

EU Policy Overview – Green Deal, Energy and Product Sustainability

Valerio Mazzone

Manager - Public Affairs

European General Galvanizers Association

Monday, 19 June 2023



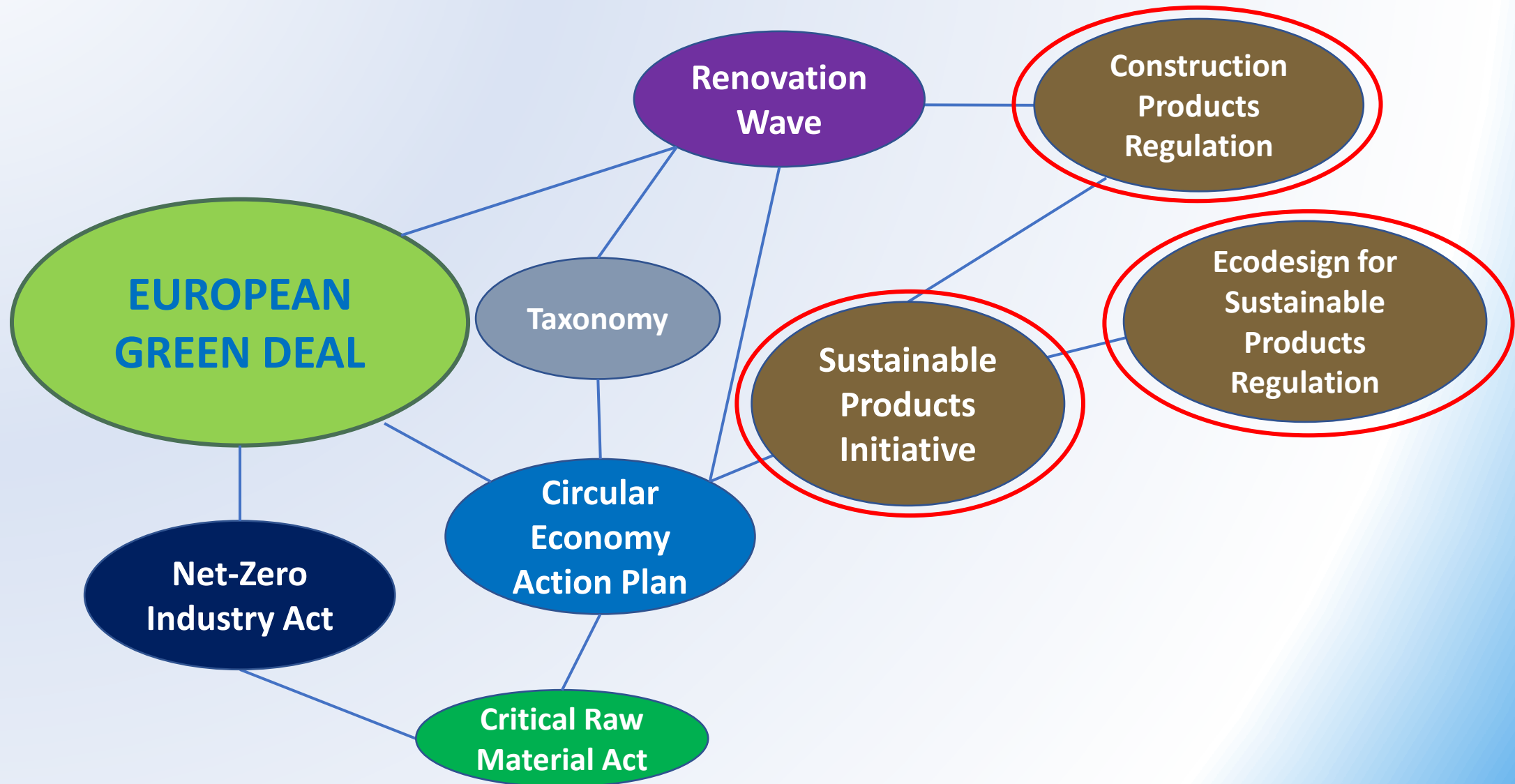
Initiatives encompassed within the EU Green Deal



EU Green Deal: Relevant Initiatives to our Industry



Focus of the presentation



Our connections and partnerships



SPI: ESPR and CPR

Making sustainable products the norm in a more resilient Single Market



Ecodesign for Sustainable Products Regulation

Brussels, 30.3.2022
COM(2022) 144 final
2022/0094 (COD)

Proposal for a

REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

laying down harmonised conditions for the marketing of construction products, amending Regulation (EU) 2019/1020 and repealing Regulation (EU) 305/2011

(Text with EEA relevance)

{SEC(2022) 167 final} - {SWD(2022) 87 final} - {SWD(2022) 88 final} -
{SWD(2022) 89 final}



Construction Products Regulation

Brussels, 30.3.2022
COM(2022) 142 final
2022/0095 (COD)

Proposal for a

REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

establishing a framework for setting ecodesign requirements for sustainable products and repealing Directive 2009/125/EC

(Text with EEA relevance)

{SEC(2022) 165 final} - {SWD(2022) 81 final} - {SWD(2022) 82 final} -
{SWD(2022) 83 final}



EUROPEAN
COMMISSION

Ecodesign for Sustainable Products Regulation

Proposal for a

REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

establishing a framework for setting ecodesign requirements for sustainable products
and repealing Directive 2009/125/EC



EUROPEAN
COMMISSION

Construction Products Regulation

Proposal for a

REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

laying down harmonised conditions for the marketing of construction products,
amending Regulation (EU) 2019/1020 and repealing Regulation (EU) 305/2011

- product **durability**, **reliability**, **reusability**, upgradability, reparability, ease of maintenance and refurbishment;
- restrictions on the presence of substances that inhibit the circularity of products and materials;
- energy use or energy efficiency of products;
- resource use or resource efficiency of products;
- minimum recycled content in products;
- ease of disassembly, remanufacturing and recycling of products and materials;
- life-cycle environmental impact of products, including their carbon and environmental footprints;
- preventing and reducing waste, including packaging waste.

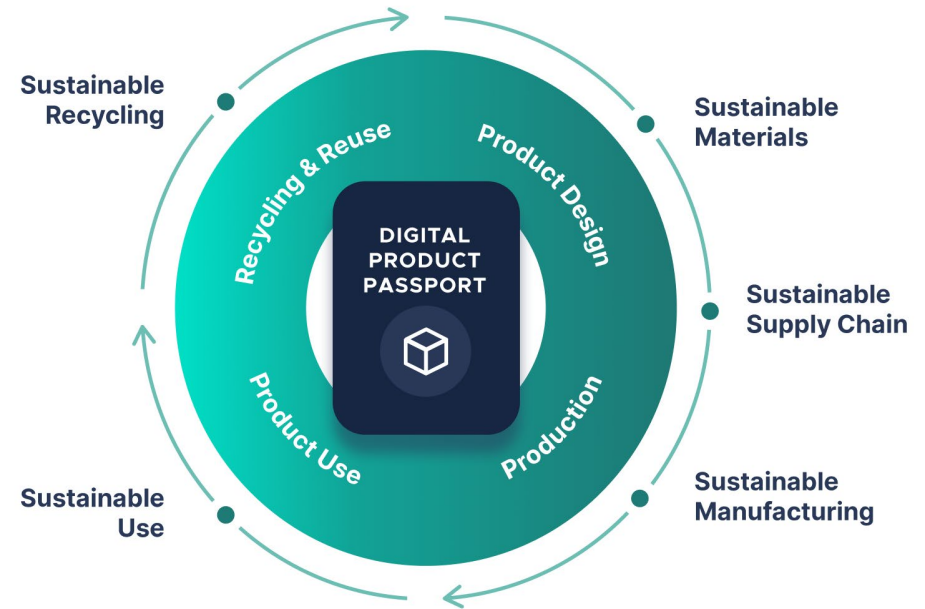
The structure and structural elements of construction works shall be designed, manufactured, constructed, maintained and demolished in such a way that they meet the following requirements:

- (a) **be durable for their intended life span (durability requirement);**
- (b) be able to sustain all actions and influences likely to occur during construction, use and demolition with an appropriate degree of reliability and in a cost-effective way (structural resistance requirement). They shall not:
 - (i) collapse,
 - (ii) deform to an inadmissible degree,
 - (iii) damage other parts of the construction works, fittings or installed equipment as a result of major deformation of the load-bearing construction;
- (c) remain within their specified service requirements during the intended life span with appropriate degrees of reliability and in an economic way (serviceability requirement);
- (d) maintain appropriately their integrity in adverse events, including earthquake, explosion, fire, impact or consequences of human errors, to an extent disproportionate to the original cause (robustness requirement).

Digital Product Passport

DPP system development:

Commission standardization proposal for the proper functioning of the DPP



Which information is in the DPP?

- **Article 7 (2) of ESPR** specifies the “information requirements” (e.g. **performance of the product, how to install, use and repair, etc.**)
- **Annex III of ESPR** lists the information that may be included (e.g. product identifier, global trade identification number, etc.)
- **Article 8 of ESPR** provides that Delegated Acts specify the information to be included in the product passport

Pros and Cons

Positive

- Sustainability requirement as a competitive factor
- Address the problem of dependencies and security of supply
- Generate a boost for the internal market and the construction sector

Negative

- The power shifts to the Commission
- Durability could be made more prominent
- Significant burden on sub-contract providers of services

CPR Revision: EGGA activities

RESPONSE TO PUBLIC CONSULTATION

REVISION OF THE CONSTRUCTION PRODUCTS REGULATION (2022/0094)

12 JULY 2022

Importance of the CPR

The European General Galvanizers Association (EGGA) represents approx. 600 industrial operators (mostly SMEs) that provide the service of sub-contract application of long-term protective zinc coatings for steel products (i.e., hot dip galvanizing). Over 80% of the steel products processed by the galvanizing industry are construction products that are within the scope of the existing Construction Products Regulation (CPR) and a (the product manufacturer).

The CPR has high importance for our sector because

1. We believe that the provisions of the CPR regarding corrosion protection in achieving the durability of construction products is properly recognised.
2. Any requirements for information to be provided by manufacturers in order to achieve conformity have implications for sub-contractors and administrative burdens that are placed on them.

General Remarks – Standardisation and Delegation

We support the position submitted by Construction Products Regulation as a reliable basis for the inter-construction concerns at the envisaged use of Delegated Acts to limit, wherever possible, the circumstances rationale for those concerns here.

Environment and Sustainability – Durability

Our most significant concern within the proposal is that a lower prominence within obligations or with the requirements related to the sustainability represents a lost opportunity to drive the greater

For example, Article 22 states that products should not fall beyond the average durability of products, which lacks ambition and will not drive change. More is needed to be more suited to reuse.

Similarly, Annex 1 C.2.1 refers to 'maximising the durability' definition of this requirement lacks clarity.

EGGA would welcome the opportunity to work with the Commission to enhance the aspects of the proposal related to durability. We have extensive expertise in this field.

Environment and Sustainability – ReUse

We welcome the greater emphasis on reuse of construction products, but question if the objectives of Article 5 (Ecodesign requirements) of the Commission's "Proposal for a Regulation establishing a framework for setting eco-design requirements for sustainable products" (2022/0095) are similarly implemented in the CPR proposal. The CPR proposal contains no clear obligation for design for reuse.

Environment and Sustainability – EN 15804 & EPDs

The role of EN 15804 and the existing system of Environmental Product Declarations in fulfilling the environmental aspects of the Declaration of Performance should be made clear. This is especially important with regard to the choice of indicators to be declared – where EN 15804 and any product-specific CPRs currently provide greater clarity than Annex 1, Part A of the proposal – where the phrase 'to the extent possible,' will be open to wide interpretation when determining which indicators are considered sufficiently reliable to form part of a Declaration of Performance.

Further information:

Murray Cook
Executive Director
mcook@egga.com

Comments of the Spanish Technical Association of Galvanization to the Proposal for Regulation of Construction Products 2022/0094 (COD)

General comments

The Spanish Technical Galvanization Association within the Construction Products Regulation, in particular it supports *environmental obligations and laying the foundation application of an evaluation method with which to construction products (recital 7).*

Additionally, we applaud the approach included in recital *"in order to ensure the sustainability and durability manufacturers must make their products usable for a long time, in line with the objectives of the Action Plan for the Circular Economy, reuse, remanufacturing and recycling of their products."*

Thus, ATEG welcomes an increased focus on circular economy and remanufacturing, which are inherent characteristics of construction.

However, after a detailed reading of the articles and the annex, **we consider that these objectives are not particularly the requirements of durability and reuse and the need that, for this purpose, the construction products be designed for disassembly.**

From the ATEG we consider it necessary for the Regulation to establish explicit and detailed way the need for construction products to be designed in a way as to optimize both their durability and their reuse, as tools to achieve the decarbonisation and circularity of the construction sector.

The sector is already working on amendments to the article proposals that we consider to be of high priority.



Enmienda N.º 2.

Artículo (22) Obligaciones medioambientales adicionales de los fabricantes

Punto 2. Letra d)

Enmienda de MODIFICACIÓN

Donde dice:	Debe decir:
(d) avoid premature obsolescence of products, use reliable parts and design products so that their durability is not less than the average durability of products in their respective category;	(d) avoid premature obsolescence of products, use reliable parts and design products in a way that optimizes their durability and is not less than the maximum average durability of products in their respective category;
Rationale: We consider that as written, this requirement is insufficient, since it does not require a clear objective or measurable obligation that construction products be marketed with maximum durability. The final objective should not be "average durability" but the maximum durability or optimal durability , in line with the objectives that are included in the NEW draft of the Regulation establishing a framework for the establishment of ecological design requirements applicable to sustainable products and Directive 2009/125/EC is repealed. In the aforementioned draft of Ecological Design, «durability» is defined as the «ability of a product to function properly, under certain conditions of use, maintenance and repair, until a limiting event prevents it;». And as stated in its Article 7.2.b) ii, on product information requirements, it must include "information intended for consumers and other end users related to how to install, use, maintain and repair the product with in order to minimize its impact on the environment and ensure optimal durability , as well as how to return or dispose of the product at the end of its useful life;". Therefore, and given the necessary harmonization of both Regulations, construction products, which are also within the scope of the aforementioned Ecological Design Regulation, must inform and guarantee their optimal or maximum durability.	

European General Galvanizers Association

Registered Office: 14-16 Reddicroft, Sutton Coldfield, B73 6AZ, United Kingdom
Telephone +44 (0)121 355 2119; Fax +44 (0)121 354 4895

Brussels Office: Boulevard du Souverain 68, 1170 Brussels, Belgium

European General Galvanizers Association

Registered Office: 14-16 Reddicroft, Sutton Coldfield, B73 6AZ, United Kingdom
Telephone +44 (0)121 355 2119; Fax +44 (0)121 354 4895

Brussels Office: Boulevard du Souverain 68, 1170 Brussels, Belgium



CPR Revision: EGGA activities



Reduce information on environmental sustainability for “service providers and suppliers”

- Article 30

Amendment 194

Proposal for a regulation
Article 30

Text proposed by the Commission

Amendment

Amendments supported by EGGA:
Setting aspirations for durability at a suitably high level

IMCO Amendments

Amendment 914 [Annex I, Part D, 1.3 (c), introductory part]

Justification: If extensive maintenance is required to achieve maximum level of durability over several lifecycles, this should be made clear in the Product Information Requirements. Similarly, products with inherent high levels of durability can then communicate the lower levels of maintenance required.

Amendment 917 [Annex I, Part D, 1.3 (c) (ii)]

Justification: As for Amendment 914. This amendment is required to reinforce the link between maintenance and durability.

Amendments 915 and 918 are supported as they are identical to Amendments 914 and 917.

ENVI Opinion

Amendment to Recital 43

Justification: Amendment from ‘for a very long time’ to ‘**as long as possible**’ sets a higher aspiration for product durability

Amendment to Article 22 2 (d)

Justification: Amendment from ‘durability does not fall beyond’ to ‘durability **is significantly improved compared to** the average’ sets a higher aspiration for product durability

ESPR: JRC Report



ESPR: Necessary to prioritise **products or product groups** and **horizontal ecodesign measures**

JRC Report = Provides a preliminary ranking of new product groups and horizontal measures that could be considered as a priority

ESPR Prioritisation for Paint – identified as a high impact product for improvement...



ESPR: EGGA activities



12 May 2023

New Product Priorities for Ecodesign Response to European Commission

BACKGROUND

This document provides EGGA's response to the 'Priorities for Ecodesign for Sustainable Products' the development of the Ecodesign for Sustainable Products Regulation and the application of horizontal measures.

The general (batch) galvanizing industry provides a service that is applied after manufacture of the product. Applications include ensuring many decades of service life, such as solar power structures and other outdoor structures.

A galvanized coating is sufficiently durable and resistant to corrosion over the product lifecycle. Both zinc and steel are used.

GENERAL REMARKS

EGGA supports the objectives of the proposed Regulation and the fundamental approach to focus on the product's potential for improvement in their sustainability.

The observations and recommendations in this Policy Report: "Ecodesign for Sustainable Products" of January 2023 and draws on our experience in the cycle studies, environmental product declarations and sustainability assessment across the various product groups for which galvanized coatings are applied.

EGGA's main request is that **opportunities for improvement in product sustainability through optimisation of corrosion protection services are properly recognised when addressing priority product groups.**

E-mail: mail@egga.com
Website: www.galvanizingeurope.org

EU Transparency Register: ID 634416015579-93

New (unambitious) interpretation of the concept of durability, which includes that of maintenance

- Article 2, par. 1, point 21

Proposal for a regulation Article 2 – paragraph 1 – point 21

Text proposed by the Commission

(21) 'durability' means the ability of a product to function *as* required, under *specified* conditions of use, maintenance and repair, *until a limiting event prevents its functioning*;

Amendment

(21) 'durability' means the ability of a product to function **and maintain for a certain period of time its required function and performance** under **normal** conditions of use, maintenance and repair;

We do not support this amendment because it normalises maintenance. It is better if the delegated act specifies ambitiously low levels of maintenance!

Construction Products Regulation Ecodesign for Sustainable Products Regulation

General direction-key points for EGGA

- Reduced power for the Commission (delegated acts)
- Eased the burden on sub-contract providers of services and SMEs

Next actions

- CPR: Council experts to examine the latest version of the Presidency compromise text soon
 - Plenary sessions to be held in July 2023, then trilogues will begin
- Support our positions before and during the Parliament's plenary

Call to action

