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## Sustainable products initiative

### BIBM feedback

BIBM supports the objectives of the Sustainable Product Policy Initiative (SPPI) within the new Circular Economy Action Plan, one of the action plan's most important initiative to shift towards a well-functioning European market for secondary raw materials and circular products. We fully share the Commission's ambition towards achieving more sustainable and digital Europe.

Construction industry worked relentlessly during the last years to accomplish these goals under a European approach considering that the environmental performance of construction products only make sense in the context of the building or the construction works (the final "product"). Construction products are CE marked according to Regulation (EU) 305/2011 (CPR) and the EC is discussing how environmental performance of products is going to be integrated in this product policy.

When it comes to the construction sector, the Commission should take into account that:

- Circularity in construction can only be addressed in a holistic approach respecting the subsidiarity principle (market regulated at European level and construction works at National level). Regulation (EU) 305/2011 (CPR) was developed to be able to deal with this competence sharing. Environmental assessments should be done at **building level**, rather than at product level. The assessment should be over the whole life cycle of the building/structure.
- Construction products manufacturers deliver **Environmental Product Declarations** under a voluntary approach according to a European methodology for the assessment of the environmental performance of products exists. It is standardised in CEN documents developed by CEN/TC 350 e.g. EN 15804+A2 and it is aligned with the PEF methodology. The information provided is complete and include additional indicators to the PEF list e.g. renewable energy use. We must emphasize that the approach of EN 15804 is particularly adapted to the specific peculiarities of the construction sector and that the European Commission's Level(s) framework has relied on this EPD information.

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For precast in particular:

- Precast concrete products lifespan is longer than usual consumer products and it did not become shorter over the last decades; on the contrary, durability of concrete elements is constantly improved.
- The idea of “mandatory recycled content” would not lead to better environmental and circularity performances in all cases:
  - Recycled concrete can be used both in bound (e.g. new concrete) or unbound (e.g. geotechnical works) applications. When used in unbound applications, recycled concrete has better performances than natural aggregates and should therefore be the preferred re-use of concrete after its first life;
  - It is assessed that using 100 % of recycled concrete could cover between 10 % and 20 % of the yearly needs of aggregates; recycled materials can therefore be unavailable or should be transported from high distances, which would negatively affect the life cycle impacts;

Therefore the positive impacts of using recycled materials should be assessed on local/regional bases, taking into account the needs, the availability and the transportation distances.

The regulatory overlap between CPR and Ecodesign is not justified because the scope of the first already covers a potential wider scope of the Ecodesign. In addition, duplication of CE marking according to two legislative frameworks delivering the same performance information is misleading for the market and creates an unjustified risk of regulatory clash. Declaration of Performance (DoP) according to the CPR proved to be an excellent instrument to implement public procurement; environmental information integrated in DoP will serve for this purpose without the need for additional regulatory frameworks.

BIBM fully agrees with Construction Products Europe that there is no need to widen the Ecodesign legal framework for construction products because Regulation (EU) 305/2011 offers enough and even more instruments to achieve the European Union goals as regards sustainability.