

Unlocking the potential of Construction Chemicals to support Sustainable and Affordable Housing Construction

Feedback in Call for Evidence on European strategy for Housing Construction by the German Construction Chemicals Industry Association (Deutsche Bauchemie)

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Rising housing costs and elevated construction and renovation expenses increasingly pose financial strain on European citizens, particularly affecting vulnerable households, while at the same time hampering the necessary modernization of Europe's infrastructure. Consequently, the construction of affordable and sustainable high-quality housing stock has become a matter of urgency throughout Europe – both in urban and rural areas – a challenge that cannot be met without efficient and innovative construction solutions. According to housing demand forecasts¹, by 2030 an annual construction demand for around 320,000 new residential units is expected in Germany.

As Europe strives to address the social and environmental dimension of the residential building stock crisis and seeks to close the housing supply-demand gap via initiatives, such as the EU Renovation Wave Strategy under the European Green Deal, it is crucial to recognize the transformative contribution construction chemicals can make in achieving the targets of a European Strategy for Housing Construction.

It should be emphasized that affordable housing construction is not only determined by the functional building elements themselves, but also by the planning of building structures, and by using materials wisely in the appropriate areas of application. In that regard, advanced construction chemicals offer an essential toolkit both for the development of cost-efficient new builds and the renovation of existing residential building inventory. They play a vital role when it comes to accelerating construction times, reducing construction-related costs and resource consumption, optimising energy-efficiency or extending the lifespan of buildings. Overall, the potential construction chemicals have to offer in support of cost-efficient, scalable and sustainable housing construction spans across a vast range of applications, particularly when aligned with stringent health and safety standards. Such examples include, but are not limited to:

- prefabricated concrete elements for modular buildings and digital building solutions to optimize construction times,
- high-performance construction chemicals that allow efficient material usage in the construction stage or enhance the durability of building elements while minimizing long-term waste generation,
- structural elements with reduced thickness that make lower construction and operational costs possible without compromising quality and structural integrity,
- air and water insulation materials for energy-efficiency and prevention of moisture-related damage,
- hybrid construction methods that combine the positive effects of individual materials and elements coupled with technologies which support the reuse and recycling of construction materials spurring the shift towards circular construction practices.

As such, the German Construction Chemicals Industry Association (Deutsche Bauchemie) welcomes the European Commission's ambitious initiative on an Affordable Housing Plan and a European Strategy for Housing Construction. Given the pivotal role of construction chemicals in tackling the ever-worsening housing

shortage, coordinated policy efforts focusing on stabilizing construction costs while accelerating the green transformation of the built environment are essential.

It is, however, also imperative to note that any upcoming European Strategy for Housing Construction must be pragmatic and should be tailored to the respective needs of its end recipients to ensure easy accessibility without imposing additional administrative complexity on both EU citizens and industry. To facilitate its implementation, we recommend a set of targeted regulatory actions to increase the competitiveness of the construction chemicals sector, allowing stakeholders (i.e. construction companies, manufacturers, planners, installers, etc.) to effectively fulfill their strategic role and contribute to the development of affordable residential infrastructure:

1. Reduce market access barriers for construction products that meet quality, safety and sustainability standards by limiting the regulatory burden and by simplifying approval procedures for CE-marking and market entry:
 - Improve the cost-efficient implementation of the commendable Construction Products Regulation (CPR-2024) through a Construction Sector Omnibus, i.e. very targeted, limited CPR Omnibus-amendments and non-legislative acts:
 - Eliminating legal ambiguities concerning the content of technical documentation and the Declaration of Performance and Conformity (DoPC) and securing harmonized interpretation and legal certainty for companies and national enforcement, for instance by withdrawing the specification of a single batch number within the DoPC,
 - Extending the given deadline for finalization of adopted EAD publications and aligning validity period of existing EADs with newly developed EADs,
 - Avoiding new focus on product-specific assessments in AVS 2+,
 - Developing robust reference methods for additional environmental characteristics as a prerequisite before mandatory declaration,
 - Enabling efficient declaration of environmental performance based on established solutions by industry associations (i.e. certified sector-EPDs)
 - Keep a risk-based approach as the guiding principle for chemical regulation within the upcoming REACH-Revision:
 - A shift towards generic hazard-based assessments must be avoided, as it undermines the nuanced evaluation of actual exposure and use conditions.
 - It is crucial to maintain access to the existing portfolio of construction chemical products whose safety has been well demonstrated, in order to ensure that professional users can continue to rely on high-performance solutions across a wide range of construction applications.
 - Reduce unnecessary administrative burdens on manufacturers by swiftly implementing the Chemicals Simplification Omnibus proposal through legislation to support innovation and competitiveness in the construction chemicals sector.
2. Strengthen EU funding mechanisms on innovative technologies that promote cost-effective, resource-efficient and time-saving construction practices and support their accelerated implementation at mass scale ensuring rapid market maturity. Such technologies include 3-D concrete printing, modular/prefabricated construction, digital analysis and planning tools (e.g. Building Information Modeling (BIM) and construction management software), etc.

3. Boost the digital transition across the building sector at all stages of the value chain maximising productivity and tackling labour shortages by supporting relevant know-how acquisition and continuous construction workforce upskilling.
4. Break down existing barriers holding back from establishing reliable supply chains of secondary materials, and accessing products manufactured with renewable and/or recycled (i.e. alternative) feedstock processes:
 - by establishing standardized quality criteria for the use of recycled input materials (e.g., recycled aggregates) that can partially or fully replace natural ones while maintaining the required performance standards. Until proper and robust quality specifications have been introduced and a consistent supply chain can be ensured, requirements for the use of such recycled materials (e.g., proportion of recycled aggregates in concrete or mortars) should be waived;
 - by eliminating regulatory hinderances that impede a swift transition to circular chemical production models for construction chemicals with existing infrastructure. Against this backdrop, the importance of the horizontal recognition of chemical recycling technologies, such as mass balance chain-of-custody (CoC) methods, in resource-intensive industrial sectors, such as construction, should be emphasized.

Construction chemicals are not just auxiliary materials – they are powerful instruments that can accelerate the efficient delivery of affordable, high-quality and energy-performing housing across the EU and, thus, can purposefully contribute towards achieving the technical, social and environmental goals of the European Housing Strategy. Therefore, their full potential should be leveraged via targeted integration into policy and funding frameworks.

¹ Müther, Anna Maria; Waltersbacher, Matthias, 2025: Zentrale Ergebnisse der BBSR-Wohnungsbedarfsprognose. Neubaubedarfe in Deutschland bis 2030. BBSR-Analysen KOMPAKT 05/2025, Bonn. <https://doi.org/10.58007/kxyg-cm28> (Federal Institute for Research on Building, Urban Affairs and Spatial Development)

Deutsche Bauchemie e.V.
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The German Construction Chemicals Industry Association (Deutsche Bauchemie) has been representing the interests of its member companies and the German subsidiaries of foreign corporations to the professional public, politics, authorities, science, and media for 77 years. The industrial association is a sector association within the German Chemical Industry Association (VCI). In 2024, the approximately 140 member companies generated a turnover of 4.6 billion euros in Germany with around 32,000 employees.