

Statement of the Federal Chamber of Architects (BAK) on the draft standard prEN 17680:2021 „Sustainability of construction works - Evaluation of the potential for sustainable refurbishment of buildings”

Date: 2021-07-27	Document: Objection of the BAK	Project: E DIN EN 17680: 2021-06
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Schumacher, Jörg Koordinator Energie und Nachhaltigkeit Schlesinger, Barbara Referatsleiterin Architektur u. Bautechnik	Bundesarchitektenkammer (BAK)	Askanischer Platz 4, 10963 Berlin	schumacher@bak.de schlesinger@bak.de

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BAK				ge	We would like to thank you for sending us the draft standard for E DIN EN 17680:2021-06 and are pleased to have the opportunity to comment from the perspective of the German Federal Chamber of Architects (BAK).		
BAK			Entire document	ge/te	The standard is rejected in its present form. A fundamental revision should take place.	Instead, the aim could and should be to standardise framework conditions, system boundaries, protection goals, assessment units if necessary, and the general procedure.	
BAK			Entire document	ge	The present draft standard seems to be based on a rating system already existing in another country.	It is suggested to check whether European or national principles or standards do not already exist which should enable an assessment of the building condition.	
BAK			Entire document	ge/te	It is not clear why a standard in the "Sustainability Assessment" series of standards is predominantly concerned with as-built assessment and documentation. Here, it would have been more expected that the refurbishment/modernisation itself would be considered.	It is proposed that the content of the standard be more strongly oriented towards questions of the assessment of modernisation options with regard to their contribution to sustainable development. This includes the presentation of consequences for life cycle assessment (e.g. dealing with building fabric that continues to be used during modernisation).	
BAK			Entire document	ge	The translation should be reviewed in general. The German translation is difficult to understand in large parts and sometimes misrepresents the		

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					content. The correct translation and expression in the German text should be urgently revised. Nevertheless, the English original is also full of contradictions. The following list makes no claim to completeness and is only exemplary.		
BAK			Title	ge	<i>“Nachhaltigkeit von Bauwerken – Bewertung des Potentials zur nachhaltigen Sanierung von Gebäuden”</i>	Please check translation; refurbishment is translated as “Modernisierung” below in the document.	
BAK		0 Introduction	(para. 2)	te	<i>“This is based on the assumption that in the large majority of cases refurbishment does offer a more sustainable route to a sustainable building when compared with demolition and reconstruction.”</i> On what basis is this assumption made?	The statement should be justified in a footnote as a minimum. An interpretation for “in most cases” must be given. Alternatively, it is possible, <ul style="list-style-type: none"> to waive the statement To be reworded as follows: In the interest of conserving resources, options for continued use and modernisation are to be examined intensively and, if suitable, are to be given preference over new construction. 	
BAK		0 Introduction	(para. 9)	te	<i>“Benefits of sustainable refurbishment in comparison to deconstruction and redevelopment: ...</i> <i>- Improved health and well-being of occupants...</i>	Please mention the named advantages as advantages of sustainable modernisation compared to non-modernisation or demolition without replacement!	

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					<p>- Retention of community infrastructure</p> <p>- Additional benefits of local economic development</p> <p>- Neighbourhood renewal and well-being for all stakeholders;...</p> <p>- Better adaptation to climate change (e.g. limiting the solar gain in summer)”</p> <p>It does not seem plausible that the advantages presented are actually advantages over demolition and new construction. After all, the same effects (improvement of health and well-being, etc.) can also be achieved with demolition and new construction. Rather, the advantages of modernisation versus non-modernisation or demolition without replacement are listed here. Moreover, these are only "possible" advantages.</p>	<p>On the other hand, modernisation can have advantages over demolition and new construction:</p> <ul style="list-style-type: none"> - Conservation of resources - Reduction of environmental impact - Preservation of cultural values (where applicable) <p>The benefits should be linked to quality requirements for modernisation.</p>	
BAK		0 Introduction	(para. 9)	te	<p>"Other benefits may include: ...</p> <p>- protection for built heritage for future generations; ..."</p> <p>This advantage does not find a counterpart in the list of evaluation criteria under section 1</p>	Please add "building culture-related, architectural, urban development-related quality" as a further criterion when assessing the quality of existing buildings under Section 1.	
BAK		1	(para. 2)	te	For the assessment of the quality of existing buildings, 6 criteria are given.	Please revise and check features for completeness.	

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					The criterion "building cultural, architectural, urban development quality" is missing. The quality of an existing building cannot be assessed without these factors.	Please add " building culture-related, architectural, urban development-related quality " as a further criterion when assessing the quality of existing buildings under Section 1 .	
BAK		1	(para. 2)	ed	In the list of criteria for the assessment of existing buildings, 6 criteria are given. However, in the following (from 5.5.2.2, Table 2) a seventh criterion is mentioned: " <i>Climate change resilience</i> ". This is missing from the list under section 1, para. 2.	Please add " <i>Climate change resilience</i> " as another criterion when assessing the quality of existing buildings under section 1. In addition, it is recommended to assess the potential of adaptability.	
BAK		4	(para. 2)	te	<i>"Closing the gap totally can only be achieved if the building is not protected / listed..."</i> This statement is to be doubted as it suggests the wrong conclusion that a listed/protected building is not compliant or cannot be adapted to comply with the requirements.	The sentence should either be deleted completely or put into perspective to the effect that, due to justified restrictions, it may not be possible to achieve complete congruence between the existing "quality profile" and the possible "demand profile".	
BAK		4	(para. 2)	te	<i>"... or measures to be taken do not change building physic in a negative way (ex.: insulation on inside may cause increase of humidity in wall / roof and possible rot or freezing damages can be introduced)."</i>	The sentence should be deleted completely.	

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					This only applies in the case of faulty planning. It is implied that interior insulation basically has a negative effect.		
BAK		4	Figure 4	ge	<p>From the 6 categories mentioned above, a building rating is presented in 4 quality levels (I-IV) based on 2 categories (usability + adaptability). It does not become clear,</p> <ul style="list-style-type: none"> - Var. 1: whether this is an example and now all 6 categories in all possible combinations are to lead in the same way to a building assessment, which in turn must then be assessed in the overall view (Variant 1). - Var. 2: or whether these should be the decisive categories for an overall assessment of the building (Variant 2). <p>Variant 1 is not practicable, variant 2 is not comprehensible in this reduction.</p> <p>Overall, the approach does not seem practicable and does not do justice to a differentiated approach. The reduction to 2 aspects does not do justice to the complex consideration of sustainable modernisation. The principle of sustainability is always the consideration of</p>	Information and statements should be made more precise.	

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					ecological, economic and social/functional qualities. <u>Regarding the 4 quality levels:</u> What is the meaning of a classification "maintain until not suitable"?		
BAK		4	Figure 5	te	"Sustainable refurbishment: Renovation that also includes change space plan" A refurbishment can also be a sustainable modernisation without changing the spatial plan.	Please revise description / definition.	
BAK		5.1		ed	Original English text is difficult to understand: <i>"Following a comprehensive sustainability assessment of elements shown in Clause 6 Table 3 following process given in Clause 6 Figure 7, evaluation of different approaches to methods and technologies should then take place to inform possible options and decisions."</i>	Please revise the original English text and make it more comprehensible ... to identify and evaluate possible courses of action and to support decision-making.	
BAK		5.2	Figure 7	ed	Original English Text: „Establishing the brief (5.3.1)" German translation: „Nutzungsanforderungen festlegen (5.3.1)" Original English Text: „Definition of requirements (5.3.2)"	Please check translation from English into German	

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					German translation: „Festlegen der Anforderungen (5.3.2)“		
BAK		5.3.1		te	„Number of indicators to be examined should be according to the purpose; 18 for technical evaluation, 7 for usability, 12 for adaptability and 11 for indoor condition (health), see Clause 6.4. For indicators; see appropriate sub clause under Clause 6.4. All indicators shall be considered.“ Contradiction between the statement that only indicators appropriate to the purpose should be examined and the statement that all indicators should be examined.	Please eliminate contradiction between the statements: - that only indicators appropriate to the purpose should be examined - that all indicators should be examined.	
BAK		5.3.3		ed	Original English Text: „The party...” German translation: „Die Partei...”	Please check translation from English into German	
BAK		5.3.4		ed	The description of how to obtain the building information is difficult to understand (in the German translation): “Bei unzureichender Dokumentation des Gebäudes gibt es zahlreiche Möglichkeiten für versteckte Nicht-konformitäten. In solchen Fällen kann es angemessen sein, anzugeben, dass die Dokumentation im Allgemeinen unzureichend ist und nicht den aktuell gültigen Anforderungen	Please check translation from English into German	

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					<p><i>entspricht, und eine allgemeine Bewertung vorzunehmen, inwieweit mögliche versteckte Nichtkonformitäten tatsächlich vorliegen, anstelle alle möglichen versteckten Nichtkonformitäten aufzulisten.”</i></p> <p>The original English text reads:</p> <p><i>“In the case of lack of documentation of the building, there will be many opportunities for hidden nonconformities. In such cases, it may be appropriate to state that the documentation is generally inadequate and does not meet current requirements, and to carry out a general assessment of the extent to which the possible hidden nonconformities are real, instead of listing all possible hidden nonconformities.”</i></p>		
BAK		5.3.5		ed	<p>Original English text:</p> <p><i>“NOTE1 Criteria for defining performance degree can be set out in separate building-specific standards or other documents with standardized descriptions”</i></p> <p>German translation:</p> <p><i>“ANMERKUNG 1 Kriterien für die Festlegung des Qualitätsniveaus können in separaten gebäudespezifischen Normen oder in anderen</i></p>	Please check translation from English into German	

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					<i>Dokumenten mit genormten Inhalten festgelegt sein.”</i>		
BAK		5.4.1		ed	„The condition shall be specified through performance classes, as described in Clause 6.2.5.“ Section 6.2.5 is missing from the draft document	Either change reference or add section 6.2.5	
BAK		5.4.1		ed	The quality classes (I-IV) can be seen in Figure 13, but there is no explanation of how the quality classes are defined. Only adaptability and usability are shown (see comment above). How are the other categories included? How does one get from the numerous individual indicators to this overall assessment of the building in 4 quality classes?	Please explain/supplement.	
BAK		5.4.1		ed	Original English text: <i>“The person who carries out the condition survey shall notify the building owner/client immediately of any circumstances with major and serious consequences”</i> German translation: <i>“Die Person, die die Zustandserhebung durchführt, muss den Gebäudeeigentümer/den Kunden unverzüglich über die Umstände sowie</i>	Please check translation from English into German	

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					<i>über große und schwerwiegende Schadensfolgen informieren.”</i>		
BAK		5.5.1	Table 1	ed	Original English term: “Consequence class / Grade classes of consequences” German translation: “Schadensfolgeklasse” It is probably rather meant that the number of necessary consequences is divided into classes - much need for action versus no need for action - which first of all has nothing to do with damage.	Please check translation of the word “Consequence class / Grade classes of consequences”	
BAK		5.5.2.2 5.5.2.3	Table 2 Table 3	te	The indicators and criteria do not take into account architectural, urban development and building culture aspects. Without these, a decision on how to deal with an existing building cannot be made.	Please revise the systematics and indicators. Please add indicator(s) for building culture-related, architectural, urban development-related quality	
BAK		5.5.2.3	Table 3	te	<u>Technology:</u> At what point is the quality of the building envelope, e.g. in terms of energy efficiency, included? Energy efficiency included? The list and examples in the appendix only allow conclusions to be drawn about damage or defective installations.	Please revise the indicators, as they are not complete and not conclusive.	

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					At what point are other physical properties of the building (e.g. moisture load) assessed? <u>Economic factors:</u> Why is the previously mentioned resilience to climatic changes missing here? Economically relevant measures may also be required here.		
BAK		5.5.2.3	Table 3	te	Indicators <u>indoor climate</u> : Here, indicators are mixed, which are partly influenced by the building fabric (e.g. asbestos), partly by the technical equipment (e.g. ventilation, artificial lighting), partly by the location or the position in the building (radon, noise from outside). In our opinion, a differentiated consideration is not possible with this system.	Please revise the indicators, as they are not complete and not conclusive.	
BAK		5.5.2.3		te	„Based on the costumer's scope (see 5.3.1 Establishing the brief) the person responsible for the conditional evaluation select relevant indicators from the four main categories.“ The description is not understandable. Which 4 main categories are meant? Under section 1 there are 6, from 5.5.2.2, table 2 there are 7 criteria. For Section 4, Figure 4 and Section 6.2, Figure 13, only 2 (adaptability + usability) are ever compared in the matrix for overview.	Please clarify contradiction in the document and work it out in a uniform way: What is a main category and how many are there?	

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BAK		5.5.3.1 to 5.5.6.1	Figures 9 - 12	te	Standards should be short and clear: pictures 9 to 12 are too large, the added value is low	Please delete figures 9-12.	
BAK		5.5.3.2	Table 4	te	Energy recovery + material recovery for backfilling is missing. How can social indicators (neighbours and labour force) lead to an assessment of sustainable modernisation potential? Deconstruction/demolition measures are usually always associated with dust, noise, traffic and vibrations. Often there are also health (e.g. asbestos) and safety risks (e.g. from demolition parts) for workers. These risks, which also exist on new construction sites, must be counteracted with the usual occupational hygiene and safety measures. The most dust, noise, etc. is generated by complete demolition, the least by leaving the existing condition. How does one arrive at a classification of the intermediate area?	Please explain/supplement.	
BAK		5.5.5		te	<u>Sustainable commissioning:</u> What influence does the procedure for	Streichen, bzw. Verweis auf die bestehenden Systeme für den Neubau.	

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					<p><i>"sustainable commissioning"</i> (after completion of the modernisation measures) have on the <i>"evaluation of the potential for sustainable refurbishment of buildings"</i> (see scope below)? Is this not the same for all buildings? What is the difference to the procedure for new construction?</p> <p>Scope of the standard (section 1): <i>"This document provides a process for the evaluation of the potential for sustainable refurbishment of an existing building, as a mean of contributing to the circular economy. ..."</i></p>		
BAK		5.5.5.2	Table 5	te	What is meant by the expression <i>"Outdoor systems functions"</i> ?	Please clarify the term <i>"Outdoor systems functions"</i>	
BAK		5.5.6		te	ditto, see comment <i>"sustainable commissioning"</i> on section 5.5.5	Delete, or refer to the existing systems for new construction.	
BAK		5.5.6.2	Table 6	te	<p>To what extent does the <i>"aesthetic environment"</i> play a role in sustainable use?</p> <p>For what reason are aspects of maintenance and servicing not mentioned?</p>	Delete, or refer to the existing systems for new construction.	
BAK		6.2		te	The limitation to 2 categories has already been criticised, see section 4, figure 4 and section 6.2, figure 13	Further discussion needed	

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					Legend / Buildings A and B: “They will always be in quadrant I) and will keep best economy for users and owner” This statement cannot be made for any building.		
BAK		Appendix A		te	The classification descriptions for the quality classes have no comprehensible basis and do not match the requirements applicable in Germany. For Germany, Annex A is therefore predominantly not applicable. Moreover, a European standard may not interfere with national requirements.	Complete deletion or comprehensive revision of Annex A	
BAK		Annex A	Table A.1	te	“Choose the performance class as objectively as possible.” The sentence is not clearly formulated. Is this to be understood as guidance?	Needs to be clearly defined.	
BAK		Annex A	Table A.1	ed	“Example of how to build up criteria for performance and condition classes as describes in Clause 6.2.7.” Section 6.2.7 is not available.	Either change reference or add section 6.2.7	
BAK		Annex A	Table A.2	te	Even if these are only examples, they should represent a meaningful assessment and the required range of qualities to be examined in	Please revise.	

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					<p>order to underpin the consistency of the system. This is not the case.</p> <p>General: partly very superficial classifications, which show that a much more differentiated stocktaking is required here.</p> <p>Indicator 1: no difference in the content of the classes</p> <p>Indicator 3: In the example, only damage to the façade is assessed. At what point is the quality of the building envelope assessed, e.g. in terms of energy efficiency? Energy efficiency?</p>		
BAK		Annex A	Table A.4	te	<p>In the example, 13 indicators are summarised for the area of technology and classified into 4 classes. This does not do justice to a differentiated building survey and assessment.</p> <p>The same applies to the other categories.</p>	Please revise.	
BAK		Annex A	Table A.5	te	<p>In the example of a classification of Table A.5, further problems become apparent in detail:</p> <p>Ventilation rate / in the example ventilation systems + thermal comfort: In the example, the need for repair of the ventilation system is assessed together with the thermal comfort. The number of complaints is</p>	Please revise indicators, as they are not complete and not conclusive.	

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					<p>added (what is "a lot", what is "very much"?).</p> <p>Radon: The measured value depends first on the location and then on the floor. This may require a different measurement strategy than e.g. for VOC.</p> <p>Mould and microorganisms: This is a secondary damage process, the cause of which is usually due to building physics. The moisture load test is missing from the "Technology" list.</p> <p>Suspended solids and fibres: All or only old CMF? Which suspended solids?</p> <p>The following is missing (see e.g. NBB_BK_1.1.6: PCBs, wood preservatives, biocides, PAHs, lead, flame retardants)</p> <p>Daylight and artificial lighting: What does the indication "artificial lighting" in class 1-3 do? Are there buildings without artificial lighting?</p> <p>Acoustics (reverberation times in the room) and noise (from outside): concerns different aspects and cannot be assessed in one line without differentiation.</p>		
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