

IRISH GREEN BUILDING COUNCIL'S SUBMISSION TO THE DEPARTMENTS OF ENTERPRISE, TRADE AND EMPLOYMENT, AND ENVIRONMENT, CLIMATE AND COMMUNICATIONS ON ECODESIGN FOR SUSTAINABLE PRODUCTS

ABOUT THE IRISH GREEN BUILDING COUNCIL

The Irish Green Building Council (IGBC) provides leadership for a sustainable built environment. IGBC is a registered charity with over 300 corporate [members](#) drawn from all parts of the value chain, from occupiers, design professionals, contractors, suppliers, academics and public authorities and affiliated with a global network of 70 national councils within the [World Green Building Council](#). This allows us to create workable solutions and tools to deliver transformative change towards a sustainable built environment.

In particular, the IGBC run the [EPD Ireland programme](#), publishing Environmental Product Declarations (EPDs) on construction products currently available in Ireland, and making them available to the industry.

Another key mission of the IGBC is to educate the industry for a more sustainable built environment. A section of our [learning hub is dedicated to resources & circularity](#) (this includes webinars and guidance documents). The IGBC also run training and webinars on whole life carbon ([see example here](#)) and circularity ([see example here](#)) in the construction industry on a regular basis. The IGBC are currently running two Circular Projects - Circular Life and CMEx (Construction Materials Exchange). Furthermore, a course mail on "[Circular economy in the Built Environment](#)" was adapted from a version developed by the UK Green Building Council.

This submission was informed by the [large-scale consultation currently run by the IGBC to develop a roadmap to decarbonise Ireland's built environment across its whole life cycle](#), by workshops and meetings that have occurred during the Circular Life and CMEx projects, and by regular conversations with our members.

The IGBC welcomes the proposal for a Regulation on Eco-design for Sustainable Products, and the opportunity to inform the Irish position on this proposal. Our submission includes some general comments, as well as feedback on specific parts of the proposed Regulation.

GENERAL COMMENTS

Introduce a Right to Repair

The IGBC welcome the publication of the proposed Regulation but believe that **the inclusion of a "right to repair" would significantly increase impact**. For example, glass seals in double glazed windows often fail due to poor seals, leading to reduction in performance due to loss of inert gases with very high replacement costs and embodied carbon¹ to replace. These should be designed with in-situ repair in mind. **Data should be provided on who to contact to carry out repairs or should enable processes so simple that can be carried out by local trade people without proprietary equipment**. An alternative option would be to support the development of take-back schemes run by manufacturers.

To support this approach, **all construction products should maintain an inventory of replacement parts for all models or products from previous product lines for the projected maximum life cycle of the product and these should be easily available online**. Where these parts cannot be available after a certain date, manufacturers should provide digital files of every component to facilitate generation by three D printing.

All construction products should also be **designed to be reparable with a limited range of simple standardised tools that enable maintenance and replacement of parts in-situ, by local tradesmen or by users themselves** avoiding use of soldering or fixing components in place with non-mechanical fixings to allow essential parts to be easily replaced.

Dismantling & Segregation of different materials within products

Design should allow clear segregation of different materials within products into biological or technical cycles. Those materials destined to be reintegrated into biological cycles or claiming to be, must not be contaminated with any substance or material that would inhibit composting, e.g., nylon reinforcing to sheep's wool insulation. Those destined for technical cycles should be designed for easy separation.

To support maximum circularity, **each element of a construction product should be easily dismantled** with simple hand tools to allow for segregation into distinct non contaminated waste streams, with each component clearly labelled and signalling the correct waste stream. Unnecessary coatings, laminations or soldering which inhibit recycling should be avoided.

PROPOSED REGULATION

CHAPTER II – ECODESIGN REQUIREMENTS

Strong performance requirements are critical to build consumers' trust in sustainable products, including low carbon intensity and reused construction materials.

Article 7 highlights the importance of providing information on disassembly, recycling, or disposal at end-of-life. In the construction industry, **information on take-back schemes for construction products should also be provided**, these schemes allow to take back excess materials from overorderingⁱⁱ and should be promoted.

Although hazard materials must be reduced, when these are included, they should be clearly signalled (as well as information on the fact that the product cannot be recycled).

In the construction industry, **a QR on each item (where feasibly possible) would support design for disassembly and reuse of secondary construction materials**.

CHAPTER III – DIGITAL PRODUCT PASSPORTS

The IGBC welcome the inclusion of a full section on digital product passports, as these are highly needed in our transition to a circular economyⁱⁱⁱ. In particular, this will allow the product information to be inputted into BIM models for construction projects, allowing a digital twin of the building to be created. Introduced alongside Digital Building Logbooks, they would also allow to capture better quality data on buildings and facilitate reuse.

Digital product passports would also allow consumers and specifiers to make an educated choice about which product they should choose. Information regarding the materials environmental impact should be clearly displayed on products to support transparency. Ideally, key information should be made available in a user-friendly way, e.g., with a label similar to the nutri-score. Any construction product manufacturer/supplier whose marketing communications contain environmental claims should produce an EPD as evidence of such claims.

Due to the large amount of embodied energy and carbon that is needed to create most standard construction products used today^{iv}, **construction products should be designed to last as long as**

possible, and information provided to owner to maintain. The maintenance manual could be included in a digital product passport.

CHAPTER IV – LABELS

Labels are key in improving transparency and hence in supporting the development of a circular economy. **Where labels are used, they must display information in a user-friendly way.** E.g., through a system similar to nutri-score. As previously highlighted in the construction industry, a QR on each item (where feasibly possible) would support design for disassembly and reuse of secondary construction materials. For all sectors, a QR code may be useful in providing additional information.

CHAPTER V - PRIORITISATION, PLANNING AND CONSULTATION

As the built environment is both a carbon and resource intensive sector, the IGBC believe that this sector should be prioritised when planning for a circular economy^v.

The IGBC welcome that consultation with the industry and key stakeholders will be key in developing these strategies (article 17). Taking a collaborative and inclusive approach is key in transitioning to a circular economy.

The IGBC welcome the recommendations to provide additional support to SMEs both at EU and national level (article 19). **More specifically, additional financial support (as already provided by Enterprise Ireland to decarbonise manufacturing processes) should be provided to SMEs.**

The regulation would also need to be set out as clearly as possible to manufacturers and all construction personnel. Training should be provided to all to make the roll-out feasible. A contact centre in Ireland would be good for queries from customers, manufacturers, and construction industry.

CHAPTER VI - DESTRUCTION OF UNSOLD CONSUMER PRODUCTS

The IGBC **welcome the inclusion of articles to put a stop to the destruction of unsold consumer goods.** In the construction industry, **a priority should be to support take-back schemes for construction products to take back excess materials from overordering^{vi}.**

CHAPTER X – INCENTIVES

The IGBC welcome the inclusion of a full article on Green Public Procurement but believe the text could be stronger. As highlighted in many EU policies, the **public sector must lead by example when it comes to climate action.** Green Public Procurement remains in its infancy but has a key role to play in supporting innovation, and the development of low carbon products and industries.

To reach our climate targets and to support innovation, **Level(s)^{vii} indicator and more specifically Life Cycle Assessment should become part of all public tenders.**

The IGBC is concerned by section 2.c of article 58 "When establishing requirements pursuant to Article 4, third subparagraph, point (h), for public contracts, the Commission shall take into account the following criteria:... (c) the economic feasibility for contracting authorities or contracting entities to buy more environmentally sustainable products, without entailing disproportionate costs." At the very least, this should read "without entailing disproportionate costs on a full life cycle basis".

CHAPTER XI - MARKET SURVEILLANCE

At national level, the IGBC believe that enforcement teams are needed to ensure manufacturers are complying with the regulation.

CHAPTER XIV - FINAL PROVISIONS

The IGBC support article 68 and believe that the penalties “shall be effective, proportionate and dissuasive, taking into account the extent of non-compliance and the number of units of non-complying products placed on the Union market”. **These penalties should also be clearly stated and communicated.** More specifically, they should only be introduced alongside a proper awareness raising campaign, and ensuring that supporting measures are in place for SMEs.

ⁱ i.e., emissions associated with their production.

ⁱⁱ It is estimated that 20% of all material arriving on site in the UK is thrown away. This means that for every five dwellings built, one dwelling’s worth of materials go to landfill or even incineration.

ⁱⁱⁱ See Recommendation 4.2.26 of the Draft Roadmap to Decarbonise Ireland’s Built Environment Across its whole life cycle. Available at [Draft-Roadmap-for-Public-Consultation-May-2022-For-Printing-V2.pdf \(igbc.ie\)](#).

^{iv} [Embodied Carbon Actions – Architecture 2030](#)

^v In Europe, the construction industry is responsible for 50% of all extracted raw materials and 1/3 of fresh water used. Construction products and buildings are also the main source of waste generation in the EU, representing 30% of our total waste, with most materials still ending up in landfill.

^{vi} It is estimated that 20% of all material arriving on site in the UK is thrown away. This means that for every five dwellings built, one dwelling’s worth of materials go to landfill or even incineration.

^{vii} Level(s): Launched in October 2020, Level(s) is a framework of sustainability indicators that are common to all buildings across the EU. The key idea is that if all member states focus on these same indicators, we can use them to learn, set benchmarks and develop standards. The framework offers comprehensive manuals for the understanding and reporting of each indicator. Level(s) was developed as a detailed reporting framework to improve the sustainability of buildings from the life cycle perspective, including the transition towards a circular economy. It encourages life cycle thinking and supports users all the way from design stage through to operation and occupation of a building