European Concrete Platform's position on ITRE Committee's draft report on amending directive 2010/31/EU on the energy performance of buildings (COM (2016)0765 – C8-0499/2016 – 2016/0381(COD))

The European Concrete Platform (ECP) welcomes the ITRE Committee's draft report of the Energy Performance of Building Directive and welcomes the "smartness indicator" that includes the "flexibility of a building's overall electricity demand, including its ability to enable participation in active and passive as well as implicit and explicit demand-response".

Furthermore, ECP welcomes the acknowledgement of thermal storage and the importance of shifting demand when it comes to the use renewable energies.

However, there are some points the European Concrete Platform believes are inapt.

MATERIAL NEUTRALITY

Legislation needs to be material neutral as much as it needs to be technology neutral, without expressing a preference for one or other building material. Therefore, ECP calls for the withdrawal of any text favouring a construction material over another. **ECP asks the Council in Trilogue negotiations to delete the reference to wood in EP AM 13.**

Amendment 13
Proposal for a directive
Recital 10 b (new)

Original text of ITRE report	Proposed text
10b) A clear vision for a decarbonised building stock by 2050 requires a high level of ambition. When the energy use will be brought closer to zero the share of embodied energy will be more decisive in the whole life-cycle of the buildings. The future vision for a decarbonised building stock should include the embodied energy in buildings. ***Therefore building with wood is positive for the climate.***	10b) A clear vision for a decarbonised building stock by 2050 requires a high level of ambition. When the energy use will be brought closer to zero the share of embodied energy will be more decisive in the whole life-cycle of the buildings. The future vision for a decarbonised building stock should include the embodied energy in buildings.

Justification: *This sentence is not correct: there is no evidence that building with wood is positive for the climate. On the contrary, several independent studies[1] show that concrete buildings perform better when the entire life cycle is considered (from the extraction of raw materials until their end of life and recycling).*

Moreover, the case law of the European Court of Justice states that is an established principle of EU law that legislation be supported and motivated by accurate and correct data, based on scientific excellence. The unfounded respectively, unverifiable case brought forward by the wood and timber sector, does not comply with this principle.

It is one of the European Union legislation objectives to ensure a free and fair competition in the Single Market; therefore as a general principle it is inappropriate to promote the use of a specific construction material in any legislative act. Comparison, if necessary, should be done on a case-by-case basis, e.g. by delivering a full LCA assessment, rather than proposing recommendations in favour of one building material.

[1] See e.g. "Energy and climate efficient building systems" by RISE (Research Institute Sweden) http://www.sp.se/en/Sidor/default.aspx (former SP Sveriges Tekniska Forskningsinstitut)

EMBODIED ENERGY

- Regarding the possible extension of the scope of the Directive to cover embodied energy of building components also, we understand that **embodied energy has a greater importance when the energy use in the use phase of the building is coming to the minimum**.

- ECP welcomes the fact that an additional impact assessment will be delivered by 2020 and believes that the **embodied energy of building components and buildings should be measured from a Life Cycle Assessment[2] (LCA) point of view at all stages of the life cycle, including the end of life of the construction material or building**.

ECP asks the Council in Trilogue negotiations to add in EP AM 13 a definition of the embodied energy as follows:

Embodied energy is the energy consumed by all of the processes associated with the production, deconstruction and end-of-life of a building or building component, from the mining and processing of natural resources to manufacturing, transport, product delivery, maintenance and renovation of the building, deconstruction and end of life, including the potential energy delivered by the product (e.g. by burning it).

Justification: *LCA is identified as the most apt method the measure the environmental impact of products. It is crucial not to underestimate the environmental impacts, in particular the CO_2 emissions of end-of-life stages of construction products.*

[2] Life Cycle Assessment (LCA) is an internationally standardised method (ISO 14040 ff) for the evaluation of the environmental implications of goods and services (products) along their life cycle. LCA helps to avoid the "shifting of burdens" from one life cycle phase to another and among environmental implications; European Platform on Life Cycle Assessment, source: http://ec.europa.eu/environment/ipp/pdf/flyer_lca_0511.pdf