



José Manuel Barroso
President of the European Commission
Collège 1
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Brussels, 28th January 2009

The European insulation industry calls for a coherent approach towards sustainable construction

Dear Mr Barroso,

The European Insulation Platform (EIP) is strongly committed to increasing the energy and environmental performance of buildings. The EIP members have therefore offered their full support to the recast of the Energy Performance of Buildings Directive (EPBD) and actively participate in discussions concerning the future Construction Product Regulation (CPR). Furthermore, EIP members contribute to the Commission mandated standardisation work in the CEN product TC's and in CEN TC 350 (sustainable construction) and CEN TC 351 (regulated substances). The objective of these activities is to develop harmonised test-, calculation and classification methods for the environmental and health-related performance of construction products and enhance the Internal Market for these products.

The EIP is however concerned about a number of parallel legislative and regulatory initiatives jeopardising the coherence of the European policy approach. They include

- the extension of the eco-design directive and the energy labelling directive to include energy-related products;
- the green public procurement initiative for construction products and
- the eco-label for buildings and the intention to develop eco-label criteria for energy-related construction products and, in particular, insulation.

These initiatives do not take into account the ongoing work in the CEN committees and look at construction products in an isolated manner without relating the product performance to the end-use application. Without this, it is however impossible to determine the environmental performance of construction products in their use phase. EU supported re

search shows that the use phase accounts for 98 % of the environmental impacts of buildings in the case of existing buildings and about 80 % in the case of new buildings¹.

The level to which an insulation material contributes to the overall building sustainability and energy performance highly depends on the building design and orientation, the quality of the works and the local climatic constraints.

The insulation material should first of all be fit for use (CE marking) and ensure the desired level of thermal insulation during the entire use-phase of the building (EPBD). This corresponds to the interests of owners, users and society in general who want energy efficient and sustainable buildings.

These aspects are covered by existing legislation and, in the case of sustainability, the future Construction Products Regulation. Mandated standardisation work in CEN product TCs as well as CEN TC 351 and CEN TC 350 provide the practical implementation tools (prEN15804).

The EIP worries about the development of additional sets of sustainability / environmental performance criteria. There is a risk that green public procurement, eco-design implementation measures and the eco-label criteria each use different sets of parameters and assessment methods for these parameters which, in addition, differ from the requirements of the Construction Products Directive / Regulation and the related standards. This would lead to disproportional additional costs for manufacturers with SMEs being most severely penalised. On the other hand, the benefit for the environment, if any, would be limited. On the contrary, these additional financial burdens would negatively affect the competitiveness of energy-saving products such as insulation materials although studies clearly prove that insulation provides the most cost-effective solution for energy savings in buildings².

The construction market is facing a large number of parallel voluntary and mandatory initiatives. In addition to a rapidly increasing number of national labels, the following European schemes are in place or under development:

- Energy performance certificate for buildings (compulsory, introduced by the EPBD);
- Sustainable buildings label (voluntary, in preparation at TC 350, mandated standards);
- Energy labelling for construction products (compulsory, planned, extended Energy labelling directive);
- Eco-label for buildings (voluntary, in preparation);
- Eco-label for construction products (voluntary, planned).

This proliferation of labels will cause significant confusion in the buildings supply chain and among end-users and may harm the credibility of the whole idea.

In conclusion, the EIP calls on the European Commission to carefully weigh up the additional costs and benefits of the proposed measures and work towards a coherent policy approach. This should focus in particular on the following objectives:

- Sustainability initiatives for energy-related construction products should only be launched if there are no specific provisions with a similar objective, nature or effect in

¹ Environmental Improvement Potentials of Residential Buildings (IMPRO-Building), JRC 2008

² A cost curve for greenhouse gas reduction, McKinsey, 2007

other existing rules of Community legislation such as the Construction Products Directive / Regulation or REACH. Confusion in the market and excessive costs due to overlapping legislation must be avoided.

- The Commission Directorates General should agree on one single set of sustainability criteria to be applied to all initiatives whether they are voluntary or mandatory. The EIP strongly recommends the environmental criteria developed by CEN/TC350 with a view to avoiding duplication of work.
- The European Commission should ensure that the performance of intermediary products, such as energy-related construction products, is always assessed at the level of the end-use application (building, major building component such as roof, wall etc.). CEN/TC350 provides the tools to link individual product data to end-use applications.
- All sustainability initiatives must take account of the whole product life cycle, including the use phase, and be based on scientifically sound criteria.

Yours sincerely,

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The European Insulation Platform (EIP) brings together in an informal manner four associations representing different segments of the European insulation sector, namely:

- Rigid Polyurethane Foams (BING)
- Expanded Polystyrene (EUMEPS)
- Mineral Wool (EURIMA)
- Extruded Polystyrene Boards (EXIBA)