

Remissyttrande

Proposal 2022/0094 (COD) 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

[Public Housing Sweden](#) is an interest and industry organisation for the municipality and private owned public housing companies in Sweden. We represent more than 900 000 apartments and over 300 companies in Sweden.


Public Housing Sweden welcomes the revision of the Construction Products Regulation, where information on construction products will be expanded with information on the environment, health and safety. The information is important in order to increase recycling and reuse of construction products, thereby increasing circularity and promoting the green transition in the real estate and construction sector.

Public Housing Sweden believes that if the information on construction products is regulated at EU level this reduces the need for national legislation and the EU's large internal market benefits. This provides the conditions for more products with declared environmental performance as well as increased competition.

This, in turn, can promote the cost reduction of building homes in Sweden, which today has Europe's highest construction prices. With reduced construction costs, Public Housing Swedens member companies and their owners can build more affordable homes that have a smaller climate and environmental footprint.

Public Housing Sweden considers it important that the Commission's scope to introduce mandatory sustainability requirements is limited to minimum levels. That is to say, rules which the Commission is given the opportunity to lay down in relation to procurement must not prevent the use of procurement requirements with higher ambitions by contracting organisations in the Member States.

SVERIGES ALLMÄNNYTTA AB



It is desirable that national voluntary market-initiatives that have driven the development of phasing out harmful chemical substances in construction products in the real estate and construction sector in Sweden, such as [Byggvarubedömningen](#), [BASTA](#) and [Sunda Hus](#) can also be used in the future.

Public Housing Sweden emphasize the importance of that Environmental Product Declarations (EPD), which are well established in the European building materials industry, can continue to be used to declare the environmental performance of construction products. The integration of environmental information should be implemented according to the same principle that applies to other information, where standardization is at the core.

Public Housing Sweden emphasize that according to the Swedish strategy for the circular economy, it is important that recycled materials meet equivalent requirements as newly produced materials in terms of safety and quality. This applies not least to the content of harmful chemicals in materials.

Public Housing Sweden considers it important that the information is freely available for everyone in digital format to download and in a format that can be used in various environmental evaluation systems.

Stockholm, 2022-07-05

Jonas Högset
Head of Real Estate and Sustainability
jonas.hogset@sverigesallmannytta.se

Magnus Ulaner
Climate and energy expert
magnus.ulaner@sverigesallmannytta.se