Eurima response to the Roadmap of Environmental performance of products and businesses - substantiating claims

Eurima welcomes the Commission’s intention to harmonize and set a baseline for the substantiation of green claims for products and businesses. Our industry shares the concerns raised in the Roadmap regarding the detrimental impact of unsubstantiated green claims on consumers, both on B2B and B2C markets and on the internal market. We therefore support the objectives of the Circular Economy Action Plan in this regard as it will contribute to a fairer market and allow for a better valorization of the more sustainable products in the construction sector.

Eurima believes in:
- The importance of making sustainability performance an integrated part of the EU building’s policy; and of encouraging manufacturers to communicate about such performance;
- The need to address the impact of buildings across their full life cycle accounting in particular for both embodied and operational carbon; Building level assessment based on the EN15978 standard.
- Environmental performance of construction products assessed according to the EN15804+A2 standard;

For construction products, Environmental Product Declarations (EPDs) based on the recognised standard EN 15804 provide a science based tool to communicate about the life-cycle environmental impact of products. EPDs are today mostly voluntary but have already been in use for many years for different purposes. The mineral wool industry can be seen as a leader in the development and use of EPDs, and more specifically of third party verified EPDs. In addition to the optimization of building designs, the EPDs also feed the different building assessment schemes to allow reliable environmental impact assessment of buildings. Moreover, the manufacturers use it for external communication but also for internal improvement and optimization of the manufacturing processes towards reductions of environmental impacts. At the same time, construction products differ from end products and considered intermediate as the environmental impact shall be considered based on their application and at the building level.

When it comes to green claims, EPDs are requested in some countries. In Belgium, a royal decree for building materials requires to have an EPD for making an environmental claim on the packaging. In France, EPDs are also considered as the reference to make environmental claims. And EPDs will be part of documents to be produced to comply with the forthcoming environmental regulation 2020.

Eurima has actively participated and supported the harmonization between EN15804 and PEF as a result the new “PEF for buildings” method, EN15804+A2. We continue to support the alignment of standards and schemes towards the new EN method in accordance to the efforts of the European Commission at all levels.
EN15804+A2 provides a structure to ensure that all EPDs are derived, verified and presented in a common and appropriate way to be used for the building assessment. This has been achieved thanks to the participation of all construction products representatives and Member states which ensured horizontality, but also to the fact that the EN15804 was developed in accordance to the EN15978 related to the environmental performance of buildings.

In addition, Eurima together with the other insulation manufacturers have committed to update their Product Category Rules (PCRs) according to the new method.

Since 2015, Eurima has been involved in the developments of Level(s), the European voluntary reporting framework that is designed to improve the sustainability of buildings. Its target is to provide a common EU approach to the assessment of environmental performance in the built environment, on the basis of existing standards. In Level(s), a targeted list of indicators links the individual building’s impact with the priorities for sustainability at the European level. It encourages life cycle thinking for the whole building by offering a step by step approach to life cycle assessment and uses the already existing EN15804 method.

We would therefore support a combination Option 2 and 3, with realising option 2 in the shorter term but once established and recognised by the industry, gradually transition into option 3. For any of these options it should be considered that EN15804+A2 method is, for construction products the equivalent method to the Product Environmental Footprint method, and that EN15804+A2 should therefore remain the basis for substantiating green claims. We are concerned about the risk of parallel systems between what could be required in future building codes encompassing whole life cycle impact (such requirements being based on the EN 15804) and green claims based on another methodology.

We remain at your disposal for any further exchange on the points mentioned above and we look forward to work with the European Commission and other policymakers & stakeholders on the elements of the substantiation of green claims.