



EUROPEAN AUTOCLAVED AERATED CONCRETE ASSOCIATION
ASSOCIATION EUROPEENNE DES FABRICANTS DE BETON CELLULAIRE
VERBAND DER EUROPÄISCHEN PORENBETONINDUSTRIE

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European Commission
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February 5, 2021

Decree on the energy and environmental performance requirements for residential, office or primary or secondary education buildings in metropolitan France

Dear Sir or Madam

On 14 December 2020, France notified three draft regulations to the European Commission through the Technical Regulations Information System (TRIS), in line with the Single Market Transparency Directive (EU) 2015/1535:

- Decree on the energy and environmental performance requirements for residential, office or primary or secondary education buildings in metropolitan France, Notification Number 2020/790/F (France)
- Order approving the calculation method provided for in Article R111-20-5 of the Construction and Housing Code, Notification Number 2020/791/F (France)
- Order on the energy and environmental performance requirements for residential, office or primary or secondary education buildings in metropolitan France, Notification Number 2020/792/F (France)

The European Autoclaved Aerated Concrete Association (EAACA) would like to highlight to the Commission that these regulations would give a tremendous advantage to bio-based-only solutions in the building sector, with a clearly expressed aim from the French government's side to promote and prefer timber construction over other materials for single family houses and multi-family residential buildings by 2030.

The signatories of this letter would therefore like to ask you to take action and refuse the approval of these draft regulations, in order to ensure a performance-based policy and legislation aimed at promoting innovative solutions whilst maintaining material and technology neutrality.



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We believe that such rules would only delay the damage to nature and put the burden of carbon emissions on future generations, considering the only temporary carbon storage of bio-sourced materials. The next generations will have to make even bigger efforts and sacrifices to cope with the temporarily stored carbon once it is released. This would also be against all current European efforts to transition to a more circular economy.

Further, EU projects such as Level(s) have underlined that the carbon footprint of goods and services should be assessed regarding its whole life cycle, especially in the construction sector. By splitting the manufacturing and the use phase, the proposed methodology could not reach or even worsen the initial objectives.

Finally, we are convinced that the proposed set of rules would stop any innovation efforts in the sector in France, as bio-sourced construction solutions would not be required to improve their current efforts in manufacturing, transport and construction processes. Other construction solutions would simply not be able to compete, also not through innovative new production processes and would stop investing in such processes. This would go against any material neutrality principles of the EU and hamper competition entirely.

At the same time, we want to clearly state that the signatories of this letter share the EU objectives of mitigating and adapting to climate change. The implementation of the Green Deal and, more specifically the Renovation Wave as part of it, is of crucial importance for the construction sector which is an essential industrial ecosystem for Europe and offers employment to 13 million people. An evidence-based approach in setting out the relevant policy framework is essential. Our sectors are working hard to set out their contribution to carbon neutrality by 2050. We also share with the EU the belief that bio-based building components and systems are part of the solution to the challenges of climate change and resource depletion. The built environment of tomorrow will however need a combination of building materials to have the chance to achieve the ambitious goals as communicated with regards to the renovation wave for Europe, while delivering durable, decarbonised and sustainable building systems.

We question, however, the unbalanced promotion of certain Member States regarding bio-based building solutions as the preferable answer for combating climate change. In doing so, the principles of scientific-based policy are abandoned and given unconditional preference to solutions for which a lifecycle assessment of the specific cases may result in a greater negative impact. Independent scientific research clearly shows that bio-based products have impacts on global warming throughout their lifecycle. The growth of bio-based raw material, besides being in competition with food making and other land uses, requires fertilizers and fossil fuels; organic harvesting and processing waste is also a source of green-house gases (GHGs). Manufacturing operations (both of chemical and mechanical nature) and transportation (from the source to the manufacturing plant and then to the user) are sources of GHG which may be quite significant in case of long distances and the need to preserve bio-based materials when exposed to the environment for long periods of time. Finally, the over promoted “temporary carbon storage” in bio-based products is not providing a solution to climate change, but is in fact postponing the burden to the next generation.



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The independent scientific community shares the opinion that the best solution has to be found on a case-by-case basis¹, using the life cycle analysis principles based on sound assumptions and also considering the local conditions (availability of raw materials, energy mixes etc...). Decisions based on Life Cycle Analysis of the final “product” (a building or an infrastructure in the case of Construction) shall therefore be promoted instead of advocating for specific technologies and materials in a general way. In the framework of the Green Deal, cement and steel industries were identified as “indispensable to Europe’s economy”; promoting their substitution without a proper assessment is therefore not only scientifically wrong, but also against the general policy framework.

We therefore call on the European Institutions to rely on substantive evidence when assessing to the French draft regulations, based on Life Cycle Analysis science and refrain from being prescriptive in the promotion of specific materials or solutions. We would also very much appreciate if we could meet with you to discuss the French proposals. We strongly believe that achieving carbon neutrality by 2050 will require a joint effort from all our industries and we are ready to play our role. We would be very grateful if you could offer some dates and times **before the 15 February in order to meet the comment deadline** for an online meeting to discuss the matters raised in this letter.

Sincerely,

Robert Turski
President

Torsten Schoch
Board member

Cliff Fudge
Board member

¹ E.g. “Environmental assessment of various frame options for buildings in Brf. Viva” from SP Sweden or “Emission Omissions: Carbon accounting gaps in the built environment” from IISD (international institute for sustainable development); additional sources can be provided