

Construction product regulation (CPR) (EU) No 305/2011

Position paper - 22.05.2018

The Swedish Association of Public Housing Companies (SABO), HSB, Riksbyggen, the Swedish Construction Federation, the Swedish Union of Tenants and the Swedish Property Federation welcome a revision of the CPR in order to streamline the regulation to match the current political framework and ambitions of the European Commission and the member states of the European Union, such as the Circular Economy. A revised regulation must be done with regard to environmental aspects while at the same time minimizing unnecessary costs and administrative burdens for suppliers of construction products.

Background

The construction and building sector in the EU accounts for roughly 50% of all material consumption, 50% of energy use and 33% of water consumption. Construction waste increased between 2004 – 2014 with 57% in the EU and the potential for recycling is high as demolished buildings may contain materials of high value. However, this potential is not utilized due to the risk of harmful substance in construction waste, making recovery of resources economically unviable. Sourcing and analyzing materials are proven to be very costly.

Knowledge regarding the content of construction products is essential to improve resource efficiency and to eliminate substances which can have a negative impact on human health and ecosystems. This is currently not required under EU law.

In lack of EU-wide regulation, different market actors in members states have set up parallel systems for environmental assessment which creates market fragmentation and unnecessary administrative costs. By addressing this issue at an EU-level one can improve resources efficiency, remove barriers to trade and eliminate chemical substances in building materials which can be harmful to human health and ecosystems.

Proposal

The signatories of this position paper suggest the following revisions:

- **The information requirements regarding chemical substances (art 6.5) in the declaration of performance (DoP) should be extended to substances having a harmonized classification under the EC 1272/2008, CLP (Annex VI).** The extension of information on chemical substances would benefit actions to reduce human exposure from potentially hazardous substances in the indoor environment and reduction of hazardous substances in our ecosystems. This extension is also important due to the long-life cycle of construction products and that knowledge about the chemical substances and combination effects of chemicals is developed continuously. In addition, information regarding chemical substances in construction products will enable an increased rate of recycling as the sourcing and analyzing of harmful substances potentially found in waste is very costly.
- **Information in the DoP should be expanded and include information on climate impact from the resource and manufacturing process.** This should be done in accordance with the European standard on life cycle assessment EN 15804.
- **The DoP should also include information on how to de-construct and recycle materials at the end of their life-cycle.** This should be done in accordance to existing standards and frameworks such as EN15805 and Level(s).

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