



Think Concrete, Go precast

bureau international du béton manufacturé  
international bureau for precast concrete  
internationales büro der beton- und fertigteilindustrie

To the European Commission DG Environment  
PE International  
TNO

**RE: PE International answer on *BIBM reaction EC Workshop - Improvement RE in buildings***

BIBM<sup>1</sup> would like to thank you for your answer of 17 June, followed BIBM statement on Improvement Resource Efficiency in buildings. However, BIBM believes that your answer missed the point of BIBM comments sent 23 May 2013.

As for the Option 9.1 we **strongly object** to the fact to compare lightweight and heavyweight masonry and to assume that lightweight construction is more resource efficient or sustainable than heavyweight masonry. Our reason for that is, that the study you developed doesn't consider the benefits of whole reference service life (including use phase) and doesn't include additional obvious benefits of heavyweight masonry such as energy savings. Comparison at building level without taking into account the whole life cycle benefits is misleading and nonsense. Therefore PE International proposal to simply amend the title of option 9.1 is not acceptable.

BIBM strongly saddened by the fact that such **-both technically and politically- incorrect** scenarios and not appropriate assumptions are the basis of such a study.

BIBM would kindly remind the European Commission that recently the so-called "wood decree" in France has been condemned unconstitutional by the French Constitutional Court and therefore has been nullified. The decree imposed a minimum quantity of timber in each new construction and on 24 May 2013, in its decision, the French Constitutional Court stated that the use of timber would not have direct benefits for the environment and indeed violate the right to free enterprise; therefore the decree has been invalidated.

This issue has been previously referred by the European Parliament by MEP Hannu Takkula (ALDE) in 2010 and in the European Commission's answer, replied by **Commissioner Tajani** responsible for Enterprise and Industry, the European Commission pledged **not to favour any construction materials over another**.

Therefore **BIBM calls** the European Commission to **stay consistent**, stick to its previous position and not to favor any construction materials in its Resource Efficiency policy for buildings.

As for the proposed policies, BIBM repeatedly **stands up against the use of Ecolabel** for building products. An **ecolabel** for individual construction products **cannot guarantee adequate, sustainable performance**. It is building design and the combinations of different products which are decisive. Therefore, the sustainability assessment of buildings should be done **at the building level**, based on the CEN standards covering the environmental (mandated by the European Commission), economic and social performance of buildings (CEN/TC 350). Labels (ecolabels etc.) may only target end-products. In the case of works, whole life-cycle assessment at the building level should be used rather than labels being applied to intermediate construction products.

Therefore BIBM repeatedly calls for the **withdrawal of Option 9.1 Use lightweight timber construction instead of heavyweight masonry**, which it believes neither technically, environmentally nor politically correct.

<sup>1</sup> BIBM (from the French acronym "Bureau International du Béton Manufacturé") is the European Federation of Precast Concrete Industry, established in 1954, represents the interest of precast concrete industry of 17 European countries with a combined industry turnover of 26 billion Euro, directly employing approximately 210,000 European citizens.