



ANEC position on the first draft Ecological criteria for the award of the Community Eco-label for buildings

Introduction

ANEC supports the provision of information on the environmental performance of building products and buildings on a fair and unbiased basis, taking into account all relevant impacts during the life cycle of a building. We furthermore support the idea of a meaningful assessment and communication of best performing buildings to the user (i.e. tenant/buyer). Hence, ANEC strongly welcomes efforts to develop eco-label criteria for building products and buildings at national and European levels and is, in principle, supportive of the project initiated by ISPRA¹.

ANEC believes that the development of a demanding, high quality set of European environmental and health criteria for buildings could be valuable in complementing the European Sustainable Production and Consumption Action Plan². We believe an ambitious criteria catalogue to be even more necessary considering that the work carried out by CEN³ in the area of sustainable buildings is entirely unsatisfactory from a consumer perspective.

Particular comments on draft criteria by ISPRA

Despite supporting the ISPRA project in principle, ANEC finds the first draft criteria disappointing in that the proposed criteria lacks ambition, is difficult to verify in practice, and neglects major consumer issues. We would also like to draw attention to some shortcomings regarding methodology, scope and technical content. Our main concerns are:

¹ Former APAT, Italian Institute for Environmental Protection and Research, Project to Develop an Ecolabel for Buildings

² Sustainable Consumption and Production and Sustainable Industrial Policy Action Plan, 16 July 2008

³ CEN TC 350 Sustainability of construction works

- The scope includes new and existing office and residential buildings. However, in many cases the proposed criteria are unsuitable for the type of building they are suggested (for example, material related requirements cannot be applied to materials of unknown origin). Regrettably no distinction is made between requirements for existing buildings and for renovated buildings.
- Using national regulation as reference values (e.g. for energy use) will lead to different ambition levels in different countries.
- Setting pure declaration requirements (e.g. for CO₂ embodied in construction products a Life Cycle Assessment according to ISO 14040⁴ for the building) without corresponding maximum levels makes little sense.
- Some requirements do not relate to the building, but rather to user patterns which cannot be controlled (e.g. maximum water consumption allowed, or proportion of renewable energy). Fulfilment of such requirements would necessitate 'policing' of users to ensure their consumption of e.g. water is within the limits set.
- We regret that real chemical requirements are hardly present and believe that merely calling for compliance with legislation is insufficient in the case of an excellence label.
- The indoor air emission requirements are not appropriate (only 50% of paintings and covering materials should be Type I labelled, whatever the labels may require). Regrettably the requirements are also not obligatory.
- We consider that several important requirements are either listed as optional when they should be mandatory (e.g. waste management during construction or demolition), or are missing entirely (e.g. noise and dust management at the construction site).
- Many of the requirements are formulated in an ambiguous manner and are consequently subject to interpretation (e.g. 'the building shall allow flexibility and adaptability', or 'the constructor shall have capability on eco/green building').
- We do not consider it relevant to require ISO 9001 or EMS/ISO 14001 certification from those carrying out construction, renovation or maintenance work as this is not related to the actual quality of the building.
- Finally, requiring SA 8000⁵ certification based on basic rules of the ILO⁶ seems a somewhat nonsensical and redundant in Europe. This requirement also seems out of the scope of an eco-label.

⁴ ISO 14040:2006 Environmental management - Life cycle assessment - Principles and framework

⁵ Social Accountability Standard

⁶ International Labour Organisation

Conclusions

For these reasons, we cannot support the first draft criteria for an eco-label for buildings, and call for a substantive revision of the draft criteria⁷.

We believe that, in its present form, the document prepared by ISPRA would not add substantive value to existing schemes (such as the energy certification scheme which is obligatory for all buildings being sold or rented out within the EU), and does not go in the direction of a broadly accepted European catalogue of sustainability indicators for buildings. We believe more consultation with institutions involved in building assessment, as well as with members of the EU Eco-Labeling Board Ad Hoc Working Group on Buildings is needed to proceed with this work. It may also be useful to facilitate the undertaking by limiting the scope to cover only new buildings.

In addition to the above, and regardless of the further development of the said Eco-label project, ANEC calls upon the Commission to establish a European forum covering the various ongoing national and European initiatives in sustainable construction (e.g. Green Public Procurement, Energy certificates, Eco-label of building products and buildings, indoor air emissions, etc.). Such a Forum should initiate a broader discussion on a future European indicator set in this field, and should help develop a consistent policy in this area. The forum should be based on a balanced representation of all relevant stakeholders.

ANEC would be willing to commit to such a forum.

ANEC in Brief

ANEC is the European consumer voice in standardisation, representing and defending consumer interests in the process of standardisation and certification, as well as in policy and legislation related to standardisation. Our aim is a high level of consumer protection. ANEC was set up in 1995 as an international non-profit association under Belgian law. We represent consumer organisations from the European Union Member States and EFTA countries. The European Commission and EFTA fund ANEC, while national consumer organisations contribute in kind. The ANEC Secretariat is based in Brussels.

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⁷ ANEC will provide more detailed comments separately.