

## **CEMBUREAU FEEDBACK TO THE EUROPEAN COMMISSION'S INCEPTION IMPACT ASSESSMENT ON A CONSUMER POLICY – EMPOWERING THE CONSUMER FOR THE GREEN TRANSITION**

*Brussels, 01/09/2020*

**The European Cement Association CEMBUREAU welcomes the opportunity to provide feedback on the Commission Inception Impact Assessment (IIA) on empowering the consumer for the green transition.**

CEMBUREAU agrees with the consumer law initiative announced in the Green Deal to provide consumers the ability to make sustainable choices based on trustful environmental information and green claims.

We endorse the Commission's view that the consumer is best protected through a harmonised approach at EU level and that individual consumer protection initiatives at national level can affect the internal market. In designing such consumer protection policy, it is important, however, not to proceed to a "one-size-fits-all" approach for all products and materials without due consideration for their place in the supply chain and for the function fulfilled by different types of products.

Applied to construction products, for instance, it is important to note that the purchasing process in the construction industry is in general different from that of other goods and occurs more often on a B2B platform. The selection of materials or products is made by a designer (architect or specifier), and the actual purchase is made by a builder or a contractor. As the building material will achieve its functionality in the final product, i.e. the building or construction work, these professionals need data to assess the environmental performance of this final product.

For that reason, CEMBUREAU would like to highlight that, in our view, construction products would require a dedicated approach when it comes to empowering consumers for the green transition.

We believe that for the construction market's specialised consumers Environmental Product Declarations (EPDs) are the best source of information for purchase decisions as EPDs use verifiable and accurate information about the life-cycle environmental impact of construction products to encourage the demand for, and supply of products that have a lower negative impact on the environment for the building or construction works.

CEMBUREAU has always felt that it is the cement sector's responsibility to provide interested parties with environmental information about cement. The EU cement sector responds to the increased awareness and the requests of professional users and consumers for environmental information through the development of cement EPDs, especially for B2B communication. For instance, cement EPDs were fundamental for the environmental input to CEMBUREAU's Level(s) building sustainability assessment framework pilot projects.

While we acknowledge that there are information asymmetries in the way low carbon products and materials are brought to the market and that market uptake needs specific attention, we believe that a construction specific approach taking into account the particularities of the supply chain and the place of the product or material in the final construction deserves appropriate attention.

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