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Submitted to Growing the market for low carbon industrial products: policy framework
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## About you

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Organisation:
Alliance for Sustainable Building Products (ASBP)

We usually publish a summary of all responses, but sometimes we are asked to publish the individual responses too. Would you be happy for your response to be published in full?

Yes

How did you hear about this consultation?

How did you hear about this consultation?:
Email from this department

Other (please specify):

## Chapter 1: Introduction and Cross-Cutting Considerations

1.1 Please indicate how relevant you think each primary assessment criterion is and explain your reasoning as well as any additional views, including whether there are other criteria not listed that should be included when considering policy options.

Please indicate how relevant you think each primary assessment criterion is and explain your reasoning as well as any additional views, including whether there are other criteria not listed that should be included when considering policy options - Primary criterion 1: Incentivises decarbonisation:
Very relevant

Please indicate how relevant you think each primary assessment criterion is and explain your reasoning as well as any additional views, including whether there are other criteria not listed that should be included when considering policy options - Primary criterion 2: Enables product comparison:
Moderately relevant

Please indicate how relevant you think each primary assessment criterion is and explain your reasoning as well as any additional views, including whether there are other criteria not listed that should be included when considering policy options - Primary criterion 3: Ensures measurement is robust and comprehensive:
Very relevant

Please indicate how relevant you think each primary assessment criterion is and explain your reasoning as well as any additional views, including whether there are other criteria not listed that should be included when considering policy options - Primary criterion 4: Operationally ready:
Quite relevant

Please indicate how relevant you think each primary assessment criterion is and explain your reasoning as well as any additional views, including whether there are other criteria not listed that should be included when considering policy options - Primary criterion 5: Minimises costs:
Quite relevant

Explain your reasoning:

It is important to look at the whole life cycle approach for carbon, which includes end of life. Moreover in construction, it can be difficult to compare products on a like for like basis. It is very much based on their functional unit, and indeed many materials (steel, concrete) will form a product and/or component and element. We should not be directly comparing timber, steel, concrete etc. Moreover it may also be difficult to compare in the same product group - what application is best to use GGBS as a cement replacement, when this is a finite. There are many nuances when it comes to a product selection - in some cases a higher carbon product could be preferable, if less can be used compared to a lower carbon product or for example it is more durable/longer lasting. The choice of product is very much based on its application.

Cost is an important consideration; especially with regard to SMEs' as well as access to data. Any criteria should not be to the detriment of innovative

products.

1.2 Which environmental impacts should the government consider at this stage in its policies? Please explain your reasoning.

Option 3: Global Warming Potential and all the other core environmental impacts listed above

Please explain your reasoning:

We believe that reporting on the other core environmental impacts is feasible and viable as these are already collected as part of EPDs. Its important that we consider product selection in the wider context then carbon - this includes the use of water, resource depletion etc. We do not want any unintended consequences by focusing on one single metric. However, from a non-technical viewpoint, they could be difficult to understand, or establish what good looks like for each category. Other countries and systems have used weighting type approaches e.g. the Dutch Environment Cost Indicator. We also strongly believe that aspects such as health and wellbeing should be factored in - healthy products are key.

1.3 Considering the objectives of this policy framework, to grow the market for low carbon products, which of the following do you think will be impacted? Please explain your reasoning with reference to specific policies.

Considering the objectives of this policy framework, to grow the market for low carbon products, which of the following do you think will be impacted? - Option 1: Large and multinational enterprises:
Moderate positive impact

Considering the objectives of this policy framework, to grow the market for low carbon products, which of the following do you think will be impacted? - Option 2: Small and medium enterprises, and/or micro businesses:
Neutral impact/Depends on the situation

Considering the objectives of this policy framework, to grow the market for low carbon products, which of the following do you think will be impacted? - Option 3: UK end consumers:
Moderate positive impact

Considering the objectives of this policy framework, to grow the market for low carbon products, which of the following do you think will be impacted? - Option 4: International trade:
Moderate positive impact

Considering the objectives of this policy framework, to grow the market for low carbon products, which of the following do you think will be impacted? - Option 5: Other (please specify):
I don't know

Please explain your reasoning with reference to specific policies:

As follows:

Option 1 - many large and multinational enterprises already produce EPDs for their construction products, as such they will be well placed to feed into this framework; however it should align with projects requiring WLCA assessments.
Option 2 - the issue here is to ensure that it is cost effective and not a barrier to market; considerable hand-holding/tools etc maybe needed
Option 3 - this should be positive, unless the purchase price is increased to absorb any costs
Option 4 - should assist in exports, though measuring products differently (e.g. not using EN standards) could complicate this.

1.4 Are you taking embodied emissions into account when making purchasing decisions?

Are you taking embodied emissions into account when making purchasing decisions? - Are you taking embodied emissions into account when making purchasing decisions?:
Sometimes

1.5 If response to Question 1.4 was not 'Never' or 'Don't know' and you have accounted for embodied emissions at least sometimes, which of the products or product groups you buy does this apply to?

Please explain your answer:

N/A

1.6 If response to Question 1.4 was not 'Always' or 'Don't know' which factors prevent you from taking embodied emissions into account when making purchasing decisions?

Please explain your answer:

Factors can include:

Lack of data
Lack of interest/requirement - very much dependent upon the client and the project and what is driving them
Lack of knowledge/awareness (but getting better)
Issues (possibly perceived) of price competitiveness

1.7 Do you agree or disagree that you have sufficient access to embodied emissions data to support your decision-making? Please explain your reasoning, including examples of existing sources for this data and additional data which you would find valuable.

Do you agree or disagree that you have sufficient access to embodied emissions data to support your decision-making? - Do you agree or disagree that you have sufficient access to embodied emissions data to support your decision-making?:
Yes, Agree

Please explain your reasoning, including examples of existing sources for this data and additional data which you would find valuable:

Information is a lot better now, e.g. through EPDs (verified) e.g. the ECOPLATFORM, various databases/platforms e.g. Materials 2050, ICE Databases and tools for whole life carbon assessment e.g. One Click LCA. However it can be difficult to obtain data for newer products and/or those manufactured by smaller companies. Also there is a lack of data for reused products. ASBP has provided guidance and resources in this area.

1.8 Would you consider paying more for products with a lower embodied carbon content? Please explain your reasoning.

Would you consider paying more for products with a lower embodied carbon content? - Would you consider paying more for products with a lower embodied carbon content?:
Unsure

Please explain your reasoning:

This is very dependent upon the context and how much is more. A project where there is a stringent target for embodied/whole life carbon assessment may be more willing to spend more to meet this (especially if there is an internal price mechanism for example if the target is not met). It also depends on the product and how much influence it may have overall in determining any carbon targets.

1.9 If you answered yes to question 1.8, on average, how much extra would you be willing to spend?

If yes to question 1.8, on average, how much extra would you be willing to spend? - If yes to question 1.8, on average, how much extra would you be willing to spend?:
I don't know

1.10 How likely are you to increase the proportion of low carbon products in your purchases in the future? Please explain your reasoning including what factors would support the increased proportion of low carbon products you purchase.

How likely are you to increase the proportion of low carbon products in your purchases in the future? - How likely are you to increase the proportion of low carbon products in your purchases in the future?:
Likely

Please explain your reasoning including what factors would support the increased proportion of low carbon products you purchase:

This is based on the assumption that there is a continued increase in the number of projects (and clients) that are requiring whole life carbon assessment benchmarks to be met. There is however a lot that still do not.

1.11 To what extent would a future of increased consumer demand for low carbon products would have the below impacts? Please explain your reasoning.

To what extent would a future of increased consumer demand for low carbon products would have the below impacts? - Impact 1: help you scale up your production:
Likely

To what extent would a future of increased consumer demand for low carbon products would have the below impacts? - Impact 2: help you reduce your embodied emissions across the value chain:
Likely

To what extent would a future of increased consumer demand for low carbon products would have the below impacts? - Impact 3: affect your business model:
Likely

Please explain your reasoning:

This answer is based on a wide range of our membership, including smaller manufacturers. Of course any increase in low carbon demand is beneficial to manufacturers. However it may be dependent on the feedstock and capacity to grow and other issues e.g. material maybe imported e.g. wood fibre insulation. Business models could be affected by bringing in more of a circular approach for example, being more responsible for products at end of (first) life.

1.12 To what extent would improved information on the embodied emissions throughout the value chain help you achieve your decarbonisation goals, and implement any of the below measures and/or technologies? Please explain your reasoning.

To what extent would improved information on the embodied emissions throughout the value chain help you achieve your decarbonisation goals, and implement any of the below measures and/or technologies? - Option 1: Fuel switching measures (i.e. electrification, hydrogen or biomass):
Very much

To what extent would improved information on the embodied emissions throughout the value chain help you achieve your decarbonisation goals, and implement any of the below measures and/or technologies? - Option 2: Energy efficiency measures:
Very much

To what extent would improved information on the embodied emissions throughout the value chain help you achieve your decarbonisation goals, and implement any of the below measures and/or technologies? - Option 3: Resource efficiency measures:
A little

To what extent would improved information on the embodied emissions throughout the value chain help you achieve your decarbonisation goals, and implement any of the below measures and/or technologies? - Option 4: Carbon capture (usage) and storage:
A little

To what extent would improved information on the embodied emissions throughout the value chain help you achieve your decarbonisation goals, and implement any of the below measures and/or technologies? - Option 5: Supply chain maximisation:
A little

To what extent would improved information on the embodied emissions throughout the value chain help you achieve your decarbonisation goals, and implement any of the below measures and/or technologies? - Option 6: Contractual arrangements with more sustainable suppliers:
A little

To what extent would improved information on the embodied emissions throughout the value chain help you achieve your decarbonisation goals, and implement any of the below measures and/or technologies? - Option 7: Cost savings:
Unsure

To what extent would improved information on the embodied emissions throughout the value chain help you achieve your decarbonisation goals, and implement any of the below measures and/or technologies? - Option 8: Other (please specify):

Please explain your reasoning:

Option 1 and 2 have the biggest impact - being directly related to carbon. The others, the link may be less evident; for example resource efficiency measures may reflect more so on how much of a product is used (which in turn maybe related to design). The effectiveness (and cost) of capture and storage is largely unknown.

1.13 Do you have existing relationships with lower carbon steel/cement/concrete producers? If so, please provide details.

Yes

If yes, please provide details:

Yes, in our membership we have companies that procure and sell reclaimed steel and related products.

## Chapter 2: The Embodied Emissions Reporting Framework: overview and cross-cutting considerations

2.1 Do you agree or disagree that producers and buyers of in-scope products are the main intended end users of the EERF? Are there any additional end users that should be considered? Please explain your reasoning.

Producers/Buyers Intended End Users - Do you agree or disagree that producers and buyers of in-scope products are the main intended end users of the EERF?:
No, Disagree

Please explain your reasoning:

In construction, the architects/designers/structural engineers will be making the choice of the type of systems and materials to be used; these need to be factored in. Sometimes this could also be the client.

2.2 What do you consider are the benefits of measuring and reporting embodied emissions?

Please explain your answer:

The overall benefit is to provide the data, to be able to make informed decisions when specifying and procuring products in the context of a building/infrastructure projects. In turn, this should provide confidence in the specification and procurement of materials, investment etc. Albeit acknowledging the different functions and applications of products. This also has a relationship for implementing circularity approaches. However we would contest the assertion that 'producers currently use various complex methodologies to calculate the embodied emissions of their products'. The methodology is defined in EN 15804 and various Product Category Rules with many being updated.

2.3 Do you believe that there are barriers to measuring and reporting embodied emissions?

Please explain your answer:

Yes too an extent, these include:

- Cost of undertaking them, this could be a considerable sum to a smaller manufacturer (note this may also relate to obtaining the data needed); though we are aware of tools to try and reduce this
- There are many assumptions within an embodied carbon data set, especially when it comes to areas such as end of life, wastage rates; having much more robust and up-to-date data would assist.
- Variations in products, may mean than more than one EPD is required
- There can be variations in EPDs in the same product groups, consistency is important
- Lack of guidance/approaches on how to measure for reused/circular products
- Needs to be a systems thinking approach., on how the EPD fits into and vica versa into other data requirements

2.4 If you are a producer or practitioner, do you currently measure embodied emissions? If so, please provide details of the processes, methodologies and standards that you follow, as well as any secondary data that you may use.

Do you measure embodied emissions? - If you are a producer or practitioner, do you currently measure embodied emissions?:
Often

Please provide details of processes:

Our members use a variety of tools, including One Click LCA, phTibbon (Passiv Haus Trust), in house tools etc. RICS WLCA is followed, which refers back to EN 15 978.

2.5 If you currently measure embodied emissions, what are the costs of this activity? Please provide context.

Please provide context:

This can vary. Our members suggest that is a verified EPD can be from £8-12K (with around £2K for the verification), depending on the various systems used (some may require less verification).

2.6 Do you agree or disagree with the government's proposal to initially introduce the EERF on a voluntary basis? Please explain your reasoning.

Agree/Disagree Voluntary - Do you agree or disagree with the government's proposal to initially introduce the EERF on a voluntary basis?:
Yes, Agree

Please explain your reasoning:

Whilst we agree at this stage, we feel that it important to ensure that companies (e.g. smaller manufacturers) will not be losing out if they have for example not the resources and/or budget. Moreover there is a lot of work going on in industry to provide robust approaches - especially aligning with the EC CPER requirements. For example. with the CPR, many cements and steel which are manufactured and marketed in the EAA will need to provide GWP impacts as part of CE marking. This will follow revisions and harmonisation of standards, eg hEN 16908, hEN 16757, hEN 17662 (metals cPCR) and after the publication of PEF 4.0, hEN 15804.

2.7 Do you agree or disagree that a potential transition to a mandatory approach to reporting embodied emissions of products in the longer-term could be beneficial? Please explain your reasoning and whether you see any risks or opportunities.

Agree/Disagree Transition to Mandatory - Do you agree or disagree that a potential transition to a mandatory approach to reporting embodied emissions of products in the longer-term could be beneficial?:
Yes, Strongly agree

Please explain your reasoning and whether you see any risks or opportunities.:

Yes agree, mandatory reporting is essential to provide a level playing field - it will also be a requirement when selling into Europe.

2.8 Should there be a common methodology and standard for EERF guidance and should this represent best practice or minimum requirement? Explain your reasoning.

Option 1: Prescriptive minimum requirement guidance

Please explain your reasoning:

Option 1. This is due to to the various work that is being undertaken. Use EPD, BS EN 15804, BS EN 16908 (cement cPCR), BS EN 16757 (concrete cPCR) and the metals CPCR when published as these are the most detailed and widely adopted and accepted currently.

2.9 Do you agree or disagree that the initial EERF guidance should focus on life cycle assessment (LCA) based approaches to reporting? Please explain your reasoning.

EERF guidance should focus on LCA approach - Do you agree or disagree that the initial EERF guidance should focus on LCA based approaches to reporting?:
Yes, Strongly agree

Please explain your reasoning:

See response above. EPDs (based in LCA methodology) also feed into whole building WLCA assessments. ASBP has advocated for a long time for the use of EPDs and they are growing in numbers. This approach also aligns with the various work being done in Standards Committees and to align with the revised CPR.

2.10 Is there anything else that the government should consider regarding maximising use of existing data?

Please explain your answer:

Endorse ECO EPD - EPD from platforms which have been audited by ECO Platform, so have ISO 14025 compliant verifier approval processes and adopt the ECO platform calculation rules and verification procedures, which address many of the methodology and quality issues identified.

## Chapter 3: Guidance in the Embodied Emissions Reporting Framework

3.1 Which option for the reporting metric do you think the guidance should recommend? Please explain your reasoning, and details of any alternative options.

Option 2: Functional unit, where possible if the function of the product is known to the producer and the use of a declared unit where that is not feasible

Please explain your reasoning, and details of any alternative options:

A functional unit should be used to enable comparison. However it is recommended to follow the relevant Standards eg hEN 16908, hEN 16757, hEN 17662 (metals cPCR) and after the publication of PEF 4.0, hEN 15804.

3.2 Which part of the product's life cycle should the EERF guidance recommend reporting on? Please explain your reasoning.

Option 1: Aligned with EN 15804 (as per the scenarios above)

Please explain your reasoning:

Alignment with EN15804 and the various Standards being developed. however there needs to be a more robust dataset to support certain modules e.g Module A4, C

3.3 For steel producers, which of the options for reporting standards should the EERF guidance endorse? Please explain your reasoning.

Option 2: ISO 14025 with the appropriate PCR (if so, please define the level of product standard specificity desired: for example BS EN 15804 only)

Please explain your reasoning:

This Standard is in development hEN 17662 (metals cPCR) supporting EN 15804. With the CPR, many steel products which are manufactured and marketed in the EAA will need to provide GWP impacts as part of CE marking.

3.4 For cement and concrete producers which of the options for reporting standards should the EERF guidance endorse? Please explain your reasoning.

Option 1: A general product standard (such as ISO 14067, Greenhouse Gas Protocol for Products, or PAS 2050). (If so, please specify)

Please explain your reasoning.:

BS EN 16908 (cement cPCR), BS EN 16757 (concrete cPCR) - these are adopted and accepted, supporting EN 15804.

3.5 Do you think the EPD verification system is sufficiently robust?

The EPD verification system is sufficiently robust - Do you think the EPD verification system is sufficiently robust?:
Yes, Agree

3.6 If you believe that there are issues with the EPD verification process, which of the below possible issues apply? Please explain your reasoning. [select all that apply]

Option 2: Verification time following submission of EPD, Option 4: Comparability of results, Option 5: Availability of qualified verifiers

Please explain your reasoning:

It can take time to obtain verification; this may be in relation to a shorttage of verifiers.

3.7 Do you believe that any of the following possible government interventions could help improve the robustness and quality of the current EPD verification process and capacity in the market? Please explain your reasoning. [select all that apply]

Option 3: Work with or accredit programme operators

Please explain your reasoning:

Endorse ECO EPD - EPD from platforms which have been audited by ECO Platform, so have ISO 14025 compliant verifier approval processes and adopt the ECO platform calculation rules and verification procedures. Explore opportunities with ECO Platform to increase verifier capacity and quality via training and potentially certification, ensure tool verification is as robust as conventional verification, and EPD program audits and ongoing monitoring are increasingly rigorous, eg through AI and use of digitised EPD. Explore how ECO Platform could accredit notified bodies verifying environmental data as part of CE marking to ensure quality as they do for EPD Programmes.

3.8 Which options should the EERF guidance recommend regarding secondary data? Please explain your reasoning.

Option 1: Secondary data from a single database

Please explain your reasoning:

Ecoinvent and Sphera (Gabi) are used but they do conflict. Also not always appropriate to the UK. An LCA expert group could decide on the best dataset to use, which could be a combination.

3.9 If you answered Option 1 to Question 3.8, which secondary database do you think reporting should be in accordance with for cement and concrete? Please explain your reasoning.

Option 4: Other (please specify)

Please explain your reasoning:

See above.

3.10 If you answered Option 1 to Question 3.8, which secondary database do you think reporting should be in accordance with for steel? Please explain your reasoning.

Option 4: Other (please specify)

Please explain your reasoning:

See above

3.11 Separate to the specific rules of product classifications, do you consider that the EERF guidance should specify a particular allocation of co-products method and if so what method? Please explain your reasoning.

Option 3: Economic allocation

Please explain your reasoning:

There is good reason to use economic allocation for true Co-products (where you can't produce it without eg bark and wood, sawn wood and sawdust, steel and slag, chlorine/hydrogen/sodium hydroxide etc) because it reflects the economic purpose of the process. Physical allocation can be abused.

3.12 Do you agree or disagree with the proposal that both net and gross emissions figures from production should be reported in the EERF guidance? Please explain your reasoning.

Agree/Disagree Net/Gross should be reported - Do you agree or disagree with the proposal that both net and gross emissions figures from production should be reported in the EERF guidance?:
Yes, Agree

3.13 Do you agree or disagree with this proposal to use gross emissions (which include emissions from non-biogenic waste) when a single emissions figure is required? Please explain your reasoning.

Agree/Disagree use gross for single figure - Do you agree or disagree with this proposal to use gross emissions (which include emissions from non-biogenic waste) when a single emissions figure is required?:
Yes, Agree

Please explain your reasoning:

3.14 Do you agree or disagree with the proposed guidance recommending reporting the embodied emissions of products in accordance with BS EN 15941? Please explain your reasoning.

Agree/Disagree reporting to BS EN 15941 - Do you agree or disagree with the proposed guidance recommending reporting the embodied emissions of products in accordance with BS EN 15941?:
Yes, Strongly agree

Please explain your reasoning:

3.15 Considering the objectives of this section and the proposed emissions reporting guidance, are there any other methodological areas where respondents think there needs to be a consistent or coordinated approach, or other considerations that the government should be aware of?

Please explain your answer:

DESNZ should engage with the relevant uk mirror committees in BSI to ensure their interest in clear and defined rules for assessment of these products is clear to UK experts participating in the revision of the EN standards, so this can be considered and proposed as a UK view in the CEN work.

## Chapter 4: An Embodied Emissions Reporting Framework IT system

### 4.1 Where do you currently get data for product level embodied emissions reporting from? [select all that apply]

Other (please specify)

If other, please specify:

The verification platforms for EPDs (e.g. Environdec, Eco Platform, EPD Online) or within the whole life carbon assessment tools

### 4.2 What limitations, if any, do you or your business currently face when accessing or publishing product level embodied emissions data?

Please explain your answer:

Can be difficult to find the appropriate EPD;

### 4.3 Do you agree or disagree that a UK repository for embodied emissions data could help your business report emissions data? Please explain your reasoning.

Agree/Disagree with repository - Do you agree or disagree that a UK repository for embodied emissions data could help your business report emissions data?:
Agree

Please explain your reasoning:

Yes, this would help, if regularly updated, and information taken from good sources i.e. EPDs. It could provide appropriate ranges and benchmarks (with the usual caveats). This could build on work already out there e.g. the ICE Database. Some of the trade associations collect some of this data e.g. Concrete Centre, Timber Development UK.

### 4.4 Should the UK produce its own life cycle inventory with regularly updated, regionally specific data? Note that this could be built from scratch or upon existing inventories. Please provide details of any potential benefits or concerns, as well as how these may impact the completion of a life cycle analysis.

Should the UK produce a life cycle inventory - Should the UK produce its own life cycle inventory with regularly updated, regionally specific data?:
No, Do not support

Please explain your answer:

This is likely to include confusion, especially for those with products manufactured in the EEA. However as already mentioned some of the data is poor, it is recommended that there are better datasets for assessment including wastage rates, impact of demolition versus deconstruction, end of life scenarios (some of these are more relevant at the building assessment level).

### 4.5 Would a product benchmarking tool that interacts with the proposed product level embodied emissions reporting database be helpful in making meaningful product comparisons and informing buying decisions? Please explain your reasoning.

What product benchmarking tool would be helpful - Would a product benchmarking tool that interacts with the proposed product level embodied emissions reporting database be helpful in making meaningful product comparisons and informing buying decisions?:
No, Disagree

Please explain your reasoning:

As stated it can be difficult to compare product with product, it needs to be considered in its full application (e.g. at a specification level). More of a lower carbon product may have to be used or they could for example be less durable and as such need replacing more.

### 4.6 What tools, such as an EPD generator or a product carbon tool, if any, do you currently use when producing embodied emissions data? Please provide details of the features and benefits.

Option 1: EPD generator tools

Please provide details of the features and benefits:

These are used for generating EPDs and follow EN15804 and assist with the verification process.

### 4.7 What tools, such as an EPD generator or a product carbon tool, if any, should government explore producing to reduce the administrative burden of producing EPDs? Please provide details of the features and benefits.

Please provide details of the features and benefits:

Use existing ones; some are now using AI - this should be investigated if they can save time and money.

## Chapter 5: Product classifications for embodied emissions

5.1 Do you currently use any form of product classifications, whether as a manufacturer, supplier, or buyer? If yes, please specify which one(s)?

No

If yes, please specify which one(s):

5.2 If you answered no to Question 5.1, are you interested in starting to use product classifications? Please explain your reasoning, and details of any potential benefits, barriers, or challenges (such as financial implications) you foresee.

Are you interested in using product classifications? - If you answered no to Question 5.1, are you interested in starting to use product classifications?: Probably not

Please explain your reasoning, and details of any potential benefits, barriers, or challenges (such as financial implications) you foresee:

This is very difficult to do at a product level for the reasons outlined - largely it depends on the application of the product and it would be difficult to compare between different types of products e.g. timber, steel and concrete - is an A rated product for concrete, the same for an A rated timber product?. Previous ways of doing this looked at this at a specification level e.g. BRE'S Green Guide to Specification. A lot of industry involvement and consensus would be needed.

5.3 Is there anything that the government should consider regarding its intention to use existing, sector-specific product classifications, rather than develop its own (including any single, cross-sector model)?

Please explain your answer:

As above.

5.4 Which option for the approach to product classifications would be most appropriate as a basis of green procurement policies? Please explain your reasoning.

Option 4: Unsure

Please explain your reasoning:

5.5 Are there any other steel product classification options that the government has not identified and should consider as potentially suitable, in particular for use in green procurement policies? If so, please provide details.

Please provide details:

We feel that its important that any steel product classification should include reclaimed steel (steel that has been taken from an existing building), as well as any surplus stock for reuse. This also needs to be differentiated for steel with a higher recycled content.

5.6 Do you agree or disagree that the above is an accurate understanding of the key differences between steel product classifications? Please explain your reasoning, and if any other differences should be considered.

Agree/Disagree with assessment of steel product classifications - Do you agree or disagree that the above is an accurate understanding of the key differences between steel product classifications?:

Please explain your reasoning, and if any other differences should be considered:

Not answered.

5.7 Do you agree or disagree that the government should use a steel product classification that uses a scrap sliding scale? Please explain your reasoning.

Agree/Disagree scrap sliding scale - Do you agree or disagree that the government should use a steel product classification that uses a scrap sliding scale?:

Please explain your reasoning:

Not answered.

5.8 Is there anything else the government should consider regarding the ResponsibleSteel Decarbonisation Progress Levels (DPLs), or any points of the description, potential advantages, or disadvantages that you disagree with?

Please explain your answer:

Not answered.

5.9 Do you believe that the emissions reporting and verification requirements to use the ResponsibleSteel Decarbonisation Progress Levels (DPLs) are robust and appropriate for use in green procurement policies, or not? Please explain your reasoning.

Are reporting requirements for RS DPLs robust enough for procurement policies? - Do you believe that the emissions reporting and verification requirements to use the ResponsibleSteel Decarbonisation Progress Levels (DPLs) are robust and appropriate for use in green procurement policies, or not?:

Please explain your reasoning:

Not answered.

5.10 Is there anything else the government should consider regarding the Low Emission Steel Standard (LESS), or any points of the description, potential advantages, or disadvantages that you disagree with?

Please explain your answer:

Not answered.

5.11 Do you believe that the emissions reporting and verification requirements to use the Low Emission Steel Standard (LESS) are robust and appropriate for use in green procurement policies, or not? Please explain your reasoning.

Do you believe that the emissions reporting and verification requirements to use Low Emission Steel Standard (LESS) are robust and appropriate for use in green procurement policies, or not? - Do you believe that the emissions reporting and verification requirements to use Low Emission Steel Standard (LESS) are robust and appropriate for use in green procurement policies, or not?:

Please explain your reasoning:

Not answered.

5.12 Is there anything else the government should consider regarding the Global Steel Climate Council's (GSCC) product standard, or any points of the description, potential advantages, or disadvantages that you disagree with?

Please explain your answer:

Not answered.

5.13 Do you believe that the emissions reporting and verification requirements to use the Global Steel Climate Council's (GSCC) product standard are robust and appropriate for use in green procurement policies, or not? Please explain your reasoning.

Do you believe that the emissions reporting and verification requirements to use the Global Steel Climate Council's (GSCC) product standard are robust and appropriate for use in green procurement policies, or not? - Do you believe that the emissions reporting and verification requirements to use the Global Steel Climate Council's (GSCC) product standard are robust and appropriate for use in green procurement policies, or not?:

Please explain your reasoning:

Not answered.

5.14 Is there anything else the government should consider regarding the green steel scale in the Construction Leadership Council's (CLC) Five Client Carbon Commitments (5CCCs), or any points of the description, potential advantages, or disadvantages that you disagree with?

Please explain your answer:

Not answered.

5.15 Is there anything else the government should consider regarding the U.S. Environmental Protection Agency's (EPA) approach to setting limits for low embodied carbon steel, or any points of the description, potential advantages, or disadvantages that you disagree with?

Please explain your answer:

Not answered.

5.16 Which of the following steel product classification option(s) is best suited to provide an accurate basis for classifying steel products as low carbon? Please explain your reasoning, especially if you are selecting multiple options or if you have a preference. [select all that apply]

Please explain your reasoning, especially if you are selecting multiple options or if you have a preference:

Not answered.

5.17 Which steel product classification option is best suited to encourage and support improved resource efficiency and a circular economy? Please explain your reasoning. [select all that apply]

Please explain your reasoning:

Not answered.

5.18 Are there any other considerations that the government should consider regarding the reporting and verification of product level embodied emissions data with respect to the use of steel product classifications? Please explain your reasoning.

Please explain your reasoning:

Not answered.

5.19 Are there any other concrete product classification options that the government has not identified and should consider as potentially suitable, in particular for use in green procurement policies? If so, please provide details.

Please explain your answer:

Not answered.

5.20 Do you agree or disagree that the above is an accurate understanding of the key differences between concrete product classifications? Please explain your reasoning, and if any other differences should be considered.

Do you agree or disagree that the above is an accurate understanding of the key differences between concrete product classifications? - Do you agree or disagree that the above is an accurate understanding of the key differences between concrete product classifications?:

Please explain your reasoning, and if any other differences should be considered:

Not answered.

5.21 Is there anything else the government should consider regarding the Lower Carbon Concrete Group's (LCCG) Market Benchmark, or any points of the description, potential advantages, or disadvantages that you disagree with?

Please explain your answer:

Not answered.

5.22 Is there anything else the government should consider regarding Arup-UKRI's Universal Classification for embodied carbon of concrete, or any points of the description, potential advantages, or disadvantages that you disagree with?

Please explain your answer:

Not answered.

5.23 Is there anything else the government should consider regarding the GCCA's Global Ratings adapted for the UK by the MPA, or any points of the description, potential advantages, or disadvantages that you disagree with?

Please explain your answer:

Not answered.

5.24 Which of the following concrete product classification option(s) is best suited to provide an accurate basis for classifying concrete products as low carbon? Please explain your reasoning, especially if you are selecting multiple options or if you have a preference. [select all that apply]

Please explain your reasoning, especially if you are selecting multiple options or if you have a preference:

Not answered.

5.25 Which concrete product classification option is best suited to encourage and support improved resource efficiency and a circular economy? Please explain your reasoning. [select all that apply]

Please explain you reasoning:

Not answered.

5.26 Do you think that a 'combined approach', such as the Universal Classification and Market Benchmark, could be utilised for procurement guidance? If so, how useful do you think it would be in practice? Please explain your reasoning.

Please explain your reasoning:

Not answered.

5.27 Are there any other examples of cement product classifications that the government should consider? If so, please provide details.

Please explain your answer:

Not answered.

5.28 Do you agree or disagree with the government's proposed approach to not initially pursue a cement product classification? Please explain your reasoning, including examples of when it could be helpful to use a cement classification in addition to concrete.

Do you agree or disagree with the government's proposed approach to not initially pursue a cement product classification? - Do you agree or disagree with the government's proposed approach to not initially pursue a cement product classification?:

Please explain your reasoning, including examples of when it could be helpful to use a cement classification in addition to concrete:

Not answered.

5.29 In addition to product classifications, are there any policy approaches the government should take to support the scale up of supplementary cementitious materials (SCMs)? What changes may be required to ensure that some potentially promising SCMs are not disadvantaged?

Please explain your answer:

Not answered.

## Chapter 6: Green Procurement for Low Carbon Products

6.1 If you are a procurer, does your organisation already practice any product level green procurement policies? If so, please provide details.

Not Answered

If yes, please provide details:

Not a procurer but we encourage our members to have EPDs and evidence of sustainability claims to avoid any greenwashing.

6.2 If you are a procurer, do you already require embodied emissions data to be provided by potential suppliers? If so, please provide details.

If you are a procurer, do you already require embodied emissions data to be provided by potential suppliers? - If you are a procurer, do you already require embodied emissions data to be provided by potential suppliers?:

If yes, please provide details:

As above

6.3 If you are a procurer, do you already use any examples of product classifications in your policies? If so, please provide details.

If you are a procurer, do you already use any examples of product classifications in your policies? - If you are a procurer, do you already use any examples of product classifications in your policies?:

If yes, please provide details:

No.

6.4 Do you agree or disagree with our overview of the barriers and possible limitations of the current green procurement landscape? Please explain your reasoning, including any others that the government should consider.

Do you agree or disagree with our overview of the barriers and possible limitations of the current green procurement landscape? - Do you agree or disagree with our overview of the barriers and possible limitations of the current green procurement landscape?:
Yes, Agree

Please explain your reasoning, including any others that the government should consider:

Broadly agree with this list, it would be useful to have a consistent approach across Government departments and guidance which can be followed. There is possibly a lack of knowledge from those procuring building assets and of embodied carbon/low carbon products - and how this may interact with other issues. Moreover, how low carbon products pricing is accounted for, when many contracts are still very much based on lowest price.

6.5 Do you agree or disagree with our proposal to develop green procurement guidance for buying low carbon products? Please explain your reasoning, and if you disagree, please provide any suggestions for alternatives.

Do you agree or disagree with our proposal to develop green procurement guidance for buying low carbon products? - Do you agree or disagree with our proposal to develop green procurement guidance for buying low carbon products?:
Yes, Agree

Please explain your reasoning, and if you disagree, please provide any suggestions for alternatives:

Yes too an extent, guidance needs to be comprehensive enough to explain the requirements with regard to product selection and how embodied carbon (LCA) is part of this. it should build on existing WLCA guidelines for projects. It would be useful to know when the key decision points are and by whom - much can be value engineered out.

6.6 Do you agree or disagree with the proposal to introduce best practice, voluntary green procurement standards into the Government Buying Standards? Please explain your reasoning, including whether there are any other procurement guidance documents that should be considered.

Do you agree or disagree with the proposal to introduce best practice, voluntary green procurement standards into the Government Buying Standards? - Do you agree or disagree with the proposal to introduce best practice, voluntary green procurement standards into the Government Buying Standards?:
Yes, Strongly agree

Please explain your reasoning, including whether there are any other procurement guidance documents that should be considered:

Yes agree, but this should be aligned with existing frameworks/sustainability requirements.

6.7 Would you agree or disagree with the prospect of the best practice guidance being made mandatory for government departments through the Government Buying Standards in future? Please explain your reasoning.

Would you agree or disagree with the prospect the best practice guidance being made mandatory for government departments through the Government Buying Standards in future? - Would you agree or disagree with the prospect the best practice guidance being made mandatory for government departments through the Government Buying Standards in future?:
Yes, Strongly agree

Please explain your reasoning:

Yes, Government should be acting as an exemplar and also share its learning with the sector.

6.8 Do you agree or disagree with the above proposal to develop stage 1: core guidance as set out above? Please explain your reasoning.

Do you agree or disagree with the above proposal to develop stage 1: core guidance as set out above? - Do you agree or disagree with the above proposal to develop stage 1: core guidance as set out above?:
Yes, Agree

Please explain your reasoning:

Yes but this needs to align with WLCA assessments for buildings. Also important to ensure that there is guidance on monitoring.

6.9 Do you agree or disagree with the above proposal to develop stage 2: expanded guidance as set out above? Please explain your reasoning.

dance as set out above? - dance as set out above?:
Maybe/Undecided

Please explain your reasoning:

Any guidance needs to be embedded within WLCA for projects. Consideration should be at an asset level.

6.10 Do you agree or disagree with our proposal to develop stage 3 ‘high ambition guidance’ as described above? Please explain your reasoning.

Do you agree or disagree with our proposal to develop stage 3 ‘high ambition guidance’ as described above? - Do you agree or disagree with our proposal to develop stage 3 ‘high ambition guidance’ as described above?:
Maybe/Undecided

Please explain your reasoning:

As above

6.11 Do you agree or disagree with the proposed types of evidence outlined, or are there other sources of evidence that should be considered? Please provide details and explain your reasoning.

Do you agree or disagree with the proposed types of evidence outlined, or are there other sources of evidence that should be considered? - Do you agree or disagree with the proposed types of evidence outlined, or are there other sources of evidence that should be considered?:
Maybe/Undecided

Please provide details and explain your reasoning:

Agree with the need for market availability and cost implications - however it is important to still encourage and test innovative products in projects which may not have robust data in place.

6.12 What would be the cost implications of procuring low carbon products? Please provide details, including how this might change over time.

What would be the cost implications of procuring low carbon products? - What would be the cost implications of procuring low carbon products?:
Probably yes

Please provide details, including how this might change over tim:

The cost is completely dependent upon the product in question and the ability to scale. For example, a reclaimed product (which is in effect low carbon) could cost more dependent upon the amount of storage, re-warranty etc, but conversely it can also cost less. Much is dependant upon the price of the raw material feedstock and the scalability of the manufacturing process. There can be a barrier to entry for more innovative low carbon products with associated cost due to the amount of testing etc that is needed.

6.13 Do you agree or disagree with including circular economy principles alongside advice in the GBS on procuring low carbon products? Please explain your reasoning.

Do you agree or disagree with including circular economy principles alongside advice in the GBS on procuring low carbon products? - Do you agree or disagree with including circular economy principles alongside advice in the GBS on procuring low carbon products?:
Yes, Strongly agree

Please explain your reasoning:

Yes agree, circularity is a key tool in achieving lower carbon, e.g. through the use of reclaimed materials and higher recycled content, use of less materials, less waste etc. It also factors in long term decision making and the need for different business models. Social value can also be gained. However it should be noted that embodied carbon should not be used as a proxy for circularity. CE principles should be included in their own right. Support should be given for testing of products to provide confidence in their usage.

6.14 Are there other public procurement guidance documents where circular economy principles should be included? Please explain your reasoning. [select all that apply]

Construction Playbook, Government Buying Standards, Procurement Policy Notes

Please explain your reasoning:

They should be within all of these - in a consistent manner. With regard to the CPR, this should be aligned to European requirements - work is being done in European Standard committees for example on developing a horizontal standard for construction product reuse, which can then be taken forward by technical product committees.

## Chapter 7: Longer Term Policy Options

7.1 Is there anything else that the government should consider in terms of its objectives, audiences, and possible use cases for any future work on product ecolabelling? If so, please provide details.

If yes, please provide details:

Ecolabels should be holistic with a wider range of impacts consider; they could tie in with digital product passports; as well as providing useful information to aid the user when it comes to end of life e.g. end of life waste routes, disassembly information etc. However considerations needs to be given to ensure that their is fair comparison between products e.g. a steel beam versus a timber beam.

7.2 Do you agree or disagree that either approaches A or B, to (A) utilise existing ecolabels, or (B) develop new forms of ecolabel could be beneficial? Please explain your reasoning and specify if there are any options within these approaches that the government should consider.

Option 3: Both approaches A and B

Please explain your reasoning and specify if there are any options within these approaches that the government should consider:

Yes but with the comments above; look at work for environmental footprints.

7.3 Do you believe that the EU's development of Digital Product Passports (DPPs) for steel and cement will create opportunities or challenges for UK businesses and the government's objectives for ecolabelling? Please explain your reasoning and provide details of any specific opportunities or challenges that the government should consider.

Do you believe that the EU's development of Digital Product Passports (DPPs) for steel and cement will create opportunities or challenges for UK businesses and the government's objectives for ecolabelling? - Do you believe that the EU's development of Digital Product Passports (DPPs) for steel and cement will create opportunities or challenges for UK businesses and the government's objectives for ecolabelling?:
Presents some opportunities

Please explain your reasoning and provide details of any specific opportunities or challenges that the government should consider.:

Should be aligned. Again, it is expected that this will address many of the issues which DESNZ has identified, providing consistent CE marked data (including environmental data) though a digital product passport. It will be problematic if the UK follows a different path, either in terms of information requirements, assessment methodology or digital delivery. BIM and building assessment tools will all be using the EU DPP data. Note that countries such as France which currently have strong additional requirements and restrictions on the EPD which can be used will have to drop this for products covered by the CPR - they will have to accept any CE Marked GWP data from any member state notified body within public procurement and EPBD assessments.

7.4 Should the government consider any additional information or developments since the previous consultation as the government continues to explore whether there is a role for mandatory product standards (MPS) from the late 2020s?

Please explain your answer:

Needs to be considered within any proposed regulation of embodied/whole life carbon assessment e.g. Part Z.

7.5 Which of the proposed strategic approaches to expansion do you prefer? Please explain your reasoning.

Option 1: Other Construction-Related Sectors

Please explain your reasoning:

ASBP is committed to low carbon and healthy products, as such we think that this should apply to other construction related sectors, particular where there is high usage of the products and/or high carbon (and other) impacts.

7.6 Regardless of overall strategic approach, please note any specific sectors you think should be a priority in any future expansion of low carbon product market policies. Please explain your reasoning. [select all that apply]

Option 1: Aluminium, Option 2: Asphalt, Option 3: Ceramics, Option 6: Glass, Option 7: Other non-ferrous metals, Option 8: Non-metallic minerals, Option 10: Plastics

Please explain your reasoning:

All of these are used extensively in the construction industry.

7.7 Should the government explore any of the long-term policies suggested in this section? Please explain your reasoning. [select all that apply]

Option 1: Collaborative procurements and buyers' alliances, Option 3: Embodied carbon limits on end products

Please explain your reasoning:

Regulation of embodied carbon is needed in projects - with these emissions increasing relative to our operational energy. This needs to be looked at, at a project level - with the aim of the lowest carbon asset. This provides a level playing field, confidence to industry going forward to invest and also aligns us with the EC.