



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

BIBM- European Federation for Precast Concrete¹ was pleased to be invited and taken part in the *Second Workshop on Scenarios towards a resource efficient Europe*, organized by the European Commission, DG Environment and would like to make some comments concerning the options presented at the meeting.

BIBM took note of the options developed by *Topical Paper 4: Validation of Technical Improvement for Resource Efficiency of buildings and infrastructure*, developed by PE International and *Topical paper 5: Policy options for resource efficiency as input for modeling* prepared by TNO.

However, some options and the studies' approach raised concerns in the Precast Concrete Industry, mainly relating to *Option 9.1 Use lightweight timber construction instead of heavyweight masonry*.

First, BIBM would like to express its disapproval of the idea of comparing construction products and would like to draw the attention to the fact that **comparing intermediary products is misleading and nonsense**.

Secondly, the Federation believes that the study's assumption of timber and concrete having the same reference service life should be revised. When drafting options and considering future optimal scenarios, the European Commission should ensure that the most **appropriate and realistic information** is the one which is taken into account. The use of inappropriate studies and assumption leads to a study built on eroded basis.

Thirdly, it is essential to indicate the importance of **energy savings gained** from the use of heavyweight construction methods². Also, in order to make an appropriate comparison, the study should assess the **whole life cycle of the products** including *use phase* as well and not to stop at assessing the *embodied energy* of products.

Furthermore, reaction to the policies proposed, **BIBM 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 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.

¹ 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.

² European Concrete Platform : Concrete for energy efficient buildings - The benefits of Thermal Mass, available at http://www.europeanconcrete.eu/images/stories/publications/en_energy_performance_brochure.pdf?phpMyAdmin=16bbb563ca43adfed14bd78eb7d8cd8a