

Statement of Deutsche Bauchemie on the "Initiative for Sustainable Products"

Deutsche Bauchemie supports the environmental and climate goals and the related promotion of sustainable products. The products of the construction chemicals industry already make an important contribution to increasing the resource and energy efficiency of buildings. The products are being continuously optimised in this regard.

Supply chain communication and long-term documentation of required information should be supported and improved through more extensive digitalisation. While doing so, it is important to maintain and strengthen the competitiveness and innovative capacity of European industry.

Deutsche Bauchemie would like to provide the following comments on the "Sustainable Products Initiative":

- **The sustainability of a construction product cannot be meaningfully assessed in isolation, but only in relation to the installation situation at the building level.**

Construction products are in the special situation that they are not end products, but intermediate products of buildings. The regulations on the sustainability and environmental performance of construction products must therefore be aligned with the corresponding regulations for buildings. It should also be noted that the usual service life of a construction product installed in a building is considerably longer than the service life of consumer products.

- **An application of the Ecodesign Directive to construction products is not necessary.**

Construction products are subject to the European Construction Products Regulation (EU) 305/2011 (CPR) and must officially bear a CE marking. Environmental, health and sustainability aspects are covered by the current CPR and will receive greater attention in the process of the upcoming revision of the CPR. Therefore, for construction products, it is not necessary to implement possible measures of the "Sustainable Products Initiative" via an extension of the Ecodesign Directive. A suitable European legal framework is already in place in the form of the CPR.

- **Environmental product declarations have established their worth.**

Environmental Product Declarations (EPDs) according to EN 15804 have proven their worth for the determination and communication of environmental impacts of construction products and are successfully used for many construction products. With the revision of EN 15804, the EPD methodology was adapted to the PEF methodology wherever possible. EPDs according to the current EN 15804+A2 are thus the state of the art and should be used in the case of measures of the "Sustainable Products Initiative".

- **Use digital Declarations of Performances of Construction Products as "Digital Product Passports".**

In accordance with the provisions of the Construction Products Regulation, all relevant characteristics of harmonized construction products are communicated in the supply chain in form of a declaration of performance. The upcoming revision of the CPR is expected to create the basis for standardised, digital declarations of performance. These digital declarations could assume the role of "Digital Product Passports".

- **Avoid the duplication of regulation and ensure coherence.**

If construction products are mixtures in the sense of chemical legislation, extensive regulations on the declaration of certain substances already apply. Possible specifications for the declaration of substances in mixtures should not go beyond the existing provisions of European chemicals legislation. Should the need arise to restrict or prohibit certain substances and their uses, such restrictions should be imposed under European chemicals legislation (REACH). Otherwise, there is a great risk of inconsistent regulations in different European legal areas as well as an unnecessary additional burden on industry due to double regulation.

Deutsche Bauchemie e.V.

Frankfurt, 7 June 2021

As an industry association, Deutsche Bauchemie represents the entire construction chemicals industry in Germany. In 2020, the more than 130 member companies with around 32.000 employees generated sales of 8.8 billion euros. This corresponds to half of the European market volume and about a quarter of the world market. Under the umbrella of the German Chemical Industry Association (VCI), Deutsche Bauchemie has been representing the interests of its member companies for over 70 years, towards the public, political actors, authorities, other industry sectors, science, and the press.