

Statement of the Federal Chamber of Architects (BAK) on the draft standard prEN 15978-1, „Sustainability of construction works — Methodology for the assessment of performance of buildings — Part 1: Environmental performance“

Date: 2021-10-28	Document: Objection of the BAK	Project: prEN 15978-1:2021
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Schlesinger, Barbara Referatsleiterin Architektur u. Bautechnik Schumacher, Jörg Koordinator Energie und Nachhaltigkeit Loni Siegmund, Bayerische Architektenkammer	Federal Chamber of German Architects / Bundesarchitektenkammer (BAK)	Askanischer Platz 4, 10963 Berlin	schlesinger@bak.de schumacher@bak.de siegmund@byak.de

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
MB		general		ge	The BAK rejects the draft standard in its present form. However, should the proposed amendments described below find their way into the document, the BAK supports the draft standard.		
		Title (p. 1)		ge	<u>English Text:</u> "Sustainability of construction works - Methodology for <u>assessing</u> the quality of buildings - Part 1-Environmental quality". <u>German Translation:</u> "Nachhaltigkeit von Bauwerken – Methodik zur <u>Bewertung</u> der Qualität von Gebäuden – Teil 1-Umweltqualität"	Please check translation from English into German; "assessing" should primarily be translated as "Berechnung" (calculation). An assessment or weighting is to be implemented nationally with the aid of the calculation bases of the standard. <u>Proposed German translation:</u> "Nachhaltigkeit von Bauwerken – Methodik zur <u>Bewertung</u> <u>Berechnung</u> der Qualität von Gebäuden – Teil 1-Umweltqualität"	
		European foreword		ge	There is no clarification in the foreword that this document is about quantitative calculations and not about qualitative assessments.	A clarification should be added to the foreword that the subject of the standard is a methodology for (quantitative) calculation, not for (qualitative) assessment.	
		10.2	Table 9	ge	The indicators of environmental aspects relating to the local environment listed here are outside the assessment threshold.	Either Table 9 and the associated Annex E should be deleted from the present document and transferred to another standards mandate.	

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						Alternatively, Table 9 and its Annex E should be drawn up in such a way that the indicators included can be described quantitatively (rather than qualitatively). <u>Reason:</u> The quantifiability of the indicators is a necessary basis for the calculation. As shown above, the present standard is about the calculation and not about the assessment of the sustainability quality of buildings.	
		11.2	Table 10	ge	The indicators of technical characteristics relating to environmental quality listed here are either already addressed in other sets of standards (e.g. air tightness and energy design characteristics) or are the subject of the work of another standards committee (e.g. design for circularity as a remit of CEN TC 350 / SC1 Circular Economy). In addition, the "building material passport" mentioned under "design for circularity" is not a quantifiable physical unit.	Either Table 10 and its Annex F should be deleted from the present document. Alternatively, Table 10 and the associated Annex F should be drawn up in such a way that there is a corresponding reference to the indicators addressed in other sets of standards (e.g. air tightness and energy design characteristics) and that the remaining indicators can be described quantitatively (and not qualitatively). <u>Justification:</u> The quantifiability of the indicators is a necessary basis for the calculation. As shown above, the present standard is about the calculation and not about the assessment of the sustainability quality of buildings.	

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		Annex E		ge	In the event that Annex E is not deleted as proposed above under "10.2 / Table 9", the following comments: Annex E is referred to as "normative" in the document. However, Annex E must be described as "informative". <u>Reason:</u> It could certainly be concluded from the very specific proposals in the Annex that these are formally normative specifications. From the BAK's point of view, however, this is incorrect, since these are mainly examples and, moreover, requirements which are not to be laid down in a European standard, but are reserved for national use. It is also the principle of European policy to describe the methodology in normative terms, but not the requirements. The annex must therefore be listed as informative, so that national freedom of action can be retained here.		
		E3.1		ed	<u>English Text:</u> <i>Using land and soil sparingly and in a way that minimises the impact on this land and soil is necessary from an ecological standpoint.</i>	Please check translation from English into German.	

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					<p><i>Sparingly use of land that minimises the impact on this land at local level, results in lower development, less wastewater charges and an improved microclimate.</i></p> <p><u>German translation:</u></p> <p><i>Der sparsame Umgang mit Land, ... führt zu geringer Entwicklung, <u>weniger Abwassergebühren und einem verbesserten Mikroklima.</u></i></p>	<p><u>Proposed German translation:</u></p> <p><i>„Der sparsame Umgang mit Land, ... führt zu geringer Entwicklung, weniger Abwassergebühren und einem verbesserten Mikroklima. <u>einem verbesserten Mikroklima und geringeren Mengen anfallendem abzuführenden Wasser.</u>“</i></p>	
		E.3.2		ed	<p>Construction site area and quality of the building land and sealing</p> <p>For better comprehensibility, the naming of the criteria should be reversed or the building site area should first be dealt with under E.3.2.2 and the quality of the building land under E.3.2.3. The heading E.3.2.3 should again establish the reference to the building site area, Attention: also take over in Table E.1</p>		

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		E.3.2.1		te	<p><u>Existing text:</u></p> <p><i>“The indicator applies on newly built structures or parts of structures added to existing objects.”</i></p> <p>The indicator applies only on newly built structures or partial structures added to existing objects.</p> <p>Does the use of the construction area only apply to supporting structures or as well to the further structures needed to construct buildings?</p> <p>And if this is linked to the condition that existing properties are added to, the assessment of whether greenfield sites are being built on becomes superfluous.</p>	<p><u>Proposed text:</u></p> <p><i>“The indicator applies on newly constructed buildings, as well as additions and extensions to existing buildings.”</i></p>	
		E.4.3			<p>The checklist (E.4.3) should also take into account valuable habitats that are neither water bodies nor woody plants (e.g., flowering areas, stone walls/dry stone walls, rough grassland, etc.) Since some of these are only selective measures, it does not always make sense to specify the area or the effect of the measure. In addition, different measures have different habitat potential in terms of height (tree more than meadow, because it is higher), so the volume should also be considered</p>	<p>Please check whether, in addition to considering areas in certain cases (such as the presence of trees), a volume figure would not be a more adequate unit of measurement.</p> <p>Please examine the extent to which, in addition to considering individual species, impacts on the ecosystem can also be described quantitatively in their spatial-functional context.</p>	

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					here. Diversity must also be considered (e.g. 120 m ² of shrubbery is not necessarily more valuable than 20 m ² each of meadow, shrubbery, watercourse and stone bar). In addition, impacts on the ecosystem in its spatial-functional context should be considered, not just individual species.		
		E.4.3.3			In E.4.3.3 "Effect on biodiversity", explicit reference should also be made to native species, as these show a significantly higher species diversity. For example, an oak tree can be home to 1000 species, whereas an amber tree is only home to around 50 species.	Consider explicit consideration of native species.	
		E.4.5.1			In E.4.5.1 "Suitably Qualified Ecologist", the requirement is formulated that the relevant experience of this person must relate to the country in which the construction site is located. This may seem sensible in relation to the relevant applicable legal framework. However, it makes little sense in relation to natural areas and ecosystems. Nature does not stop at national borders.	Experience of the "qualified ecologist" should not only have to refer to the country in which the construction site is located, but also and above all to the corresponding natural area (which can extend independently of a national border).	

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		Annex F			In the event that Annex F is not deleted as proposed above under "11.2 / Table 10", the following comments: Annex F is designated as "normative" in the document. However, Annex F must be described as "informative". <u>Reason:</u> It could certainly be concluded from the very specific proposals in the Annex that these are formally normative specifications. From the BAK's point of view, however, this is incorrect, since these are mainly examples and, moreover, requirements which are not to be laid down in a European standard, but are reserved for national use. It is also the principle of European policy to describe the methodology in normative terms, but not the requirements. The annex must therefore be listed as informative, so that national freedom of action can be retained here.		
		F.2.4.2.3		ed	Reference is incorrect: text in F.1.4 and F.1.5.	Presumably the following are meant: F.2.5 and F.2.4.	

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		F.2.4.2.3		ge	In principle, the treatment of the topic "Design for circularity" is to be welcomed. Nevertheless, the BAK votes for option A: to remove the topic from the document (for now). <u>Substantiation:</u> Design for circularity is already the subject of the work of another standards committee. This is CEN TC 350 / SC1 Circular Economy. Furthermore, the annex should not contain provisional proposals if it claims to be normative.		

Drawn up: 28.10.2021

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