

# Stakeholder consultation on the Staff Working Document

## "Scenarios for a transition pathway for a more resilient, greener and more digital construction ecosystem"

Fields marked with \* are mandatory.



The [update of the EU Industrial Strategy](#) highlights the need to accelerate the green and digital transitions of EU Industry. Among the various instruments, the Commission proposed to co-create, in partnership with industry, public authorities, social partners and other stakeholders, transition pathways for ecosystems, where needed. Priority should be given also to sectors heavily affected by the crisis, which benefit from accelerating their twin transition in order to boost their recovery. Construction has been recognised to be one of these critical ecosystems and therefore, it will be tackled first, by co-creating its transition pathway together with its stakeholders.

The Commission services have prepared a [Staff Working Document](#) to outline possible scenarios for a transition pathway for a more resilient, green and digital construction ecosystem. For the creation of this Staff Working Document, the service responsible engaged in dialogue with the construction ecosystem. Approximately 250 stakeholders were consulted in the High Level Construction Forum and thematic digital, green and resilience cluster group meetings that took place in September and October 2021.

You are now invited to provide **feedback on the [Staff Working Document](#) through this online consultation form**, which consists of the following chapters:

0. Introduction
1. About you
2. Publication of information
3. Consultation questions

- 3.1 EU level strategies and other legislative initiatives
- 3.2 Vision 2030: Towards a resilient, green and digital construction ecosystem
- 3.3 Supporting the ecosystem transition and long-term horizontal challenges
- 3.4 Key performance indicators
4. Expression of interest in concrete pledges and commitments
5. Other comments

**This survey will be open until 28 February 2022.** You are, however, warmly encouraged to send your responses as soon as possible to facilitate early analysis.

In case of questions about this consultation, please send an email to [GROW-CONSTRUCTION-TRANSITION-PATHWAY@ec.europa.eu](mailto:GROW-CONSTRUCTION-TRANSITION-PATHWAY@ec.europa.eu)

*Please note: If you wish to re-visit this form, you have the option save your progress (by clicking 'save as draft') and return to complete the form at a later stage - provided that the final input is submitted before the deadline.*

## 1 About you

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### I am giving my contribution as:

\* 1.1 First Name

Magdalena

\* 1.2 Last Name

Herbik

\* 1.3 Type of stakeholder

- Academic/research institution
- Business association
- Company
- Consultancy
- EU institution
- Financial institution
- International body
- Local public authority (e.g. city)
- National ministry
- Non-governmental organisation (NGO)
- Permanent representation
- Private agency
- Public agency
- Regional public authority
- Other public authority
- Other private organisation

Citizen

\* 1.5 Full name of the organisation you represent

BIBM - Federation of the European Precast Concrete Industry

\* 1.6 Country represented

*(For network organisations, please indicate the country of the headquarter and as a private citizen the country of residence)*

Belgium

\* 1.8 Role within your organisation

Public Affairs and Communication Officer

## 2 Publication of information

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The European Commission (Unit GROW.H.1) will publish a report on DG GROW website with an overview of contributions and a summary of the input received. No personal information of the respondents will be published.

2.1 *You can access the privacy statement hereunder.*

[privacy\\_statement\\_consultation\\_on\\_SWD\\_construction.docx.pdf](#)

I agree with the personal data protection provisions

## 3 Consultation

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### 3.1 EU level strategies and other legislative initiatives

You are invited to review the list of EU level strategies and other (legislative) initiatives presented in Section 1.5 of the [Staff Working Document](#). You may choose which questions you answer and leave others empty.

3.1.1 Were you previously aware of the below-mentioned EU level strategies?

*(\*) Upcoming initiatives or expected revisions or updates*

	Yes	No
Renovation wave	<input checked="" type="radio"/>	<input type="radio"/>
New Circular Economy Action Plan	<input checked="" type="radio"/>	<input type="radio"/>
EU Climate Adaptation Strategy	<input checked="" type="radio"/>	<input type="radio"/>
European Skills Agenda for sustainable competitiveness, social fairness and resilience	<input checked="" type="radio"/>	<input type="radio"/>

Zero Pollution Action Plan	<input checked="" type="radio"/>	<input type="radio"/>
Chemicals Strategy for Sustainability	<input checked="" type="radio"/>	<input type="radio"/>
Bioeconomy Strategy	<input checked="" type="radio"/>	<input type="radio"/>
(*) Communication "Sustainable carbon cycles"	<input checked="" type="radio"/>	<input type="radio"/>
(*) Regulatory framework for the certification of carbon removals	<input checked="" type="radio"/>	<input type="radio"/>
(*) EU Forest Strategy 2030	<input checked="" type="radio"/>	<input type="radio"/>

### 3.1.2 Were you previously aware of the below-mentioned legislative initiatives?

(\*) *Upcoming initiatives or expected revisions or updates*

	Yes	No
Fit for 55 legislative package	<input checked="" type="radio"/>	<input type="radio"/>
EU Emissions Trading Scheme (ETS)	<input checked="" type="radio"/>	<input type="radio"/>
Social Climate Fund	<input checked="" type="radio"/>	<input type="radio"/>
Waste Framework Directive	<input checked="" type="radio"/>	<input type="radio"/>
Sustainable Products Initiative	<input checked="" type="radio"/>	<input type="radio"/>
European Accessibility Act	<input type="radio"/>	<input checked="" type="radio"/>
(*) Ecodesign Directive	<input checked="" type="radio"/>	<input type="radio"/>
(*) Drinking Water Directive	<input checked="" type="radio"/>	<input type="radio"/>
(*) Effort Sharing Regulation (ESR)	<input checked="" type="radio"/>	<input type="radio"/>
(*) Energy Efficiency Directive (EED)	<input checked="" type="radio"/>	<input type="radio"/>
(*) Energy Performance Building Directive (EPBD)	<input checked="" type="radio"/>	<input type="radio"/>
(*) Construction Products Regulation (CPR)	<input checked="" type="radio"/>	<input type="radio"/>

### 3.1.3 Were you previously aware of the below-mentioned 'other' initiatives?

	Yes	No
New European Bauhaus (NEB) initiative	<input checked="" type="radio"/>	<input type="radio"/>
Report "Towards a shared culture of architecture - Investing in a high-quality living environment for everyone"	<input checked="" type="radio"/>	<input type="radio"/>
Affordable housing initiative	<input checked="" type="radio"/>	<input type="radio"/>
Energy Poverty Recommendation	<input type="radio"/>	<input checked="" type="radio"/>
Pact for Skills	<input checked="" type="radio"/>	<input type="radio"/>
Blueprint for Sectoral Cooperation on Skills initiative	<input checked="" type="radio"/>	<input type="radio"/>

European Alliance for Apprenticeships	<input checked="" type="radio"/>	<input type="radio"/>
EU Building Stock Observatory	<input checked="" type="radio"/>	<input type="radio"/>
European Construction Sector Observatory (ECOSO)	<input checked="" type="radio"/>	<input type="radio"/>

3.1.4 Are the links and synergies between the above-mentioned EU level strategies and other (legislative) initiatives sufficiently clear and well-understood in your organisation?

- Yes  
 No

3.1.5 Please explain your answer in the box below

*2000 character(s) maximum*

Messages are confusing. As all Energy Intensive Industries (EIIs) included in the EIIs Transition pathways, concrete is not included in the construction ecosystem, even though the European Green Deal (EGD) recognises our industry as important to the EU economy. We believe that a coordination between these two work streams is key for both ecosystems and the EGD goals.

BIBM and Construction Products Europe believe that the CPR does not need a deep review to comply with the legalities imposed by EU law. Nevertheless, construction products representative organisations have been confronted with extremely complex and confusing options for its new configuration.

Construction products in general respond to the requests of professional users and consumers for environmental information through EPDs based on EN 15804 + A2. While we have seen a push by the Commission to adopt the Product Environmental Footprint methodology in new initiatives, we still believe EPDs to be the way forward in the construction ecosystem.

Policies should be developed that support and drive the decarbonisation of life-cycle emissions for all building materials on an equal and fair basis. The full supply chain concept of the EGD should stimulate an increased dialogue between manufacturers, builders, contractors, planners, architects, and end-users.

Therefore, policies promoting one type of material against another would do little for climate protection.

Material and technology neutrality are key principles of EU policymaking. We believe that built environment policies should be material neutral and policies related to forestry and the bioeconomy should avoid promoting wood in construction via policy means. The legislator can prescribe science-based targets or objectives to be reached by construction materials but should express a preference for one building material over another, which is being the case throughout several Commission proposals.

3.1.6 Has your organisation (or have you) reflected on how to seize the opportunities and benefits of these initiatives and the links and synergies they may represent?

- Yes, we have developed our own strategy, position or other addressing these issues  
 No, but we plan to do so / are in the process of doing so  
 No, we have not

3.1.7 Please explain your answer in the box below. You may also provide a link in the textbox below and/or use the upload function to provide relevant strategy documents.

*2000 character(s) maximum*

In September 2021, ahead of the first High-Level Construction Forum meeting, Construction Products Europe published an analysis of European initiatives related to the green, digital and resilient construction ecosystem. This publication identified numerous European Commission initiatives, their interactions, and impact on the construction industry. In short, it may be seen as a substitute to the built environment strategy that had been promised by the Commission.

Link: <https://www.construction-products.eu/publications/green-digital-and-resilient-construction-ecosystem-roadmap/>

3.1.8 Please upload any supporting documents (if relevant)

3.1.9 Considering the relationship between national legal provisions, policies, instruments and the above described EU actions or proposed actions, do you consider these to be consistent and synergetic with each other?

- Yes they are
- They are partially synergetic and consistent
- No they are not

3.1.10 What are the inconsistencies you identified and what do you think is missing? How can greater consistency and synergies be ensured?

*2000 character(s) maximum*

Some national provisions like R2020 in France favour wood in construction using the temporary carbon storage concept while the Commission in its Sustainable Carbon Cycles Communication underlines that “There is, however, still no scientific consensus about methodologies to measure such storage, in particular concerning its duration”. The Commission even requested clarification to France through the TRIS procedure.

At EU level, we believe there are inconsistencies in Commission’s initiatives: promoting the development of Life Cycle Assessments (LCAs) while at the same time pushing for temporary storage or calling for the replacement of mineral-based construction products by wood. LCAs are key to take due consideration of all environmental aspects (chemicals, biocides). The proposal to reward the use of wood in construction mentioned in the Sustainable Carbon Cycles Communication is a good example. Here we do note that the study commissioned by DGL CLIMA has concluded that “(...) the identified carbon saving levels are not of enough significance to prompt a major market signal to increase the uptake of wood-based construction products.”

3.1.11 How could the Commission better communicate upcoming changes as well as ongoing initiatives and opportunities to raise awareness? And what could the Commission do to better engage the construction ecosystem's stakeholders in such policy developments?

*2000 character(s) maximum*

These initiatives are moving in parallel at different paces, bringing in new elements to report on (e.g., whole-life carbon in the EPBD, for which the methodology based on Level(s) will be adopted by delegated acts) or declare (environmental issues in the CPR for which the methodology remains unknown), and the implications will be significant.

We believed that the High-Level Construction Forum would be a good platform for communication, exchange, and engagement of stakeholders but then we were surprised with that construction product manufacturers that are in the energy intensive industries ecosystem are excluded from the construction ecosystem (and coordination is not yet evident). We were also surprised to see in the Staff Working Document (SWD) with the transition pathway for a more resilient, greener, and more digital construction ecosystem there is no reference to material neutrality despite the HLCF agreeing on it during the workshops. On the contrary, the Commission SWD is explicitly favoring wood in construction (even if wood manufacturing is also excluded from the construction ecosystem). There is also a reference to the potential for buildings to act as a temporary carbon sink through the “the use of organic building materials that can store carbon”. Here we would like to underline that the CO<sub>2</sub> uptake in concrete, which permanently traps the CO<sub>2</sub>, and transforms the built environment into carbon sinks, has been recognized in the Full Sixth Assessment Report of the Intergovernmental Panel on Climate Change and should be included in the Construction Transition Pathway.

## 3.2 Vision 2030: Towards a resilient, green and digital construction ecosystem

You are invited to reflect the different issues, actions and roles as well as the possible output scenarios presented in the [Staff Working Document](#) for the key themes of Resilience, Green and Digital. You may choose which questions you answer and leave others empty.

3.2.1 Which theme(s) would you like to answer/comment on?

- Resilient transition
- Green transition
- Digital transition

### 3.2.1 Resilient transition

Please read and reflect on the issues and scenarios proposed in the Section 2.1 of the [Staff Working Document](#).

3.2.1.1 In your view, how resilient is the construction ecosystem?

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The choice of building materials and construction techniques that are particularly resilient should play an important role in addressing challenges that arise with changing weather conditions. BIBM believes that precast concrete, which is widely used in construction, enable the resilience of the construction ecosystem with its intrinsic properties of:

- Structural integrity and resistance to extreme weather events.
- Durability and low maintenance cost over the lifecycle.
- Versatility.
- Energy savings and thermal comfort thanks to thermal mass reducing the risk of overheating in summer; resistance to fire (and additionally no emission of toxic fumes or smoke); and
- Affordability.

3.2.1.2 Which challenges or changes currently faced by the ecosystem could represent opportunities to progress in the twin green and digital transition? How can they best explored?

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First, a clarification of the role of standardization bodies and the European Commission in the standardization process is essential to allow a fast adoption of standards, thus facilitating the bringing to market of low carbon products and new “circular” materials availability through the supply chain. Digital technologies can provide many opportunities for identifying and matching environmental requirements together with design modelling - optimizing resources, CO2 emissions and waste management. Digitalisation also allows the life-cycle assessment of a building to be considered during all phases of a building’s life (construction, use, end-of-life phases).

To implement a holistic approach and ensure cooperation between designers, concrete producers and contractors, an effective connection (forward and backward) between physical and digital assets is needed. This connection is only possible through a common language for data platforms, shared methodologies, and Product Data Templates. To move on properly, harmonized (EN, ISO, national) standards that can effectively promote digitalisation are needed.

A regulatory framework is however needed to manage digital information for the whole construction sector and support from the EU is needed, both for financing a unique digital platform for the construction sector and ensuring data ownership and data safety.

3.2.1.3 Is your organisation on track to a transition towards a resilient transition?

- No, we are not on track
- Neutral
- Yes, we are on track

3.2.1.4 Please explain your answer in the box below

*2000 character(s) maximum*



Concrete intrinsic properties help address the climate change challenges towards a resilient transition. Concrete's structural integrity and resistance to extreme weather events; durability and low maintenance cost over the lifecycle; versatility; energy savings and thermal comfort thanks to thermal mass reducing the risk of overheating in summer; resistance to fire (and additionally no emission of toxic fumes or smoke); and affordability provides for a safe built environment (homes, infrastructure).

More information:

BIBM Little Green Book of Concrete 2021 - [https://bibm.eu/wp-content/uploads/2021/12/The-Little-Green-Book-of-Concrete\\_2021.pdf](https://bibm.eu/wp-content/uploads/2021/12/The-Little-Green-Book-of-Concrete_2021.pdf)

GCCA Roadmap for Net Zero Concrete 2021- [https://bibm.eu/wp-content/uploads/2021/10/BIBM\\_GCCA-Concrete-Future-Net-Zero-Roadmap.pdf](https://bibm.eu/wp-content/uploads/2021/10/BIBM_GCCA-Concrete-Future-Net-Zero-Roadmap.pdf)

The Concrete Initiative Manifesto - <https://www.theconcreteinitiative.eu/images/PDF/Concrete-Initiative.pdf>

The Concrete Initiative New European Bauhaus Manifesto 2021 - [https://theconcreteinitiative.eu/images/TCI\\_Manifesto\\_-\\_compressed.pdf](https://theconcreteinitiative.eu/images/TCI_Manifesto_-_compressed.pdf)

3.2.1.5 Have you set specific targets and milestones in your organisation relevant for the resilient transition?

- Yes  
 No

3.2.1.8 Considering the EU pieces of legislation, policies, instruments and initiatives, upcoming or recent changes (listed in Section 1.5 of the Staff Working Document), do they contribute sufficiently to strengthening the resilience of the construction ecosystem?

- Yes, they contribute sufficiently  
 Mostly they do, however further improvements can or need to be made  
 No, they do not contribute sufficiently

3.2.1.9 Please explain your answer in the box below

*2000 character(s) maximum*

In light of the lack of coordination between Member States, the EU initiatives listed contribute to the resilience of the construction ecosystem. However, we would require clarity in the overall EU strategy and potential ways forward, as well as coordination with, and commitment from, Member States to ensure added impetus.

More so, the Staff Working Document is too vague to allow us to answer this question. It remains unclear which legal framework will set which requirements. Accordingly, the industry awaits clarifications at best, or worse struggles to comply with numerous individual national requirements. This is damaging resilience, not strengthening it.

Moreover, policymakers and legislators should have an essential role to play in elaborating the performance criteria every building material needs to comply with. In executing this task, policymakers should shy away from expressing a preference of one building material over another without sound, science-based arguments.

3.2.1.10 Considering the three resilience topics mentioned in the Staff Working Document (Section 2.1), what other actions need to be taken by the Commission, national competent authorities and/or other stakeholder groups to increase the resilience of the construction industry?

The three resilience topics, as specific in the Staff Working Document, are:

1. The role of an enabling framework and of the single market
2. Dealing with raw material shortages and the impact on the construction products market
3. The importance of skills for the ecosystem's resilience

	Please provide your answer below
European institutions	<p>There is liability related to the construction of a building and the choice of materials, specification and structural design are essential to provide for safety. Therefore:</p> <ul style="list-style-type: none"> <li>- The full supply chain concept of the Green Deal should stimulate an increased dialogue between manufacturers, builders, contractors, planners, architects, and end-users, towards the objective of reducing environmental impacts at the building level and increasing the resilience of construction using the right materials for a specific function.</li> <li>- There should be incentives to develop a reliable market for secondary raw materials that ensure reliable quality and enough supply to meet the demand. Boosting the EU market for secondary materials like recycled concrete is fundamental and recognised as one of the objectives of European Commission Circular Economy Action Plan. The market for recycled aggregates is in the hands of multiple stakeholder groups: the precast and ready-mix manufacturers, aggregate producers, recycling enterprises, road builders, construction, and demolition enterprises, building codes and standards bodies, local governments, city planners, waste regulators, trade associations, environmental agencies and NGOs, architects, green building councils, research bodies and universities, the consumers, and the public.</li> <li>- Investment in the development of a skilled work force across all the construction value chain will be key for achieving the ecosystem's resilience.</li> </ul>
National, regional or local authorities	<p>EU Member States (i.e., at national, regional, and local levels) have different construction practises according to their geographical situation (e.g., coastal, hilly, valley, at risk of seismic activities); climate situation (e.g., water abundance x scarcity, warm x cold); availability of raw materials (forest, minerals x imports); industry network and clusters; therefore Member States should adapt their transition pathway for a more resilient, greener and more digital construction ecosystem according to their reality.</p>
Academia/research	<p>These could test hypothesis, compare national strategies, provide best practice guides.</p>

Construction industry	<p>Communication, e.g., on circularity principles, must be enhanced across the construction industry to engage all actors to play each one his role to reach a more resilient, greener, and more digital construction ecosystem. With good initial planning and design of buildings, well considered renovation and managed demolition, the recovery and reuse of concrete is achievable and will contribute to sustainable buildings. By applying durability, disassembly, adaptability, and recyclability to the design of buildings and infrastructures, the properties of concrete elements can be enhanced to enable their re-use in future life cycles of a building or in other future structures. Such an approach would significantly reduce demolition and subsequent raw material extraction requirements while avoiding future CO2 emissions.</p>
Citizens/civil society	no comment
Other (please specify)	no comment

Please note that Chapter 5 of this survey will ask which pledges your organisation would like to make (or have already made) to contribute towards the resilient transition pathway for the construction ecosystem.

3.2.1.11 Have you experienced issues with regard to the resilience of value chains that negatively affect the functioning of the construction ecosystem?

- Yes  
 No

3.2.1.13 Which value chains' bottlenecks are the most critical for the resilience of the construction ecosystem? Can you provide data/evidence?

*2000 character(s) maximum*

Life cycle assessments (LCAs) should be carried out for some of the measures being proposed for the transition pathway, for instance, on minimum recycled content. For instance, concrete, cement's end-product, can be 100% recycled after demolition. Recycled concrete aggregates (RCA) from demolition concrete are traditionally used in unbound applications such as for road base. RCA's meeting the same quality requirements as virgin aggregates are also used as aggregates for new concrete. Several projects are developing methods to enhance the natural uptake of CO<sub>2</sub> by concrete (called recarbonation) during the recycling process. These advantages of concrete recycling are evident but need to be considered with caution and according to individual circumstances. For instance, using recycled aggregates may not have the lowest environmental impact, if the supply of raw materials is not made locally and require additional processing and transport distances. A Life-cycle analysis can be used to find the optimal approach for each case. Also, if all concrete C&D waste in Europe were recycled, this could only supply 10% of the total demand for aggregates for all applications. If all concrete C&D waste were recycled to supply aggregates just for use in new concrete, this would fulfil roughly 32% of the total demand. A consequential LCA would give an estimate of how the global environmental burdens are affected by the production and use of a product across the life cycle stages through end of life, for instance, the impact of growing wood use and harvesting on forest carbon sinks and storages, and the net climate impact of wood use.

3.2.1.14 What type of measures can help remove cross-border barriers and thus increase the resilience of the construction industry?

*2000 character(s) maximum*

Examples of possible measures include harmonised standards, reinforcement of mutual recognition, etc.

A fast adoption of harmonised standards would facilitate the bringing to market of low carbon products and a regulatory framework to manage digital information for the whole construction sector.

3.2.1.15 How can these actions create synergies and also support the green and digital transitions?

*2000 character(s) maximum*

These actions would provide for a well-functioning single market whereby cross-border movements of low carbon products would be aligned with a unique digital platform for the construction sector and ensuring data ownership and data safety for sustainable construction across the EU.

3.2.1.16 To what extent do you think that the different levels of governance (local, regional, national, EU) affect the resilience of the construction industry, positively or negatively?

	Very negative	Negative	Neutral	Positive	Very positive
Local / regional	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
National	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

3.2.1.17 Please elaborate on your response by explaining how different levels of governance have affected the resilience of the construction industry in the box below.

*2000 character(s) maximum*

Potentially the three levels of governance can affect positively the resilience of the construction industry if the three of them abide to the same rules and respect the principle of material and technology neutrality. As in the EPBD recast proposal, the EU sets the overarching rules; Member States must develop their national implementation action plans in close liaison with their regions and local stakeholders. The local governance plays a key role in delivering resilience, because ultimately that is the level where the construction projects are carried out.

3.2.1.18 Based on your experience and the data available to you, what intermediary milestones and targets relevant for the resilient transition need to be set for the different actions towards 2030? Should additional targets be set beyond 2030? If yes, what should they be?

*2000 character(s) maximum*

It should be part of an overall strategy that defines needs and targets for a sustainable built environment. Our industry will deliver solutions, but we require regulatory provisions and incentives that are based on a scientifically accepted assessment methodology.

3.2.1.19 Please upload any supporting documents (if relevant)

## 3.2.2 Green transition

Please read and reflect the issues and scenarios proposed in the Section 2.2 of the [Staff Working Document](#).

3.2.2.1 In your opinion, is your organisation on track with the green transition?

- No, we are not on track
- Neutral
- Yes, we are on track

3.2.2.2 Please explain your answer in the box below

*2000 character(s) maximum*

The green transition includes a variety of actions from sustainability, circularity, waste disposal and management along the value chain. In our sector, it is important that all provisions in relation with these actions are based on scientifically accepted assessment methodology. For many years now, Life Cycle Assessment (LCA) and Environmental Products Declaration (EPD) are reliable and trusted tools to deliver information having an impact on the greener of products. All actors in the value chain will also need to work on improving the secondary materials market to enhance circularity in construction. Another valid instrument is Level(s), the European Commission framework for improving the sustainability of buildings, which is usually implemented through national provisions and should be promoted as a the EU reference methodology.

More information:

BIBM Little Green Book of Concrete 2021 - [https://bibm.eu/wp-content/uploads/2021/12/The-Little-Green-Book-of-Concrete\\_2021.pdf](https://bibm.eu/wp-content/uploads/2021/12/The-Little-Green-Book-of-Concrete_2021.pdf)

GCCA Roadmap for Net Zero Concrete 2021- [https://bibm.eu/wp-content/uploads/2021/10/BIBM\\_GCCA-Concrete-Future-Net-Zero-Roadmap.pdf](https://bibm.eu/wp-content/uploads/2021/10/BIBM_GCCA-Concrete-Future-Net-Zero-Roadmap.pdf)

The Concrete Initiative Manifesto - <https://www.theconcreteinitiative.eu/images/PDF/Concrete-Initiative.pdf>

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3.2.2.3 Have you set specific targets and milestones in your organisation relevant for the green transition?

- Yes  
 No

3.2.2.4 If yes, could you please elaborate on the targets your organisation has set?

*2000 character(s) maximum*

The industry aims for 2030 a 30% gross emissions reduction on cement, and a 40% reduction in concrete.

3.2.2.5 Based on your data, how far are you from achieving your goals? What are the challenges you foresee?

*2000 character(s) maximum*

Upstream, the cement industry is on track. Downstream, the cement industry still sees a low uptake of the already available low-carbon cements by the construction market. Also, construction practises will need to undergo changes to adopt structural leaner options and avoidance of overspecification.

3.2.2.6 Considering the EU pieces of legislation, policies, instruments and initiatives, upcoming or recent changes (listed in Section 1.5 of the Staff Working Document), do they contribute sufficiently to strengthening the green transition of the construction ecosystem?

- Yes, they contribute sufficiently  
 Mostly they do, however further improvements can or need to be made  
 No, they do not contribute sufficiently

### 3.2.2.7 Please explain your answer in the box below

*2000 character(s) maximum*

the green transition is part of a larger movement. However, this is probably the one sector where EU initiatives have had the greatest impact. We may consider two examples, firstly Level(s), the EU sustainable buildings framework reference methodology. A lot of work has been invested in this crucial initiative, both by the European Commission and by industry, but it has yet to receive full political backing to become the EU reference methodology. Secondly, we now have the EU Taxonomy Regulation, delivering a classification system for sustainable activities. Regretfully, there has been no coordination with existing schemes for construction or integration of existing indicators.

As mentioned above, instruments are already in use, delivering sustainability information for construction products. However, the use of our EPDs greatly varies with some Member States making good use of the data, others ignoring their very existence. Again, and as repeatedly mentioned, a key element of success is coherence between all the instruments and cooperation with all the stakeholders involved.

3.2.2.8 Considering the five green topics mentioned in the Staff Working Document (Section 2.2), what other actions need to be taken by the Commission, national competent authorities and/or other stakeholder groups to unlock the potential of the green transition?

The five green areas, as specified in the Staff Working Document, are:

1. Energy renovation
2. Resource consumption, waste and circularity
3. Life cycle greenhouse gas emissions
4. Nature-based solutions
5. Enhancing climate resilience and adaptation to climate change

	Please provide your answer below
European institutions	<p>EU should provide an overarching strategy for the built environment. Furthermore, BIBM highlights that the EU should fully use the untapped carbonation potential of concrete which absorbs CO2 during its lifetime. The absorption of CO2 turns the built environment into carbon sinks and this recarbonation effect has been recognized in the Full Sixth Assessment Report of the Intergovernmental Panel on Climate Change. The re-carbonation of built concrete products over their life cycle should be recognised in CO2 emissions accounting, carbon footprint methodologies, and CO2 certification removal schemes.</p>
National, regional or local authorities	<p>On 3 and 4, BIBM calls for material neutrality in legislation. There is huge potential in design improvements and in integration of different construction materials in the built environment to achieve energy efficiency and mitigation of CO2 emissions. While all actors in the construction market need to cooperate and complement each other, policymakers have the responsibility to create a level playing field to all building materials.</p> <p>On 3, BIBM highlights that Member States should fully use the untapped carbonation potential of concrete which absorbs CO2 during its lifetime. The absorption of CO2 turns the built environment into carbon sinks and this recarbonation effect has been recognized in the Full Sixth Assessment Report of the Intergovernmental Panel on Climate Change. The re-carbonation of built concrete products over their life cycle should be recognised in CO2 emissions accounting, carbon footprint methodologies, and CO2 certification removal schemes.</p>
Academia/research	<p>These could test hypothesis, compare national strategies, provide best practise guides.</p>



Construction industry	Delivering carbon neutrality in the building sector will require 11 appropriate skills and new building techniques. The Transition Pathway should promote cooperation between architects, local authorities, and engineers. It should foster skills and training to deliver energy-efficient designs and lower-carbon concrete mixes.
Citizens/civil society	no comment
Other (please specify)	no comment

Please note that Chapter 5 of this survey will ask which pledges your organisation would like to make (or have already made) to contribute towards the resilient transition pathway for the construction ecosystem.

#### 3.2.2.9 How can these actions create synergies and support resilience and the digital transition?

2000 character(s) maximum

Guiding principles to a fair legal framework must include material neutrality, accurate and correct databases, comparisons at the building level over full life cycle of the building.

#### 3.2.2.10 Based on your experience and the data available to you, what intermediary milestones and targets relevant for the green transition need to be set for the different actions towards 2030? Should additional targets be set beyond 2030? If yes, what should they be?

2000 character(s) maximum

The proposed revision of the EPBD already set new targets:

- as of 2030, new buildings must be zero-emission buildings, new public buildings must be zero-emission as of 2027.
- public and non-residential buildings will have to be renovated and improved to at least energy performance level F at the latest by 2027, and to at least level E by 2030 at the latest. Residential buildings should be renovated from G to at least F by 2030, and to at least E by 2033. Member States must then establish specific timelines for achieving higher energy performance classes through new National Building Renovation Plans, in line with their pathway to achieve zero-emission building stock by 2050.

#### 3.2.2.11 What are in your opinion the untapped opportunities and lead markets for the green transition of the EU construction ecosystem?

2000 character(s) maximum

A set of actions are required to create lead markets for low-carbon products:

- Incentivising the demand for these products;
- Incentivising the production of low-carbon products;
- Make the European Standardisation process fit for purpose.

#### 3.2.2.12 Please upload any supporting documents (if relevant)

### 3.2.3 Digital transition

Please read and reflect the issues and scenarios proposed in the Section 2.3 of the [Staff Working Document](#).

#### 3.2.3.1 Is your organisation on track with the digital transition?

- No, we are not on track
- Neutral
- Yes, we are on track

#### 3.2.3.2 Please explain your answer in the box below.

5000 character(s) maximum

Digital technologies should come as supporting tools, leading to improved efficiency and performance of the construction value chain, and built environment.

Having said that, let us remember that one of the key features brought in by the Construction Products Regulation (CPR) is the possibility to deliver product information in a digital, harmonised format. However, the CPR defines the paper format as the pillar of the common technical language for the Declarations of Performance (DoP). As the use of a harmonised product data template is crucial for the exchange of information in a digital built environment, Construction Products Europe developed Smart CE marking with the approval of the European Commission. This voluntary CEN Workshop Agreement approach offers a way to both comply with the CPR and deliver DoPs in a digital format accessible by all. The upcoming revision of the CPR will hopefully build upon the experience of industry and benefit from investments already made by our industry. We also call for an alignment with other initiatives, such as a potential building and/or product passport, or the database for information on Substances of Concern In articles as such or in complex objects (Products) established under the Waste Framework Directive (WFD).

3.2.3.3 Have you set specific targets and milestones in your organisation relevant for the digital transition?

- Yes
- No

3.2.3.6 Are there any additional barriers (besides those mentioned in the Staff Working Document) to the uptake of digital technologies in the construction ecosystem that you believe should be considered in developing this pathway?

- Yes, there are other barriers
- No, the Staff Working Document covers all relevant barriers

3.2.3.7 If yes, what are they? Can you provide relevant data/evidence?

2000 character(s) maximum

A regulatory framework is needed to manage digital information for the whole construction sector. A European product data template – PDT – should be developed to harmonise the properties to be integrated into digital systems according to their standardised specifications.

3.2.3.8 Considering the EU pieces of legislation, policies, instruments and initiatives, upcoming or recent changes (listed in Section 1.5 of the Staff Working Document), do they contribute sufficiently to strengthening the digitalisation of the construction ecosystem?

- Yes, they contribute sufficiently
- Mostly they do, however further improvements can or need to be made
- No, they do not contribute sufficiently

3.2.3.9 Please explain your answer in the box below

2000 character(s) maximum

New requirements in legislation will need a database and a digital platform to deliver.

3.2.3.10 What other actions need to be taken by the Commission, national competent authorities and/or other stakeholder groups for the digital transition?

*Please note that Chapter 5 of this survey will ask which pledges your organisation would like to make (or have already made) to contribute towards the resilient transition pathway for the construction ecosystem.*

	Please provide your answer below respecting a limit of 2000 characters maximum
European institutions	Digitalisation should be perceived not as a target but a tool. Support from the EU is needed, both for financing DIGIPLACE, a unique digital platform for the construction sector, and ensuring data ownership and data safety.
National, regional or local authorities	no comment
Academia/research	no comment
Construction industry	To implement a holistic approach and ensure cooperation between designers, concrete producers and contractors, an effective connection (forward and backward) between physical and digital assets is needed. This connection is only possible through a common language for data platforms, shared methodologies, and Product Data Templates. To move on properly, harmonized (EN, ISO, national) standards that can effectively promote digitalisation are needed.
Citizens/civil society	no comment
Other (please specify)	no comment

3.2.3.11 How can these actions create synergies and support resilience and the green transition?

*2000 character(s) maximum*

Digital technologies can provide many opportunities for identifying and matching environmental requirements together with design modelling - optimizing resources, CO2 emissions and waste management. Digitalisation also allows the life-cycle assessment of a building to be considered during all phases of a building's life (construction, use, end-of-life phases).

3.2.3.12 Based on your experience and the data available to you, what intermediary milestones relevant for the digital transition need to be set for the different actions towards 2030?

*2000 character(s) maximum*

A regulatory framework is needed to manage digital information for the whole construction sector. Support from the EU is needed, both for financing a unique digital platform for the construction sector and ensuring data ownership and data safety. Milestones would follow.

3.2.3.13 Do you think the construction ecosystem should set milestones and targets relevant for the digital transition beyond 2030? If yes, what would they be? Should additional targets be set beyond 2030? If yes, what should they be?

*2000 character(s) maximum*

A regulatory framework is needed to manage digital information for the whole construction sector. Support from the EU is needed, both for financing a unique digital platform for the construction sector and ensuring data ownership and data safety. Milestones would follow.

3.2.3.14 How can the exchange of data among different stakeholders be fostered? What interoperability framework (e.g. common standards, open formats, licenses) is required to secure the exchange of data?

*2000 character(s) maximum*

The industry is implementing digital information flows, manufacturing, and logistics systems during the whole process (from tendering to the construction until the end-of-life of the built asset). Digital regulatory and technical information and use of digital platforms will transform administrative transactions through the supply chain. A regulatory framework to manage digital information for the whole construction sector and a unique digital platform for the construction sector and ensuring data ownership and data safety are needed.

3.2.3.15 What are in your opinion the untapped opportunities and lead markets for the digital transition of the EU construction ecosystem?

*2000 character(s) maximum*

Design models, fully integrated with the production process, lead to material optimization, automatization of the process, and the possibility to embed different technologies in concrete structures. Stock management, logistics and onsite operations are improved and under control at any time.

3.2.3.16 Please upload any supporting documents (if relevant)

## 3.3 Supporting the ecosystem transition and long-term horizontal challenges

### 3.3.1 Procurement as an enabler

Please consider Section 3.1 of the [Staff Working Document](#) before answering the questions below.

3.3.1.1 What actions other than the ones described in the Staff Working Document need to be taken in the area of public procurement by public authorities at different levels (municipal, regional, national, EU) in order to support the twin transition of the construction ecosystem?

*2000 character(s) maximum*

BIBM believes that public procurement can be an important vector to incentivise the use of low-carbon cements in buildings. Today, government entities account for a major share of the global cement and concrete demand. The success of the Green Deal including decarbonation of the cement sector will be for a major part the result of the effort of greening the procurement processes of these bodies. To be fully effective, public procurement criteria should be set at the level of the building based on a full-life cycle analysis. Public procurement policies should not seek to unduly favour one type of construction material over others and should abide to responsible sourcing rules.

3.3.1.2 How can it be ensured that industry and national competent authorities are prepared to meet potential new digitalisation requirements in public procurement?

*2000 character(s) maximum*

. Digital EPDs based on ISO standards and Smart CE based on the CPR, deliver the require data required by public procurement. More so, public authorities rarely procure products but rather order the construction of a building, renovation works or an extension. Support work of CEN/TC 442 "BIM" development of standards for value-chain interaction is still important, e. g., product-data-templates, enabling "all sorts" of synergies along technical, environmental, regulatory dimensions.

3.3.1.3 What role can the industry play in the modernisation of public procurement?

*2000 character(s) maximum*

Industry should use Life Cycle Costs in construction methods to offer the best result.

### 3.3.2 Funding and financing

Please consider Section 3.2 of the [Staff Working Document](#) before answering the questions below.

3.3.2.1 Which types of actors can support a good private investment environment for resilient, green and digital solutions in the construction ecosystem?

*2000 character(s) maximum*

no comment

3.3.2.2 How can private investment best be mobilised to support the ‘twin’ transition (green and digital) and also strengthen resilience?

*2000 character(s) maximum*

no comment

### 3.3.3 Research and Innovation

Please consider Section 3.3 of the [Staff Working Document](#) before answering the questions below.

3.3.3.1 To achieve a resilient twin transition of the construction ecosystem, what are the unmet needs to enable Research and Innovation (R&I) from basic research to deployment?

*2000 character(s) maximum*

A clarification of the role of standardization bodies and the European Commission in the standardization process is essential to allow a fast adoption of standards facilitating the bringing to market of low carbon products.

3.3.3.2 In your experience, how well does technology transfer from research institutions to industry (and in particular to SMEs) in the construction ecosystem?

- Very bad
- Bad
- Neutral
- Good
- Very good

3.3.3.3 Are there barriers to technology transfer from research institutions to industry? What are they? And how can they be addressed?

*2000 character(s) maximum*

no comment

### 3.3.4 Other emerging topics

Please consider Section 3.4 of the [Staff Working Document](#) before answering the questions below.

3.3.4.1 Are there any additional emerging topics (to those mentioned in the Staff Working Document) which you feel should be taken into account for the scenarios for a transition pathway for a more resilient, greener and more digital construction ecosystem?

- Yes
- No

3.3.4.2 What are these additional emerging topics and how would they affect the construction ecosystem?

2000 character(s) maximum

The Commission should further underline the importance of affordability, versatility, fire resistance, accessibility and modularity in the building sector.

### 3.4 Key performance indicators

Please consider Section 4 of the [Staff Working Document](#) before answering the questions below.

3.4.1 Is the list of key performance indicators (KPIs) presented in the Staff Working Document comprehensive enough?

- Yes  
 No

3.4.3 What other data could Member States, local authorities, industry and other stakeholders provide? *You may provide a link in the textbox below and/or use the upload function to provide additional relevant data /evidence.*

2000 character(s) maximum

no comment

3.4.4 Please upload any supporting documents (if relevant)

## 4 Expression of interest in concrete pledges and commitments

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For a successful transition, supporting actions towards and beyond the proposed scenarios of 2030 are needed. However, this can only be achieved through joint work and commitments.

The objective of the transition pathway is to co-create actions and scenarios supported by specific commitments to working towards them. For this reason, the Commission is gathering expressions of interest from industry, associations, networks, national, regional or local administrations and other organisations to pledge their involvement, support and actions.

During the consultations of the High Level Construction Forum and the thematic resilience, green and digital cluster group meetings that took place in September and October 2021. Initial discussions took place on targets and roadmaps both at a sector level and Member State level. The Commission now asks you to indicate which pledges you propose for actions to contribute towards the transition scenarios of 2030.

*Please note: Based on the expressions of interest submitted through this consultation, DG GROW will be in contact with the organisations in order to jointly define common pledges and create synergies.*

4.1 Would you / your organisation like to contribute towards a more resilient, greener and more digital construction ecosystem?



Yes

No

4.2 If so, which concrete actions would you / your organisation the transition pathway towards a more resilient, green and digital construction ecosystem?

*You may also provide a link in the textboxes below and/or use the upload function to provide relevant strategy documents outlining these pledges and actions.*

#### 4.3 Table of existing actions which are ongoing in your organisation

'Existing actions' involve those that are already included in targets or roadmaps (either at a sector level or Member State level) and which already have been committed to, but are relevant for the green, digital and resilient transition pathway for the EU construction industry ecosystem.

	<i>Please provide your answer below</i>
Resilient	see below
Green	see below
Digital	see below
Cross-cutting	see below

#### 4.4 Table of new actions that your organisation is willing to undertake alone or in collaboration with other stakeholders

'New actions' involve those that are additional to the pledges already included in targets or roadmaps (either at a sector level or Member State level).

	Please provide your answer below
Resilient	see below
Green	see below
Digital	see below
Cross-cutting	<p>BIBM is part of The Concrete Initiative that pledges to work with policy-makers and relevant stakeholders, including EU Institutions, suppliers, and civil society to maximise the contribution of concrete to achieving truly sustainable and zero carbon construction. It is a cross-sectoral forum that investigate how concrete's properties can be harnessed by intelligent design and construction techniques to maximise the contribution to society and minimise the environmental footprint of buildings and structures over their whole life cycle.</p> <p>Also, BIBM is cooperation with the Construction Products Europe, whose work is to: share information, look for coordination and organising debates, collecting opinions and points of views. Such initiatives are already part of the CPE day-to-day operations. CPE suggested, organised, and helped to set-up the Construction 2050 alliance. Prior to the pandemic, CPE brought together key stakeholders for monthly, topical lunches. Webinars have been organised regularly in the last two years and the European Commission officials and Members of the European Parliament are regular guests of such events and have always been extremely supportive.</p>

4.5 Are there any specific organisation(s) you would like to (or need to) collaborate with to implement your actions? If yes, please let us know what organisations these are

*2000 character(s) maximum*

BIBM is part of the 2050 Construction Alliance which gathers the construction chain stakeholders and of Construction Products Europe (CPE). Input from the Alliance and CPE should be considered by the Commission.

## 5 Other comments

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5.1 Would you like to submit any additional comments?

*You may also provide a link in the textbox below and/or use the upload function to provide relevant supporting documents.*

*2000 character(s) maximum*

During the High-Level Forum on construction workshops on Resilience and Green, BIBM attended to, several organisations mentioned the need for material neutrality in policies regarding the built environment. That request was not included in the meeting reports. These organisations represented a variety of stakeholders (value chain stakeholder; Member State).

5.2 You may upload any other relevant documents linked to your additional comments here.

\* 5.3 Do agree to be contacted regarding your contribution and possible further involvement in the definition of the Construction Transition Pathway?

- Yes  
 No

If yes, please provide us with your contact details:

\* 5.4 Email

ar@bibm.eu

5.5 Secondary email (if relevant)

For example a mailbox that should be put in copy.

mh@bibm.eu

### Useful links

Staff Working Document ([https://ec.europa.eu/growth/consultations/scenarios-transition-pathway-resilient-greene-and-more-digital-construction-ecosystem\\_en](https://ec.europa.eu/growth/consultations/scenarios-transition-pathway-resilient-greene-and-more-digital-construction-ecosystem_en))

HLCF mailing list registration (<https://ec.europa.eu/eusurvey/runner/d5823bdd-cd51-798d-ad6d-3807202c4903>)

## Contact

GROW-CONSTRUCTION-TRANSITION-PATHWAY@ec.europa.eu