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ACE POLITICAL POSITION

Environment and Sustainable Architecture - Consultation on Sustainable Buildings

29 October 2013

Final

TARGET

European Commission's consultation on Sustainable Buildings (DG Environment)

BACKGROUND

The EU Commission launched on 9 July 2013 a public consultation on Sustainable Buildings (close on 1 October 2013). The European Commission wanted to gather views and additional information on the possible introduction of EU wide measures to achieve better environmental performance of buildings. Resource use and related environmental impacts all along the life-cycle of buildings were in the scope. The consultation put forward questions related to the problem definition as well as to possible policy options. It looked at both demand and supply side measures. Responses to the consultation will feed into the Commission's on-going preparation for a Communication on Sustainable Buildings which will be tabled in first quarter 2014.

ACE POSITION HIGHLIGHTS

ACE considers it essential that more comparable data becomes publicly available about the environmental impact of construction materials and products. Transparent calculation metrics are required to enable built environment professionals to report on the environmental footprint of buildings cheaply and routinely. For the moment the lack of data, the complexity and great variety of calculation methods make such assessments prohibitively expensive and individual products and buildings difficult to benchmark.

An 'Open Data' policy must be mandated for any such frameworks to succeed. This will ensure this type of data will be shared amongst stakeholders throughout the design/construction/operation phases of a building removing an important barrier from streamlining the management of such data across a building's life cycle.

ACE agrees that mandating disclosure versus targets or ratings is the most sensible way forward until adequate data has been gathered to set robust benchmarks. Mandating Green Public Procurement is considered the most useful instrument in the meantime.

ACE considers voluntary declarations less cost effective than mandatory ones. ACE is in support of policy measures that will achieve a measurable reduction in the environmental impact of construction and waste.

Educational programs and guidance alongside incentives for collaborative research should be promoted alongside incentives for business models supporting a responsible management of natural resources.

ACE POSITION – SHORT REPORT

ACE welcomes this consultation on improving the measurement, reporting and reducing resource consumption in the built environment. The structure of the questions was helpful and positive and appeared to stem from the recognition that EU-wide harmonisation of metrics is essential to remove existing barriers and achieve progress. The survey was well structured to gather feedback about industry priorities on what to monitor and when and what instruments would work best to incentivise the reduction of resource consumption. A detailed explanation of the responses provided in the survey is given below.

1. Concept of Sustainable buildings

This question aims to establish which type of resource consumption and from which stage of the building lifecycle should be the focus of future policy? Whilst it is difficult to prioritise, from architects point of view the most critical areas to improve are the construction and disassembly stages. Whilst operational stages are also important, it is likely that if the environmental impact of construction and deconstruction of buildings is better monitored and understood this will inevitably bring about more durable and easily replaceable construction products used in the operational stages of buildings too. Durability and irreplaceability tend to be more difficult to measure and may take longer to establish standards for.

2. Low demand for better environmental performance

only where this is mandated or private clients with exceptional Corporate Social Responsibility agenda. Without new policy initiatives this is unlikely to change due to the barriers described under point A. Current voluntary Green Procurement is perceived to have had little impact on either existing or new buildings. At the minimum, the mandatory reporting of the environmental impact of works carried out has been recommended for all building types to guarantee the availability of data for future targets to be set based on statistical evidence and benchmarking. Once adequate data is available EU-wide binding targets should be set for public buildings initially, to achieve progress.

3. Availability of indicators and data

Whilst ACE as an organisation has not performed Life Cycle Assessment (LCA), individual members of the sustainability group have. Likewise, members of this expert group have assessed the environmental assessment standards of buildings using national and international schemes including BREEAM, LEED, PassivHaus, Estidama, Energy Star and Nabers. Based on this experience ACE Environment and Sustainability Group can state that the availability of data and quality indicators for LCA is varied at best. The alignment of data collection and reporting standards across the EU is a must to underpin progress in this area. A simple and transparent assessment framework with a graduated response structure (inviting more detail for more rewards), with an associated freely available online database to support EU-wide comparisons is seen as the most beneficial intervention. Mandating reporting of quantitative indicators rather than a rating system is advised at least initially. All products entering the EU should be required to undergo the same assessment to ensure a level playing field when evaluating products and outcomes.

4. Systems to communicate environmental performance of construction products and buildings

At present Environmental Product Declarations vary across national boundaries and different systems are used depending on convenience or advantage for a particular product/system/building. ACE advocates the EU-wide harmonisation of reporting to improve transparency and reduce the cost and specialist training required for reporting. Alignment with ISO standards is recommended wherever possible. ACE recommends the mandating of reporting based on harmonised standards but advises that performance ratings and targets should be set at national level.

5. Material Management

ACE members report that the management of construction and demolition waste varies greatly across the EU. For the majority of member states great improvements are needed in the areas highlighted by the survey and EU intervention is recommended to raise the standards in the countries where diverting waste from landfill is still lagging behind. Standardised reporting of recycled content and an easy and low cost certification route is much needed.

6. Increasing Built Space

ACE's view is that increasing demand of built space per person is largely driven by smaller family sizes that nevertheless still require the same amount of auxiliary areas as larger families. The statistics may not reflect that space standards are in fact reducing and not increasing and this is further exacerbated by the gradual erosion of communal spaces for speculative purposes.

7. Measures on Assessment framework for the environmental performance of buildings

ACE supports the approach outlined in the consultation of a harmonised EU-wide framework for the assessment with a limited number of agreed core indicators for most kinds of buildings. ACE also agrees that benchmarks can only be set once adequate data has been gathered. Benchmarking should be mandated to be effective but binding targets on achieved performance should be agreed at national level. An 'Open Data' policy must be mandated for any such frameworks to succeed.

8. Measures to stimulate demand for better environmental performing buildings

Mandating Green Public Procurement can be an effective way to raise the demand for environmentally friendly products and services and allow investment decisions to be based on a whole life cost assessment rather than capital cost only. Unless a direct financial benefit exists for a certification process voluntary schemes may incur a higher cost to industry than a mandatory one without achieving the step change required. It is essential that any mandated scheme has a low-cost entry level reporting template that provides rapid feedback of a building's environmental footprint. More detailed data should also be made publicly available in an open standard format. This will ensure this type of data will be shared amongst stakeholders throughout the design/construction/operation phases of a building removing an important barrier from streamlining the management of such data across a building's life cycle. Such a step is also likely to improve the uptake of Building Information Modelling at all phases, further reducing the cost of data management and integration.

Harmonisation of data structures and mandating data disclosure of key building metrics and making gathered data available online is essential. CarbonBuzz, a free UK online platform for benchmarking the energy consumption, embodied carbon and water consumption of buildings, demonstrates how the construction industry can use such data to spur competition and educate built environment professionals, owners and end users about building performance. The platform cost £750K to develop. The greatest challenge is the lack of data in the public domain.

9. Measures on assessment and reporting scheme for the environmental performance of construction products

ACE recognises that product declarations can be costly and burdensome to SMEs that are responsible for a significant proportion of economic activity in the construction sector. ACE would therefore like to see a graduated response structure in product and building certification: declarations to be limited to a selected set of environmental impacts but incentives would be in place for reporting all relevant environmental impacts.

10. Measures to ensure the availability of data for life-cycle analysis (LCA)

ACE sees the development of a shared European Life-cycle Database alongside a common platform to share existing and future LCA data as a cornerstone of EU policy in this area. Other mechanisms for incentivising economic activity in this area should be explored. For example ACE would recommend the development of an ONLINE market place/matching service for recycled construction products so that products purchased through these accumulate 'eco-credits' for validated products.

11. Measures to ensure the availability of national data on resource flows related to buildings

ACE recommends the harmonisation of high level data across national boundaries to support the EU-wide monitoring of consumption of resources such as materials, water, energy, land for the built environment as well as for waste-generation and management.

12. Measures to use construction material more efficiently

For certification to be successful the validation process needs to be robust. It is essential that simple online tools are made available, featuring an easy-to-use interface that would allow small suppliers and manufacturers to certify validated products fast and at a low cost. Again, voluntary declarations

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are considered less cost effective than mandatory ones. The overall benefits of lower environmental impacts will absolutely outweigh their costs and ACE is in support of policy measures that will achieve a measurable reduction in the environmental impact of construction and waste. Educational programs and guidance alongside incentives for collaborative research should be promoted alongside incentives for business models supporting a more responsible management of natural resources.

13. Measures to use buildings more efficiently

ACE supports the incorporation of efficient use of buildings in Green Procurement Criteria as well as the publication of best practice case studies and guidance.

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ANNEXES

Link to ACE website: www.ace-cae.eu

Link to this particular issue on the Commission website:
http://ec.europa.eu/environment/consultations/buildings_en.htm