



Position Paper on the introduction of an EU-initiated PEF-methodology into the construction sector

ECO Platform, representing all major European Environmental Product Declaration (EPD) program operators in the construction sector, welcomes the initiative of the European Commission to converge the EN15804 and the PEF methodologies for EPDs in the construction sector. With well over 2.000 registered EPDs based on EN15804, representing an industry investment of several million Euros, the ECO Platform believe that such a convergence should build on the vast experiences gained in the sector with EN15804 to make use of the upcoming PEF proposals in a way that will meet a general acceptance in the business sector to further improve today's successful common practice.

Background

ECO Platform recognizes the need for regular efforts to revisit LCA methods described in existing standards for the purpose of improving their practical applications for different market purposes. Therefore ECO Platform welcomes the initiative of the EU commission to further refine the international standards on LCA and EPD in this context, specifically the CEN standard EN 15804 - *Sustainability of construction works – Environmental product declarations – Core rules for the product category of construction products*. The Commission suggests to converge EN 15804 with suitable elements of the PEF methodology which is currently being tested as pilots in the EU for various sectors, including the construction sector.

ECO Platform would like to highlight the fact that the EN 15804 has become a big success on the European market by means of voluntary engagement by a large number of companies and trade associations in the construction sector through the establishment and the activities of the ECO Platform. Furthermore, many national regulations and voluntary schemes in Europe refer to EN 15804. This positive development has also been reflected by an increasing uptake and practical use of EPD within the European internal market of construction products thus reducing potential technical barriers based on environmental requirements.

Based on its ambition to support harmonization and avoid inconsistencies with regard to the practical use of EPDs on the European market and beyond, ECO Platform members have raised some concern on the seemingly rapid introduction of the PEF methodology. In order to support and be constructive the Board of the ECO Platform has decided to draft and provide this Position Paper on the subject to the EU Commission with the hope that it might be taken into account for future activities following the Commissions ambition for "Single Markets for Green Products Initiative".

European companies in the construction sector being members of the ECO Platform have invested large amounts of money in collecting LCA-data, convert and present them as EPDs including activities for official registration and publication. A rough estimate of the total costs carried by the construction sector to establish EPDs so far will amount to, as a minimum estimate, around 50 million Euros. However, also including investments over the previous years the total cost is much higher, maybe two-or three fold this figure.

About ECO Platform

ECO Platform is an International Non-Profit Association established by European EPD Program Operators registering ECO Platform EPDs, European Trade Associations in the construction sector and

LCA practitioners. Its work formally started in September 2011 with a MoU signed between 26 partners in 16 European nations. The ECO Platform organization was officially launched in June 2013 by 13 Founding Members. In the scope of these Program Operators thousands of EPDs are already available and in practice.

The activities of ECO Platform are in full compliance with the work of CEN TC/350 and the rules set forth in EN 15804. The overall objective of ECO Platform is to support the development of verified environmental information of construction products, focusing specifically on EPDs. An important added value of EPDs developed under the ECO Platform framework is the attempt to establish principals for mutual recognition between EPD program operators to enable the common use of ECO Platform EPD's for most of the European markets. ECO Platform members are committed to the removal of technical barriers in the internal market due to environmental requirements.

Furthermore, the EPD methodology following EN 15804 fully supports and practice the principles of circular economy. Hence, EPD program operators can proactively facilitate, motivate and initiate activities related to the concept of a circular economy in the future.

EPDs in the construction sector are somewhat different from other EPDs

It is worth noting that EPDs in the construction sector are somewhat different from other EPDs as they represent intermediate and long lasting products. Their assessments from an environmental point of view therefore have to be carried on a building level. They usually also cover quite a large range of different sizes and formats of products in a specific product category. In addition, construction products are very seldom sold in market places for private consumption.

Our viewpoints

ECO Platform understands the initiative taken by the EU Commission to carry out an overview of existing standards in case new expectations emerge of additional practical applications possible when making use of these standards. However, it is important that such a development is carried out in a close cooperation with international standard bodies and partners associated in their work to be accepted on a global scale. Therefore, a convergence between relevant ISO standards, EN 15804 and the PEF methodology for construction products is a necessity instead of any preference for either one of them.

Such a necessity for a global recognition includes the following activities that ought to be carried out:

- Maintenance of modularity and definition of system boundaries at the construction works level
- Amendments of EN 15804 according to the presented mandate M/350 to lead to its use as the horizontal PCR for construction products

Also other activities are of high priority, among them:

- The approach taken by the Commission shall follow supporting standards on the methodology for declaring environmental performance of products
- Necessary complementary steps taken by the Commission at the product (TC) level must or ensure a consistent system approach and avoid diverging developments
- The use of weighting methods, bench-marks and procedures to categorize and rank products ought to be excluded from a modified EN 15804 and considered in another context

ECO Platform would like to emphasize that it seems logical that substantial amendments of the CEN standards developed under the original mandate to CEN TC/350 should wait until the evaluation of the PEF methodology pilot projects has been carried out and the results have been generally accepted.

Our offer

Any doubt of the usefulness of the PEF methodology will most likely be avoided if its future use in a European context will undergo a thorough discussion with industry having experiences of the use of

relevant international standards on the subject. This ought to be a key activity during the execution of the pilot tests carried out. It is also a vital component during the subsequent evaluation once the pilot studies are completed that such a discussion will take place before any decision is taken about the eventual implementation of the PEF methodology into existing standards.

The activities of the ECO Platform members have resulted in a vast amount of experiences of the practical application of EN 15804 including e.g. methodological issues, verification procedures and suitable ways for communicating the results to various audiences on the market. These experiences represent a world-wide unique knowledge that the EU Commission should benefit from in its work with developing its PEF methodology. In fact, some of the ECO Platform and CPE members are participating in the work with the PEF pilots, which we appreciate and give our full support to.

The ECO Platform therefore offers to become an active partner in the process of the final evaluation of the PEF methodology for the construction sector. This offer also includes an invitation to representatives of the EU Commission to a common meeting so they can gain further insights on the ECO Platform's position on the subject.