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Sustainable Buildings – European Commission consultation and future policy measures

Dear Mr Misiga

For several years now, ANEC has called on the European Institutions to initiate a debate with interested parties on the development of a robust European strategic approach for sustainability in the construction area. We thus looked forward to the present Commission public consultation on sustainable buildings.

However, we are disappointed to see from the consultation that it appears as if the energy consumption of buildings can be regarded as settled by existing EU policy initiatives in the field of the environmental performance of buildings. We believe focus needs to remain on how Member States will implement the Energy Performance of Buildings Directive in respect of the requirement to oblige zero energy houses by 2020 (for new construction). Moreover, a huge task remains in retrofitting poorly insulated building stock.

Furthermore, we fear that any system for an environmental performance, as seem to be promoted through the consultation, risk to allow compensating worse energy performance with fulfilment of other environmental requirements (e.g. recycling, material consumption, parking space for bicycles). Environmental



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performance requirements need instead to be considered additional to energy performance requirements.

Because of the variety of calculation methods used in Member States, and the various indicators used in energy performance certificates, a more consistent and harmonised method is required. Energy performance certificates of buildings currently present considerable shortcomings in terms of reliability.

We therefore consider that energy consumption needs to remain a chief priority for sustainable buildings.

Separately, many of the questions in the Commission consultation that relate to possible policy measures cannot be answered properly without having a clear view about the kind of indicators and requirements on which these measures will be based, and their quality.

On the other hand, there has not been a meaningful discussion at political level about the basic strategies, key concepts or the indicators and requirements that should be pursued in achieving the sustainability of buildings. It is regrettable that the questionnaire omits these aspects entirely.

Our criticisms of the European Standards developed by CEN on sustainability of construction, through its Technical Committee 350, are well known. In particular, we have shown that the normative provisions and their underlying concepts are questionable in many ways. We do not consider them to focus on the essentials; to contradict established building schemes and to be cost-intensive in attitude. The approach taken by CEN, based on LCA and EPDs, is highly questionable in our view and certainly should not be adopted as the European approach.

In order to provide more details of our views, we enclose two position papers:

"Sustainable construction – a building site without end Alternatives to flawed standards" (September 2011) <http://tinyurl.com/phm87av>

"Environmental assessment goes astray. A critique of environmental footprint methodology and its ingredients" (May 2012) <http://tinyurl.com/dyh6npo>

Of course, we would be pleased to discuss our concerns further.

Yours sincerely

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