1 Proposals and their impacts

1.1 Main proposals

1.1.1 Low carbon and life cycle characteristics of buildings

The main amendments proposed to reduce the administrative burden and bureaucracy relate to the reduction of the scope of the obligation to draw up a climate report and a material specification: the climate report and material specification would not need to be presented for prefabricated houses nor for major renovations of buildings, nor would the obligation apply to other alterations and extensions. The material specification would be changed to a list of construction products. In addition, the proposal proposes to amend the Construction Act so that preparing and presenting the climate report for the building and the construction site would only be required at the time of the final inspection of the building. According to the proposal, it would therefore not be required to present a climate report at the time of application for a building permit, and instead evidence of the building's carbon footprint being lower than the limit value would only be required to be demonstrated once the project is completed. The list of construction products would still need to be presented in connection with the application for a building permit.

The proposal proposes that the climate report and limit values should cover the following new buildings: terraced houses; apartment blocks; office buildings; health centres; commercial buildings; department stores; shopping centres; retail and wholesale buildings; market halls; theatres, opera, concert and conference buildings; cinemas; libraries; archives; museums; art galleries; exhibition halls; accommodation buildings; hotels; residential homes; care homes; medical care institutions; educational buildings and kindergartens, sports halls; hospitals; and storage buildings, transport buildings, swimming pools and ice rinks with a net heated area of more than 1 000 square metres. The following new buildings would not be subject to the requirements relating to the climate report and limit values: detached single-family houses, relocatable buildings, and storage buildings, transport buildings, swimming pools and ice rinks with a net area of less than 1 000 square metres. The proposal would remove the obligation to prepare a climate report for certain of buildings, as described above. Additionally, in future, a climate report would no longer be required for buildings undergoing major renovation. The limitation of the scope is a significant cost-reducing measure which, in addition to the costs incurred by the party embarking on a construction project, will also have a direct impact on the workload of the building supervisory authority. The reduction in workload, in turn, will to some extent contribute to the streamlining of the permit-granting process.

At the same time, the proposal proposes a few clarifications to the Act to specify the principles for the development of low-carbon assessment and the setting of limit values. It is proposed to introduce a basic provision to the Act which would allow the setting of limit values to take into account specific situations in which achieving a value below the limit value would be particularly challenging because of characteristics linked to the purpose of use or the location of the building or because of the implementation of the essential technical and functional requirements referred to in section 29 of this Act. The proposed addition is intended to help streamline the process.

The proposal proposes to amend the Construction Act so that instead of a material specification, a list of construction products would be presented, which is to be drawn up at the building permit stage and updated in line with major changes for the final inspection of the building. The proposal would reduce the obligation to draw up a list of construction products to the same extent as the obligation to prepare a climate report, as described in more detail above. According to the proposal, the scope of the content of the list of construction products would be laid down at the level of general arrangement drawings, which will help to avoid over-reliance on specific plans at the permit stage and would also reduce the burden of preparing drawings for the party embarking on a construction project. The list of construction products would include information on the products to be used in the building rather than materials.

Section 59 of the Construction Act provides for permission for minor derogations in connection with building permits. In line with the proposal, there would be no verification of the carbon footprint being below the limit value at the building permit stage, and it is therefore proposed to extend the right of the municipality so that a minor deviation from the provision could also be made at the final inspection stage. Such a provision, which could be slightly derogated from, would be the carbon footprint limit value for a new building, for example. Otherwise, no substantive extensions or clarifications have been proposed to the right under section 59, which would simply be extended with the same content to the final inspection stage.

It is proposed to extend the transition period for the obligation to prepare the climate report and list of construction products as well as for the carbon footprint limit value requirement by one year so that they would come into effect from 1 January 2026. The obligations would apply to projects for which the building permit application is initiated after 1 January 2026.

4.1.3 Information and digitalisation of the application for a building permit

The administrative burden of an application for a building permit would be reduced by limiting the quantity and quality of the information to be included in the permit. A project information model or information in a machine-readable format corresponding to the building's concept design to be included in the permit would be drawn up at the level of general arrangement drawings. Information at the level of general arrangement drawings is sufficient to assess whether the concept design complies with construction regulations and the requirements of good construction practice. The project information model contains the design information from which the general arrangement drawings for concept design have been produced as a printout or a data product. This avoids separate data production processes, as the information contained in the general arrangement drawings is generated using a project information model or equivalent information. The proposal aims to avoid a situation where the building design information handled in the building permit process would need to be produced separately in overlapping processes. Some of the information to be included in the building permit application would require a legitimate reason from the building supervisory authority. In the light of comments received, section 71 is also specified so that the as-built model is also done at the level of general arrangement drawings.

4.1.4 Requirement for a building permit and the relationship to the municipal building code

The relationship between the building permit and the municipal building code would be clarified by amending section 17, subsections 2 and 3 of the municipal building code, so that it would not be possible to change the limit for the requirement for a building permit set out in section 42.1 of the Construction Act on the basis of the municipal building code.

Section 42.1, subsection 4 of the Construction Act would be amended in such a way that the building permit requirement for a public structure would not apply to event structures.

4.1.5 Clean transition location permit

The Construction Act would provide for a new location permit to speed up the construction of clean transition industrial projects, which would allow a site-use review of the location of a clean transition industrial project to be carried out by means of a location permit without a local detailed plan or master plan providing for its use as a basis for the grant of a building permit. The clean transition location permit would implement a process industry clean transition investment, with the exception of wind power, located in areas covered by Articles 17 and 18 of the EU Regulation establishing a framework of measures for strengthening Europe's net-zero technology products manufacturing ecosystem. In response to feedback from consultation, section 46a on the conditions for a clean transition location permit, section 63a on consultation and information, section 67a on opinions, section 75a on the impact assessment, and section 179a on the right of appeal would be laid down as separate sections.

1.1.6 Grant of a building permit prior to plot division and the parcelling of plots

The grant of a building permit prior to plot division and the parcelling of plots made possible by the Experimentation Act would be laid down as a permanent practice throughout the country.

1.1.7 Prerequisites for a demolition permit

The conditions for granting a demolition permit would be specified. The proposed Act would lay down that a municipality may grant permission for the demolition of a building protected by the local detailed plan under certain conditions.

1.1.8 Time limit for processing a building permit application and penalties for failure to comply with the time limit

A time limit of three months would be laid down for the building supervisory authority to decide on the application for a building permit once the building supervisory authorities begin processing the building

permit application and its annexes and when the annexes allow the application to be processed. A building permit application for an exceptionally demanding construction project and the application for a clean transition location permit should be decided within six months. In the event of a delay in the processing of a permit application, the municipality should reimburse 20 % of the building permit fee for each month of delay, unless the delay was caused by the applicant.

1.1.9 Principal operator's responsibility for implementation

The principal operator's responsibility for implementation would be revoked. As a result of the revocation, reference to the principal operator would be deleted from sections 71, 84, 93, 94, 109, 110 and 112.

1.1.10 Right of appeal

The right of appeal of Centres for Economic Development, Transport and the Environment (ELY Centres) would be restored to align with the Land Use and Building Act. The Finnish Heritage Agency's right of appeal would be waived for sites other than sites of national or provincial importance. Similarly, the right of appeal of registered associations whose operations include safeguarding cultural heritage or influencing the quality of the built environment would be waived.

1.1.11 Amendment to the Environmental Protection Act

Section 156b of the Environmental Protection Act concerns serviceable wastewater systems based on requirements in force at the time of construction prior to 2004 or based on granted building permits. In these cases, the location determines when the purification of domestic wastewater must meet the requirements for wastewater treatment. The provision contains an obligation to improve the treatment of domestic wastewater in areas far from a water body and outside groundwater areas. Operations in these areas too will be required to continue to comply with current practice. In principle, therefore, all major repairs and alterations of water and sewerage systems are currently subject to either a permit or notification.

The main proposal is to amend section 156b, subsection 1, of the Environmental Protection Act in order to maintain the current level of environmental protection. As regards subsection 1, paragraph 1, of this section, this would mean moving to the system of the Environmental Protection Act. The dependency of the provision on the land use and building permit system would be removed because the activities referred to in the subsection would no longer require a building permit on the basis of the new Construction Act, which will enter into force on 1 January 2025.

The terminology of subsection 1, paragraph 2, would be revised to include a building permit in the future.

1.2 Principal impacts

1.2.1 Uncertainties relating to impacts

The impacts of the proposal have been assessed in relation to the Construction Act. The Construction Act will enter into force on 1 January 2025 and there is as yet no experience of its application. As a result, assessment of the impacts involves uncertainties.

1.2.2 Economic impacts

4.2.2.1 Impacts on households

Clarification of the permit-granting process can have significant positive effects on households. In particular, the processing time laid down for the permit-granting process could be significant for prefabricated house builders. Measured by floor area, single-family houses and semi-detached houses account for more than half of construction and terraced houses for around 10 % of construction. The vast majority of single-family houses, around 80 %, are produced by prefabricated building manufacturers and the time limit for the permitting process will help schedule the actual construction at the cheapest time. The period between the decision to embark on a construction project and the final building permit is clear, which seen as a positive effect. The permitting process has been regarded as being difficult to predict in terms of the time taken. The time limit for processing building permit applications facilitates the planning of the construction process.

More detailed regulations on the building permit application documents and their processing will harmonise the processing practices of the building supervisory authorities. The building supervisory authority may request supplementation of the submitted documents only for specific legitimate reasons. Clearly separating advice and guidance from control of non-compliance clarifies the role of the building supervisory authorities and reduces the opportunity for demanding that municipality-specific 'interpretations' be included in the plans. The interpretation of building regulations and good construction practice given by the project leader and the principal designer in the building permit application documents is, in principle, correct. The municipal building supervisory authority must identify the extent to which the plan or its annexes are in breach of the regulations. It is however true that the building supervision authority can provide advice or guidance or persuade, in particular, the party embarking on a one-time construction project, to implement what the authority considers to be a better solution. However, this cannot be required. The clarification of the procedure, combined with the absolute time limit set for the permit-granting process also saves planning costs, as non-compliance with each of the building supervisory authority instructions does not delay the permit-granting process.

In connection with the permit-granting process, the data model used in the building design would also be submitted at the level of general arrangement drawings, if the design has been done by means of data modelling. The applicant would not incur additional costs due to the fact that the delivery obligation would only apply to the extent that the concept design and the construction drawings have been produced using data modelling tools. Most design is currently done using data modelling tools. The use of a data model for the assessment of a building permit will speed up the processing of the permit, as it is possible to automatically check compliance with building regulations and plans in part or in full. Limiting the information to the level of general arrangement drawings reduces the administrative burden for the permit applicant, as the building supervisory authority cannot require more detailed design information than the general arrangement drawing documents that have been drawn up. However, the information contained in the template should be sufficient to enable a machine-based verification of the compliance of concept design with building regulations and plans and for making any necessary deviation decisions. Otherwise, the benefits of digitalisation will be lost and the compliance check will have to rely on a manual check that requires human resources.

According to the proposal, the list of construction products that is replacing the climate report and material specification will not be required for new detached single-family houses, which would contribute to a slight reduction in the cost of building prefabricated houses. A climate report and a list of construction products could be prepared in future if applicants so wish, but this would not be a condition of building permits for detached single-family houses.

According to the Construction Act, there would be no need for a climate report and a list of construction products in connection with the renovation of detached single-family houses. It is therefore irrelevant for those living in single-family houses that the proposal would remove the obligation to draw up these documents for all buildings undergoing major renovation.

In apartment blocks or terraced houses, individual residents or tenant-owners would not draw up the list of construction products that is replacing the climate report and material specification, and this obligation would fall to the company carrying out the construction project. The carbon footprint limit values would also apply to terraced houses and apartment blocks.

The processing time guarantee would make it easier for households to plan the construction process for a prefabricated house, which can have positive effects on the economic feasibility of the construction project.

Revoking the responsibility for implementation of the principal operator would deprive households of the possibility of transferring the public liability for implementation to the principal operator, thereby ascertaining the party liable for possible construction errors. In contrast, households would not incur any costs for the principal operator.

A limitation of the right of appeal could speed up the time it takes for the party embarking on a construction project to start building work.

4.2.2.2 Impacts on enterprises

For construction sector companies, the amendments relating to the annexes to the permit application and to the information to be provided will mean a clearer and more predictable process. A harmonised maximum time limit for processing will necessarily also harmonise the activities of the building supervisory authorities. Companies applying for a permit can expect partly more congruent permitting procedures in the various

building supervisory authorities in Finland. Any request for further clarifications will be justified on a request-by-request basis.

Potential refunds of the permit fee are not of great importance. On average, the total permit fee amounts to only 0.5 % of the value of the project and the refund would be limited to only a part of it. The main significance for operators and owners in the construction sector is that the processing time of an application for a permit will become shorter and the processing will become more predictable.

The business risk of the time spent on the permitting process will be reduced. The developer will have a better view of the start-up date of the construction site and more certainty as to the length of the phases in the construction schedule. The cost of additional and alteration works due to delays in the permitting process will be reduced. The speed with which a company can invest in a planned project may be affected by the accelerated processing of a building permit, meaning that the economic benefits are derived from production starting earlier.

The location permit for a clean transition industrial project will speed up the process as there is no need for a land use planning phase. This makes construction time more predictable from a cyclical point of view, even though all the same reports have to be carried out as in the context of land use planning.

Event sector operations will become more predictable when there is assurance that stage and tent structures do not require a building permit.

Changes to the scope of the list of construction products that is replacing the climate report and the material specification should only have a marginal impact on the finances of enterprises. The cost of preparing a climate report and a list of construction products would be eliminated for major renovation projects undertaken by enterprises. However, the magnitude of these costs is very difficult to estimate as the number of major renovation projects has not been recorded. The elimination of this cost would be targeted at companies owning buildings undergoing major renovation.

Construction projects launched by enterprises involving ice rinks, swimming pools, transport buildings and storage buildings of more than 1 000 square metres would be subject to a carbon footprint limit value. It is not possible at this stage to assess the impact of the carbon footprint limit values on these companies, as the level of ambition of the limit value has not yet been defined.

According to the proposal, the material specification would be replaced by a list of construction products, which would be drawn up at the level of general arrangement drawings. The proposal ensures the need for specific plans in connection with building permit applications remains moderate, and the new requirements would not change the permit-granting process.

The proposed limitations to the obligation to prepare a climate report may to some extent slow down the development of new low-carbon innovations, for example in the prefabricated house construction sector and in respect of buildings undergoing major renovation.

4.2.2.3 Impacts on public finances

The proposed amendments to the building permit process would not entail significant public spending. The proposed amendments to the low-carbon and life-cycle characteristics of buildings would not have a significant impact on public finances.

4.2.2.4 Impacts on the local economy

Since the beginning of the 2000s, human resources in building control had remained more or less at the same level. Between 2012 and 2017, the number of specialist staff in the field of construction was reduced in more units than was added. As a rule, the municipalities which increased their personnel were municipalities where the construction volume had increased. The total cost of the building control function on an annual basis is approximately EUR 90 million. In 2016, the majority of the operational expenditure of building control was covered by fees throughout the country.

The costs incurred by municipalities in the permitting process are mainly covered by the permit fees. The impact of the amendments to the process on the local economy in municipalities is neutral. The reimbursement of the building control fee may have significant effects on some individual municipalities in

the short term. The processing time requirement may facilitate cooperation between building supervisory authorities in terms of capacity-alignment. In the long term, this network-based building control can have a positive impact on the operational expenditure of the building control field as a whole. The abolition of permits for small houses below 30 square metres under the Construction Act will reduce permit fees, especially in small communities. The processing time guarantee included in the set of amendments may entail additional costs for municipalities if more permit handlers need to be recruited. Some municipalities may also incur costs due to permit applications in the form of data models.

The proposed amendments to the low-carbon and life-cycle characteristics of buildings would not lead to significant new costs for the local economy in municipalities. However, the proposed limitations to the obligation to prepare the list of construction products that will replace the climate report and the material specification will slightly reduce the administrative costs of municipal building supervisory authorities. According to the proposal, the building supervisory authority would continue to be required to check, at the building permit processing stage before the permit has been granted, that the required list of construction products has been drawn up, but only for a small number of construction projects. The climate report would only be drawn up in connection with the final inspection of the building and would therefore no longer need to be reviewed at the building permit stage. The workload of the building supervisory authorities would be reduced from the initial proposal. Conversely, compliance with the carbon footprint limit value for buildings will only be checked once the building has been completed, with the result that any exceedance of the limit value and the related additional clarifications and decisions may in some cases lead to an increase in the work of the building supervisory authorities. Municipalities would no longer require skills and training to assess the low-carbon characteristics of major renovations to the extent set out in the original proposal.

Municipalities' own costs as property owners and the party embarking on a construction project may slightly increase compared to the Construction Act adopted in 2023, as, according to the proposal, the climate report must also be prepared for storage buildings, transport buildings, swimming pools and ice rinks with a net heated area of more than 1 000 square metres. Under the proposal, a carbon footprint limit value would also be laid down for these buildings. Depending on the level of the limit value, it may lead to a small increase in costs if the municipality has not previously set any low-carbon targets for its projects.

Due to the easing of the conditions of the demolition permit, a municipality may see costs decrease if it is able to demolish a protected building in unusable condition and does not invest in the renovation of the building.

4.2.2.5 Impacts on the economy

Construction is an important part of the productivity of the national economy. In 2023, around 180 000 people were employed in the construction sector, which accounted for around 6.8 % of Finland's total GDP. Laying down a time limit for the permitting process will potentially have a positive impact on the speed of investment and thus on the national economy.

The location permit for clean transition industrial projects will streamline investment, which can have a positive impact on employment and tax revenue.

Regulating for the low-carbon performance of a building can be seen as having a positive impact on the development of low-carbon solutions in Finland, on the mobilisation of desirable investments and on competitiveness, in a context where clean and sustainable construction already affects construction work globally at all levels. The development of low-carbon building materials has great potential. Finland is the largest exporter of building products in Europe in relation to population.

The proposed abolition of the obligation to draw up a climate report and material specification for detached single-family houses would mean that the climate report would not be produced on an annual basis for around 6 600[1] detached single-family houses. It is estimated that the cost of producing a climate report and a material specification for a prefabricated house is on average a few hundred euros[2]. On average, the cost of preparing climate reports for detached single-family houses amounts to around EUR 1.3 million per year. However, the majority of these buildings are delivered directly from the house manufacturing factory or as a

[1] This amount corresponds to the building permits applied for in 2022 for prefabricated houses, according to statistics from the Finnish Association for Manufacturers of Prefabricated Houses.

[2] The price estimate is based on a study carried out by the Green Building Council Finland (FIGBC) in 2020 entitled 'Impact assessment of the climate report for construction projects'

turnkey project, allowing the same climate report to be used for several different buildings with minor modifications, significantly reducing the cost of the report. The impact on the national economy is therefore likely to be smaller than set out above.

1.2.3 Impacts on the activities of public authorities

1.2.3.1 Impacts on the activities of museum authorities

The limitation of the right of appeal would make it more difficult for museum authorities to operate in relation to the Construction Act.

1.2.3.2 Climate report

According to the Construction Act, the climate report and the material specification should also be presented when applying for a building permit for buildings within category 9 of section 4 of the Decree of the Ministry of the Environment on the energy performance of new buildings (1010/2017), despite the fact that these buildings were not intended to be subject to limit values. The category of use 9 comprises around 1 000 buildings per year. This proposal introduces a limitation to the obligation to draw up a climate report for category 9, according to which the climate report should be drawn up only in the case of ice rinks, swimming pools, transport buildings and storage buildings with a net heated area of more than 1 000 square metres. According to the proposal, these would also be subject to limit values. The obligation to prepare a climate report would not apply to relocatable buildings. The proposed change would result in a slight reduction in the workload of the authorities.

Additionally, removing the obligation to produce a climate report and material specification in the case of major renovations would reduce construction and building control costs and workload. A clear reduction in the workload will also streamline the permitting process.

The proposal proposes that the climate report would be drawn up in one step and only reported at the final inspection stage of the construction project. This would mean that the climate report would no longer have to be submitted at the building permit stage. This simplification would reduce the workload of the building supervisory authority. Conversely, compliance with the carbon footprint limit value for buildings will only be checked once the building has been completed, with the result that any exceedance of the limit value and the related additional clarifications and decisions may lead to a slight increase in the workload of the building supervisory authorities during the final inspection stage.

To streamline procedures, it is proposed to introduce a basic provision which would allow the setting of limit values to take into account specific situations in which achieving a value below the limit value would be particularly challenging because of characteristics linked to the purpose or the location of the building or because of the implementation of the essential technical and functional requirements referred to in section 29 of this Act. The proposed additional provision would make it possible to ensure and, where necessary, respond in advance to situations where achieving a value below the limit value proves to be particularly challenging, e.g. due to the height of the building, fire safety or location. Among other things, this is intended to avoid disproportionate situations, to ensure that other essential technical requirements are met and also to otherwise keep the building permit application process as smooth as possible in the future, as guidance will include the introduction of limit values as a new issue.

1.2.3.3 Environmental Protection Act

The amendment to the Environmental Protection Act would ensure that the application of Section 156b would be consistent with the Construction Act and that the terminology also corresponds to the terminology of the Construction Act. The municipal building supervisory authority and the environmental protection authority are key authorities in the practical application of the provision. The municipal environmental protection authority will continue to monitor that wastewater from dispersed settlements does not cause environmental pollution. The proposal shifts the focus towards the municipal environmental protection authority, in particular with regard to the proposed section 156b, subsection 1, paragraph 1. This is due to the change in the permit system of the Construction Act.

1.2.3.4 Impacts on information management in municipalities

Amendments to the building permit process would require some changes to the information management of municipalities. Municipalities must start monitoring the processing times of permits. If the municipality uses an electronic permit processing system, tools for monitoring and control of permit procedures should be developed. The system would be able to log when the permit was initially received, when it was sufficient, and when the time limit for processing the permit is approaching. It would be appropriate to develop a reminder procedure for approaching time limits. It would be possible to monitor the smoothness of the processes by employee. In addition, a procedure should be developed for the reasons given for requests for supplementary information and, if the procedure so requires, changes made to the permit processing system. Changes should be made to the processing of the building control fee to allow for the refund of permit fees.

According to the proposal, a project information model or information in a machine-readable format corresponding to the concept design would be developed at the level of general arrangement drawings. Limiting the information to the level of general arrangement drawings would reduce the amount and accuracy of the building data accumulated by municipalities.

The process of refunding the building control fee would provide elected representatives with information about the reasons for slow processes and the opportunity to demand smoother procedures. The calculation of processing times for building permits would be harmonised. The accumulated monitoring data can be used for the national development of inter-municipal building control.

1.2.3.5 Construction

The proposal would clarify the fact that planning beyond concept design and working drawings cannot be required as part of permit processing. The accuracy requirement for the reports and information required for the permitting process can only be based on the concept design documents and general arrangement drawings. Specific plans cannot be required.

Specific plans and their data models must be submitted to building control only to the extent that they are requested by the building control for justified reasons. On one hand, before the final inspection, the applicant must submit as-built plans and any data models in the form of a complete series covering the whole building. On the other hand, the building supervisory authority cannot require plans to be submitted other than for a specific reason. This provision will necessarily require closer discussion between designers and public authorities during the construction phase. This will contribute to the quality of construction and the smooth running of the construction phase.

Section 68a ensures the building permit process of public authorities is harmonised and brought into line with best practice. In the event of a backlog in the permitting process, it will be possible to collaborate with other building control agencies.

The effects are more pronounced in growth centres, where processing times in the event of a backlog in the permitting process can be 3 to 7 months. In Finland, construction projects range from large public construction projects to prefabricated houses, and the scope of individual plans differs considerably in terms of content.

According to Government proposal HE 139/2022 vp, the legislative amendment creates the conditions for moving to the processing of data model-based plans also in the permitting process, should the municipality so decide. However, after introduction and the transition period, data model-based processing would streamline the work of the authorities and reduce manual administrative work.

The processing time will speed up the transition of municipalities to data model-based processing of plans.

1.2.4 Environmental impacts

There are no direct impacts on the environment as regards the permitting process.

The clean transition relocation permit will accelerate climate change mitigation as a result of new clean industry.

Regulating the low-carbon performance of buildings has the potential to steer a large portion of the new buildings built annually towards improving their low-carbon performance over their life cycle, both in terms

of construction materials and the building's energy consumption, without significantly increasing the costs of construction or running costs. Effective control is possible to implement through limit value control.

The proposed changes to the scope of the climate report and the limit values would not significantly affect the achievement of the original greenhouse gas emission reduction targets set out in the Construction Act, but the magnitude of the positive climate impacts will depend essentially on the selected carbon footprint limit values and the rate at which these are updated. In the Government Proposal (HE 139/2022), it has been suggested that limit value control has the potential to reduce and avoid some hundreds of thousands of tonnes of greenhouse gas emissions annually, depending on the level of the carbon footprint limit values of buildings used in the guidance.

The proposal proposes to add a carbon footprint limit value for ice rinks, swimming pools, transport buildings and storage buildings with a net heated area of more than 1 000 square metres. The extension of the scope of the limit values is likely to have positive effects on the environment, but their effectiveness depends on the level of ambition with regard to limit values.

The limitations to the obligation to draw up a climate report and a list of construction products may signal to the parties embarking on a project that there is no need to pay attention to the low-carbon characteristics and material efficiency of certain building types. Failure to assess and make visible the life-cycle emissions of a building means that awareness of these factors does not increase and makes it more difficult to control the low-carbon performance of projects. However, the indirect impact of the reduced scope on carbon dioxide emissions is very difficult to assess, as these buildings were not intended to be subject to carbon footprint limit values. However, for construction projects outside the scope of the climate report, such as detached single-family houses, climate reports can be prepared on a voluntary basis. A standardised and reliable assessment methodology will enable increased awareness of the project's carbon footprint and carbon handprint and allow comparison of the low-carbon performance of projects.

The proposal also proposes that in future, the climate report and material specification would no longer be required for buildings undergoing major renovation, as they are not subject to a limit value requirement. The removal of the requirement for a climate report and material specification for major renovations will have the effect of not increasing awareness of the climate impact of building renovations among different operators to the extent estimated in the preparation of the original Construction Act. In accordance with the Government Proposal (139/2022), greenhouse gas emissions from major renovation projects and their assessment were due to be made visible. The aim was to contribute to reducing greenhouse gas emissions from buildings by increasing awareness of them and helping to steer procurement and design towards more climate-friendly choices. In addition, the obligation to prepare a climate report also for major renovation projects would enable the collection of data on the existing building stock and its emissions, thereby contributing to the implementation of a national renovation strategy. However, major renovations are already subject to strong control on the basis of energy efficiency, thus contributing to the achievement of low-carbon targets. The national low-carbon assessment methodology may be applied on a voluntary basis to major renovations in future also.

It is proposed to add a provision to the Act which would allow the setting of limit values for the carbon footprint of new buildings to take into account specific situations in which achieving a value below the limit value would be particularly challenging because of characteristics linked to the purpose or the location of the building or because of the implementation of the essential technical and functional requirements of this Act. The proposal provides the necessary flexibility to verify limit values. At the same time, the proposal has the effect that carbon footprint limit values would not lead to a deterioration in the life-cycle quality of construction. This means the proposed changes could be used to try to ensure that limit value control would not have unintended consequences, e.g. by reducing the longevity of buildings or the quality of construction. It is important to ensure that the implementation of low carbon solutions does not make it more difficult to fulfil other essential technical requirements relating to e.g. fire safety or sound insulation. However, from the perspective of reducing greenhouse gas emissions, it is important that, in specific situations, the threshold is high in order not to overlook the objectives of limit value control.

The provision in Section 156b of the Environmental Protection Act is an important part of the regulation applicable to wastewater from dispersed settlements. Wastewater must continue not to cause environmental pollution. A substantive revision of the provision, as well as, where appropriate, alignment with the

Construction Act is therefore necessary in order to continue to improve the treatment of domestic wastewater in these cases by means of renovations.

4.2.5 Other societal impacts

The proposed changes have no gender impact.