



Mr Bütikofer
Parlement européen
Bât. Altiero Spinelli
08G302
60, rue Wiertz
B-1047 Bruxelles

Brussels, 14 June 2013

Dear Mr Bütikofer,

Following your appointment as a rapporteur on the Industrial Policy Update, Construction Products Europe (formerly named CEPMC) would like to present you its analysis of the EU policy needs in regards to construction policy.

According to the EC Sustainable Competitiveness Strategy COM (2012) 433, the construction industry generates almost 10% of GDP and provides 20 million jobs mainly in micro and small enterprises. The construction sector is one of the hardest hit by the financial and economic crisis: building and infrastructure works fell by 16% between January 2008 and November 2011 across the EU 27¹.

The European construction industry is proud to have world leading companies as well as SMEs at all levels of the supply chain. These bring versatile and innovative solutions in terms of products, systems and services. Construction Products Europe believes that the EU should recognise and strengthen this leading industry and help it defend its competitiveness¹. The construction sector needs support from the EU to remain competitive. This would be enabled by a predictable, reliable and coherent policy framework. Therefore, coherence between the following initiatives needs to be ensured:

- The Construction Product Regulation (EU) 305/2011 which includes in its Annex I the Basic Requirement for Construction Work number seven on the sustainable use of natural resources;
- The Ecodesign Directive 2009/125/EC;
- The Energy Performance of Buildings Directive 2010/31/EU;
- The Ecolabel Regulation (EC) 66/2010;
- The EU Procurement Directives 2004/18/EC and 2004/17/EC (currently under revision) and in particular the part on Green Public Procurement;
- The Roadmap to a resource efficient Europe COM(2011) 571;

¹ Eurostat press release 169/2011 of 17 November 2011.



- The Communication on “Building the Single Market for Green Products” COM/2013/0196;
- The Sustainable Buildings Communication expected for 2014;
- The soil, water, and waste policy and their possible review.

Acknowledging the release of the Industrial Policy Communication Update - A Stronger European Industry for Growth and Economic Recovery COM(2012) 582 in October 2012, Construction Products Europe wishes to make a few remarks concerning the policies suggested to reach sustainable construction, which is one of the six priority action lines defined in the Communication.

In particular, we would like to draw your attention on the two following policy recommendations:

- **“New European standards will be developed for sustainability criteria related to construction products and processes and the international uptake of Eurocodes will be promoted as part of the implementation of the Action Plan on Sustainable Competitiveness of the Construction Sector in cooperation with the Tripartite Strategic Forum (2013-14).”**

Construction Products Europe strongly believes that sustainability in the construction sector needs to be assessed at the level of the building and not of the product, since the sum of sustainable products does not necessarily result in a sustainable buildingⁱⁱ.

The sustainability assessment of buildings shall be based on the CEN standards covering the environmental, economic and social performance of buildings (CEN/TC 350). This methodology, developed upon EC request, is now in use. Construction Products Europe notes the development of the Product Environmental Footprint (PEF) Methodology and welcomes an LCA approach but insists that CEN/TC 350 standards already provide the appropriate rules for life-cycle assessment of buildings, and, through EPDs, for the declaration of environmental data of construction products to be used in such LCAs.

The European Commission is considering using Eurocodes to define criteria for the assessment of environmental performance. CEN TC350 standards already cover the assessment of sustainability for construction products so we consider that there is no need to include this in the scope of Eurocodes.

We welcome the Commission’s intention to promote the international uptake of Eurocodes since it will increase the competitiveness of European companies outside Europe.

Our policy recommendation:

Prior to the development of new standards, we consider that it would be best to apply/test the existing methodology with the possibility of further improvements through CEN procedure.



- **“The Commission will implement specific ecodesign regulations on industrial product, including in particular those having a significant impact on the environment during their life cycle; support the faster and cheaper delivery of ecodesign policy objectives through sectoral voluntary agreements; jointly review the energy labelling directive and certain aspects of the ecodesign directives to maximise their effectiveness; support ecodesign advisory services through the Enterprise Europe Network to better address the needs of SMEs (2012 onwards).”**

The Ecodesign Directive now includes energy related products (ERPs) and aims to provide EU-wide rules for improving their environmental performance (framework Directive 2009/125/EC), whilst preventing disparate national legislations.

When it comes to energy efficiency, Construction Products Europe agrees that the existing building stock must be renovated or rebuilt and that new buildings must meet the Nearly Zero Energy standards. However, construction products are not end-use products. These are intermediary products and, as for any assessment scheme, the energy efficiency and sustainability targets must be set at the building level to ensure fully functioning systems. Minimum requirements per square meter or kilogram of construction product do not provide any indication of performance in specific building designs.

On 1 July 2013, the Construction Product Regulation (305/2011/EU - CPR) will come into force and replace the current CE marking rules as defined by the Construction Product Directive (89/106/EEC-CPD). Basic work requirements are set for construction works. Should the setting of minimum performance requirements be required, it must be noted that Article 3.3 of the CPR allows the European Commission to set such threshold values. It is our understanding that the CPR takes priority over Ecodesign Directive for achieving such objectives. In addition, minimum energy performance for elements of the building envelope (e.g. windows) are required by the recast Energy Performance of Buildings Directive (2010/31/EU – EPBD) in case of renovation as described in Article 4.1 and 7. The EPBD is thus a second existing Community legislative document through which minimum performance requirements can be set for construction productsⁱⁱⁱ.

Our policy recommendation:

Delete the reference to the Ecodesign directive as there are already existing community legislative documents

We remain at your disposal should you need any complementary information regarding our sector.

Sincerely,

Christophe Sykes
General Director

ⁱ Annex I: the European Construction Forum manifesto regarding competitiveness

ⁱⁱ Annex II: CEPMC Thematic Group 3 input – 250413

ⁱⁱⁱ Annex II: CEPMC reflection on the Ecodesign Directive & Mandate M/495 - 16 May 2012