

PU Europe, the European federation of rigid polyurethane foam manufacturers, has been supporting the work of the European Commission services over the last months for a greener and more sustainable Europe, notably via the sharing of our views on the *Substantiating Green Claims* and *Sustainable Products initiative* public consultations.

Our industry welcomes the opportunity of this open public consultation to restate that we do not believe that this initiative shall include construction products made out of chemicals, please find below why:

- Construction products have to be considered as intermediary products, not consumer goods. They can therefore only be assessed at the building or construction work level, which represents the final "product" for the end-user. To further support a differentiated treatment for insulation products outside of the SPI, it is important to recognize that their key features are: durability (long-lasting products with service life > 50 years), the absence of repair/maintenance activity and that as products they do not become old-fashioned or obsolete after a few weeks or even years;
- The best way to tackle sustainability in the construction sector would be to rely on the Construction Products Regulation (CPR). This regulation aims at setting standard rules for construction products by providing a common technical language to assess their performance. Therefore, the CPR shall be the only vehicle for this type of information;
- For thermal insulation products and many other construction products, Environmental Product Declarations (EPDs) are already shared on a voluntary basis within the value chain. These declarations are based on the European standard EN 15804, which is continuously improved, and are underpinned by Life Cycle Assessment (LCA). They provide a complete overview of the product environmental footprint, from the supply of raw materials to the end-of-life (EoL) stage;
- The construction sector *ready-to-deploy* solution to assess and communicate on the sustainability of their products - i.e., buildings - is the Level(s) framework, which itself is rooted on information provided in the EPDs and the construction works performance;
- We fear that any push to include our construction products into this initiative will enter in conflict with the "better regulation" principle by creating overlaps with the CPR and REACH regulation, at a time when a deep review of the former is taking place. Furthermore, this will represent a shift away from the current arrangements between EU and national/regional legislators, based on the subsidiarity principle, with those latter authorities deciding on the level of performance of construction products that can be accepted in construction works/buildings;
- With regards to the sharing of information on chemicals to end-users, PU Europe fully supports the continuous improvement and better enforcement of this REACH regulation (we just shared our views on the [targeted review of the REACH Regulation](#)), and thinks that additional legislations shall focus on the risks that may be posed by chemicals and not their mere hazard characteristics.

On sustainable production and circular business models:

- Regarding the sustainability of polyurethane insulation production, this footprint is mainly linked to the raw materials' footprint that manufacturers use. We are witnessing in this upstream industry a string of innovations for decreasing the environmental burden at each step of the life cycle production. In addition, many of those innovations- chemical recycling for instance - are not economical today but receive significant consideration from the industry. While it is true that EPDs are describing generic End of Life (EoL) pathways and fall short of driving more specific and sustainable EoL solutions, a lot of activities are on-going in the market place by PUR/PIR manufacturers to offer more sustainable products. Those initiatives have all in common that they take always a far looking view at the European environmental and sustainability goals. It is also worth reminding that PU insulation products, in particular rigid boards and sandwich panels, can be easily recovered and reused at their EoL because of their durability (mechanical/resistance to moisture and other external attacks) and little loss of performance¹. It is important that policy makers acknowledge manufacturers' voluntary commitment to increase their products' sustainability;
- Concerning the circular economy business models described on the *Sustainable Products initiative* survey, we believe that except the on-demand production which is already the rule in our sector, they cannot and shall not be applied.

PU Europe stands ready to continue contributing to the policies and regulations needed for a more sustainable European Economy, and wishes to restate that the two key ingredients for drafting policies/legislations in that area shall be material neutrality and technological openness.

Best regards
Arnaud Duvielguerbigny
Secretary General

PU Europe is the European voice of the polyurethane (PUR / PIR) insulation industry. The 110 manufacturing sites and more than 20,000 direct jobs in the PU rigid foam sector contribute to tackling the carbon footprint of the buildings stock responsible for around 36% of the CO₂ emissions of the European Union (more information about us via www.pu-europe.eu and lobbying transparency register ID number 27993486325-38).

¹ Note: In case PU insulation products cannot be given a life extension (meaning reused, recycled or transformed into other products), they may go to energy recovery plants. In this way, this option leads to credits in energy balance, as PU waste replaces fossil fuels.