

## WHITE PAPER | SUSTAINABLE CONSTRUCTION

### Paper developed by members of the CCIFP's ESG Committee for Sustainable Construction

The construction sector, seeking to improve its ESG performance, based on both the requirements of the market regulator (such as CSRD obligations or indirectly the taxonomy) and the individual ambitions of individual companies enshrined in their environmental strategies, calls for support by considering the following changes and solutions:

- A. Raise awareness of sustainable construction through the adoption of technical requirements and the introduction of obligations to calculate the embodied carbon.**

In order to adopt sustainable building requirements, it would be expected that a new section on this topic would be added to the Regulation on Technical Building Conditions.

According to the new Energy Performance of Buildings Directive (EPBD), it will become mandatory to count the carbon footprint for new buildings with a floor area of more than 1,000 m<sup>2</sup> from 2028, and for all new buildings from 2030. Furthermore, the revised EU Construction Products Regulation will require manufacturers to declare the carbon footprint of construction products. It therefore seems reasonable to amend the following:

- construction projects regarding the obligation to calculate and report the carbon footprint for new buildings (according to EN15978);
- energy performance certificates, which should give the carbon footprint of the premises/building;
- obligation for manufacturers to declare the carbon footprint or environmental life cycle assessment of construction products;
- inclusion of the life-cost analysis in further work on openBIM;
- inclusion of the building's carbon footprint in the architectural and construction designs provided by GUNB, the electronic building book and the electronic building log;
- making subsidies in a programme financed by BGK (*Bank Gospodarstwa Krajowego - National Development Bank*) conditional on the new dwelling/building having a calculated carbon footprint (according to EN1597).



- B. Encourage a shift in the energy sources of producers from the construction sector to those promoting climate-energy policies and related sustainable development goals (autogeneration).**

Competitive conditions in the construction market constantly promote companies using fossil fuel-based energy sources. Investment in and use of in-house RES in many segments is costly and makes own production uncompetitive due to an due to insufficient market interest in products with a smaller carbon footprint. The postulate concerns the development of a system of support for investment activities in the form of preferential loans, subsidies, grants, tax changes, as well as changes in regulations and requirements for construction materials and products in a way that favours the use of those with a lower declared GWP.

- C. Facilitate the reuse of recycled building materials or dismantling.**

The high level of regulatory requirements placed on assembled materials and equipment makes it difficult or impossible to reuse recycled or dismantled products. The classification of all residues from production, assembly and - in many cases - dismantling as waste has a negative connotation. Today, there are opportunities to increase the re-use of materials currently treated as waste. In addition, there is a finite list of materials whose treatment does not require hazardous processes requiring detailed and time-consuming procedures. Facilitations are therefore expected in the form of changes to the regulations liberalising the approach to full products and establishing rules for the confirmation/declaration of the performance characteristics possessed by dismantling materials. As an example, regulatory changes are possible to facilitate the safe use of recycled asphalt and construction debris in road works, e.g. sands and clays considered as waste and small quantities of bitumen membranes (scraps), coming from the production of SBS-modified bitumen membrane, could be used in road construction or the production of asphalt mixtures for road surfaces.

- D. Changes in the state's purchasing policy to give preference in construction to materials and technologies that meet environmental objectives.**

Not all activities related to the implementation of sustainable technologies are competitive compared to traditional solutions. Manufacturers and contractors in the construction sector expect to level the playing field by giving preference, in the requirements for newly constructed or renovated buildings, "green" products and technologies. Amendments should address the inclusion of environmental objectives in the specifications for public procurement or in general plans and local development plans. They can be of an optional nature and only concern investments subsidised by public funds.



## E. Increase energy efficiency of buildings

Programmes supporting thermal modernisation and investment in energy efficiency improvements are a tangible way of protecting the economy and citizens from dependence on unpredictable international events and unstable energy supply and price fluctuations. The recent revision of the EPBD is an excellent time to prepare for the implementation of measures to encourage investments in energy efficiency in buildings at national level. To this end, changes in public support programmes for thermal modernisation are necessary. These should effectively ensure that building energy losses are minimised by investing in insulation of walls, roofs, basements, replacement of roofing, doors, windows and the use of ventilation before installing a new heat source for a greener one. This is due to the need to select a new heat source that is adapted to an optimised level of the building's energy needs. The following changes and facilitations are proposed in the thermomodernisation programmes:

- progressive dependence of subsidies on energy savings achieved (highest support for investments leading to at least 60 % energy savings);
- increase in support for investments in thermal insulation of buildings;
- increasing and simplifying the thermo-modernisation allowance by introducing a mechanism of deduction from tax rather than reduction of its base;
- revision of income thresholds for Clean Air Programme (*Czyste Powietrze*) beneficiaries;
- introduction of energy classes for buildings in order to transparently determine the level of energy performance of buildings and, consequently, the levels of support for thermo-modernisation investments.

