

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).

Please find below our short input to the roadmap on the new Circular Economy Action Plan:

- The PU rigid foam industry supports the transition to a more sustainable Europe, notably via its climate neutrality objective by 2050, and its drive to a more resource efficient Europe;
- The forthcoming Circular Economy Action Plan, and its attached legislative activities, should not put to a lower footing the durability performance of construction products such as insulation materials (expected lifetime > 50 years);
- Legislative proposals for construction products should take a life cycle thinking approach, so that policy options for certain life cycle stages do not end up in creating a performance issue for the use phase;
- The European Commission should continue to work on ensuring material neutrality and technological openness in its policies/legislations for construction products. All European industries are continuously innovating for making what is not economic today (chemical recycling to give an example) part of the toolbox of solutions of tomorrow;
- In the construction sector, the setting of a “sustainable product” definition would not help in rendering buildings sustainable since they are made of construction products which cannot be looked at like ready-to-use consumers products. To take an example, a wall system consists of construction products, specific fixings, construction techniques, finishing materials and so on. Replacing a construction product for another one deemed more “sustainable” might lead to very significant changes to the remaining components of this system, and in turn the sustainability performance of the alternative system might be worse than the original one. In order to make progress on the sustainability of the construction sector, the current LEVEL(S) initiative should be further explored for setting an assessment framework of the sustainability of buildings. It should be based on the environment performance of construction products with the continued recourse to EPDs, Environmental Product Declarations EN 15804 (cross-industry accepted standard for quite some time);
- With regard to the end of life of buildings, all market players (demolition companies, architects, contractors and manufacturers in particular) should work on ensuring a proper disassembly of those (PU Europe has endorsed the “EU Construction & Demolition Waste Management Protocol” and contributed to the yet to be released “Circular Economy Principles for Buildings Design”);
- Typical PU insulation products last for 50 years without any significant loss of performance, they can therefore be repurposed should the building be dismantled properly and a demand for such secondary product exist;
- PU Europe is committed to the success of a climate neutral and resource efficient Europe and will be engaged in the forthcoming Circular Economy Action Plan.

Best regards

Arnaud Duvielguerbigny
Secretary General