

EFCC's Feedback on the Public Consultation on the Sustainable Products Initiative (SPI)

1. Challenges to make products sustainable

The challenges to make intermediate products more sustainable in the EU cannot be addressed without taking a whole value chain perspective. An 'intermediate product' is only one part of a whole value chain and it is the sustainability of the value chain that should be improved. For the construction sector, construction works such as buildings and civil engineering works, should be the "products" to be assessed and improved regarding their environmental impacts and circularity across their lifecycle. A construction chemical or intermediate product can be used in a building (final product) to make the building more energy efficient, e.g. through insulation.

For example, to determine the energy efficiency of a building, the energy used i. to manufacture the construction chemical or intermediate product, ii. to incorporate the construction chemical or intermediate product in the building, iii. during its lifetime as well as iv. required to renovate or demolish the building, should be taken into account.

2. Measures to make sustainable products the norm

- A. **Design for Sustainability (DfS)** – Product design rules and general product requirements should at least distinguish between raw materials, intermediate products and (final) consumer products, as DfS covers different aspects for different stages of a value chain leading to a consumer product. For example, a "hazardous chemical" might be very efficient as a raw material improving the durability, energy efficiency or another environmental impact, and might not even end up in the final product (building).
- B. **Responsibility for Information (Rfi)** – Rfi is only be relevant for a final product. EFCC, for example, is contributing to the development of a Building Digital Passport that would include all life cycle stages of a building.
- C. **Avoidance of destruction of un-sold durable goods** – EFCC typically does not represent manufacturers of durable goods.
- D. **Circular Business Models** – Those circular business models should be stimulated that cover the whole value chain from raw material, through intermediate product to final product (e.g. a building) and that take a full life cycle approach.
- E. **Incentives for circularity** – A very important initiative is taken trough CEN/TC 350 'Sustainability of construction works', that provides a standardised approach to the delivery of environmental information on construction products, the assessment of the environmental, social and economic performance of buildings and civil engineering works, and more generally the sustainability performance of construction works.
- F. **Measures to make sustainable products the norm: other comments** - The challenge in defining or assessing measures to make sustainable products, is the wide variety of 'products' covered: from intermediate products to consumer products. Different measures could be envisaged for different segments in a value chain e.g. in assessing the environmental footprint of a (consumer) end-product, the environmental footprint of the entire value chain of that product should be taken into account.

3. Compliance with and enforcement of sustainability requirements for products

For the construction sector, compliance and enforcement of sustainability requirements are not considered a priority as construction products are typically regional or national. The provisions for market surveillance should only cover construction products that are subject to the EUs harmonised legislation.

4. Optional additional comments

The Construction Products Regulation, CPR, (305/2011) requires a Declaration of Performance of construction products (DoP). It is compulsory for (most) construction products to identify the product type and include the DoP of essential characteristics, which may include environmental ones. A third party validation scheme is implemented and the documents are delivered by manufacturers in a digital format, which is being harmonised at European level.

In the construction sector Environmental Product Declarations (EPDs) integrated in a Digital Product Passport (DPP) scheme or in the CPR would facilitate assessment of a building support decision-making taking sustainability aspects into account.

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