

In the context of the European Commission (EC) consultation on the Evaluation of Energy Labelling Directive and certain aspects of the Ecodesign Directive, Construction Products Europe would like to share the following concerns:

### ECODESIGN METHODOLOGY

---

The construction products industry is fully committed to the principles of sustainability and sustainable construction, both at product level and works level, i.e. buildings and infrastructures.

The calculation of the environmental performance of construction products' as part of the overall performance of building works has been the subject of extensive standardisation work in CEN/TC350 as mandated<sup>1</sup> by the European Commission. The horizontal methodology is published in European Standards including EN 15804<sup>2</sup>. We are now witnessing a rapidly growing number of Environmental Products Declarations (EPDs) and also increased harmonization work in product standardisation Technical Committees. EPDs according to EN 15804 are now being used in the whole EU for all kind of construction products.

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

- The methodology takes into account the design and installation of the product/system.
- Assessing the performance of construction products requires the availability of the product's environmental information and it must be carried out at building level.
- A life-cycle thinking approach, which incorporates all relevant product environmental aspects from cradle to grave, must be fostered in order to promote the improvement of overall product performance.

The proposed MEErP methodology is a cross-sectoral, business-to-consumer methodology which does not take into account these fundamental specificities. The table in Annex compares the two methodologies and shows that CEN/TC350 already covers a large majority of the MEErP indicators. However, while CEN/TC350 methodology has a clear declaration purpose, Ecodesign solely aims at defining benchmarking rules. Therefore, we believe that any Ecodesign measure on construction products should be based on TC 350 methodology.

### ECODESIGN & CPR

---

Further to these methodological considerations, Construction Products Europe would like to make the following points.

We are concerned about the creation of a secondary route to CE marking as illustrated in the drawing below. Indeed, construction products fall under the Construction Products Regulation (CPR), which means that their CE marking is well established and requires the declaration of the so-called 'essential characteristics'. Therefore, the implementation of both the CPR and the Ecodesign on the same product should be clear enough to avoid the illegal placement of products on the market.

---

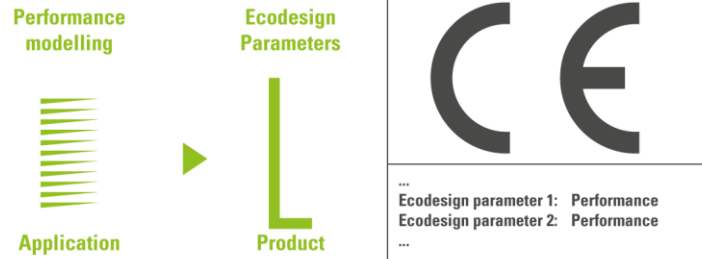
<sup>1</sup> Mandate M350: Development of horizontal standardised methods for the assessment of the integrated environmental performance of buildings.

<sup>2</sup> Sustainability of construction works - Environmental product declarations - Core rules for the product category of construction products.

## Construction Products Regulation



## Ecodesign Directive



2

The upcoming development of the declaration of essential characteristics under the Basic Requirement 7 of the CPR, 'Sustainable use of natural resources'<sup>3</sup>, is meant to provide the same environmental information as the Ecodesign Directive. To ensure policy coherence, we strongly recommend that these legislative processes are consistent and coordinated.

## EC UPCOMING REVIEW

Our industry believes that the EC should now focus on the implementation and uptake of the existing Ecodesign scheme. Furthermore, we recommend ensuring the stability of the system and acquiring experience rather than extending the scope.

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

Founded in 1988, Construction Products Europe is a Brussels-based international non-profit making association. The association is made up of national and European associations that represent Small and Medium-size Enterprises and world-leading companies. Construction Products Europe aims to promote the European construction industry, to share information on EU legislation and standardisation and to provide input in all European construction-related initiatives.

<sup>3</sup> The construction works must be designed, built and demolished in such a way that the use of natural resources is sustainable and in particular ensure the following:

- (a) reuse or recyclability of the construction works, their materials and parts after demolition;
- (b) durability of the construction works;
- (c) use of environmentally compatible raw and secondary materials in the construction works

## Annex: Environmental Product Declaration & MEErP – comparison of indicators

Indicators	TC 350 method EPD (EN 15804)	Ecodesign method MEErP 2011
Use of renewable primary energy ex. energy resources used as raw material	✓	✓
Use of renewable primary energy resources used as raw material	✓	Total energy +
Use of non-renewable primary energy ex. energy resources used as raw material	✓	Electricity
Use of non-renewable primary energy resources used as raw material	✓	
Acidification of land and water	✓	✓
Eutrophication	✓	✓
Global warming potential,	✓	✓
Hazardous waste disposed	✓	✓
Non-hazardous waste disposed	✓	✓
Use of net fresh water	✓	✓
Ionising radiation - human health effects	In discussion	✓
Particulate matter/ Respiratory Inorganics	In discussion	✓
Depletion potential of the stratospheric ozone layer	✓	Not included
Formation potential of tropospheric ozone photochemical oxidants	✓	Not included
Abiotic Resource Depletion Potential for elements	✓	Not included
Abiotic Resource Depletion Potential of fossil fuels	✓	Not included
Use of renewable secondary fuels	✓	Not included
Use of non-renewable secondary fuels	✓	Not included
Radioactive waste disposed	✓	Not included
Components for re-use	✓	Not included
Materials for recycling	✓	Not included
Materials for energy recovery ex. waste incineration	✓	Not included
Exported energy	✓	Not included
Use of secondary material	✓	Not included

Indicators	TC 351 test	Ecodesign method MEErP 2011
Volatile Organic Compounds	✓	✓
Persistent Organic Pollutants	Under development	✓
Heavy Metals	Under development	✓
PAHs	Under development	✓

Indicators	TC 350 social impact assessment	Ecodesign method MEErP 2011
Sound power level	Under development	✓
Vibration	Under development	✓
Electromagnetic fields EMF	In discussion	✓

### CONSTRUCTION PRODUCTS EUROPE - AISBL