

## **Comments on the Commission Communication and Recommendation on the Internal Market for Green Products and the Product Environmental Footprint Method**

PU Europe<sup>1</sup> takes note of this Commission initiative and wishes to submit the following comments:

### **General:**

- PU Europe fully supports the Commission objective to prevent manufacturers from making misleading and unjustified environmental claims in the market.
- PU Europe also agrees with the Commission regarding the need to base environmental claims on a harmonised / standardised life cycle assessment method using reliable and verifiable data.
- However, the use of the term "green" sounds more like a marketing slogan than a scientific assessment and, moreover, the definition of a "green product" (point 2.2 of the Communication) opens the door to misuse. Almost all products can claim to have a better environmental performance than other, similar products and could therefore call themselves "green". Furthermore, while a system A might show a lower carbon footprint, it might have a higher water footprint than system B: which one is "green"?
- This simplistic distinction between "green" and "not green" ignores the multiple facets of markets and use patterns. It should be stressed again that the LCA methodology can only highlight environmental impacts, trade-offs and improvement potentials. Comparative LCA studies rarely identify clear winners or losers.
- A multi-criteria LCA is a complex tool and more suited for business-to-business communication. When used for end products and business-to-consumer communication, it would have to be summarised in a single label to make it understandable to consumers. However, as stated in ISO 14040, there is no scientific basis for reducing LCA results to a single overall score or number, since weighting requires value choices.

### **The case of construction products:**

- PU Europe calls for a clear statement that the PEF method will not apply to construction products as such. Some years ago, the European Commission mandated the development of standards for the assessment of the environmental performance of buildings. These CEN standards are published and the construction products industry has already spent millions of Euros to have Environmental Product Declarations for construction products developed and third-party verified according to EN 15804. It would be a disaster for this crisis-hit industry, if all that money had been spent in vain, as the same Commission now proposes a slightly different scheme.
- This would also violate the spirit of the Construction Products Regulation. While the new Basic Works Requirement (BWR) 7 on the sustainable use of resources remains rather general, Recital 56 provides clear indications as to how the legislator wishes to implement it: "*For the assessment of the sustainable use of resources and of the impact of construction works on the environment Environmental Product Declarations should be used when available.*"
- An evaluation and weighting of data should always take into account the end-use application. For intermediate construction products, this is the building element or, indeed, the whole building. PEF, as it stands today, cannot achieve this and is not suited to enable sound design choices regarding the environmental performance of buildings.

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<sup>1</sup> PU Europe represents the European polyurethane insulation industry. Polyurethane (PUR/PIR) is the high performance insulant used in a wide range of building and technical applications to comply with the most stringent efficiency requirements.

- These differences in targets, audiences and, hence, formats and scopes are reflected in the structure of the CEN/TC 350 standards and PEF. PEF wants to assess and communicate the cradle-to-grave environmental performance of finished consumers products while TC 350, considering the building as the finished product, developed a standard to assess the building's environmental performance (EN 15978) and another standard to assess and communicate the environmental profile of construction products (EN 15804) in the form of Environmental Product Declarations (EPDs).
- The EPDs adopt a modular approach, with only the cradle-to-gate assessment of the construction product being mandatory, while the assessment of the subsequent life cycle stages remains optional. There is no aggregation of the results across the various life cycle stages. The reason is that the exact end-use and end-use performance of these products is unknown to manufacturers when they place their product on the market. Only the building assessor, knowing all the components, the building design and performance requirements can perform a cradle-to-grave assessment of the building and use or replace the scenarios provided by the manufacturer. This modularity is a key element for building assessments, as it allows the inclusion of scenarios for installation / use / maintenance / dismantling / end of life, which are all building- and not product-dependent.
- The Commission must recognise that the construction sector is far more advanced in its efforts. Many product groups, including thermal insulation, are already working on identifying specific product category rules based on EN 15804. The results of this work must be respected.
- PU Europe therefore finds it encouraging that the Communication stresses the Commission's will to support sector-specific activities (including construction), and work on or promote compatibility between these methods. The construction products industry is faced with a rapidly increasing number of national and regional environmental assessment schemes. Working towards compatibility between PEF and the European standards would certainly be in the interest of the industry. It is however regrettable that the Commission had not worked with CEN/TC350 from the outset to achieve a single European scheme. Instead, the Commission chose to develop its own system and now looks into ways to achieve compatibility. As outlined above, this has led to some fundamental differences which might be difficult and costly to reconcile.
- The draft revised Directive on Public Procurement as proposed by the European Commission and modified through draft amendments in the European Parliament, explicitly allows for the use of European, international and other labels to address environmental aspects for supplies (products) and (construction) works. It is not understandable that the Commission provides for the multiplication of new assessment schemes while, at the same time, stressing the need for a single method to assess products and, in a separate initiative, buildings.

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