). Indeed, the





performance of a product will be determined by the characteristics of the construction works such as location, design, installation and use.

Additionally, BIBM is concerned about the possible creation of a secondary route to CE marking, which is presently ruled by the Construction Products Regulation (CPR), is well established and requires the declaration of the so-called ‘essential characteristics’. A parallel route to “another” CE marking of the same product should be avoided.

The standardisation work in CEN/TC350 is mandated (1) by the European Commission. Furthermore, a rapidly growing number of Environmental Product Declarations (EPDs) are being developed according to EN 15804 and these are already available to the market for all kinds of construction products.

Amendment 262
Josu Juaristi Abaunz

Motion for a resolution
Paragraph 14

Motion for a resolution

14. Urges the Commission to submit the announced proposal on the review of waste legislation by the end of 2015 and to include the following points: setting extended producer responsibility requirements; endorsing the ‘pay-as-you-throw-principle’ **prioritising** separate collection schemes in order to facilitate the development of business based on the reuse of secondary raw materials; increasing recycling targets to at least 70 % of municipal solid waste, based on the output of recycling facilities, using the same harmonised method for all Member States with externally verified statistics; introducing a ban on landfilling recyclable and biodegradable waste by 2025 and a ban on all landfilling by 2030; introducing fees on landfilling and incineration;

Amendment

14. Urges the Commission to submit the announced proposal on the review of waste legislation by the end of 2015 and to include the following points: **setting binding waste prevention targets for municipal, commercial and industrial waste to be achieved by 2025; setting a binding food waste reduction target in the manufacturing, retail/distribution, food service/hospitality sectors and households of at least 30% by 2025; setting binding preparation for reuse targets for municipal solid waste and packaging;** setting extended producer responsibility requirements; endorsing the ‘pay-as-you-throw-principle’, **facilitating the introduction of deposit return schemes;** separate collection schemes **for organic waste, textiles, plastics, metals, paper and glass** in order to facilitate the development of business based on the reuse of secondary raw materials; increasing recycling targets to at least 70 % of municipal solid waste, **including re-use and recycling of**





construction and demolition waste, based on the output of recycling facilities, using the same harmonised method for all Member States with externally verified statistics; ***not considering backfilling as part of construction and demolition waste recycling achievements; ending environmentally harmful subsidies, such as those for incineration from the Renewable Energy Directive 2009/28/EC; introducing premiums for energy savings from prevention, preparation for re-use and recycling to be achieved by 2025; introducing a ban on landfilling and incineration of recyclable and biodegradable waste by 2025 and a ban on all landfilling by 2030; introducing annual incremental fees on landfilling and incineration; supporting the design-out of unnecessary single-use, non-recyclable products and toxic materials;***

BIBM's opinion: Negative

Reasoning:

It is not always a given fact that recycled material has the least environmental impact.

First, the distance between the source and construction site could result in additional transportation, which has high environmental impact. An example is the London Olympics where recycled material was transported long distances in order to comply with the rules, while obviously it had worse environmental impacts than using local, abundant natural aggregates.

Second, the availability of the recycled material is variable.

Therefore, a minimum recycled content requirement is counterproductive, especially in the case of locally available materials. When recycled material covers only a small fraction of the need of constituents (10-20 %), it is much better (from an environmental point of view) to use them for some applications (at higher rates) and to avoid in others (where their use is bringing additional environmental impacts). This flexibility should be preserved to achieve an optimum solution in all cases.

When backfilling is correctly implemented (and not used to hide landfilling), it can contribute to reducing the use of virgin material, and therefore it should be recognised as an instrument for resource efficiency. Recycling is not the goal in itself, but the reduced use/extraction of virgin raw materials.





Amendment 281
Simona Bonafè, Massimo Paolucci

Motion for a resolution
Paragraph 14 a (new)

Motion for a resolution

Amendment

14a. Calls on the Commission to submit by 2015 a legislative proposal making it compulsory for biowaste to be collected separately in 2020; calls on the Commission to assess the feasibility of extending the requirement of separate collection to construction and demolition waste, textiles and bulky waste; calls on the Commission to draft a recommendation to Member States to adopt the ‘pay as you throw’ principle for the management of municipal solid waste; calls on Member States to make the separate collection, house to house, of the main fractions more efficient and to increase separate collection by means of a combination of collection centres, reverse collection, collection by appointment and separated-waste collection vehicles which can be stationed temporarily in various places;

BIBM’s opinion: Support

Reasoning:

The separate collection of construction and demolition waste (C&D waste) would help to solve market failures blocking the recycling of C&D waste.





Amendment 348
Mark Demesmaeker

Motion for a resolution
Paragraph 17

Motion for a resolution

17. Calls on the Commission to propose the full implementation of the circular economy principles and requirements in the building sector and to further develop the policy framework on resource efficiency in buildings; **this includes developing indicators, standards and methods as regards land use and urban planning, architecture, structural engineering, construction, maintenance, adaptability, energy efficiency, renovation and reuse and recycling; targets and indicators on sustainable buildings should also include green infrastructure, such as green roofs;**

Amendment

17. Calls on the Commission to propose the full implementation of the circular economy principles and requirements in the building sector and to further develop the policy framework on resource efficiency in buildings; **stresses the importance of a holistic vision with clear objectives for the medium and long term; this involves on the one hand developing a policy framework that includes time as the fourth dimension in the design, construction, maintenance and reuse of buildings, and on the other hand introducing the collection of cradle-to-grave (building product) data and developing an LCA-based method to map out in a holistic manner the environmental impact of the built environment and subsequently further reduce this impact by means of eco-design;**

BIBM's opinion: Support

Reasoning:

Holistic approach and Life Cycle Assessment is the correct way of assessing the environmental performance of construction products. Only when they are assessed in the building or the construction work they are part of, the results may be considered as reliable.





Amendment 353
Massimo Paolucci, Simona Bonafè

Motion for a resolution
Paragraph 17

Motion for a resolution

17. Calls on the Commission to propose the full implementation of the circular economy principles and requirements in the building sector and to further develop the policy framework on resource efficiency in buildings; **this includes developing indicators, standards and methods as regards land use and urban planning, architecture, structural engineering, construction, maintenance, adaptability, energy efficiency, renovation and reuse and recycling; targets and indicators on sustainable buildings should also include green infrastructure, such as green roofs;**

Amendment

17. Calls on the Commission to propose the full implementation of the circular economy principles and requirements in the building sector and to further develop the policy framework on resource efficiency in buildings; **observes that this requires the development of an ambitious long-term vision of Europe's building stock from which a sustainable roadmap of targets can be derived; considers that the inclusion in this vision of the well-being and social needs of users will make buildings more efficient by means of better use of them and by giving them a longer life;**

BIBM's opinion: Support

Reasoning:

A recent study prepared by the European Commission's Joint Research Centre on "Building Design for Safety and Sustainability" confirms, that "...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.**"¹

¹ Joint Research Centre: Building Design for Safety and Sustainability, 2014; page 29. Source: <http://publications.jrc.ec.europa.eu/repository/bitstream/JRC93115/lbna27116enn.pdf>





Amendment 355

Piernicola Pedicini, Marco Affronte, Eleonora Evi, Tiziana Beghin, Dario Tamburrano

Motion for a resolution

Paragraph 17

Motion for a resolution

17. Calls on the Commission to propose the full implementation of the circular economy principles and requirements in the building sector and to further develop the policy framework on resource efficiency in buildings; this includes developing indicators, standards and methods as regards land use and urban planning, architecture, structural engineering, construction, maintenance, adaptability, energy efficiency, renovation and reuse and recycling; targets and indicators on sustainable buildings should also include green infrastructure, such as green roofs;

Amendment

17. Calls on the Commission to propose the full implementation of the circular economy principles and requirements in the building sector and to further develop the policy framework on resource efficiency in buildings; this includes developing indicators, standards and methods as regards land use and urban planning, architecture, structural engineering, construction, maintenance, adaptability, energy **and carbon efficiency of construction materials and construction methods**, renovation and reuse and recycling; targets and indicators on sustainable buildings should also include green infrastructure, such as green roofs;

BIBM's opinion: Negative

Reasoning:

Indicators assessing the buildings and construction works are developed in the standardisation work of CEN TC 350 who received its mandate from the European Commission. **Shall any change be made to the indicators; it should be carried out in the standardisation committees** where all the different stakeholders are sitting around the table, with technical experts ensuring an implementation in line with the economic, societal and environmental constraints.





Amendment 360
Kateřina Konečná

Motion for a resolution
Paragraph 17 a (new)

Motion for a resolution

Amendment

17a. Urges the Commission to further develop indicators, capitalising on existing standards and methods, on the basis of a social, economic and environmental sustainability approach, covering the different stages of the building, from extraction of raw materials over the use phase till the final stage of deconstruction;

BIBM's opinion: Support

Taking into account all the three axes of sustainability is the best condition for achieving a real sustainable construction work.





Amendment 372
Ivo Belet

Motion for a resolution
Paragraph 18

Motion for a resolution

18. Urges the Commission to propose that BAT principles and standards be applied to all materials and parts of buildings and to **develop** a building passport based on the whole lifecycle of a building;

Amendment

18. Urges the Commission to propose that BAT principles and standards be applied to all materials and parts of buildings and to **assess the merits of** a building passport based on the whole lifecycle of a **building, enabling high performance for energy and sustainability, an informed choice on future solutions for maintenance, repair, renovation and recycling, and an efficient deconstruction of the** building;

BIBM's opinion: Support

BIBM agrees with the principle of whole lifecycle and the importance of efficient deconstruction of the buildings. However, it draws the attention to the fact, that product passport are not necessary because they are already covered by the Construction Products Regulation 7th basic requirement: sustainable use of natural resources.





Amendment 376
Claude Turmes

Motion for a resolution
Paragraph 18 a (new)

Motion for a resolution

Amendment

18a. Calls on the Commission to propose, by the end of 2016, legally binding targets for re-use and recycling of construction and demolition waste of 80% by 2025 and 90% by 2030;

BIBM's opinion: Negative

Reasoning:

The use of recycled material does not always have the least environmental impact.

First, the distance between the source and construction site could result in additional transportation, which has high environmental impact. An example is the London Olympics where recycled material was transported long distances in order to comply with the rules, while obviously it had worse environmental impacts than using local, abundant natural aggregates.

Second, the availability of the recycled material is variable. Therefore, a minimum recycled content requirement is not acceptable.

See also reasoning for Amendment 262.





Amendment 377

Piernicola Pedicini, Marco Affronte, Eleonora Evi, Tiziana Beghin, Dario Tamburrano

Motion for a resolution

Paragraph 18 a (new)

Motion for a resolution

Amendment

18a. Calls on the Commission, in the framework of the Construction Products Regulation, to prepare a common and sound basis for environmental product declaration (EPD) of building products;

BIBM's opinion: Support

A common, EU wide recognised environmental product declaration would benefit the industry. However, there should be consistency with the already existing schemes.





Amendment 380
Massimo Paolucci, Simona Bonafè

Motion for a resolution
Paragraph 18 a (new)

Motion for a resolution

Amendment

18a. Calls on the Commission to promote more recycling and reuse of resources by banning landfilling of construction and demolition waste by 2030 and developing infrastructure for separate collection and recycling in the field of construction, in order to be able to access this major source of resources;

BIBM's opinion: Support

This apparently simple statement correctly summarises the right approach to define a legislative framework for the achievement of resource efficiency in the construction sector.





Amendment 390
Claude Turmes
Motion for a resolution
Paragraph 19 a (new)

Motion for a resolution

Amendment

19a. Notes that concrete is one of the most used materials in the construction industry; calls on the Commission to assess the possibilities to increase recycling of concrete in construction, as is the case in Germany and Switzerland;

BIBM's opinion: Support

Concrete is an easily recyclable construction material, especially when it is separated from contaminants at the demolition/deconstruction phase. Recycled concrete find its best application when used for geotechnical works (e.g. road base foundations) because it replaces the use of virgin aggregates and provide some additional remaining binding properties. Transport distances in this case may also be minimised.

The most effective (environmentally speaking) objective is to re-use 100% of the concrete used in construction for its best application, not to impose the use of recycled concrete into a specific construction work.





Amendment 392
Ivo Belet

Motion for a resolution
Paragraph 19 a (new)

Motion for a resolution

Amendment

19a. Calls on the Commission and the Member States to look into the potential of predemolition audits (which is an assessment of a building before deconstruction or demolition to describe the materials present and to define which fractions could be separated for recycling) and on-site sorting of recyclable materials (on-site sorting usually delivers secondary raw materials of higher purity than off-site recycling and can help to reduce environmental impact of transport, for example by crushing/compacting on site).

BIBM's opinion: Support

See rationale to amendment 390

