European consultation on Sustainable Buildings

SAINT-GOBAIN Group's contribution

SAINT-GOBAIN *strongly believes that sustainability is a key challenge as well as a key driver for the construction sector. Our vision is to be the reference in sustainable buildings. As the world leader in the habitat and construction markets, we design, manufacture and distribute building materials providing innovative solutions to today's critical challenges of growth, energy efficiency and environmental protection.*

1 Sustainability in the Construction sector goes beyond environmental aspects

The consultation concentrates exclusively on the environmental impacts of buildings and construction products. This should be considered as a first and limited step in the approach of sustainability in the construction sector given the social and economic roles of buildings.

Comfort, safety and well-being (thermal comfort, acoustics, indoor air quality, daylight, modularity…) as well as economic affordability and asset value should be optimised together with the environmental aspects, in a life cycle approach.

2 Environmental assessment of buildings

Currently most of the efforts regarding sustainability and environmental improvements in buildings refer to new constructions. Thermal renovation of existing buildings starts to be seriously considered. We believe that sustainability needs to be enhanced both in new construction and in the existing building stock and leveraged with both pull and push policies.

The building market should be *pulled* to more sustainability by commercial building assessment schemes. Existing building labelling schemes, such as LEED, BREEAM, DGNB, VERDE or HQE, are valued and recognized by the market (e.g. among investors and property developers) not only in their countries of origin or in Europe but worldwide. They award the best-in class buildings and drive the market up. They create a positive market-driven dynamic involving a broad range of stakeholders and paving the way for possible future mandatory requirements. They are still mainly addressing new constructions but many have also started to develop specific guidance for existing buildings. SAINT-GOBAIN supports the alignment of these private assessment schemes with the CEN/TC350 standards and encourages harmonisation between the schemes on key performance indicators: that is why we have been a partner of the SB Alliance work since its foundation.

In parallel, the building market should be *pushed* by excluding the worst performing buildings. We believe that this could be achieved by setting in regulations minimum performance requirements on a core set of standardised indicators[1]. The performance and the indicators should be displayed in labels / certificates[2]. This would allow comparison between buildings across EU countries. The minimum performance levels should be defined by country, in order to consider aspects such as local climate or cultural specificities, and be regularly reviewed and increased in order to improve the average performance of the building stock. Public entities should show the way and lead by example and be the first to display the performances of their buildings on the core set of indicators. These core indicators should also be included in Green Public Procurement (GPP) guidelines.

3 Environmental assessment of construction products

To assess the environmental performance of a building over its entire life cycle, it is necessary to rely on consistent environmental data for the incorporated construction products and materials. To allow calculation at building level, the detailed data must be made available according to common standards.

We consider that the only science-based approach to assess properly the environmental performance of construction products is through **Life Cycle Assessments (LCA)**, whose results shall be displayed in **Environmental products declarations (EPDs).** LCAs should be carried out according to a unique standard as

[1] derived from CEN/TC350 work and to be also mandatory in the commercial building assessment schemes

[2] E.g. a building environmental label similar to existing building EPCs energy performance certificates or a Building ID Card

well as the elaboration of EPDs: the existing **European EN 15804 standard** should be recognised in EU and national policies as THE only valid standard[3], without national additions or deviations. To be able to make calculations for all buildings it will be necessary to have data for all products and materials. That is why we believe that **EPDs shall gradually[4] become mandatory for all construction products placed on the European single market**.

First lessons learnt from experience with the standard, existing requirements in some national regulations or EPD systems and the new developments around the PEF methodology show that there is a need to review and upgrade the EN 15804 standard; such **a revised and strengthened EN15804 shall become the PEF methodology adapted for construction products**. In particular:

- EN15804 was initially supposed to define common rules for all construction products; practice has shown that it is not enough and that more detailed Product Category Rules (PCRs), are needed. In order to keep consistency and harmonisation across Europe, we support the idea that these PCRs should be developed vertically by the CEN Product Technical Committees;
- If LCA results are to be used on the market (for calculation, comparison or communication purposes), then the EPDs should be verified by independent 3rd parties to guarantee a high level of confidence in the data;
- The list of indicators could be updated to incorporate indicators already required in some markets, for instance, toxicity-related indicators.

Regarding **input secondary data to LCA**, there is a need for consolidation at EU level, for instance through further development of the European Life-cycle Database (ELCD). Currently, data are mainly coming from private databases that are not always fully coherent and transparent. This leads more and more often to disputes on the quality of input data and makes mutual recognition of EPDs difficult.

The current lack of harmonisation and mutual recognition between the different national EPD platforms leads to increased complexity to carry out EPDs and requires more resources, without creating real additional added value neither for the market nor for the consumers. This is why we support the objectives of the ECO PLATFORM initiative towards **harmonization and mutual recognition between LCAs carried out in different national EPD schemes**. If developed according to the unique standard and verified in one country, then an EPD should be fully accepted in any other country.

Regarding **databases of EPDs**, we assume that they should remain at national level in order to fit properly the market needs and to offer documents useful for the local professionals (language, local products…). A common European portal could be developed, linking to all national databases, in order to facilitate access.

4 Waste management and recycled content

See our position paper on C&D waste management and our answer to the European consultation on the Review of the European Waste Management Targets.

5 Eco-innovation

We consider that proper material management goes beyond end-of-life management. When developing new products, all environmental aspects should be considered across the whole life-cycle. EU policies should encourage companies to develop eco-Innovation policies aiming at offering consumers innovative sustainable construction products and solutions.

[3] This standard is consistent with the ISO 21930 and is already under implementation in many Member States and European companies (including SME's).
[4] « Phase-in » approach