



# ANEC/BEUC/EEB COMMENTS ON EU ECOLABEL AND GPP CRITERIA FOR BUILDINGS

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**Ref.:** X/2011/098 - 23/09/11

ANEC-ENV-2011-G-039

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## **Introduction**

The EU Ecolabel Board is aiming to develop EU Ecolabel criteria for buildings. In this paper, ANEC (the European Consumer Voice in standardisation), BEUC (the European Consumer Organisation) and the EEB (European Environmental Bureau) are commenting on the following report:

- Background report including draft criteria proposal. Working document for the First AHWG-Meeting for the development of ecological criteria for office buildings.

The report was produced by the Institute for Prospective Technological Studies (IPTS) at the JRC in June 2011 to assist the development of criteria for buildings for the EU Ecolabel and for green public procurement (GPP).

## **Scope**

### **The EU Ecolabel is a label for consumers**

In previous comments<sup>1</sup>, we have already shared our concerns regarding the scope on this product group. We recommend not restricting the scope to office building but to also include private houses as the EU Ecolabel is first and foremost addressed to consumers.

Additionally, we believe that the criteria should only apply to new buildings as in our view developing criteria for existing buildings is problematic. Consumers are expecting from the Ecolabel that it is only awarded to the best (in terms of environmental performance) and safest products on the market. An Ecolabel for existing buildings that establishes criteria and indicators using the same approach as an Ecolabel for new buildings cannot keep this promise.

### **Energy performance of buildings is key**

Energy efficiency is, in our view, one of the most important aspects when setting ecological criteria for buildings. Improving energy efficiency will also allow cutting energy bills. We support the view that energy efficiency criteria should be set on the level of passive house standard. In our view one single European harmonized method for calculation of the energy consumption should be used such as for example the existing passive-house methodologies that are used in almost all EU countries today.

We understand the complexity of regional and local specifications and market availability of components but we recommend supporting district heating as one of the most environmentally benign forms of energy supply, even though some old systems need renovations to realise their environmental potentials.

We support the view of rewarding buildings with Ecolabel, which are equipped with heating systems with EU Ecolabel.

In our view, Ecolabel for buildings should promote local usage of renewable energy in the form of solar energy, ambient energy and, where available, geothermal energy. We believe that the energy should be gained from installations on the buildings (such as solar panels), from installations placed in the surrounding (solar

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<sup>1</sup> EU Ecolabel for buildings – Joint ANEC, BEUC and EEB comments on the JRC report “Analysis and evaluation of the 3<sup>rd</sup> draft criteria for buildings and next steps”, from November 2010. <http://www.eeb.org/?LinkServID=747C73A2-E2C5-2959-AA46C645F6C3E9F4&showMeta=0>

panels on parking lots) and as part of the energy delivered via district heating and district cooling systems. We support setting the level of these kinds of renewable energy to a minimum of 25 % of the buildings heat supply. Using green electricity and green gas schemes should not count towards fulfilling the buildings renewable energy target. When ambient energy is used with heat pumps, the heat pumps should be equipped with heat storages and intelligent controls, so they are able to operate primarily when the renewable part of the electricity supply is the highest over the day.

We support reduction of heat island effects in warm climates in city areas as additional criteria.

The energy demand limits should also cover cooling systems.

### **Office equipment**

In case office equipment is delivered with a building, it should have been awarded with the best energy performance according to EU Ecolabel, minimum the A+ (or A if A+ is not available) class of energy label, and if available - the energy star.

### **Light**

We support setting criteria for the use of daylight in order to reduce use of artificial light and save energy. Already existing EU Ecolabel criteria for light bulbs and GPP criteria for light sources (under development) should be used.

### **Ventilation**

We support the view that ventilation is designed to keep pollution and CO2 levels and humidity below thresholds for healthy indoor climate, rather than setting fixed flow-rates, such as a fixed rate of exchange of air in the rooms.

In our view it should be possible to open windows or allow natural circulation of outdoor air in other ways. Cooling and heating systems should be automatically turned off when windows are opened.

### **Indoor air quality**

The relationship between building materials and indoor air quality is very important. We believe that ecolabelled buildings should use only healthy materials with no emissions and hazardous chemicals. Regarding emissions of VOCs we consider the relevant provisions of the German ecolabels Blue Angel and Natureplus based on the methodology of the AGBB scheme as the model to follow (see also below).

### **Materials**

We suggest developing the proposed criteria for materials. First of all, we believe that recycling requirement of building construction and demolition should be on higher level than the 70% (by weight) set in the [Directive 2008/98/EC](#) of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives. For the construction phase we propose to award the avoidance of waste, for the demolition waste during construction we recommend

not to specify a certain percentage because the recyclability highly depends on the existing construction works on the site.

Secondly, we believe that road transport could be addressed (like support for short transport of raw materials or cement) although it might be difficult to set criteria.

Thirdly, we support a view of setting criteria related to the responsible sources of the materials. We urge to ensure that at least 90% of wood comes from sustainably managed forests both for solid wood and for wood-based materials. Additionally the criteria should ensure that only credible and independent forest certification schemes will be allowed to validate the certification of the forest management unit and of the chain of custody system. This is needed to ensure that the timber originates from legal and sustainable sources.

We recommend including requirements of usage of ecolabelled products in the building. Detailed requirements should be specified in case-by-case approach (such as Blue Angel for paints etc).

Regarding proposition on content of hazardous substances – (*Verification: the applicant shall provide information about materials and their composition with a weight higher than 0.1% total wt. Certifications/declarations of the producers shall also be provided*<sup>2</sup>), we would like to point out the need of more ambitious level of the limitation of hazardous substances- values lower than 0.1% wt.- since even such small amounts of some hazardous substances might be dangerous for human health<sup>3</sup>.

Finally, we believe that materials used for buildings must not contain PCB, or heavy metals (mercury, cadmium, lead).

### **PVC and flame retardants**

In our view, PVC should not be used. There are alternatives for all major uses of PVC in buildings such as tubes, electric insulation, and surfaces. The related negative environmental and health problems of PVC and halogenated flame retardants are well known and their complete phase out has been recommended by many researchers. For instance, in a report commissioned by the European Commission, the Ökoinstitut made the following recommendations<sup>4</sup>.

On halogenated flame retardants:

*"the group of organobromine and organochlorine substances have been considered in the present study and their phase out from EEE is highly recommended by the authors".*

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<sup>2</sup> Page 89 of Working Document.

<sup>3</sup> Recent study of ChemSec and Swedish Society for Nature Conservation shows that highly problematic chemicals are commonly found under people's beds. Even small amounts of those substances might be very dangerous for people, especially children.

<sup>4</sup> [http://ec.europa.eu/environment/waste/weee/pdf/hazardous\\_substances\\_report.pdf](http://ec.europa.eu/environment/waste/weee/pdf/hazardous_substances_report.pdf) (page 179 and 196).

On PVC:

*"The phase out of PVC should(...) have priority over selective risk management measures to guarantee a reduced release of PVC, of its additives and of hazardous combustion products".*

Most of the scientific concerns towards brominated and chlorinated flame retardants are summarised in a consensus statement – the so called San Antonio Statement – signed by more than 210 scientists<sup>5</sup>. From our point of view, the concerns formulated in this statement justify the exclusion of all halogenated flame retardants.

Our concerns towards PVC are summarized a briefing prepared by Jacob Hartmann (2008) attached to this document<sup>6</sup>. The briefing highlights structural weaknesses of this material such as the unsolved waste problem, problems related to the leaching of hazardous additives, dioxin formation or the lack of appropriate collection and recycling schemes.

## **Water**

We propose to set criteria for low-water appliances, such as water saving caps[GBO: TAPS] and dishwashers (if equipment is provided with the building), toilets and showers. Furthermore, we support rainwater collection.

If surroundings of the building are included in the scope we will propose to have use of plants suitable for the local climate without substantial irrigation demands.

## **Waste**

We support the view that there should be facilities for waste separation to support waste recycling in ecological buildings.

## **Facilities**

In our view there should be facilities for cycling and easy access to public transport. We propose to set a criterion: "All building users shall have adequate cycle storage facilities, either indoor or outdoor which ensure easy access, are dry and safe (in terms of theft risks) storage of bicycles"

In our view, a true environmental criterion would be the proximity of the building to public transports and access to bicycle lanes.

## **User information**

We consider proper use of building facilities as an important issue. Therefore, we support information for users, including clear and simple instructions among others: how to regulate indoor climates, how to use windows in combination with ventilation systems. Part of such information should be made available on posters in the building.

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<sup>5</sup> <http://www.greensciencepolicy.org/node/269>

<sup>6</sup> <http://www.eeb.org/?LinkServID=1E1AA92E-99B2-AF72-684A0D07AFE9D10B&showMeta=0>

## **Accessibility**

We support accessibility for disabled people for working spaces and public spaces (this is already partly covered by existing regulation for access to public indoor spaces). In our view those criteria could be based on ISO/FDIS 21542 standard.

## **Adaptability**

In our view, buildings should be easily adaptable for different uses. We also support the idea of easy access to installations.

## **Construction Site Management**

Construction site activities are responsible for environmental impacts especially at a local level (e.g. soil erosion, soil contamination, loss of biodiversity, air pollution, waste) and nuisances such as dust and noise (caused by traffic from and to the building site, construction machines, etc.). In order to minimize this negative impact we propose setting target values which allow clear benchmarks and comparison of rating results achieved in different projects.

We consider establishment of criteria for trucks and construction machines based on existing national ecolabel criteria useful.

The analysis of different building assessment systems according to ANEC study "Environmental and health related criteria for buildings"<sup>7</sup> shows two different approaches in defining criteria to minimise these effects:

- Process-oriented ratings (i. e. existence of Quality Management Systems, experience of designers in waste reduction, implementation of Environmental Management Systems or other certification schemes by constructors). These criteria aim at a continuous improvement of processes on the construction site, but do not guarantee the fulfilment of definite objectives.
- Target-oriented ratings: require specific measures to be set on construction site and provide detailed information to achieve defined target values or levels of quality.

The authors recommend preferring target values which allow clear benchmarks and comparison of rating results achieved in different projects."

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<sup>7</sup> <http://www.anec.eu/attachments/ANEC-R&T-2011-ENV-001Final.pdf>