

Eurima Input to the construction roadmap discussion

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For more information please contact:
Eurima - +32 2 626 20 91

Eurima welcomes the efforts deployed by DG GROW ensuring constructive and fruitful exchange with stakeholders (both public and private) within the High Level Construction Forum.

During the three recent thematic sessions, many important subjects have been identified underlining that the construction sector, as an important vector in the green and digital transition, must address a number of opportunities and a considerable amount of challenges. The construction ecosystem is complex. Defining transition pathways therefore requires adopting a holistic approach and identifying interlinks between opportunities and challenges to ensure the development of coherent, realistic and feasible actions.

In addition to the many suggestions mentioned during the sessions, Eurima would like to share with you the following additional thoughts:

- During the last few years, we have seen a large number of EU initiatives under responsibility of different European Commission Directorates that are of great relevance to the construction sector. Many of these initiatives are still relevant today and ongoing. Within the context of the EU Green Deal, Eurima has been emphasizing the need for a coherent, consistent and mutually reinforcing policy framework thus avoiding the risk of sub-optimisation. Only this will ensure efficiency and avoid overlaps.

We believe that the Strategy for a Sustainable Built Environment, which was initially planned for 2021, would have helped to establish a common shared vision and ambition for the built environment. It is important that current work on the Roadmap helps aligning institutional and private stakeholders on the direction that needs to be chosen towards sustainability in the sector. Greater alignment will help to better articulate initiatives coming from different Commission DGs, and where needed to better prioritise, and avoid or better handle policy overlaps.

In this context a number of initiatives merit further attention and support to unleash their full potential: this is the case, for example, of the LEVEL(s) framework and its full integration into the policy work, or the uptake of the CDW Management Protocol at national level.

- *With regards to the transition towards a green ecosystem :*
 - Circularity is key. To ensure circularity in practice, an enabling framework is necessary both within the EU regulatory context (e.g. interface between chemicals and waste policy, waste classification, waste shipment, end-of-waste criteria) and in its interaction with national and local waste management realities. For instance, countries need to adopt demolition protocols and waste management schemes to ensure proper separation between the different construction materials and to maximize their recovery. Targets could be set at European level but their implementation should be at national/regional level to adapt to the national reality.
 - In construction, sustainability assessments should be at building level, building on a sound interaction with assessment at product level, as enabled by the links between the EN15804+A2 and EN15978. Life Cycle Assessment (LCA) based targets are indeed

needed. The evolution towards life cycle assessment of buildings should rely on the LEVEL(s) methodological framework and indicators to ensure a European wide harmonized approach and level playing field. More work is needed in that respect.

- We need to secure the use of Declaration of Performance (DoPs) and Environmental product declarations (EPDs based on the EN15804+A2) to ensure reliable and realistic building sustainability assessments (based on the EN15978), and notably to support the evolution of the regulatory framework towards whole life cycle assessment of buildings. It is important, in this respect, to anchor a European wide approach for building life cycle assessment, based on common standards, as opposed to disruptive, non-harmonised national ad-hoc methodologies.
- Further work is also needed to accelerate the uptake of EPDs and build capacity, notably in SMEs, as well as to develop more clearly defined scenarios and more uniform Product Category Rules (PCR) for construction products, to ensure a maximum level playing field, improve understanding and reliability. The EPDs must indeed be subject to continuous updates and harmonisation.
- Whilst the main objective of the upcoming revision of the Energy Performance of Buildings Directive (EPBD) is to increase the rate and depth of renovation, the EPBD's long-term goal is to reach a highly energy-efficient and decarbonized EU building stock *by 2050*. This can only be achieved if European and national policies include a *whole life carbon (WLC)* approach to tackling building emissions, which requires a holistic consideration of both the operational carbon of buildings (emission emitted during the use of the building) and embodied carbon of buildings (emissions associated with construction materials and products as well as the processes carried out prior and after the use of the building).
- To respond to the need to tackle whole life cycle carbon emission of buildings, the Commission should ensure that a common language for sustainability performance of buildings is adopted first. The LEVEL(s) framework brings together all relevant European standards mentioned above and provides this common technical language for sustainability performance of buildings. This now needs to evolve into a harmonized framework with mandatory calculation tools and requirements addressing the embodied carbon of buildings as part of the upcoming EPBD revision and other legislative proposals, keeping EN standards at its core.

In this context, Eurima welcomes the Commission's initiative to develop a 2050 whole life cycle performance roadmap to reduce carbon emissions from buildings. This exercise should explore how the scope of the EPBD should evolve over the coming decades based on a sound EU-wide methodology in line with mandatory EU standards in order to deliver a decarbonised building stock by 2050.

- *With regards to the digital transition of the sector :*

- To achieve the overall life cycle objectives of any construction, traceability of the information becomes essential. Digitalization is undeniably the only way forward which could ensure that the full and complete identity and history of the building is available. Current tools in the

spirit of building logbooks should be promoted for important projects like public and large non-residential buildings, school, hospitals, ...etc.

- We need to ensure that BIM is built on reliable and trustworthy data and tools to ensure optimal designs, facility managements and waste handling.
- All the interoperability issues raised by DigiPlace WG and the EU BIM TG are due to the fact that there is a gap between how the available product data is structured and how the design and engineering softwares formalize their modeling processes. Standardization is the only solution which could ensure that we bridge that gap. This can only be achieved by clear mandates from the Commission.
- Design softwares are unable to store all the data associated to each and every single product available on the market. National and private databases are more and more emerging in Europe. It is important to establish a legal framework which would clarify responsibilities and secure data protection.

- *With regards to the transition to a resilient construction ecosystem:*

Eurima believes that to ensure resilience of the construction ecosystem, it is important to ensure resilience to climate change and exploit the full potential of all technologies that can support resilience, such as performing building envelope and insulation.

The multiple benefits of highly energy efficient buildings, notably in terms of health and thermal comfort, but also to support resilience of energy systems via lowering peak energy demand, need to be better accounted for, in support of climate mitigation.

Extreme events are more likely to happen; therefore it is becoming even more important to secure top-quality buildings and equip the whole construction value chain with the tools, and qualified workforce able to address the performance gap.

Eurima would like to reiterate its support for this collaborative approach adopted by the European Commission and remains at your disposal for any further questions you may have.