



Comments of BING on the extension of directive 2005/32/EC on the eco-design of energy-using products

BING is the European association representing the manufacturers of rigid polyurethane foam insulation materials in Europe.

The Commission Communication on the Sustainable Production and Consumption and Sustainable Industrial Policy Action Plan announces the extension of the eco-design directive “to cover all manufactured products”. The text goes on to quote “building components such as ... insulation materials ...” as a potential priority in the extended directive.

BING wishes to make the following comments on the proposed extension:

- The European Commission should be committed to keeping administrative burdens to the lowest possible levels. New initiatives should only be launched if there is evidence that the benefits of the initiative significantly outweigh the burdens it causes.
- Most of the BING members are small and medium-sized enterprises. They are particularly vulnerable to the effects of new administrative requirements and testing procedures. They already comply with the comprehensive requirements of the Construction Products Directive and its CE marking criteria. Additional eco-design criteria for an extended CE mark may turn impracticable.
- The planned extension of the eco-design directive to include non energy-using products is more than just a recast and should hence be subject of a detailed impact assessment, during which all stakeholders are consulted and their arguments are being seriously considered.
- Unless the impact assessment can demonstrate significant benefits, BING remains opposed to the inclusion of insulation materials in the eco-design directive.

Reasons for the BING position

Insulation materials are no stand-alone products

- Insulation materials are no stand-alone materials. They are used in combination with other construction materials (bricks, wood, metal etc.) in order to build walls, roofs and floor elements to a desired overall technical and thermal performance.
- The level to which an insulation material contributes to the overall building sustainability and energy performance highly depends on the building design and orientation, the quality of the works and the local climatic constraints. The insulation material of choice



should first of all be fit for purpose, capable of fitting the building design details and ensure the desired level of thermal insulation during the entire use-period of the building.

- This corresponds to the interests of owners, users and society in general who want efficient and non-hazardous buildings. Fixing additional requirements at component level is counterproductive, costly and confusing.

How to define meaningful eco-design parameters?

- Due to the above, and the large variety of very different insulation products (polyurethane, glass fibres, sheep wool etc.), it would be extremely difficult to define sensible eco-design parameters for the whole product group. The thermal conductivity value (which defines the thermal performance of insulation materials) would certainly be the most logical parameter, but an ambitious value would automatically exclude certain insulants (and their manufacturers) which display a much lower performance than polyurethane insulation. Is this the intention?
- Other typical eco-design criteria could potentially include the choice of materials or embodied energy, but this would not say anything about the performance of the product and the amount of energy it will save over its useful lifetime. It is estimated that, during its service life, polyurethane insulation allows savings of at least 50 times and up to more than 100 times the quantity of fossil fuels necessary to produce them. What would the eco-design directive add to it?

Do we need yet another sustainability initiative?

- 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 materials combinations and system designs.
- DG Enterprise and Industry has mandated standardization 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.
- DG Environment has mandated Italy to develop an eco-label for buildings. Due to the extreme complexity of this endeavour, it is tried to bring it in line with CEN/TC350 work.
- Health aspects of building components are covered by the future Construction Products Regulation and Commission mandate M/366 to CEN/TC351 on dangerous substances in construction products.
- The proliferation of labels and systems becomes confusing for both manufacturers and end-users and, hence, jeopardizes the credibility of the whole idea.



How to promote eco-efficient innovation in buildings?

- BING supports the considerations of DG TREN to develop European energy performance benchmarks for buildings. National or European minimum efficiency requirements should be tightened regularly to achieve very low energy house levels for new buildings by 2015.
- A number of countries (Austria, Germany, UK) have already adopted such policies. This means, that the legislator should fix maximum energy consumption levels per sqm/a for the whole building and similar requirements (for ex. U values) for major components / systems (not the individual product) such as roofs, walls, HVAC etc.
- This approach is far more reality-based, as it looks at the end result, includes a life cycle approach, is technology neutral and, hence, stimulates innovative solutions from a large pool of material options.

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