

Level(s) - a tool to deliver a sustainable built environment in Europe

Introduction

This document sets out the view of key European building and construction sector stakeholders on the transformative potential that the [European Commission's framework for sustainable buildings, Level\(s\)](#), can play in delivering on key European environmental, economic and social goals.

The crucial role of buildings

We are living in a climate emergency, and there is agreement across industry, government, and society that we must act now. By signing up to the Paris Agreement, committing to the United Nations Sustainable Development Goals and the articulation of a vision for a climate neutral Europe by 2050, the European Commission has shown their commitment to tackling climate change. But it is now time to turn these commitments into action.

In Europe, buildings are responsible for approximately 40% of energy consumption and 36% of CO₂ emissions. The EU has led the world in addressing the operational emissions from buildings but focusing on operational emissions alone means we are only addressing part of our sector's impact. Emissions are also released during the manufacturing, transportation, construction, and end of life phases of all built assets – buildings and infrastructure. These emissions often referred to as 'embodied carbon', contribute to around 11% of all global carbon emissions.

To meet the goals of the Paris Agreement, both operational and embodied carbon ('whole life carbon') must be considered in an integrated manner. Such an approach will optimise carbon reduction and avoid the unintended consequences of assessing each in isolation. Addressing whole life carbon requires the establishment of strong policies that support transformative action so that the built environment sector can play its optimal role in addressing climate change.

Avoiding a climate crisis requires bold leadership. The President-elect of the European Commission, Ursula Von Der Leyen has outlined an ambitious climate agenda for Europe. This agenda cannot be fulfilled unless there is support for policies that enable our sector to tackle the total impact of the built environment sector. With wide cross-sector support and a community of committed stakeholders, the European Commission can deliver policies that facilitate the total decarbonisation of the building and construction sector.

There is no need to reinvent the wheel as under the Circular Economy Action Plan, the European Commission has already developed a tool that can support this transformation, Level(s).

[Level\(s\) – supporting transformative action](#)

Sustainable building practice in Europe has to a large extent been led by green building certification yet sustainability assessment within Europe's construction sector as a whole is far from widespread. Although mainstreaming whole life cycle carbon is a crucial challenge for the sector, it is not yet a core part of all certification schemes.

Level(s) is a foundational framework of common European indicators offering a transparent and harmonised reporting framework to measure and account for the sustainable performance of buildings across their whole lifecycle. It is a catalyst for market transformation offering stakeholders across the value chain a 'common language' of sustainability linked to overarching European policy goals across six areas: greenhouse gas emissions, resource efficiency, water use, health and comfort, resilience to climate change, and cost and value.

Implemented correctly, Level(s) can be a decision-making tool that enables the sector to use real performance criteria to drive better all-around performance of buildings and take action on the total impact of our sector. This will provide occupants, investors, and owners with clear benefits including lower energy consumption, more efficient use of water, health related saving costs and a healthier working environment.

Since opening Level(s) to testing in September 2018, over 120 projects have been engaged in testing Level(s). Although the assessment is still ongoing, indications from the testing community point to more actions to mainstream Level(s) and drive market transformation. To achieve this market transformation potential, **the European Commission should support the evolution of Level(s) so that it can be the basis for future policy with minimum performance requirements set locally.**

This will have many benefits:

- Provide countries who are seeking to integrate sustainability into their building codes with a common European methodology
- Provide investors and companies with a harmonised reporting framework that is aligned across Europe
- Provide cities and public authorities looking to integrate sustainability indicators into their procurement procedures with a standardised European approach
- Provide assurance to building assessment and certification schemes who align their indicators with Level(s) that their schemes reflect European policy priorities
- An aligned approach will generate comparable life cycle performance data, enabling learning and benchmark setting over the long-term

It is for these reasons that we support the integration of Level(s) into a set of EU policies or a regulatory framework, a potential **'Sustainable Performance of Buildings Directive'**. The Commission can be assured of a support network of stakeholders to work together to identify the core building blocks of this evolution to a directive. An appropriate first step could be the integration of the whole life carbon, circularity and health indicators into the existing regulatory framework by 2024. This can lay the groundwork for the integration of the remaining indicators post 2024.

Why Level(s) – it delivers on key European priorities

The mainstreaming of Level(s) will enable the European Commission to accelerate the shift to a sustainable built environment while delivering on key European priorities, including:

CO₂ Emissions

Efforts to address the operational carbon through the translation into national legislations of the Energy Performance of Buildings Directive (EPBD) must continue, with increased focus on renovation. But meeting the Paris Agreement requires a whole life carbon approach. Level(s) enables Member States to address whole life carbon, facilitate the collection of data to enable benchmarking that can eventually enable performance standards in legislation.

In the Netherlands, whole life carbon is already included in building regulations. Countries such as France and Finland who are looking to include whole life carbon in forthcoming regulations are exploring how their national policy frameworks align with Level(s). In less mature markets, governments are using Level(s) as a basis to develop and update their regulatory frameworks.

In Slovenia, the government is using Level(s) as a basis to further develop and update their sustainable buildings policy. In Spain, Level(s) is one of the frameworks being explored by the government to define the roadmap for updating the national building code. In Italy, Level(s) offers an opportunity to integrate whole life carbon assessment in Green Public Procurement (GPP) and funding programs for public buildings; this is being explored with relevant authorities.

Circular economy

In Europe, buildings are responsible for 50% of extracted materials. Our sector must be at the heart of the transition to a circular economy. As climate change and resource use are closely linked, the deployment of circularity in the construction sector must be accelerated for its carbon emissions reduction potential.

The Commission's initiatives in buildings energy efficiency is to be commended but the current policy framework must be updated in order to fully address circularity. Achieving a building and construction sector that drives down emissions, optimises use of resources and results in zero waste requires systemic change.

Level(s) is the vehicle to drive this change, providing the sector with an overarching framework that embeds circular principles that will enable the sector to fully realise its potential in embracing circularity and driving down carbon emissions.

Health benefits

In Europe, nearly 84 million Europeans live in cold, damp and potentially mold-affected dwellings, increasing their risk of having respiratory illness¹. There is a compelling body of evidence that good indoor air quality, visual comfort, daylighting, acoustics and enhanced levels of thermal comfort lead to decreased asthma rates, better cognitive performance and sleep quality, increased productivity and many other benefits.²

Using the Level(s) health indicators can inform design decisions that will lead to a better indoor environmental quality for inhabitants and protect human health by minimizing exposure to health risks associated with pollutants and poor indoor environmental quality.

Sustainable Finance

The transition to a zero carbon, resource-efficient economy requires a financial system that supports sustainable growth. As investors, companies and financial institutions look to align their financial decisions with environmental and social criteria, they are looking for guidance on what can be classified as a sustainable economic activity.

As the Commission continues its efforts to develop the 'taxonomy' - an EU-wide classification system for environmentally sustainable economic activities, the Level(s) framework can be used as a basis to provide the necessary EU-wide recognized metrics for the buildings criteria.

Mainstreaming Sustainability - What is next?

The stakeholder community is ready to work with the incoming Commission to fully leverage the potential of Level(s) in mainstreaming sustainability. Initial areas of activity where the European Commission can support this work are outlined below.

Recommendations to help drive support for Level(s)

Investment and Resources	The European Commission reviews the results of the test phase and publishes a revised version of Level(s), to be launched in 2020. This launch of Level(s) must have the necessary marketing and capacity building resources to help uptake of its life cycle approach.
Digital tools & Databases	Level(s) will help drive the uptake of Environmental Product Declarations and help the sector start to generate a critical mass of comparable performance data. The European Commission must support the development of databases to enable future benchmarking.
Procurement	The European Commission must ensure its own construction procurement practice is aligned with Level(s), complemented with set targets for whole life carbon emissions and healthy built environment.
Capacity building	Mainstreaming Level(s) requires capacity building for industry and public authorities around whole life carbon and health aspects. The European Commission must develop user-friendly, smart guidance on Level(s) with specific instructions for each actor within the construction sector value chain.
National Policies	Level(s) can be used as a basis to connect national policies to EU goals. The European Commission should promote the use of Level(s) at national level by aligning structural funding criteria with Level(s) and promoting the use of Level(s) in national regulation.
Finance	Whole life carbon must be targeted in construction and renovation activities to ensure that investments are Paris proof. Level(s) should be integrated in the EU's sustainable finance framework ('taxonomy').

¹ [Buildings 2030](#)

² [Better Places for People](#)

This vision is endorsed by the following organisations

