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CEN/TC 350 neglects the value of recycled materials

Since 2005, activities have been conducted under CEN/TC 350 "building sustainability" in order to develop European standards to set up a harmonised framework and methodology to assess the sustainability of buildings and building products. In 2009, the decision was made in some of the TC350 works that the benefits from recycling materials at end-of-life shall be excluded. This development is contrary to a life cycle approach since only recycled material content is considered whilst the benefits derived from the end-of-life recycling of materials are ignored. Although a compromise was proposed and discussed at length to include, as an additional information module, the recycling benefits on the product life cycle basis, it has become clear that this information will be excluded from any aggregated indicator issued from the product or building assessment.

By deliberately and arbitrarily neglecting the end of life recycling benefits in the life cycle assessment (LCA) of building products, CEN/TC 350 is:

- **not in line with the principles laid down by the ISO standards on LCA;**
- **not in line with the methodology of the ILCD handbooks developed by the European Platform on LCA;**
- **discriminating the most recyclable materials;**
- **not supporting the objectives of the EU Waste Framework Directive.**

By doing so in spite of the substantiated warnings and constructive proposals for improvement put forward, CEN/TC 350 will:

- **fail to fulfil its legal mandate;**
- **fail to push for the "recycling society" in the building sector;**
- **fail to recognise differences in the recycling attributes of building materials;**
- **ruin the legitimacy and credibility of European standards;**
- **cause distortion on the internal market; and**
- **ultimately hinder the realisation of Europe's ambitions of sustainability.**

Thanks to their properties which are indefinitely maintained during the melting process, metals are the most recycled materials. Metal scrap is transformed into new metal ingot through profitable and well-established recycling operations. Hence, while the initial environmental impact of primary metal production can be significant, it is then rewarded by the valuable benefits that the material provides through recycling. The metal material has value and should be managed for that value: the material stock should be used today for its maximum utility while at the same time being conserved and recycled to meet the needs of future generations.

While this concept of material conservation is integrated within ISO 14044 which defines the recommended Life Cycle Assessment rules and globally accepted methodologies, CEN/TC 350 experts decided arbitrarily to neglect the benefits of recycling at the end of life stage. Hence, the material conservation concept cannot be integrated into the assessment even if it is clearly demonstrated in current recycling practices. This arbitrary choice is going also against the recommendations of the ILCD handbook for considering the recycling benefits of end of life products having a positive economic value like metal scrap.

The EU waste directive (2008/98/EC) aims to prevent waste and to promote recycling and re-use when it makes sense environmentally. Hence, it is important at the early stage of the product design or choice, to model entirely the end of life stage to assess the burdens and benefits of the various possible scenarios. It is particularly

important to be able to compare the additional burdens coming from the waste or recycling processes in comparison to the benefits resulting from the production of the recycled material. Hence, the EU waste directive also requests a proper consideration of the value of recycled materials to assess the environmental relevance of the processing route of an end of life building product.

The inadequacy of this LCA methodology addressing recycling was also largely contributing to the negative vote recorded at the end of 2009 for the draft standard (prEN15978) related to the calculation methodology at building level.

Therefore, the metal industry has proposed, as recommended by ISO 14044 and the European platform on LCA, to add a new module to present, transparently and without any double counting or crediting, the benefits of recycling over the full life cycle. However, CEN/TC 350 experts decided to reject this proposal arguing that the additional module is not part of the building life cycle assessment. Hence, any indicator reported in this additional module will be excluded from final indicator results, which, in turn, will therefore fail to cover the whole life cycle by simply ignoring the benefits of recycling at the end of life.

This preliminary value choice is discriminatory against recyclable materials, e.g. metals and against the life cycle thinking principle. As such, current CEN/TC 350 draft standards do not address the whole spectrum of materials' properties on a fair basis and go against the recommendations prescribed in international standards and by the European reference institution. The metal industry does not accept such a preliminary value choice and requests a proper and consensual methodology to consider recycling in CEN/TC 350 standards.

Example:

"Products A" and "Products B" are 2 products with the same functionality but "Product A" applies the "design for recycling" principle while product B does not integrate this concept. The "design for recycling" principle may lead to some additional environmental impact at the production level, e.g. more durable materials or more complex manufacturing processes. In this case, the current CENTC350 methodology promotes "Product B" while a life cycle based methodology (i.e. "cradle to grave") will give the opposite result. Hence, it confirms that CEN/TC350 does not award additional efforts done today for developing more sustainable products of tomorrow!