

Environmental performance of products & businesses – substantiating claims – Feedback on the Inception Impact Assessment

31 August 2020

CEI-Bois fully supports the ambition of the EU to reduce significantly the environmental footprint of products consumed in the Union and to attain the carbon neutrality target by 2050. CEI-Bois also agrees with the aim of moving towards a more harmonised approach for providing reliable product environmental information.

For what concerns specifically the building sector – one with the highest impact in terms of carbon emissions and resource use - the wood industry supports the mainstreaming of LCA-based approaches in product policy, and welcomes the suggestion to shift towards a “whole life carbon thinking” approach put forward in the Commission Document “Sustainable Products in a Circular Economy - Towards an EU Product Policy Framework contributing to the Circular Economy”. More recently, in the 2020 Circular Economy Action Plan, the European Commission has announced the intention to explore “the appropriateness of setting of carbon reduction targets and the potential of carbon storage” in buildings, which is also strongly encouraged by the wood industry.

To do so, the first step is to perform LCA analysis of construction products with an harmonised methodology. To this aim, if any legal obligation is to be imposed, the wood industry recommends to use the revised EN15804, which was revised to align with the PEF methodology, and to use PEF as a complementary method for other products categories (Option 2). This would minimise the costs that the industry would incur should it need to adapt to a new methodology for producing Environmental Products Declaration. This factor becomes even more relevant considering that the vast majority of companies in the sector are small and medium enterprises.

Another relevant advantage is that in EN15804 biogenic carbon is displayed for each part of the life cycle and so the quantity stored in the product is shown and can be used for further calculation.

It furthermore provides a platform for presenting the benefits of construction products to other levels: calculations in the standard for the building level, potentially machine readable EPDs and Building Information Modelling (BIM). For this a breakdown of impacts from the product life cycle is required to make bespoke calculations. PEF Declarations, or a database based on them, cannot provide enough granular data to supply this demand for BIM as assumptions regarding the life cycle have already been enforced unless this methodology can be amended first.

Finally, customers use digital platforms to compare and make decisions based on a multitude of factors. The EU should support the development of EPD information and digital platforms where this information is made broadly available via API (Application programming interface) for decision making tools and methodologies like BIM.

The EPD information on the database is easy accessible via the GTIN Barcode identification of the product; for example, it could be collected and interpreted via App on the smartphone.

About us

CEI-Bois represents 21 European and National organisations from 15 countries and is the body backing the interests of the whole industrial European wood sector: more than 180.000 companies generating an annual turnover of 142 billion euros and employing 1 million workers in the EU.