



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

## **PROPOSAL FOR A DIRECTIVE ON ECODESIGN REQUIREMENTS FOR ENERGY RELATED PRODUCTS - 2008/0151 (COD), named hereafter the "ECODESIGN DIRECTIVE"**

Let us imagine how confusing it would be for the consumer if, when buying a car, in addition to its CO<sub>2</sub> release labelling, he should also consider energy labels for the engine, gearbox, axle differential and air conditioning, an eco-label for the seats, the carpets and the steering wheel and, last but not least, a CE-mark for the various components based on two different legislations, one based on technical conformity and one based on eco-design. Then he would have to compare this information for various cars before taking a well-informed decision. Confused? Well fortunately this will not happen for cars as means of transport are exempted from the scope of the eco-design directive, but it may well happen for buildings.

The construction materials industry is fully committed to the principles of sustainability and sustainable construction, both at product level and at works level, i.e. buildings and infrastructures. We are working closely with the European Institutions and the European standardisation body, CEN, for the development of appropriate legislative and measurement tools to ensure the high safety, energy efficiency and comfort levels of our products and of the buildings in which they are integrated.

Our sector is also committed to declaring the environmental performance of their products through Environmental Product Declaration (EPDs). However, the environmental impact of construction materials is small if compared to the environmental impact of the building. A recent EC study<sup>1</sup> calculated that the total environmental impact of new buildings mainly depends on the use phase. Initiatives as Eco-design and Green Public Procurement only aim at fixing product-related environmental requirements without looking at end-use applications. The uncoordinated EC action and excessive environmental targets for both product and the specific design of building works will prevent these European initiatives from maximising potential environmental benefits, while imposing a disproportionate burden on the industry.

However, in the period from May 2008 to November 2008, the European Commission (EC) has proposed to the European Parliament and the Council no less than eight European initiatives, which directly impact construction materials. These are:

- Revision of the Construction Products Directive, proposed as a Regulation.
- Recast of the Energy Performance of Buildings Directive (EPBD).
- Recast of the Eco-design Directive, with an extension of the scope from "energy-using products" to "energy-related products".
- Recast of the Eco-label Regulation.
- Recast of the Energy Labelling Directive, with an extension of the scope from household appliances to all energy-related products.
- Development of Green Public Procurement criteria for construction materials.
- Lead Market Initiative (LMI) on Sustainable Construction.
- European Economic Recovery plan which has construction as on priority sector.

Last but not least, sustainability ratings at both product and building works levels are developed in a great number of Members states with no coordination between these various national initiatives.

The European Parliament and the Council are doing an important effort to deal with these complex matters simultaneously and, if possible, complete the legislative process before the June 2009 European elections.

Together, our industries are calling on to the European Institutions for consistency in the legislation process and more support for the construction materials industry sectors in order to secure employment and provide healthy and environmentally friendly housing for Europe.

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<sup>1</sup> Environmental Improvement Potentials of Residential Buildings (IMPRO-Building), JRC 2008



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**Therefore, building and construction materials should be excluded from the scope of the Eco-design Directive.**

**As such, we ask you to consider tabling the following amendment:**

Proposal for a  
**DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL**  
establishing a framework for the setting of eco-design requirements for energy related products  
**2008/0151(COD)**

## **AMENDMENT**

### **Amendment 1**

**Proposal for a directive**  
**Article 1 – paragraph 3b (new)**

*Text proposed by the Commission*

3. This Directive shall not apply to means of transport for persons or goods

***Amendment***

3. This Directive shall not apply to means of transport for persons or goods **and to building and construction products**

### ***Justification***

*Building and construction products are already subject to a complex legislation through which all eco-design aspects are already or will soon be covered:*

- *Construction Products Directive (CPD) under revision & future Construction Products Regulation (CPR)*
- *Energy Performance of Buildings Directive (under recast)*
- *Waste Framework Directive*

*European, international and national level standards already exist or are presently under development. These initiatives include the evaluation of the environmental performance of complete buildings, based on Environmental Product Declarations (EPDs), which provide much more detailed information on environmental impacts than Eco-design, Eco-labels or Energy Labels.*

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