

Response to Roadmap

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Eurima response to the Roadmap of Sustainable Products Policy

Eurima welcomes the Commission's intention to harmonize and set a baseline of principles for a market of sustainable products in Europe. We 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 valorisation of the more sustainable products in the construction sector.

The Circular Economy Action Plan is one of the pillars of the EU Green Deal and is largely in line with priority subjects, challenges and opportunities as identified by our industry. Construction products can have an enormous contribution to achieve the targets towards sustainability and climate neutrality by 2050. In particular, we believe that policies for sustainable construction product should rely on key principles such as:

- Environmental performance across the full life cycle of the building;
- Recycled content and recyclability;
- Transparent and clear information on the content of the construction products accessible to all;
- Durability;
- Social indicators inclusion such as thermal comfort, acoustic properties and fire safety;

When it comes to improving construction product's sustainability, one has to bear in mind that the purpose of construction products is their use in the context of the building. Currently, the applicable regulation for construction products is the Construction Products Regulation (CPR) which defines a framework to facilitate the delivery of environmental information from construction products and can implement any requirement derived from environmental needs. Eurima believes that CPR is the most appropriate legislative instrument to introduce sustainability principles for construction products.

The Construction Products Regulation (CPR) Basic Work Requirements (BWR) 3 and 7 define the regulatory framework for the mandatory declaration of the social and environmental impacts of construction products. Declarations under BWR 3 and 7 relate to hygiene, health and environment over the entire life cycle, and sustainable use of natural resources, respectively. Indicators included in the CPR could contain a core set of indicators which would be used at the building level as notified by EU member states.

Eco-design regulation mainly focuses on end products and the end products which incorporate the construction products would be the final buildings. Buildings are regulated by the EU national building codes. Having both CPR and Eco-design covering construction products would likely result in double regulation. This would therefore create confusion and burden to the market.

This would be against the principles of smart regulation and will lead to a reduction in the competitiveness of SMEs. Creating an additional framework for the same aspect would be an

unnecessary burden. Where certain characteristics are not yet covered, e.g. resource efficiency, these can also be dealt with through the CPR (and Basic Requirements for Construction Works - BRCW).

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 have developed in a voluntary manner; today they provide adequate answer to market players' and are also embedded in policy developments.

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.

Eurima has actively participated and supported the work, mandated by the European Commission, aimed at aligning the EN15804 standard with the Product Environmental Footprint methodologies, which resulted in the EN15804+A2. We continue to support the alignment of standards and schemes towards the new EN method in accordance with the efforts of the European Commission.

EN15804+A2 aims to ensure that all EPDs are derived, verified and presented in a common and appropriate way to be used for building assessments aligned with EN15978. This has been achieved thanks to the participation of all construction products representatives and Member states which ensured horizontality. In addition, Eurima together with the other insulation manufacturers have committed to update their Product Category Rules (PCRs) according to the new method.

Furthermore, our industry supports the development of LEVEL(s), the EU framework for assessing building's sustainability, based on 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. This framework fits well already for new built and major renovation projects and should be further used in the context of the EU Green Public Procurement and the Sustainable Finance Framework starting with carbon and energy.

When it comes to the recycled content and the recycling of construction products, the mineral wool industry has a longstanding tradition of promotion of circular production processes. We believe that recycled content should be declared in the context of the CPR for construction products as another driver for sustainability.

For mineral wool, the use of cullet from the glass and flat glass businesses but also the use of blast furnace slag from steel industry for the manufacturing of rock and slag wool insulation products enabled the industry to reduce considerably the need for primary raw materials, as well as reducing the CO₂ emissions thanks to less carbonated raw materials and a reduction of the energy consumption.

Since quite a while, mineral wool manufacturers have worked on developing and improving recycling solutions for most of their production residues in closed loops (through the furnace or through the forming) or finding ways to recover them when a closed loop recycling was not

economically or technically feasible. Which is why, an enabling regulatory framework that will stimulate the recycling would be essential.

The reuse and recycling must become more (financially) attractive than landfilling. Currently, construction materials still end up in landfills, as landfilling is often cheaper than recycling these materials. The cost of landfilling should be significantly increased and the landfilling of recyclable waste should also be progressively limited and ultimately banned. This should come together with an ambitious target for the recovery of construction and demolition waste that would include separate material-specific fractions - also for mineral wool.

The sorting of construction waste from deconstruction/demolition sites needs to become mandatory and (non-weight) targets for the recycling of construction products should be set. At the same time, it is of the highest importance to accelerate and mainstream deconstruction practices, instead of demolition. The separate collection of waste at deconstruction/demolition stages would be a major enabler for circular practices and should become mandatory. The supply chain that is relevant to recycling is subject to long and costly administrative procedures, which must be facilitated in order to compete with the quick and easy route to landfill, therefore fast track procedures regarding cross-border transportation, storage and recycling permits would be essential to improve the current situation.

Finally, to ensure content transparency of construction products, and facilitate their recycling, Eurima supports the development of an EU-wide open standard for information to encourage the use of non-toxic and recyclable materials. The information should be included in material passport and building passports and still be accessible when the building and/or products reach their end-of-life (after around 50 years for construction products), through developments in digitalization (e.g. BIM), in order to facilitate dismantling, reuse and recycling. Eurima has launched an EU voluntary initiative in order to promote such principles for construction products.

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 sustainable product policy.