Excellence in insulation

Comments of BING

on the

Study for the Development of European Ecolabel Criteria for Buildings - Product group definition (version August 2008)

BING is the European association representing the rigid polyurethane insulation industry (PUR/PIR). Rigid polyurethane foam is a premium insulation material used in a wide variety of applications in buildings, district heating, cooling and refrigeration, and industrial systems.

BING has taken note of the above study, which contains detailed housing stock statistics and an overview of national and international eco-label systems. Whilst BING appreciates the quality of the data collected, several points of principle need to be addressed:

Coherence with existing European initiatives

- **The Energy performance of buildings directive** has introduced the energy performance certificate, which is a very useful, market-driven instrument to promote energy efficient buildings. End-users, investors and the construction industry are gradually increasing their awareness and the system is beginning to work. The certificates push the construction industry to build increasingly energy efficient buildings, using the most adequate material combinations and system design solutions.

- DG Enterprise and Industry has mandated standardisation work to **CEN/TC 350** to measure the **sustainability of construction works** and develop environmental product declarations (EPDs). Whilst voluntary in principle, the EPDs are expected to be very widely used. The standards will include a number of sustainability criteria and will help architects and designers to make informed choices on the building design and its material constituents and propose buildings with low environmental impact. This system of standards will lead to a voluntary labelling scheme for construction works.
  The activities of TC 350 will find legal backing by the **Basic Work Requirement 7** of the future Construction Products Regulation.

> **Basic works requirement 3: Sustainable use of natural resources**
> The construction works must be designed, built and demolished in such a way that the use of natural resources is sustainable and ensure the following:
> (a) recyclability of the construction works, their materials and parts after demolition;
> (b) durability of the construction works;
> (c) use of environmentally compatible raw and secondary materials in the construction works.

- DG Environment has published a detailed toolkit to train national / regional / local authorities in the use of **green public procurement** methods. This includes the module covering construction (module 3 (Practical module), which proposes detailed tendering clauses to reduce the environmental impact of all phases of a building's life cycle. It recommends that only products accompanied by an EPD may be used.
- The Commission has presented a proposal to revise and expand the scope of the **eco-design directive** to all energy-related products and widen the scope for **the use of labels** that detail the energy use or impact of products. This extended scope is likely to include numerous construction products, for which implementation measures and labeling criteria will be developed.
- Health aspects of building components are covered by the **Basic Work Requirement 3** of the future Construction Products Regulation.

> **Basic works requirement 3: Hygiene, health and the environment**
> The construction works must be designed and built in such a way that they will not be a threat neither to the hygiene nor health of the occupants and neighbours, nor exert a exceedingly high impact over their entire life cycle to the environmental quality nor to the climate, during their construction, use and demolition, in particular as a result of any of the following:
> (a) the giving-off of toxic gas;
> (b) the emissions of dangerous substances, volatile organic compounds (VOC), greenhouse gases or dangerous particles into indoor or outdoor air;
> (c) the emission of dangerous radiation;
> (d) the release of dangerous substances into drinking water, ground water, marine waters or soil;
> (e) faulty discharge of waste water, emission of flue gases or faulty disposal of solid or liquid wastes;
> (f) the presence of dampness in parts of the works or on surfaces within the works.

Already today, CEN/TC 351 is working on measurement methods for dangerous substances in construction products based on Commission mandate M/366.

- **The AHWG "Ecolabel for buildings" must ensure that the ecolabel criteria are fully compatible with the existing sustainability and efficiency rating schemes. Adding yet another system with new criteria would add to the cost of manufacturers and contradict the Commission's principles of administrative simplification and proportionality of measures.**
- **In particular, BING invites the AHWG "Ecolabel for buildings" to ensure that the ecolabel is fully coherent with the system developed by CEN/TC 350. BING strongly recommends that the ecolabel should wait for the TC350 standards to be finalised. This standardisation work is rapidly progressing and enjoys the support of all stakeholders, the European Commission, industry and NGOs.**
- **The next AHWG meeting, scheduled for 28 October 08, should be used to discuss how the coherence of the ecolabel and the TC350 standards can be best achieved. A representative of TC350 should be invited. Coherence must also be ensured with regard to the other policy initiatives mentioned above.**

Proliferation of building labels

- As can be seen from the above initiatives, the European Commission is currently supporting the mandatory energy performance certificate for buildings, the future voluntary sustainable building certification scheme, the ecolabel for buildings and the products to be labelled under the revised Labelling directive. In addition, the CE mark on construction products will convey information on the Basic works requirements 3 and 7.

- It is unclear whether all national ecolabel schemes will be withdrawn once the European ecolabel adopted. If this was not the case, the number of building labels would increase even further.

- BING believes that the proliferation of building labels will have a number of adverse effects. First of all, the cost for industry will increase and, hence, reduce its enthusiasm to participate in the various schemes. Building developers, owners and tenants will become confused by the number of different labels. As it is unlikely that they are aware of the differences, the labels will not help them make informed choices. As a consequence, the credibility of the whole idea will suffer.

- **BING calls on the AHWG "Ecolabel for buildings" to ensure that the ecolabel will not just become yet another label on the market. It should be related to the voluntary TC350 labelling scheme and be awarded to the top-end of sustainable building ratings according to TC 350 standards.**

- **BING also invites the AHWG to discuss the future of existing national ecolabel schemes. It would not be acceptable if national schemes continued to exist next to the European ecolabel.**

Building level versus component level

- BING supports efforts to link the eco-label criteria to the building level. The development of "technical specifications" for the construction product / component level would not be acceptable. This would contradict existing European initiatives such as the Energy performance of buildings directive and the activities of CEN TC 350 "Sustainability of construction works - Framework for assessment of integrated building performance" which are mandated by DG Enterprise and fully supported by industry.
- The current CEN TC 350 standard development recognises the need to relate environmental life cycle assessment information on construction materials to the end-product, which is the building, in order to be able to make informed choices.
- Construction materials are often no stand-alone products. They are used in combination with other materials (bricks, wood, metal etc.) in order to build walls, roofs and floor elements etc. to a desired overall technical and thermal performance. The level to which a construction product contributes to the overall ecological and energy performance of the building highly depends on the building design and orientation, the quality of the works and the local climatic constraints. The construction product of choice should first of all be fit for purpose, capable of fitting the building design details, ensure the desired level of efficiency and functionality and comfort during the entire use-period of the building and avoid emissions of dangerous substances to the indoor air.

Brussels, 25 August 2008