



# Sustainability Assessment in the ETA Route

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# My topics today

- Current state of play
- What framework conditions are needed?
- Benefits of sustainability assessment in the ETA route

# Current state of play

- **Construction Products Regulation (EU) No 305/2011**

Annex I

[...]

## 7. Sustainable use of natural resources

The construction works must be designed, built and demolished in such a way that the use of natural resources is sustainable and in particular ensure the following:

- (a) reuse or recyclability of the construction works, their materials and parts after demolition;
- (b) durability of the construction works;
- (c) use of environmentally compatible raw and secondary materials in the construction works.



Addressing BWR 7 under the existing CPR is possible.



Source: DIBt

# How BWR 7 has been addressed by EOTA ...

- 2011: EOTA establishes **Project Team 12** (PT 12) in order to clarify how to deal with basic work requirement 7 'Sustainable use of natural resources' (BWR 7) in EADs and ETAs
- 2017: EOTA PT 12 finalises **model clauses for LCA assessment** under BWR 7 (based on EN 15804)
- There have been numerous **requests** from manufacturers to EOTA to include **LCA performance** data in EADs and ETAs.
  - First attempts to include LCA have been hampered by procedural reasons (missing AVCP legal act related to BWR 7). This might soon change!
  - However, other sustainability aspects have long been successfully covered in EADs/ETAs

# Sustainability aspects covered in EADs/ETAs

- Reuse  
Best practice example:  
EAD 170005-00-0305 'Re-cycled clay masonry units'
- Recycled products and kits
- Design for disassembly
- Use of innovative renewable construction materials: sintered stone, wood, seaweed, straw ...



Thermal insulation made of straw (ETA-17/0247 based on EAD 040146-00-1201)  
Source: FASBA e.V., Verden (Aller)

# Sustainability aspects covered in EADs/ETAs

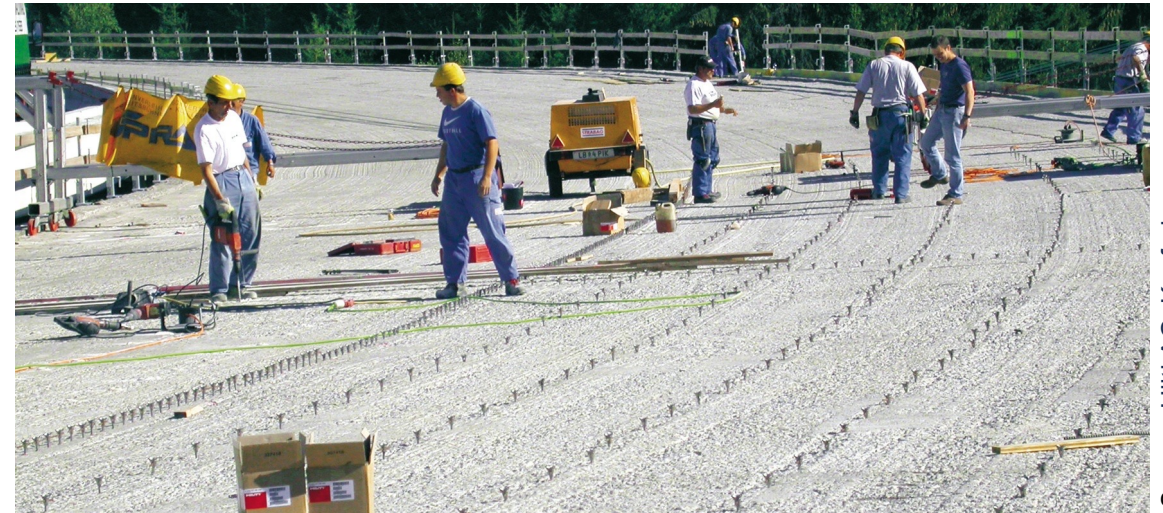


Energy-oriented refurbishment of a historic building with a high-performance aerogel insulation plaster covered by ETA-20/0277 based on EAD 0415559-00-1201

Source: DIBt, Berlin

- High-performance insulation products to improve energy efficiency
- Retrofitting and strengthening to increase durability of existing structures

Shear connector for strengthening existing concrete structures by concrete overlay (ETA-18/1022 based on 332347-00-0601)



Source: Hilti AG, Kaufering

# What is changing now?

- The Commission services have announced that they are planning to introduce the missing AVCP system regarding the essential characteristic on environmental sustainability (**AVCP 3+**) very soon.
- The Commission has included LCA indicators based on EN 15804 as essential characteristics under BWR 7 in the Standardisation Request (SR) for space heating appliances (M/577).  
→ Some standards under this SR have just been cited in the Official Journal
- A lot of spadework has already been covered and is being covered by the horizontal CPR Acquis Group on Environmental Sustainability.

COMMISSION DELEGATED REGULATION (EU) No .../...

of XXX

amending Annex V to Regulation (EU) No 305/2011 as regards the assessment and verification of constancy of performance of construction products and on the applicable systems to assess and verify constancy of performance of construction products, regarding the essential characteristics on environmental sustainability

(Text with EEA relevance)

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Regulation (EU) No 305/2011 of the European Parliament and of the Council of 9 March 2011 laying down harmonised conditions for the marketing of construction products and repealing Council Directive 89/106/EEC and in particular Articles 28(2) and 60(e) and (h) thereof,

Whereas:

- (1) Pursuant to Article 28 of Regulation (EU) No 305/2011, assessment and verification of constancy of performance of construction products in relation to their essential characteristics is to be carried out in accordance with the systems set out in Annex V to Regulation (EU) No 305/2011.
- (2) Annex V should be adapted in order to respond to technological progress by adding a new AVCP system 3+ defining the methods to be carried out in the process of assessment and verification of constancy of performance of construction products when data collection for input values, assumptions and modelling with or without software support is applied.
- (3) The European Parliament resolution of 10 March 2021 on the implementation of Regulation (EU) No 305/2011<sup>9</sup> welcomed the Commission's objective to make the construction sector more sustainable by addressing the sustainability performance of construction products, as announced in the Circular Economy Action Plan. The Council Conclusions on the Circular Economy in the Construction Sector from 28 November 2019<sup>10</sup> urged the Commission to facilitate the circularity of construction products. The Commission Communication 'A New Industrial Strategy for Europe'<sup>11</sup> stressed the need to address the sustainability of construction products and highlighted

<sup>8</sup> OJL 88, 4.4.2011, p. 5.

<sup>9</sup> European Parliament resolution of 10 March 2021 on the implementation of Regulation (EU) No 305/2011 laying down harmonised conditions for the marketing of construction products (the Construction Products Regulation) (2020/2028(INI))

<sup>10</sup> Circular Economy in the Construction Sector – Council Conclusions, adopted 28 November 2019, 14653/19

<sup>11</sup> Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions A New Industrial Strategy for Europe COM(2020)102 final.

EN 4 EN

# CPR Technical Acquis - SG 5 Environmental Sustainability

## Milestone A

- Identification of the essential characteristics and environmental indicators to be included in future standardisation requests
- Indicators according to **EN 15804**

## Milestone B

- Determination of assessment method, scenarios, reference service life, declaration...
- EN 15804 is to be used as the assessment method
- Complementary product category rules (**c-PCR**) are to be included in hTS (directly or by reference to a standard that includes the c-PCR)

## Milestone C

- Proposal for a **new AVCP-System 3+** for all products for environmental sustainability
- Draft for an amendment of Annex V of the existing CPR via delegated act



The CPR Acquis currently interprets BWR 7 only with regard to EN 15804, but **environmental sustainability is more** (e.g. reuse of construction products), which is explicitly stated in BWR 7(a).



# What framework conditions are needed?

- Delegated act for a new AVCP 3+
  - The latest draft of the delegated act needs to be amended in line with the current CPR (see Annex V, cl. 1.6):

*Notified assessment validation bodies undertaking tasks under System 3+ shall consider the European Technical Assessment issued for the construction product in question as the validation of the assessment of the performance of the product.*

- AVS 3+ in the draft revision of the CPR



Once the legal framework is in place with a delegated act for a new AVCP 3+ or with the revision of the CPR, EOTA will be able to act quickly

# Benefits of sustainability assessment in the ETA route

- Environmental sustainability characteristics become part of CE marking.
- The ETA route (EAD development + ETA) is a fast and customizable process.
- The ETA can be flexibly adapted to the specifics of the product.
- Many innovative products have special assessment needs that cannot be covered by standards, at least not in the foreseeable future.
- Assessment of environmental sustainability can be included in the ETA at any time (also at a later stage).
- At EOTA, expertise is available for sustainability assessments in all product groups.



ETA-assessed cable net systems for green facades  
Source: DIBt

# Conclusion

Initial steps and pioneers are needed to make the construction product sector more sustainable

➔ The ETA route can play this role!



Source: DIBt



# Thank you ...

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