

## **PU Europe comments on the draft Ecolabel criteria for office buildings**

**(in reaction to the request for feed-back from Pavel Missiga – DG ENV)**

In his message of 26<sup>th</sup> July, Pavel Misiga invited comments on the way forward for the draft Ecolabel criteria for office buildings. The PU Europe position can be summarised by the following general and technical comments (from page 2):

### **General:**

- PU Europe welcomes this consultation and appreciates the availability of IPTS to discuss the draft criteria within a wide stakeholder group.
- PU Europe has never opposed to the development of Ecolabel criteria for office buildings but, for the reasons outlined below, finds it difficult to see the true added value of the scheme as proposed.
- Most of the existing schemes (including BREEAM, LEED, HQE, DGNB) try to expand beyond national borders. They are unlikely to reverse these efforts with the appearance of the Ecolabel. Hence, whilst industry would certainly support a single European scheme, we can expect the Ecolabel to become just one additional international scheme amongst others.
- The Ecolabel could have distinguished itself by adopting a truly innovative approach offering a new vision to the market. This could have been achieved by adopting the CEN/TC350 methodology and trying to define thresholds for environmental indicators in cooperation with European and Member State experts (for example: maximum GWP/year/m<sup>2</sup> per building type). This would have ensured a true life cycle approach and provided TC350 with valuable feed-back for the improvement of the standards.
- Instead it was decided to find a place “between” existing schemes and add material-related requirements. This is a missed opportunity which will also limit interest in the market.
- Whilst the background study starts from a life cycle approach, many criteria are purely product-related with no clear correlation to building performance (see below). Providing the required evidence will be costly for manufacturers and, hence, put a particular burden on SMEs. The verification for certifiers will be complex.
- In the absence of a holistic life cycle view on construction product performance in end-use applications, the proposed criteria do not necessarily optimize resource use.

**Based on the above, PU Europe recommends that the Ecolabel be based on the CEN/TC350 methodology and that an expert group be set up to discuss the definition of thresholds for environmental indicators.**

## **Technical comments:**

### Criterion 4:

The phrase “Environmental product declarations (EPDs) shall be used, when possible, for comparison at the product level but from a whole life-cycle perspective” is not correct. The standards explicitly state that EPDs should only be used to compare products at the building (component) level.

### Criterion 5:

As the background report states, the question whether recycling construction products is environmentally beneficial depends on a number of indicators including the distance to recycling plants, the environmental impact of the recycling process and the impact of using virgin materials. The aim of the Ecolabel should be to minimize natural resource use over the building life cycle. This can best be achieved by identifying design options based on life cycle assessments of various end-of-life scenarios for its components.

The proposed system leads to a number of unfair effects. The number of 80% seems arbitrary. Many countries, especially those with low population densities, are highly unlikely to meet this criterion, so they would be automatically excluded from the Ecolabel.

“Applicable industry standards” do not exist for many recycling activities and the products concerned would be automatically excluded even if they were recycled.

The “economic viability” depends on raw materials prices (for virgin materials). In times of recession prices may go down and recycling may not be economically viable anymore. On the other hand, all long-term projections forecast rising prices over the next decades. Hence, technologies which are (temporarily) not viable today, will become profitable over the next years (certainly by the end of the building’s life cycle). Apart from this, it will be difficult to obtain internal figures regarding the costs of recycling processes.

**PU Europe recommends that this criterion be replaced by thresholds for resource use at the building level over the full life cycle based on the information provided in EPDs and based on the building’s specific scenario assessments.**

### Criterion 6:

As with criterion 5, the background report recognizes that recycled content does not necessarily lead to lower resource use at the building level. Still thresholds are set without justifying their level or demonstrating any related environmental benefits. For example, a products with 30% recycled content that needs to be used at higher density to achieve the right performance, might use overall the same or more virgin resources than a light weight high-performing alternative virgin product.

Moreover, the administrative work related to this criterion is very substantial and it is unclear who would issue the “certificates”. Manufacturers making composite products will find it extremely difficult to collect all information from their upstream suppliers and keep all files updated. The cost would be disproportionate for SMEs.

**PU Europe recommends that this criterion be replaced by thresholds for resource use at the building level over the full life cycle based on the information provided in EPDs and based on the building’s specific scenario assessment.**

### Criterion 7:

The IPTS undertook significant efforts to redraft this criterion while respecting the Ecolabel Regulation. However, doubts persist as to how the current version could be applied in practice.

- It is not clear if the concentration of hazardous substances in a building element would form the sum of all substances the content of which has to be declared according to existing legislation (mainly REACH) or whether the content of all hazardous substances would be taken into account.
- The latter option would lead to significant costs and hence clearly penalize manufacturers of small series, in particular SMEs. This is mainly due to the fact that the information on hazardous substances (others than substances of very high concern) is not available and would have to be identified through testing.
- The criterion might hamper the use of renewable raw materials (as the content of naturally contained hazardous substances varies from one lot to another) and recycled content (as not all substances contained are easily known or identifiable).
- REACH clearly recognises that a risk is related to a use or an application. The safe use of a substance is documented via the exposure scenarios in the extended Safety Data Sheet which is passed down the supply chain. A substance may be toxic if swallowed or toxic to the aquatic life.

Although such exposure scenarios may be excluded in end-use applications of construction products, the mere fact of bearing such an H or R phrase might lead to exclusion. This seems disproportionate.

**PU Europe recommends that the spirit of REACH be applied to this criterion. The H or R phrases to be considered should be established according to exposure scenarios and related risks.**

Criterion 9:

It remains unclear which "certification" manufacturers (of non-wooden products) would have to provide to meet the "level required". Is it ISO14001? Again, there is a risk that certification is too expensive for SMEs and they remain excluded.

Criterion 10:

Whereas the background report stresses the merits of using existing emission test methods (France, Germany, Finland), it proposes test standards which are not used by them. Emissions of most VOCs / SVOCs should be established according to the ISO16000 standards (as do the existing national schemes). It should also be stated that these standards will be replaced by the mandated emission test standards as developed by CEN/TC351 in the context of the Construction Products Directive. These methods should be available as Technical Specifications by the end of 2013, and as harmonised standards by the end of 2016.

**PU Europe recommends that the Ecolabel should be compatible with existing legal requirements and refer to their test methods.**

Brussels, 31<sup>st</sup> August 2012