

CEMBUREAU FEEDBACK TO THE EUROPEAN COMMISSION'S INCEPTION IMPACT ASSESSMENT ON A SUSTAINABLE PRODUCTS INITIATIVE

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CEMBUREAU, the European Cement Association, welcomes the opportunity to provide feedback on the Commission Inception Impact Assessment (IIA) on the Sustainable Products Initiative.

The European Green Deal explicitly recognises the cement industry as essential to the EU economy as it supplies several key value chains. The European cement industry, on its side, is mindful of its environmental footprint, and our [2050 Climate Neutrality Roadmap](#), which was published in May 2020, sets out the cement industry's ambition to reach net zero emissions along the cement and concrete value chain by 2050.

The development of sustainable products in the cement and concrete sector is an important part of this effort. The industry is also at the heart of the EU's circular economy through the use of non-recyclable waste and biomass waste in cement production, and through its final product, concrete, which is fully recyclable.

Cement is covered by the Construction Products Regulation and EPDs are being developed in the sector to provide environmental information

Cement is CE marked which means it is covered by Regulation (EU) 305/2011 (Construction Products Regulation). In addition, the EU cement sector responds to the increased awareness and the requests of professional users and consumers for environmental information through the development of cement Environmental Product Declarations (EPDs), especially for B2B communication. For instance, cement EPDs were fundamental for the environmental input to CEMBUREAU's Level(s) building sustainability assessment framework pilot projects (please see below).

Furthermore, cement companies comply with European legislation regulating dangerous substances and mixtures like REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) and CLP (Classification, Labelling and Packaging).

We welcome the objectives of the sustainable product initiative, but it is crucial to ensure a consistent European policy framework for cement, which is already covered through other initiatives.

As expressed in the inception impact assessment, this legislative proposal is part of a larger regulatory framework where all initiatives announced in the Green Deal need to be developed with an eye for consistency and coordination of definitions and concepts.

We note that the inception impact assessment refers to cement as an intermediary product and specifically announces that cement will be covered by the initiative. In this respect, we would like to stress unlike other intermediary products that have different end-users, cement is a pure business-to-

business (B2B) product manufactured for its exclusive use in construction as the key ingredient to deliver the performance of its main end-product concrete.

As mentioned above, cement is covered by Regulation (EU) 305/2011 (Construction Products Regulation - CPR). The CPR – which is currently under revision – is a solid regulatory framework able to facilitate the delivery of environmental information from construction products and can implement any requirement derived from environmental needs. In that sense, it will be important that the forthcoming impact assessment covers the overall coherence and consistency of the European policy framework. In particular, we believe that a widening of the scope of the Ecodesign Directive to make it applicable to construction products, or a new initiative that would conflict with the requirements from the CPR, would not be justified.

In the building sector, environmental assessments should be done at building level, rather than at product level

When it comes to the construction sector, a key challenge is that a given intermediary product – like cement or concrete – is part of an overall structure, whose sustainability has to be maximised. We echo the majority of the construction industries that measuring environmental sustainability, in the case of construction, should be done through a set of environmental impact indicators the performance of the final products, i.e. the whole building, water treatment plant, road, etc., as opposed to individual products such as cement.

The assessment of the environmental footprint should be over the whole life cycle of the building/structure. CEMBUREAU believes that the only tool to be referenced in the CPR to comply with BWR7 “Sustainable use of natural resources” should be the EN 15804 + A2 and Environmental Product Declarations (EPDs).

We must emphasize that the approach of EN 15804 is particularly adapted to the important peculiarities of the construction sector and that the European Commission’s Level(s) framework has relied on EPD information which proved essential for environmental information for the testing phase of the framework.

The idea of “mandatory recycled content” would be problematic in the case of concrete and should be fully assessed

Concrete is fully recyclable into aggregates, but we would warn against mandatory requirements on minimum recycled content, which can have negative environmental impacts. Recycled content targets for concrete are indeed difficult to meet and do not necessarily lead to an overall reduction in the environmental impact. This can happen for a variety of reasons: the supply of recycled materials may not always be available locally and may require transport, causing significant emissions as concrete is heavy by nature; concrete made of recycled aggregates may not have the lowest environmental impact; and recycled aggregates are often technically more suitable for other applications. Furthermore, it is very unlikely that sufficient quantities of recycled concrete could cover the overall concrete demand. Instead, policy-makers should encourage all recycling that results in a reduced use of virgin materials & energy, be it “open loop” or “closed loop”.

A large number of criteria should be taken into account to promote a sustainable built environment, and life-cycle analysis are key

CEMBUREAU supports the integration of Level(s) whole life carbon, circularity and health indicators into a set of EU policies like Green Public Procurement of buildings / infrastructures, which can be a useful tool to incentivise the take up of low-carbon products and accelerate the shift to a sustainable built environment while delivering on key European Green Deal goals.

We would also like to see durability, disassembly, adaptability, thermal inertia and circularity principles applying to the design of buildings and infrastructure, whereby the properties of construction elements like in concrete can be enhanced to enable their re-use in future life cycles of a building, in deep renovation, or in other future structures.

Finally, we would like to highlight the need to adopt a full life-cycle approach to products. As demonstrated in CEMBUREAU's [2050 Climate Neutrality Roadmap](#), significant CO2 savings can be made by devising policies covering the full life cycle, rather than the production of clinker or cement alone. Indeed, by design, cement is transformed into concrete, which is then used in buildings where it can lead to CO2 savings, up until its end of life where concrete can absorb CO2 through re-carbonation and be recycled. We believe it is key to keep such "life-cycle" approach in mind when devising policies related to sustainability and circularity.
