Svensk Betong

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The Swedish Concrete Federation (Svensk Betong), submits the following comments on the (three) French notified drafted regulations using the TRIS procedure under Directive 2015/1535:

Reasons not to support the Dynamic LCA approach

- There is an international (and notably European) consensus, reflected in ISO 14067:2018, that temporary carbon storage should not be taken into account in the carbon footprint of buildings. There is no international or scientific consensus for temporary storage of carbon. No international or European standard, or even no European regulation, concerning the carbon footprint takes into account the temporary storage of carbon.

- Numerous studies show that only the preservation of a well-managed forest can significantly reduce CO2 emissions. Taking temporary carbon storage into account will indirectly contribute to deforestation and at the expense of biodiversity, as most architects and principles will opt for wood-based construction solutions as a priority, assuming that it will necessarily be sustainable wood, which will not be the case.

- Putting the burden on future generations: Considering temporary carbon storage of bio-sourced materials corresponds to shifting the burden on future generations, without solving the problem. Our children will have to make even bigger efforts to cope with the temporarily stored carbon once this will be released. This is against all principles of circular economy.

- No whole life cycle thinking: All stakeholders agree on the fact that the carbon footprint of a product or service shall be assessed on the whole life cycle in order to apprehend the different implications of complex systems. Although sometimes difficult due to the complexity of the built environment, any other approach would bring sub optimisation in the best case and negative effectives in the worst. By splitting the manufacturing and the use phase, the proposed methodology would clearly not reach, or even worsen, the initial objectives.

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We also refer to submitted comments from ERMCO, BIBM and the Norwegian Precast Association.

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The Swedish Concrete Federation (Svensk Betong) is an industry association for companies that manufacture ready-mix concrete, practice concrete pumping and companies that manufacture and/or assemble precasted concrete products. Member companies are located all over Sweden and contribute to employment and social development in many locations in the country. In total, the concrete and cement industry have annual sales in Sweden of approximately SEK 30 billion and employs almost 9,000 people.