

EU ECOLABEL FOR FLUSHING TOILETS AND URINALS

EEB, INFORSE and BEUC position on criteria proposal to be voted
on 20th of June 2013

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Summary

The Joint Research Centre (JRC) of the EU Commission has developed a proposal of criteria for the EU Ecolabel for flushing toilets and urinals. The background information on this process including the proposal to be voted by Member States on 20th of June and the technical report can be found in the Website of the Joint Research Centre of the European Commission¹.

This paper provides an overview with the main positions of the European Environmental Bureau (EEB), the European Consumer Organisation (BEUC) and the International Network for Sustainable Energy (INFORSE) towards the proposed criterion on water efficiency. In our comments we show that values set for full flush and reduced flush volumes and average flow are not ambitious enough to ensure selectivity and high environmental performance of the ecolabelled products. We emphasize that the current proposal for the average flow leads to very little gain in terms of water savings.

¹ <http://susproc.jrc.ec.europa.eu/toilets/index.html>

Criterion 1. Water efficiency

EEB, BEUC and INFORSE welcome the special attention that the criterion on water efficiency has been given during the research and consultation process for the development of Ecolabel criteria for flushing toilets and urinals. Indeed, as stated by the Technical Report² increasing water efficiency during the use phase is the most important issue in the life cycle of flushing toilets and urinals. It is therefore critical that the proposed criterion will differentiate Ecolabelled flushing toilets and urinals from the standard toilets available in the market. In this regard, NGOs are concerned that such differentiation is not selective enough to label the best environmental products available on the market.

According to the technical report, the values proposed for **full flush volume** (criterion 1(a)) would allow for compliance of 95% of the products in the market. It is estimated criterion 1 (a) in combination with the requirement on **water saving** or reduced flush (1 (b)) would, as a rule of thumb, apply to 40% of the market share. The background report recognises the low selectivity of these criteria. It is therefore proposed to add a third criterion on the **average flush volume** (1c) which should ensure selectivity and high environmental performance of the ecolabelled products. By combining the three requirements it is estimated that less than 10-20% of the products would qualify for meeting the Ecolabel requirements. However, while we can understand this approach, we would like to stress that the requirement to define the average flush volume is based on assumptions on the user behaviour (*on a defined period of time how many times user would need a reduced flush and the same for the full flush*). Based on this consideration, we would like to emphasize the importance of setting ambitious thresholds for full flush and for reduced flush full volumes and to be stricter regarding the proposed values for the average flow. We would like to stress that the current proposal for the average flow leads to very little gain in terms of water savings.

	Flushing volumes for flushing toilets and flushing urinal equipment - EU Ecolabel proposal (l/flush)	EEB, BEUC and INFORSE proposal
Criterion 1 a. Maximum full flush limit for toilet equipment	6.0	5.0 To be increased up to 6.0 by user or installer if required by specific building drainage conditions / legal requirements

²http://susproc.jrc.ec.europa.eu/toilets/docs/Technical_report_Ecolabel_May_2013a_revised_final.pdf

Criterion 1 a. Maximum full flush limit for urinal equipment	1.0	0,5. To be increased up to 1.0 if required by specific building drainage conditions
Criterion 1 b. Water saving or reduced flush volume	3.0 Flushing toilets delivering a full flush volume equal or less than 4 l/flush exempted	2.5 To be increased up to 3.0 by user of installer if required by specific building drainage conditions / legal requirements <u>No derogation for 4 l/flush toilet equipment</u>
Criterion 1c. Average flush volume	3.5 Flushing toilets delivering a full flush volume equal or less than 4 l/flush exempted	3.0 (<u>maximal</u> average flush volume) <u>No derogation for 4 l/flush toilet equipment</u>

EEB, BEUC and INFORSE find that the limits for maximum full flush (6 l/flush) and reduced flush volume (3 l/flush) are too high, as according to the background report the values are very close to the standard toilet. In addition to being 95% of the market share, 6l/flush is a common reference in case of mandatory requirements and in voluntary schemes. However, up to 4 l/flush can be achieved by installations in Nordic countries and this level is also recommended in new UK housing market. Additionally, according to the background report, most toilets were sold with a high flush of 6 l, and 42% had low-flush of 4 or 3 l throughout the EU in 2010.

Despite possibilities to achieve stricter values, the choice of the 6/3 limit has been made based on concerns regarding the drainage system of the building, as there is concern that heterogeneous conditions at the building level and across the EU, may not allow low-flush toilets.

NGOs propose to overcome this problem by setting lower maximum full flush and reduced flush volume limits as a default (i.e. 5/2.5 respectively), while allowing the possibility for the user or installer to regulate the flush levels (up to a maximum of 6/3) if the building drainage system would require higher flush or legal requirements apply. This can be addressed through criterion 1 (d) *Flush volume adjustment*.

In Scandinavia some toilet producers (Ifö, as an example) market a number of toilets with a standard flush of 4 l for high flush and 2 l for low flush, having an average flush of just 2.5 l when placed on the market. The user or installer can then regulate the flush levels, if for instance the sewage system require higher high flush.

Regarding the proposal to limit the average flush to 3.5 litre, the saving compared to a standard 6/3 litres toilet with an average flush of 3.75 litres is only 7%. Thus we propose to reduce the maximal average flush to 3 litres, reaching a water saving of at least 20% compared with a standard toilet in many EU countries. The 3 l average flush is achievable with a toilet with 6 litres full flush and 2 litres reduced flush, which allows the use of toilets with 6 l normal flush. Such a toilet will be useful with all drainage systems that are adapted to standard toilets. Toilets with 2 litres reduced flush have been on the market in several countries for about almost 20 years. Even though they are not in widespread use they are well proven models.

As regards the maximum full flush limit for urinal equipment we propose to consider a maximal flush below 1 litres/flush, considering that best available techniques can meet 0.5.

Finally, EEB, BEUC and INFORSE disagree with the proposal to exempt toilets suits delivering a full flush volume equal or less than 4,0 litres from compliance with the obligation of having water saving devices (reduced flush volume up to 3l/flush) and restricted average flush volume. While toilets with low full flush volume are of higher environmental performance and should be encouraged, that should not justify exempting the use of water save device systems. As stated in the background report (page 24) "a reduced flush volume is indeed sufficient for draining liquid waste (urine), which remains the major issue of toilet equipment". Toilets with an average flow up to 4 litres flush without a low-flush option, will have a 7% higher water consumption than the standards toilets with 6 litres high flush and 3 litres reduced flush, and should as such not be eligible for an Ecolabel.

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