

EU Ecolabel and GPP comments form

Comments of PU Europe on the “Green Public Procurement Criteria for the design, construction and management of Office buildings

No.	Comment from	Contact person	Reference: - document - section/task - page	Subject of the comment	Comment
1	PU Europe	Oliver Loebel	Criteria 1.1 p. 2	Reference to directive 2006/32/EC	Directive 2006/32/EC was repealed by directive 2012/27/EC (Energy efficiency directive). References to withdrawn legislation should be avoided.
2	PU Europe	Oliver Loebel	Criteria 1.3 p. 4	Key environmental impacts	Deterioration of indoor air quality cannot be reduced to these two aspects. Ventilation systems should be able to cope with all sources of indoor air pollution. Rephrasing needed.
3	PU Europe	Oliver Loebel	Criteria 1.3 p. 4	Proposed GPP approach	Recycled content is no resource efficiency indicator in its own right, but a tool that may or may not lead to higher resource efficiency. It cannot be disconnected from the overall performance of the product in a given end-use application. If a recycled product offers environmental advantages, it will show lower resource depletion. In practice, a building product / element might not have any recycled content but offer advantages in terms of structural strength, durability, thermal performance, weight etc. that lead to a lower resource use over the life cycle of the whole building. Such innovative solutions should not be punished especially if they wisely use primary resources.
4	PU Europe	Oliver Loebel	Criteria 2 p. 6 (A1, 8th indent)	Competencies of the project manager and design team	Construction products are intermediate products and their environmental impact can only be established once their end-use application is known. EPDs cannot be compared. The term “low environmental impact construction materials” should therefore be replaced by “low environmental impact buildings / building elements”.
5	PU Europe	Oliver Loebel	Criteria 2 p. 8 (B1)	Minimum energy performance	New buildings can reach nearly zero energy demand without significant extra costs. EPC class C for new-build is therefore lacking ambition and will lead to lock-in effects for decades. The core criteria should ask for the second highest performance class and the comprehensive criteria for the highest performance

					<p>class.</p> <p>As regards renovation, it may be difficult to ask for a specific class to be reached due to the diversity of the building stock. The criterion could be rephrased to say that the cost-effective savings potential (return on investment during the life-time of the building) should be realised.</p>
6	PU Europe	Oliver Loebel	Criteria 2 p. 13 (B10.1)	Performance of the main building elements	<p>The principle is supported. However, material choices / design for one building element may have repercussions on other elements. For example, the thickness of the wall will impact the size of the roof. Inversely, the choices for the roof in terms of weight may impact the wall load bearing requirements and structures. A holistic building approach must therefore be added to the building element assessment.</p>
7	PU Europe	Oliver Loebel	Criteria 2 p. 14 (B10.1)	Option 2 LCA	<p>The principle is supported. However, the list of indicators in annex II should be extended to include all indicators in EN15804. This will enable sound decisions by the procurer and avoid burden shifting. For some indicators, the impact from construction products may exceed the use-phase impacts of the building.</p>
8	PU Europe	Oliver Loebel	Criteria 2 p. 15-16 (B10.2)	Incorporation of recycled content	<p>Recycled content is no resource efficiency indicator in its own right, but a tool that may or may not lead to higher resource efficiency. It cannot be disconnected from the overall performance of the product in a given end-use application¹. If a recycled product offers environmental advantages, it will show lower resource depletion. In practice, a building product / element might not have any recycled content but offer advantages in terms of structural strength, durability, thermal performance, weight etc. that lead to a lower resource use over the life cycle of the whole building. Such innovative solutions should not be punished.</p> <p>Production lines for insulation products are usually flexible and able to make many different products. Hence, the proposed calculation method is not feasible.</p> <p>A clear definition of “reuse” is needed. Can the product just stay in place, as it is frequently done with PU insulation for flat roof renovation projects? Or does it have to comply with the Waste Framework Directive which basically requires that the product becomes waste before its reuse? The latter option is not economically viable and would also require a verification of hazardous substances potentially contained in the product (which might prevent re-use).</p> <p>The verification process could turn out very costly, even more so as it involves third-party checks. Small producers may be disadvantaged. Moreover, if the recycled content is chemically reacted in a product, it will be impossible to re-trace it.</p> <p>Finally, as fitness for use is the first requirement, a number of Member States introduced regulations limiting the share of recycled content in structural elements. GPP should comply with legal obligations.</p> <p>In conclusion, this criterion should be removed and the resource efficiency indicators of EN 15805 and EN 15978 should be applied.</p>

¹ CENTC350 comments to EC CommunicationCOM(2014)445 (2014)

9	PU Europe	Oliver Loebel	Criteria 2 p. 19-20 (D4)	Selection of fit-out materials and finishes	The emission limits are too high. For example, the German AgBB sets a limit of 1,000 µg/m ³ TVOCs after 28 days. If this value is exceeded the product cannot be placed on the market. GPP should be more ambitious and propose a limit of not more than 500 µg/m ³ TVOCs after 28 days. The limit for formaldehyde represents the maximum permissible concentration in Germany and is therefore without ambition. Germany might also review this value downwards. We propose that GPP refers to the future “Harmonised EU VOC Classes – Classification System for VOC Emissions of Construction Products Used in the Indoor Environment” as proposed by DG Enterprise. Requirements others than VOC could be based on achieving the EU classes A-f2 (core criteria) and A-f1 (comprehensive criteria).
10	PU Europe	Oliver Loebel	Criteria 2 p. 21 (D6)	Incorporation of recycled content	See our comments on B10.2 (line 8). The proposed procedure is very onerous, in particular for SMEs. Batch testing will not allow identifying chemically reacted recycled content. This criterion should be removed completely.
11	PU Europe	Oliver Loebel	Criteria 2 p. 22 (D8)	Site waste management	The principle is supported. The practical implementation on site seems however extremely complex. Strip-out waste often includes a mix of materials. Furthermore, the weight (density, volume) is not known for old products and even difficult to determine for installation off-cuts. A more feasible procedure should be found.
12	PU Europe	Oliver Loebel	Criteria 2 p. 24 (F3)	Quality of the completed building fabric	This is an important step in the procurement process, as it should demonstrate that the building fabric performs as designed and calculated. Thermal imaging, as proposed in the comprehensive criteria, could identify thermal bridges but does not deliver detailed data. We therefore propose that a co-heating test on the empty building should be performed.
13	PU Europe	Oliver Loebel	Criteria 2 p. 28 (G2)	Energy performance contract	The principle is supported. However, it should be clarified over which period the “liability for additional costs” would arise. One year or the average over three years? Weather conditions vary significantly from one year to another. We believe this should be taken into account.
14	PU Europe	Oliver Loebel	Criteria 2 Annex 1 (1.2)	Conformity of the EPDs used	The second phrase starting with “These EPDs shall...” needs clarification. One building element may contain different products (bricks, concrete, insulation, membranes, render etc.) using different PCRs all of which comply with EN15804. Therefore, the same PCRs can only be imposed to comparable products (for example all insulation products that could be used in a given application). EPDs from different countries are unfortunately not fully comparable today, even when complying with ISO 14205 or EN 15804. GPP must clarify the conditions enabling the acceptance of an EPD from another country.

15	PU Europe	Oliver Loebel	Criteria 2 Annex 1 (1.3)	Additional expertise	It should be added to point 2 that EPD-based data usually include 20 to 30% uncertainty, depending on the impact indicator. Therefore, differences of 10-15% in the overall environmental impact should be considered as negligible.
16	PU Europe	Oliver Loebel	Criteria 2 Annex 1 (1.4)	Instructions for bidders (table)	See our comments on annex 1 (1.2) in line 16 regarding different PCRs and foreign EPDs. It should also be confirmed that generic EPDs are acceptable in order to reduce costs for SMEs. The requirement to compile cradle-to-grave EPDs cannot be accepted. EPDs must include the cradle-to-gate phase and may additionally cover end-of-life. The use phase can only be included if the end-use application is fully known. This is obviously not the case. Therefore, we propose that EPDs must only include cradle-to-gate and end-of-life. As outlined in line 7 (regarding B10.1), the full list of indicators included in EN15804 should be used.
17	PU Europe	Oliver Loebel	Criteria 2 Annex 2 (2.3)	Instructions for bidders (table)	Replace EN 15987 by EN 15978.
18	PU Europe	Oliver Loebel	Criteria 2 Annex 2 (2.3)	Instructions for bidders (table)	As outlined in line 7 (regarding B10.1), the full list of indicators included in EN15804 should be used.