

INDUSTRIAL POLICY / SUSTAINABLE COMPETITIVENESS OF THE CONSTRUCTION SECTOR

EAACA welcomes Europe's renewed interest in construction and reaffirms industry contribution to sustainable buildings

Brussels, 15 November 2012

With a dedicated Strategy on Sustainable Competitiveness of the Construction Sector¹ presented in July and a new Communication on Industrial Policy² identifying the construction sector as a priority action line in October, the European Commission has reaffirmed its support to one of the leading industries in Europe. The European Autoclaved Aerated Concrete Association (EAACA) very much welcomes this strong commitment to promote the competitiveness of the construction sector and would like to repeat its engagement to contribute to the endeavour in a most constructive way.

EAACA supports the emphasis put on stimulating **energy efficiency** investments in buildings. We very much endorse the EU's drive to upgrade energy performance standards for buildings and welcome the endeavour to generalise "nearly-zero energy" buildings for both existing and new constructions. However, a clear definition of this concept should be carefully developed with participation of the industry. Our material is already widely used in low-energy buildings thanks to its light weight and thermal performance properties. Concerning existing buildings, while we duly recognise the importance of refurbishing a large proportion of Europe's stock, we also would like to stress that the demolition of old inefficient buildings and replacement with modern nearly-zero energy constructions should be seen as a preferable and sustainable alternative in certain cases.

Our industry is particularly committed to **sustainable construction**, as regards both the production process of autoclaved aerated concrete (AAC) and our material's properties when incorporated in buildings. AAC is produced from natural and abundant materials: lime, fine sand, other siliceous materials, water and a small amount of aluminium powder - plus cement. The manufacturing process is particularly resource efficient, since with 1m³ of raw material 4m³ of final product can be produced. Our material also reduces the need for further resources, as it usually does not need to be combined with insulation materials in buildings. The use of energy and associated CO2 emissions during production is lower than for all other masonry products. Moreover, AAC manufacturers have taken on a voluntary commitment to recover separated and sorted AAC waste from construction and demolition sites for recycling and reuse. When building works are completed, AAC's excellent thermal efficiency makes a major contribution to environmental protection by sharply reducing the need for space heating and cooling in buildings.

EAACA therefore expects with a great interest the announced **Communication on Sustainable Buildings** and would very much like to contribute to its preparation. In fact, EAACA has long been involved in the works of the European Committee for Standardisation (CEN) to develop sustainability criteria related to construction works. We would like to stress here that the standards announced in the recent Commission Communications should be developed within the framework of CEN TC 350, in order not to duplicate the work already undertaken. The development of harmonised rules on the

¹ Communication from the Commission to the European Parliament and the Council: Strategy for the sustainable competitiveness of the construction sector and its enterprises, 31 July 2012, COM(2012)433.

² Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: A Stronger European Industry for Growth and Economic Recovery. Industrial Policy Communication Update, 10 October 2012, COM(2012)582.

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declaration of the performance characteristics of construction products related to the sustainable use of natural resources, in the framework of the Construction Products Regulation, should therefore take CEN TC 350's work into account. Also in the field of standardisation, we would obviously welcome the international uptake of Eurocodes, which would simplify cross-border cooperation with non-EU countries.

As far as sustainability of construction works is concerned, we agree that the questions of waste, recycling and generally **resource efficiency** are of paramount importance as well. While we have some concerns about the choice of resource indicators, as indicated in our separate response to the public consultation on this subject, our industry is very much committed to reducing waste in construction and demolition, and to recycling it to the highest level. In this light, we welcome the emphasis put on implementing EU waste policy and adjusting it wherever necessary.

EAACA welcomes the Commission's endeavour to **reduce red tape** and in particular the announced exercise of assessing hindrances to the authorisation process for major construction projects. We also support the "fitness checks" of EU legislation, which should facilitate our business' operations. A number of regulatory acts may well have become obsolete or overlapping with the adoption of major pieces of legislation lately, such as the Energy Performance of Buildings Directive (EPBD) or the Construction Products Regulation (CPR). A thorough screening of the legal requirements applying to the sector would be necessary to clarify the business environment.

We would invite European institutions to take our remarks into account when rolling out the strategies on sustainable competitiveness and on industrial policy and stay at your disposal for any contribution we could make to these works.

European Autoclaved Aerated Concrete Association (EAACA)
For further information, please visit www.eaaca.org
EAACA – Kochstr. 6-7, D-10969 Berlin, info@eaaca.org

Contacts

Cliff Fudge, Chairman of the EAACA Strategy Committee (cliff.fudge@hhcelcon.co.uk)
Torsten Schoch, Convenor of the Technical Committee (cliff.fudge@hhcelcon.co.uk)
Tristan Suffys, Weber Shandwick (ctiff.fudge@hhcelcon.co.uk)
Tristan Suffys, Weber Shandwick (ctiff.fudge@hhcelcon.co.uk)