



Council of European Producers of Materials for Construction
Conseil Européen des Producteurs de Matériaux de Construction
Vereinigung Europäischer Baustoffhersteller

Vice-President Günter Verheugen
Commissioner Stavros Dimas
Commissioner Andris Piebalgs

European Commission
Rue de la Loi 200
1049 Brussels

Brussels, 6 February 2009

Dear Vice-President Verheugen,
Dear Commissioner Dimas,
Dear Commissioner Piebalgs,

CEPMC calls for a coherent approach towards sustainable construction

CEPMC welcomes the Sustainable Production and Consumption Action Plan of the Commission, and in particular, the steps taken towards making the EU building stock more energy efficient and promoting sustainability criteria in EU building policy. As we have previously indicated, greater energy efficiency in buildings makes real progress on Climate Change commitments possible, as well as being economically cost effective, creating jobs and giving increased comfort levels.

However, CEPMC sees a real risk for the inadvertent creation of a patchwork of overlapping and sometimes conflicting national and European legislation, standards and policies on sustainability as listed below. There is indeed a danger that well-intentioned moves by the Commission on sustainable construction will create confusion through a lack of coherency, focus and understanding of the role of the construction products in the building.

We refer to the following sustainability initiatives:

1. The Construction Products Regulation (and more specifically Basic Works Requirement 7: Sustainable use of natural resources);
2. The EC mandated work carried out by CEN TC 350– Sustainability of construction works- and TC 351- Construction products: assessment of release of dangerous substances (both Technical Committees with strong support and commitment of the industry);
3. The current development of Green Public Procurement Guidelines for specific construction product groups;
4. The enlargement of the Eco-design and Energy-labeling Directives to cover some construction products;
5. The work on the Eco-labeling scheme;
6. The recast of the Energy Performance of Buildings Directive;
7. The Lead Market Initiative on Sustainable Construction and;
8. The general discussion on sustainability assessment at building level versus individual product level;



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In our many contacts with the different responsible Commission services we have concluded that more inter-action and organized co-ordination are necessary in order to produce results focused on achieving sustainability in practice.

The performance of the construction product in a building depends on how it is installed and functions as part of the building structure or the system. And rather than the environmental or energy performance of individual construction products, it is the overall performance of the building over its whole life cycle, which will add up to improved design and construction in the built environment and generate the desired energy savings. ***In simple terms, a product conforming to EU and MS regulations and/or bearing an Eco-Label does not necessarily make a safe and environmentally friendly building. If it is not suitable or not specifically designed to contribute to the overall performance of the building, or if it is badly integrated in the design phase or wrongly installed in the building, the construction product loses all its environmental and safety credentials.*** This viewpoint is broadly supported but does not seem to receive the attention it deserves in the practice of establishing rules intended to enhance sustainable construction.

Therefore, we call on the Commission to undertake the necessary action to prioritize initiatives, increase transparency, coordination and coherence in a more logical and concerted approach to all the different initiatives related to the sustainability of the EU building products sector as mentioned above.

We suggest the Construction Unit of DG Enterprise be given clear charge of this coordination with all the necessary power and resources to avoid all the overlapping initiatives and build a coherent approach.

We in CEP MC stand prepared to co-operate fully and actively with the appropriate representatives in the Commission in this area that can truly be win-win situation for all concerned. We would be delighted to put more detailed proposals on a face-to-face basis.

Best regards,

Erwin KERN
President CEP MC

Cc: Catherine Day