



ARCHITECTS' COUNCIL OF EUROPE
CONSEIL DES ARCHITECTES D'EUROPE

**STRATEGY FOR THE SUSTAINABLE COMPETITIVENESS OF THE CONSTRUCTION
SECTOR AND ITS ENTERPRISES**

**ACE RESPONSE TO DRAFT RECOMMENDATIONS TO THE HIGH LEVEL TRI-PARTITE
STRATEGIC FORUM**

The ACE has taken this process very seriously indeed. We have devoted considerable resources to this issue, and consulted widely in order to develop common positions. Therefore, we are somewhat frustrated that some of the debate has been held without the back up of evidence-based, written positions and statistical analysis.

It appears to us that some of the conclusions may be based only on opinions and as a result, some of these are rather general in nature and do not break new ground. That being so, this may have been something of a missed opportunity to better engage with stakeholders, and we feel that if the foregoing points could be taken into account for next year, the exercise may be more fruitful and offer more opportunities for stakeholder to re-affirm their interest and commitment to this work.

There follows, hereunder, our detailed comments on the Strategy for the Sustainable Competitiveness of the Construction Sector and its Enterprises.

General – we are missing a list of participants and the various documents they have contributed.

THEMATIC GROUP 1

- **Section 1.1. Priority - Coordinating activities** combining Research, Innovation, Procurement, Certification, Insurance – and inter-regional clusters funded by Horizon 2020, COSME and the EU Cohesion Policy. This all sounds very good, but rather non-specific!
- 1.1.1 Develop **Guidelines for Building Renovation** – while Guidelines may be useful, we suggest it would be more valuable to fund pilot schemes;
- **1.1.4 Late Payment Directive** information campaign – we agreed that this could be of particular help to SMEs, but surely enforcement lies at national level?
- 1.1.5 Develop **internationally recognized valuation standards** – we are not sure of the purpose of this and the recommendation is weak;

SECRETARIAT GENERAL

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- **1.1.6 Life Cycle Costing** – definition of a core cost classification. This is important, and ACE would be interested to contribute to this work. It is particularly important to ensure that ways of funding this are identified e.g. through professional fees and appointment documents.
- **1.2 Take-up of R&D and deployment of innovative solutions for the construction sector:** include innovative practices and governance.
- **1.2.1. Development of Public Private Partnerships:** develop funding mechanism for pilot projects.
- **1.2.2 Insurance** cover for eco-energy investments and innovative construction solutions (cf. ELIOS). This is very important. ACE has recently mapped out a common Scope for architectural services across Europe – which, in time, could be covered by a common insurance policy. Again, ACE would be interested to contribute to this activity. Also, examine the role of Building Control.
- **1.3.1 Minimum building performance levels:** consider also compulsory registration; this could possibly become a building control function. Would need an appeals process and separate treatment for older buildings (or clearer guidelines for conservation work).
- **1.4.1 Reduce tax and VAT** on works/products – we have advocated that reduced VAT rates should again be applicable to retro-fit services for domestic property under certain thresholds, to incentivize the up-take of work in the area.
- **1.4.3 Simplify permit acquisition for building renovation** – we agree.

Earlier ACE comments

- Renovation – question: will this only focus on Housing?
- Smaller renovations should not mean “lowest hanging fruit”. Encourage deeper renovations to reach Nearly Zero goals (help with definitions)
- Use European Cohesion Fund to demolish worst houses that will never attract private investors?
- **Work towards a better definition of the renovation process in the buildings regulations (including the responsibilities of all involved in the value chain) and monitoring of outcomes.**

THEMATIC GROUP 2

2.1 Better implementation of existing EU and MS instruments....

- Recommendations, scope and possible actions, all point to extending the target population of existing initiatives while narrowing in on skills for energy efficiency. These are good sentiments for SME's and the self employed who should have equal access but we should state again that the skills gap is not only about energy efficiency!

Just as ACE advocates comprehensive renovation, we should advocate COMPREHENSIVE UPSKILLING. Consider development of Skills registers, grants and other incentives.

2.2 Accelerated implementation of skills and qualifications programmes...

The idea central to this section is that barriers need to be removed to encourage rapid uptake of new skills for innovative technologies. Again, solutions proposed hinge on existing initiatives when maybe new thinking is required that encourages real employment OPPORTUNITIES through RECOGNITION of the value of new skills.

2.3 Legislation and EU harmonisation of learning outcomes, for mobility of workers, health and safety...

Professional mobility in the EU is hindered by lack of jobs (not the absence of recognition of qualifications, which is already catered for in the Professional Qualifications Directive).

The challenge is how to make the construction sector more ATTRACTIVE to school leavers. This objective has been lost in recommendations that are motivated by harmonised competence testing and development of other administrative instruments including legislation. These may have beneficial effects but are probably not the most effective way to seduce Europe's youth and encourage vocations in the construction industry.

Earlier ACE comments

- **focus on initial training to make construction more attractive to young people, ensure up-skilling of entire value chain**
- **ensure that higher skills equate with better opportunities;**
- **improve working conditions, develop new working methods;**
- as regards up-skilling architects, suggest that this be done via CPD modules if the curriculum is already too crowded

THEMATIC GROUP 3 (sustainable development)

- **3.1.1. Assessment of buildings** – mapping core indicators in existing valuation systems to enhance comparability – ACE supports this and is ready to contribute, while noting that a lot of this already exists.
- **3.1.2 Environmental performance of construction products** – a web-based specification standard would be useful, linking up various international (ISO) and national (DIN, BSI) standards.
- **3.1.3 Incentives** (Cohesion Policy, Horizon 2020 – Green Public Procurement) – there seems to be little new here.
- **3.1.5 Increase feedback from buildings in operation** – this is in line with work ACE has undertaken on 'Closing the Performance Gap' and we would be happy to contribute. Also, Post-occupancy evaluation (POE)

ACE policy positions

Closing the Performance Gap

- Advocate greater energy literacy for all built environment professionals.
- Advocate mandatory feedback from buildings in operation.
- transparent communication of operation data across EU states; base investment in energy use measures on evidence of effectiveness.
- Champion the mandating of 'disclosure' and benchmarking as opposed to detailed procedural regulation.
- Champion case studies that demonstrate excellence.
- Promote/participate in EU-wide research projects that promote the above.

Life Cycle Assessment

- NB: we shape buildings; afterwards they shape us, for decades
- Make existing building stock more sustainable and resource efficient
- Public funding for: quality based procurement, long term planning, life cycle cost analysis, life cycle assessment of the design,
- Buildings shall be built to guarantee: long service life, low maintenance and operational costs
- Integrated design approach is crucially important

Green Procurement

- Top importance for urbanistic, architectural, spatial and aesthetic quality.
- Quality of procurement determines quality/performance of building, set sustainable goals, make greater use of Design competitions
- EU common building assessment tool (harmonised reporting metrics)
reliable environmental web database of materials and products
- **measure energy demand in use phase to prove effectiveness**
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Recycling recommendations

- Promote products that offer a "deconstruction and recycling path";
- promote Design that allows for 'deconstruction and disassembling' and take notice of the big role that architects play in this process;
- benchmark use of recycled materials in assessment tools;
- ensure inclusion of deconstruction/recycling in tender documents;
- Make deconstruction and recycling plans for buildings mandatory in the construction phase, including risk assessment in the design and construction stages.

Thematic Group 4

- **4.1.1 Fitness checks** in the internal market for services – Professional Qualifications Directive/Public Procurement Directive – mapping the cumulative burden (for cross-border service providers). ACE is also keen to minimise the regulatory burden, without advocating de-regulation per se. (ditto, Energy Efficiency Directive – and Health & Safety issues (Temporary or Mobile Work Sites Directive));
- **4.2.1 SIM** – develop national contact points for Construction Products and Services (cf. existing Points of Single Contact) – it is our understanding that the PSCs do not yet fulfill their core purpose – that of providing information to assist business establishment - so the idea of extending PSCs to include information on Construction Products seems implausible. We recommend that a database is created to link up national standards. This needs to be broadly accessible to allow ordinary practitioners to be able to acquire information without vast financial outlay.
- **4.2.2 Insurance for cross-border service-providers** – the ELIOS II study is underway, along with work in DG MARKT (cf. questionnaire we answered in the summer). Difficulty in obtaining insurance cover for cross-border work is a more of an obstacle than recognition of qualification and should be addressed as a matter of urgency!
- **4.5.1 Assessing the sustainability provisions in National Building Codes/Regulation** – ACE would be interested to participate in this work..

Earlier ACE comments

- Regulatory fitness checks: we are concerned about the potentially deregulatory impact of the recent Commission Communication on Regulating Access to the Professions combined with the results of the Peer Review of Services in the Internal Market Directive.

Thematic Group 5

We find these recommendations to be generally rather weak.

- **5.1.1 Priority countries** – inevitably, these will be the countries with which the EU has developed or is developing Free Trade Agreements. Is this not happening anyway?
- **5.2.1 Support – finance/guarantees.** It is not clear what the EU will offer. Export Credit Agencies exist at national level – but what does the EU propose?
- **5.2.2 International co-operation on regulation/standards** – NB. Energy efficiency in buildings, construction products (CEN/TC 350). Again, it is not clear what will be done, or what will be achieved?

- **5.2.2 Key point – Professional Services.** As architecture is a regulated profession in most countries of the world, there is an issue about recognition of qualifications for registration. Longer term, it would be useful to have some real support from the Commission to further our Trade in Services agenda.

Earlier ACE comments

- most of this initiative seems to address products and not professional services; it is vital that professional are not overlooked;
- **absence of mutual recognition of qualifications is a major barrier;**
- difficulty getting insurance cover, export credit guarantees, getting paid;
- access to third country markets – commitments under the GPA should be strictly reciprocal;
- export support for SMEs – what? How?
- International collaboration on sustainable construction

CONCLUSION: some comfort is be taken from the questions asked of the High Level Forum:

- how can stakeholders take a more active role in the Action Plan in 2014?
- are any changes needed in the working methods?
- how to promote the Recommendations from the Thematic Groups?

We believe that in 2014 the process would benefit from a more meaningful interaction and debate with stakeholders, and more discussion of evidence-based reports.