

Introduction

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries. With the recent addition of the British Precast Concrete Federation (BPCF) and the British Association of Reinforcement (BAR), it has a growing membership of 450 companies and is the sectoral voice for mineral products. MPA membership is made up of the vast majority of independent SME companies throughout the UK, as well as the 9 major international and global companies. It covers 100% of GB cement production, 90% of aggregates production and 95% of asphalt and ready-mixed concrete production and 70% of precast concrete production. Each year the industry supplies £9 billion of materials and services to the £120 billion construction sector and others. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors.

Sustainable Construction Strategy

The MPA recognises and broadly supports the approach adopted in the Government's Sustainable Construction policies. More specifically, we have largely backed recent enhancements to Part L of the Building Regulations, and development of the Fabric Energy Efficiency Standard (FEES). Within the MPA, the concrete industry has implemented its own Sustainable Construction Strategy and, since 2008, has reported annually on a range of key performance indicators. Looking forward, the Strategy has recently been updated to include broader strategic objectives and commitments in the run up to 2020, including a pledge to contribute to the delivery of a zero carbon built environment.

Sustainable Construction Challenges

Within the Government's Sustainable Construction Strategy, a key challenge for our sector (and others) is that of ensuring a level of recognition which adequately reflects the specific contribution that materials can provide. The difficulty arises not from the strategy, but from its implementation, specifically some of the associated standards and compliance tools used in its execution. Their methodology can sometimes be fairly basic in scope and detail, leading to important aspects of material performance not being fully captured. This is probably a consequence of the difficulty in reconciling complex sustainability metrics with the need for relatively simple methods of assessment. It may also be the case that advances in sustainability policy have started to out-pace the rate at which related tools and standards can keep up. A case in point is the Standard Assessment Procedure (SAP) for housing, which has not kept pace with some of the fabric design measures now being employed in line with the Government's Fabric First policy for low/zero carbon housing.

Another example concerns embodied CO₂; an issue that is featuring more prominently in emerging sustainability policy. In this case, the policy's direction of travel risks getting ahead of the science, which has not yet delivered standardised data for construction materials across the industry. However, with the advent of

Environmental Product Declarations (EPDs) produced to an agreed standard (BS EN 14025) the construction sector should not have to wait too long for robust embodied CO₂ data for the materials it uses. Importantly, this data will be based on a detailed life cycle analysis; something that is not accounted for in many of the CO₂ figures currently in circulation. Until this information is available to help inform direction, we would urge the Committee to recommend that the Government hold off further developments to this aspect of its policy on sustainable construction.

Material Neutrality

Following on from the general point above concerning embodied impacts, there have been some worrying developments regarding the long held Government policy of material neutrality, which seems to be directing policy down a different track. As a consequence, we ask that the Committee press the Government to restate its position on this issue. Two examples of a potential shift in policy are:

- Independent Panel on Forestry (Final Report Recommendation C3). This includes the recommendation that Local Authorities should use their Local Plans to introduce a “Wood First” policy for construction projects to increase use of wood in buildings.
- Consultation “Building a Better Environment” A joint publication by Natural England, the Environment Agency and the Forestry Commission, which included a direct link to the ‘Wood for Good’ campaign website.

More involved examples also exist, which we can forward to the Committee if needed.

MPA believe Government policy should remain neutral and be performance based. Design and material choices should reside with construction professionals working with material neutral regulations and sustainability assessment methods. This is the most appropriate template for delivering sustainable construction in a balanced way.

The Green Deal

The MPA is supportive of the Green Deal objectives, but believe uptake and stakeholder engagement could be increased if, in addition to fabric energy efficiency, the scheme were expanded to recognise the other benefits that enhancements to the building fabric can deliver. This would enable a broader range of materials and products to qualify through an ability to deliver both insulation requirements and additional properties that help extend the lifespan and resilience of dwellings. Such properties include improved durability, structural performance, flood resilience and a degree of adaption to the warming climate. Whilst the relevance of these additional factors will vary from one project to another, it would be advantageous if the ‘golden rule’, under which the Green Deal operates, were able to include them where relevant. This could also attract funding from other sectors and initiatives with a common interest such as the Energy Company Obligation (ECO) fund for hard to treat

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sustainable construction and the Green Deal



homes, and the £1.1 billion market for flood damaged homes, driven by the home insurance industry. We hope the Committee will consider this suggestion.

The MPA appreciates the opportunity to contribute to this important call for evidence and remains available to discuss any of the points raised if required.

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Mineral Products Association

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