

**To: DG CLIMA, DG ENER, DG ENV and DG GROW**

## **EU policymakers must deliver an ambitious WLC roadmap for buildings**

Dear Colleagues in the European Commission,

We hope that this letter finds you well. We - a coalition of 42 stakeholder groups representing the building value chain, including product manufacturers, consulting engineers, developers, architects and civil society from over 5,000 organisations across Europe - are writing to call for ambitious leadership as the European Commission develops its own Whole Life Carbon (WLC) Roadmap for buildings.

The WLC of buildings accounts for 41% of total EU carbon emissions<sup>1</sup> and the development of this roadmap represents an essential milestone in EU building policy's trajectory towards a decarbonised Europe, and in providing the market with clear signals enabling them to scale up innovations and solutions.

As leaders within the built environment sector, we have consistently called for a robust policy framework that tackles emissions via WLC reductions. This framework should incorporate the energy efficiency first principle while also addressing other holistic sustainability priorities such as waste and circularity, procurement and finance to deliver a totally decarbonised, circular and resilient built environment that facilitates a high quality of life.

### **The Roadmap should offer a clear decarbonisation pathway**

This roadmap offers the opportunity to set out a strategic pathway to systematically address WLC emissions and promote sustainable building practices, thereby contributing to the EU's broader climate and environmental goals.

Therefore the roadmap must set out a clear trajectory for EU policy on the journey to full decarbonisation by 2050, with intermediary decarbonisation milestones at regular intervals to this date, including for 2030. As part of this, the roadmap should demonstrate how policymakers and industry can work together to achieve the emissions reduction scenarios for the sector as outlined in [Ramboll's accompanying technical report](#).

### **Clear policy interventions are needed on Whole Life Carbon**

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<sup>1</sup> Ramboll, 2023, [Supporting The Development of a Roadmap for the Reduction Of Whole Life Carbon of Buildings](#)

The roadmap should outline clear policy interventions at the EU level reflecting a holistic approach for the sector, which cuts across products and building regulations, procurement and finance, and covers waste and circularity alongside WLC impacts.

In particular, the roadmap should include key milestones for the introduction of national WLC targets and limit values, following the introduction of mandatory WLC assessment for all new buildings and major renovations, according to a methodology which should be harmonised among Member States, such as the Level(s) Framework and EN 15978. The ongoing revision of the Energy Performance of Buildings Directive should serve as a crucial first step in establishing a timeline for WLC assessment and the introduction of limit values.

For a detailed set of EU policy recommendations for building decarbonisation that our coalition has previously supported, please see the [EU Policy Whole Life Carbon Roadmap](#) that was released in 2022 as part of WorldGBC's #BuildingLife project.

### **Strong industry support for an ambitious roadmap**

Alongside the WorldGBC's EU Policy Whole Life Carbon Roadmap, Green Building Councils across Europe have convened over 600 industry and government stakeholders across ten European countries to develop national WLC Roadmaps<sup>2</sup>.

Furthermore, the introduction of WLC policy measures in countries such as [France](#), [the Netherlands](#), [Denmark](#), [Finland](#) and [Sweden](#) offers useful learnings and insights.

The Commission's own roadmap should mirror the overwhelming support from the European construction industry and leading Member States on WLC.

*WorldGBC and the 41 organisations below support the development and implementation of the European Commission's Whole Life Carbon roadmap for buildings. The development of this roadmap aligns with our shared vision of a sustainable, decarbonised built environment, and we are eager to collaborate closely with the European Commission to turn this vision into reality.*

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<sup>2</sup> Green Building Councils in Croatia, Finland, France, Germany, Ireland, Italy, Netherlands, Poland, Spain and UK, 2020-22, [National WLC Roadmaps](#)

