Statement from CEPMC on the Product Environmental Footprint Guide

26 April 2013

The construction products industry notes 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 the EC intention 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 Product Environmental Footprint (PEF) guide is a key part of the Communication referred above. It uses a life cycle analysis (LCA) approach to measure the environmental performance of a product or organisation throughout its life cycle.

We support the efforts of the Commission to introduce life-cycle assessments as the appropriate tool for sustainability assessment of construction works. It has also been used when developing the CEN/TC 350 standards. CEN/TC 350 was set up as a result of a mandate from the EC to develop voluntary horizontal standardised methods for the assessment of the sustainability aspects of construction works. These standards are based on ISO work and are currently being used by the construction sector. Therefore, LCA methodology is the method of choice for the sector.

Appreciating the possibility of convergence between the PEF and the CEN/TC 350 methodologies, we would like to share the following considerations on the specificities of buildings with regards to environmental assessment:

1. The PEF allows one to calculate the environmental footprint of a *product*. In the construction context, the product in question is the building. The building shall be considered as the final product rather than its individual components (i.e. construction products which are "intermediate" products) in the same way that we do not assess individually the different parts of an electrical appliance when assessing its performance.

2. CEN/TC 350 environmental assessment methodology[i] should be considered as the valid reference document for the assessment of the Product Environmental Footprint of Buildings.
   Since the PEF guide recommends the development of sector-specific rules (PEFCRs), we are willing to work with the EC with a view to using the CEN/TC 350 methodology as the PEFCR for buildings.

3. Due to the specificities of the assessment of a building, the PEF methodology would require some fine-tunings if applied to the construction 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.

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- 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.
- CEN/TC 350 and PEF core tables of indicators contain the same environmental impact categories and assessment methodologies except for indicators related to eco and human toxicity, particulate matter, ionising radiation, and land transformation soil organic matter, which are only present in PEF. As narrowing the suite of indicators is an option foreseen by the PEF guide, CEN TC 350 standards can be used under the PEF scheme.

4. We consider it essential that the same list of indicators and only one methodology are used for buildings and construction products across Europe.

We hope this initial input contributes to a fruitful exchange with all relevant stakeholders.

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[i] This 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"