



Mr Antonio Tajani
Vice President of the European Commission
responsible for Industry and Entrepreneurship

Mr Janez Potočnik
European Commissioner for the Environment

Brussels, 15 July 2013

Dear Vice-President Tajani, dear Commissioner Potočnik,

On 9 April 2013, the European Commission published the Communication and Recommendation on Boosting the Single Market for Green Products (COM(2013)196). This Communication establishes the Product Environmental Footprint (PEF), a method to measure environmental impacts throughout a product's life cycle.

In this context, the Commission invited volunteers for pilot projects in order to validate, test compliance and verification systems and assess different Business-to-Business and Business-to-Consumer communication tools. From the recent exchanges we had with DG Environment's services, we understand that the European Commission attaches great value in having construction products represented amongst these pilot projects.

The calculation of the environmental performance of construction products as part of the overall performance of buildings has been subject to extensive standardisation work in CEN/TC350, mandated by the European Commission. The EN15804 standard has been published and we are now witnessing, not only a rapidly growing number of Environmental Product Declarations (EPD) being made available, but also increased harmonization work in product standardisation Technical Committees and across all Member States. Environmental Product Declarations according to EN 15804 are now being used in all European countries and for all kind of construction products.

Since 1 July 2013, construction products are regulated by the Construction Products Regulation (Regulation (EU) No 305/2011), including by the application of Basic Work Requirement 7 (Sustainable Use of Natural Resources) of which the specific modalities still await specification by the European Commission.

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As CEN/TC 350 (including EN 15804) and PEF are based on the same fundamental Life Cycle Assessment principles, the construction products sector is following this policy development closely and would like to better understand the intentions and practicalities of these two parallel systems. A first internal consultation in our association has made clear that there is a general lack of understanding throughout the construction products industry on how the future PEF methodology will fit together with the other standardisation and policy initiatives initiated or mandated by the Commission and how building-level assessment will be assured. As the representative organisation of the European construction products industry, it is our role to assist and advise our members in assessing how to position and approach PEF in this context. This will allow them to better consider entering pilot projects at this stage.

Considering the tight deadlines, we would highly appreciate a dedicated meeting with the relevant Commission services and Construction Products Europe to discuss this highly important sustainable construction related subject. We remain at your disposal for any complementary query you may have and look forward to your answer.

Yours sincerely,

Jean-Marie Vaissaire,
President

A handwritten signature in blue ink, appearing to read "J. Vaissaire", with a horizontal line underneath it.

CC : Marzena Rogalska (DG Enterprise)

CC : Tapani Mikkeli (DG Enterprise)

CC : Pavel Misiga (DG Environment)

CC : Michele Galatola (DG Environment)