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Cerame-Unie's answer to the European Commission's public consultation on the Renovation Wave

The European ceramic industry covers a wide range of construction products such as bricks, roof tiles, wall and floor tiles as well as sanitaryware products. The European Ceramic Industry Association, Cerame-Unie, welcomes the Renovation Wave initiative introduced in the European Green Deal. In this position paper, Cerame-Unie would like to outline its views on the Renovation Wave and contribute to the public consultation launched by the European Commission.

Cerame-Unie supports the objectives fulfilled by the Renovation Wave. Firstly, the initiative aims at addressing the challenge of **energy renovation of the existing building stock**. Secondly, the Renovation Wave is a **key component of the EU post-COVID 19 recovery strategy**. Building renovation is central to the economic recovery: it represents an opportunity for economic growth as it provides jobs and boosts the construction sector while strengthening Europe's industrial competitiveness.

1) A holistic and integrated approach to building renovation

Several principles contribute to boosting energy performance of buildings and **particular attention should be given to circular economy**. Ceramic construction products are durable and sustainable products: in addition to their long lifespan, bricks and roof tiles can be reused for façade and roof renovations or they can be recycled.

In addition, their thermal and ventilation properties enhance the energy efficiency of buildings. An example for ceramic products in renovation are brick slips as they can upgrade the exterior appearance of an existing building. One of their most common applications is a finish for external wall insulation. Ceramic wall and floor tiles can also be used in façade renovations, through ventilated façades which improve the performance of the façades due to their capacity to provide waterproof protection and to insulate the building from outdoor temperatures, thus ensuring energy savings. In addition, the ceramic sector can contribute by providing innovative products in building renovations, which will allow for more sustainable constructions. Examples include thin tiles, with a 50% reduction in the consumption of raw materials for their manufacture, lower energy consumption, and thus fewer CO₂ emissions and less waste generation at the end of the product's life.

However, **building renovation is not just about energy efficiency, the efficiency of the water load used should not be neglected**. There are already European standards which allow to assess water consumption. Other improvements have to go with the energy renovation, e.g. sanitary hygiene, design of the building (inside and outside) and proper building equipment and appliances. Thus, **Cerame-Unie promotes a holistic and integrated approach to building renovation to stimulate the whole construction sector**.

2) Measures to boost building renovation rates

Main challenges increasing building renovation rates are linked to obstacles. Thus, further policies and measures to boost building renovation rates and depth are required (section 4). However, **public and financial subsidies may not be sufficient**. Other policy incentives, such as the Swiss legal assessment of building to evaluate if it is more efficient to renovate or to demolish and build new can be very helpful to increase the renovation rate of the existing building stock. **Cerame-Unie asks the European Commission to deliver immediate incentives so that the industry does not suffer due to lag on implementation**. The Renovation Wave must also include compliant product measures and robust market surveillance, otherwise the forecast efficiency measures will not materialise.

3) Sustainability assessment

Cerame-Unie highlights that a **sustainability assessment should be done at building level and should take into account all environmental aspects**, not only carbon footprint (15.1). The European ceramic industry association also stresses that biodiversity can be achieved through various measures, such as infrastructures in the direct surroundings of the buildings and not only with a focus on green walls and roofs (4.2.1 and 15.1).

4) The need for standards adapted to technical and industrial developments

As a last point, Cerame-Unie would like to remind that the implementation of the Renovation Wave will be supported by the use of harmonised product standards. Due to the important backlog in the citation of standards in the Official Journal of the European Union, most of revised and new standards updated according to technical and industrial developments have no legal value. However, **an efficient building renovation should be supported by state-of-the art construction products complying with relevant standards**. Thus, implementation issues related to the CPR should be urgently solved.

The European ceramic industry covers a wide range of products including bricks & roof tiles, clay pipes, wall & floor tiles, refractories, sanitaryware, table- & ornamental ware, technical ceramics, expanded clay and flower pots. The industry generates over 200,000 direct jobs and a production value of €31 billion within the EU.

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