

PU Europe input to the roadmap on the Sustainable Products initiative

PU Europe welcomes the opportunity to comment the roadmap on the “Sustainable Products” initiative and firmly believes that PU insulation products have a key role to play in a greener and more sustainable future. The views expressed below reuse and complement our submission to the “substantiating green claims” public consultation over the summer.

PU Europe key points on a possible Directive for “sustainable products”:

- Construction products are intermediary products, not consumer goods, and can only be assessed at the building or construction work level which represents the final "product" for the consumer. Manufacturers of construction products can solely be made liable for the provision of information of their products (against test methods/methodologies) but not for the construction works or building in which they are integrated to. Manufacturers cannot know the exact use of their products, and therefore cannot determine their environmental performance as part of the wall, roof or floor system;
- The Construction Products Regulation (CPR 305/2011) governs the communication of their essential characteristics and a discussion is on-going today on how best environmental performance shall be covered by this legislation;
- PU insulation manufacturers already deliver on a voluntary basis Environmental Product Declarations, EPDs, against the European standard EN 15804. Those EPDs give information on the environmental performance of the products that can latter be used by life cycle analysis practitioners for determining the overall performance of the system in which they are used (EN 15804 is being continuously improved and can now be seen as the PEF methodology for construction products);
- LEVEL(s), a framework for assessing the environmental performance of buildings, has been released by DG Environment mid-October, and is relying on EPDs;
- Any push to include construction products, in particular thermal insulation products ones, in the scope of the Ecodesign framework will run counter the “better regulation” principle by creating overlaps with the CPR. In addition, it 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 products that can be accepted in construction works/buildings (the CPR which ensures a common technical language to assess their performance). Finally, introducing Ecodesign legislations for the various construction products would take decades and a lot of efforts on the part of the industry;
- The PU insulation industry generally supports the input provided by Construction Products Europe on this topic.

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).