

To: Mr Frans Timmermans, Executive Vice-President,
Mr Virginijus Sinkevičius, Commissioner for Environment, Ocean and Fisheries
Mrs Kadri Simson, Commissioner for Energy

CC: Ms Kerstin Jorna, Director General of DG GROW
Ms Florika Fink-Hooijer, Director General of DG ENV

Brussels, 14 March 2022

Subject: environmental organisations warn the forthcoming Construction Product Regulation will fail to address climate and environmental impacts of construction

Dear Executive Vice-President, Dear Commissioners,

We, the undersigned environmental organizations, urge the Commission to carefully consider the alignment of the forthcoming Construction Products Regulation (CPR) with the objectives of the European Green Deal to decarbonize our economy.

Together with buildings, construction products - including energy-intensive intermediaries such as cement and steel, account for approximately 50% of all extracted materials, 33% of water consumption and 35% of EU waste. These translate to 36% of EU carbon emissions.

Today, no mandatory environmental performance or information requirements exist to deliver sustainable construction products to the EU market and thus support the EU climate targets. With the current Energy of Performance of Building Directive (EPBD) proposal falling short of providing demand-side incentives for the uptake of sustainable construction products, the CPR represents a unique opportunity to effectively accelerate decarbonisation of new construction, and of the existing building stock by supplying more sustainable products under the Renovation Wave.

It is absolutely vital that the soon-to-be-released CPR proposal, is aligned with the objectives of the Sustainable Products Initiative to make sustainable products the norm by driving innovation through the gradual exclusion of worst performers from the market. We therefore call on you to:

1. Introduce mandatory environmental requirements on carbon footprint, resource and water use, chemical content in the text of the CPR, to create a level-playing field for products entering the EU market.
2. Prevent greenwashing by making disclosure of environmental performance of products mandatory for manufacturers, throughout the entire lifecycle. This can be done by introducing information requirements supported by a harmonized assessment methodology such as PEF to allow for a proper comparison of products based on their true performance.
3. Avoid at all costs that the development and setting of these obligations is outsourced to the standardisation system (CEN TC 350/WG3), where dominant industry manufacturers will be able to set their own requirements and align on a minimum common denominator, potentially stifling competition, SMEs market access, and innovation.

4. Remove barriers to low-carbon, circular and non-toxic products under the CPR, and facilitate an increased market penetration, by ensuring the worst products are pushed off the market. To give a concrete example, mainstreaming the market for used and recycled construction products should be supported by clear definitions and scope, as well as incentives to market access and upscaling. It is also crucial to note that low carbon circular construction products are an essential market driver for the decarbonization of Energy Intensive Industry, as called for in the EU Industrial Strategy.
5. Set a clear workplan for the development of requirements to address core environmental hotspots of construction products, ensuring transparency and accountability in achieving these objectives. Improving the current system where no transparency and limited SME and civil society participation is ensured must be addressed as a priority.

On behalf of the below signatories, we urge you to take these points in consideration when assessing how fit-for-purpose the forthcoming CPR is in tackling the substantial environmental impacts from construction products against the decarbonization objectives set by the European Green Deal. We remain at your disposal to further discuss these elements.

Yours faithfully,

Justin Wilkes, Executive Director, ECOS (Environmental Coalition on Standards)

On behalf of:

