

THE NEW EU FOREST STRATEGY SHOULD NOT HAMPER EFFORTS TO DECARBONISE EUROPEAN BUILDINGS

CEMBUREAU's feedback to the Commission public consultation on a new EU Forest Strategy

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CEMBUREAU welcomes the opportunity to provide input on the Commission public consultation on a new EU Forest Strategy, and would like to recall that in the case of construction products, the principles of material neutrality and full life-cycle analysis are essential to deliver CO₂ emissions reduction in the built environment.

CEMBUREAU does not dispute that forest-based products have a role to play in Europe's economy. However, we are concerned by some of the questions raised in the Commission's consultation document around the promotion of wood-based products. These questions echo some statements made in different Commission documents and could lead to prescriptive policies to promote such wood-based products, which would not be scientifically based and would do little for climate protection. In this respect, CEMBUREAU calls on the European Commission to:

- **Ensure material neutrality and policies based on total CO₂ emissions reduction at building level:** there is a broad consensus among construction experts that the most efficient way to reduce CO₂ emissions from the built environment is to focus on emissions at the level of a building. In this respect, the European Commission's Level(s) approach, which promotes lifecycle thinking for buildings from design to end-of-life, based on fair assessments of material's performance, should be supported.
- **Ensure that any comparison between construction products is scientifically-based and rely on an approach based on Life Cycle Analysis (LCA):** An LCA considers all parts of the life cycle of a building material, from extraction of raw materials to end-of-life processing. For each process step, the impact of the prescribed environmental impacts is determined. In this respect, CEMBUREAU is concerned by the idea of twisting CO₂ accounting rules through the introduction of "temporary carbon storage" – a concept which would not take into account the end-of-life emissions from wood product, and put the burden of climate change to future generations. Such concept would serve as a disincentive for circularity, create market distortions, and conflict with the European Commission's work on Level(s), and EU Product Environmental Footprint methodology¹.
- **Carefully analyse, based on expert advice from relevant stakeholders, the potential impact of using wood-based products on deforestation, biodiversity, carbon sinks and**

¹ JRC, 2019. Suggestions for updating the Product Environmental Footprint (PEF) method: "Credits associated with temporary and permanent carbon storage and/or delayed emissions shall not be considered in the calculation of the climate change indicator. This means that all emissions and removals shall be accounted for as emitted "now" and there is no discounting of emissions over time (in line with ISO 14067:2018)."

other related issues. CEMBUREAU for instance understands that there would be significant natural limitations in using timber production to substitute other construction materials².

- **Equally support the drive for decarbonization of life-cycle emissions for all materials:** Each building design is unique, and while a building design may substitute wood, steel or concrete elements to some degree, all materials are typically prominent regardless of a declared material preference in a given structure. Policies should be developed that equally support and drive the decarbonization of life-cycle emissions for all building materials and avoid favouring one material or application without clear evidence that overall life-cycle emissions are effectively reduced. In this respect, CEMBUREAU re-iterates that it published [its carbon neutrality roadmap](#), looking at how net zero emissions can be achieved throughout the cement and concrete value chain by 2050.

We call on the Commission to remain technology and material neutral and science-based, and refrain from being prescriptive in the promotion of building materials or solutions, which are not underpinned by a robust analysis that assess different building solutions over the whole life-cycle of a building, and not move forward with legislation and policies affecting the single market.

² See for instance the [factsheet](#) from the NGO Bellona on cement and concrete: “*Replacing 25% of cement used in construction would require cutting a forest 1.5 times the size of India*”.